

SUBJECT: COMPREHENSIVE GENERAL PLAN UPDATE, CLIMATE ACTION PLAN, AND ENVIRONMENTAL IMPACT REPORT

INITIATED BY: DEPARTMENT OF COMMUNITY DEVELOPMENT  
(Anne McIntosh, AICP, Deputy City Manager/CDD Director)  
(John Keho, AICP, Planning Manager)  
(Bianca Siegl, Associate Planner)  
(Chris Corrao, Assistant Planner)

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**STATEMENT ON THE SUBJECT:**

The Planning Commission will conclude a public hearing to make a recommendation to the City Council regarding the proposed West Hollywood General Plan 2035, Climate Action Plan, and Environmental Impact Report.

**RECOMMENDATION:**

Staff recommends that the Commission conclude the public hearing and make a recommendation to the City Council regarding the proposed West Hollywood General Plan 2035, Climate Action Plan, and Environmental Impact Report. Staff recommends that the Planning Commission adopt the following:

1. Draft Resolution No. PC 10-943, **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING CITY COUNCIL APPROVAL OF GENERAL PLAN AMENDMENT 2010-003, A COMPREHENSIVE UPDATE OF THE CITY OF WEST HOLLYWOOD GENERAL PLAN.** (Exhibit A)
2. Draft Resolution No. PC 10-945, **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING CITY COUNCIL APPROVAL OF THE CLIMATE ACTION PLAN, AN IMPLEMENTATION ACTION OF THE WEST HOLLYWOOD GENERAL PLAN.** (Exhibit B)
3. Draft Resolution No. PC 10-944, **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING THAT THE CITY COUNCIL CERTIFY THE FINAL ENVIRONMENTAL IMPACT REPORT (“EIR”), ADOPT A MITIGATION MONITORING AND REPORTING PROGRAM, AND ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE WEST HOLLYWOOD GENERAL PLAN AND CLIMATE ACTION PLAN, WEST HOLLYWOOD, CALIFORNIA.** (Exhibit C)

## **BACKGROUND/ANALYSIS:**

Resolution PC 10-943, Attachment A (Exhibit A), contains the Proposed Changes to the Public Review Draft West Hollywood General Plan. The list of Proposed Changes has been modified to reflect the policy and map changes requested by consensus of the Planning Commission at the meetings of September 16 and 23, 2010. These changes are shown under the heading "Additional Changes Recommended by Planning Commission" on pages 19 and 20 of the Resolution. Resolutions PC 10-945 recommending City Council approval of the Climate Action Plan and PC 10-944, recommending City Council certification of the Environmental Impact Report and adoption of the Mitigation Monitoring and Reporting Program and Statement of Overriding Considerations (Exhibits B and C, respectively), are unchanged from those attached to the September 16, 2010 staff report.

Exhibit D contains two revised maps. The General Plan Designations map (Figure 3-4 of the Public Review Draft General Plan) has been modified to reflect the map changes requested along Melrose Avenue by consensus of the Planning Commission at the meeting of September 23, 2010. The map labeled "Parcels with Proposed Land Use Designation Changes – Height" has also been modified to reflect the revised Designations map.

Exhibit E, the Revised Draft General Plan Parcels Proposed for Use, Height, or Density Changes, and Parcels Included in the Transit Overlay (originally provided as Exhibit L of the September 16, 2010 staff report) has been modified to reflect the revised Designations map.

A copy of the minutes from the July 26, 2010 Historic Preservation Commission Meeting pertaining to Commission discussion of the Historic Preservation Chapter of the Draft General Plan is provided for reference (Exhibit F). Two letters received regarding the Draft General Plan and EIR are also attached for Planning Commission consideration (Exhibits G and H).

## **EXHIBITS:**

- A. Draft Resolution PC-10-943
- B. Draft Resolution PC-10-945
- C. Draft Resolution PC-10-944
- D. Revised Analytical Maps
- E. Revised Draft General Plan Parcels Proposed for Use, Height, or Density Changes, and Parcels Included in the Transit Overlay
- F. Minutes of the Historic Preservation Commission Meeting, July 26, 2010
- G. Letter from the West Hollywood West Residents Association, September 27, 2010
- H. Letter from Steven Afriat on behalf of BMB Investment Group, September 28, 2010

## RESOLUTION NO. PC 10-943

### **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD RECOMMENDING CITY COUNCIL APPROVAL OF GENERAL PLAN AMENDMENT 2010-003, A COMPREHENSIVE UPDATE OF THE CITY OF WEST HOLLYWOOD GENERAL PLAN.**

The Planning Commission of the City of West Hollywood hereby resolves as follows:

SECTION 1. On August 20, 2007, the City Council initiated a comprehensive update to the General Plan. This was the first comprehensive update since the adoption of the foundation document in 1988. During the General Plan Update process, the City engaged with over one thousand community members through a series of community events, surveys, and other activities, as explained in the Introduction and Overview of the Draft General Plan. Participants included residents, service providers, property owners, businesspeople, and others who live, work, and play in West Hollywood. Specific outreach efforts included stakeholder interviews, visioning, telephone surveys, focus groups, neighborhood workshops, four community meetings, and frequent presentations to neighborhood, business, and cultural groups. The City Manager appointed a 43-member General Plan Advisory Committee (GPAC), consisting of at least one representative of every City Advisory Board and Commission as well as members of key community groups. The GPAC held nine meetings, open to the public, during the development of the General Plan, during which the group reviewed and provided feedback on the draft goals and policies. Throughout the General Plan Update, information was made available to the public via the General Plan website, which contains a library of reports, presentations, and other documents prepared over the past three years. General Plan newsletters, updates in other City publications, public notices, and announcements of General Plan events also kept the community apprised of milestones in the project. The three year update process has resulted in preparation of the West Hollywood General Plan 2035 Public Review Draft, dated June 25, 2010, (Draft General Plan), Public Review Draft Climate Action Plan (Draft CAP), and Environmental Impact Report (EIR).

SECTION 2. Pursuant to the California Environmental Quality Act ("CEQA"), The City, acting as Lead Agency, circulated a Notice of Preparation ("NOP") for the project on September 30, 2009, beginning a 30-day review period. As part of the EIR scoping process, the City held a public scoping meeting at the Planning Commission meeting of Thursday, October 15, 2009, at the West Hollywood Park Auditorium. The NOP and letters received in response to the NOP from both public agencies and members of the public are included in Appendix 1.0 of the Draft EIR. The Draft EIR was circulated for a 45-day review period beginning June 25, 2010 and ending on August 9, 2010. The Final EIR was made public on September 8, 2010. All required notifications were provided pursuant to CEQA (Public Resources Code Section 21092.5) and all comment letters and responses were incorporated into the Final EIR.

SECTION 3. The Draft EIR, Draft General Plan, and Climate Action Plan were made available to the public on June 25, 2010 as follows: a copy of each document was available at the Planning Counter and at the City Clerk's Counter at City Hall; several copies were made available for loan from the City Clerk; digital copies were posted on the City's website, [www.weho.org/generalplan](http://www.weho.org/generalplan); the Draft EIR was available at the West Hollywood Library; and copies of each document were available for purchase at a discount directly from the WeHo Copy Center. The comment letters on the proposed General Plan and responses were incorporated into the Final EIR.

SECTION 4. Copies of the Draft General Plan were submitted to all required state agencies including the California Geological Survey, California Department of Forestry and Fire Protection, Division of Mines and Geology of the State Department of Conservation, the California Emergency Management Agency, and the California Department of Conservation for review on June 25, 2010. The City also consulted with California Native American tribes, the State Attorney General, Los Angeles County, local water and utility providers, and other agencies in preparation of the Draft General Plan.

SECTION 5. Notice of the public hearing before the Planning Commission was advertised in the Beverly Press and the West Hollywood Independent on September 2, 2010, and notices were mailed to property owners, residents, and businesses on September 3, 2010. Constituents requesting notification of hearings were also notified by mail on September 3.

SECTION 6. The West Hollywood Planning Commission has held duly noticed public hearings on the adoption of the Draft General Plan, Draft CAP, and EIR on September 16, September 23, and September 30, 2010, and has given all interested persons an opportunity to be heard.

SECTION 7. The Planning Commission has conducted an extensive review of the Draft General Plan, and the document contains each of the seven required elements under Government Code Section 65302, as follows:

- a. A Land Use Element, contained in the Land Use and Urban Design Chapter, describing the general distribution and location of land uses, standards of population density and building intensity;
- b. A Circulation Element, contained in the Mobility Chapter, describing the general location and extent of existing and proposed thoroughfares and transportation routes, correlated with the land use element;
- c. A Housing Element;
- d. A Conservation Element, contained in the Infrastructure, Resources, and Conservation Chapter, for the conservation, development, and utilization of natural resources;

- e. An Open Space Element, contained in the Parks and Recreation Chapter;
- f. A Noise Element, contained in the Safety and Noise Chapter, analyzing current and projected noise levels from vehicles and stationary sources, providing noise contour maps for these sources, and discussing possible solutions to address noise problems; and
- g. A Safety Element, contained in the Safety and Noise Chapter, for the protection of the community from seismic hazards, flooding, and other risks.

SECTION 8. The General Plan also addresses several optional topics that are of particular importance to the West Hollywood community, as allowed by Government Code section 65303, including Governance, Historic Preservation, Economic Development, Human Services, and Parks and Recreation.

SECTION 9. Based on comments received from the public, other public agencies, and further staff review of the Draft General Plan, the City has prepared a matrix of proposed changes to the Draft to be incorporated in the final General Plan. The Planning Commission has considered these proposed changes, and revised the matrix to reflect its recommendation to the City Council. This matrix is attached as Attachment A to this Resolution.

SECTION 10. The Draft General Plan includes a new Housing Element, at Chapter 11, and Housing Element Technical Appendix Public Review Draft (Draft Housing Element). The Draft Housing Element was endorsed by the Planning Commission, Rent Stabilization Commission and City Council at the Joint Study Session of April 5, 2010, and submitted to the California Department of Housing and Community Development (HCD) on May 4, 2010.

SECTION 11. The City received comments on the Draft Housing Element from HCD on July 1, 2010, requesting clarifications to the proposed Housing Element. The City has reviewed the Housing Element Guidelines adopted by HCD pursuant to Section 50459 of the Health and Safety Code and has reviewed the findings contained in HCD's comment letter. The City has revised and clarified the Draft Housing Element in response to comments by HCD and submitted the revised Draft to HCD on August 11, 2010. The revisions to the Draft Housing Element are illustrated in Attachment A to this resolution and the direct responses to HCD comments are set forth in Exhibit Q of the staff report, incorporated herein by reference.

SECTION 12. Based on the record before the Planning Commission, the staff reports, the public testimony, the EIR, HCD's comments, and considering the record as a whole, the Planning Commission recommends that the City Council find as follows:

- a. The revised Housing Element is in full compliance with the requirements of Government Code Sections 65580 through 65589.8, as demonstrated by the analysis set forth by the revised Housing Element and the responses to HCD comments set forth in Exhibit Q of the staff report.
- b. The revised Housing Element is consistent with the other elements of the Draft General Plan because the revised Housing Element uses the land use designations of the Land Use Element and those designations are, in turn, consistent with the policies and provisions of the remaining elements of the Draft General Plan. All of the policies and constraints identified in the elements of the Draft General Plan are reflected in the restrictions and policies set forth in the Land Use Element, and are the basis of the site inventory and programs of the revised Housing Element.
- c. The housing goals and policies stated in the revised Housing Element are appropriate for the City of West Hollywood and will contribute to the attainment of the state's housing goal.
- d. The adoption of the revised Housing Element will aid the City's efforts to assist in the development of housing for all members of the community.
- e. The adoption of the revised Housing Element is in the public interest.

SECTION 13. The Planning Commission of the City of West Hollywood has reviewed and considered the West Hollywood General Plan 2035 Public Review Draft, dated June 25, 2010, and hereby recommends that the City Council approve the Draft subject to the modifications listed in Attachment A.

APPROVED BY A MOTION OF THE PLANNING COMMISSION ON THIS 30<sup>TH</sup> DAY OF SEPTEMBER, 2010.

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CHAIRPERSON

ATTEST:

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COMMUNITY DEVELOPMENT DIRECTOR

# ATTACHMENT A

## Proposed Changes to the Public Review Draft West Hollywood General Plan

Following is a list of changes to the Draft General Plan, including the Draft Housing Element and Housing Element Technical Appendix, proposed following the release of the public draft document. The list includes a description of each proposed change as well as where in the General Plan it can be found. In some instances, specific language changes are identified; in others, a general description of the change is included. Following the table below is a second matrix summarizing a proposed change to the structure of the policy language in the General Plan. This re-formatting would change the grammatical structure, but not change the intent or the meaning of the policies. It is intended to make the policies more consistent in format and thus easier to read. Finally, there is a third table in which any additional changes recommended by Planning Commission for City Council consideration can be included.

Public Draft GP Page # or Policy #	Proposed Change
p. 5	Fix the name of the chapter from “Parks and Community Facilities” to its correct name: “Parks and Recreation.”
p. 6, and all policies in the General Plan	Change the way policies are written to begin with a verb rather than the convention of “will”, “should”, “may” and policies in present tense. The description of the existing language convention found on p. 6 of the Draft General Plan will be updated to describe the new conventions. Conventions for how this language would be adapted as well as examples of how the new policies would be written are included below.
General Plan Introduction	Reference and describe the Climate Action Plan called for in General Plan policy. Proposed language to add is as follows:  “The General Plan’s Relation to the Climate Action Plan: Policies to reduce greenhouse gas emissions and adapt to climate change are found throughout the West Hollywood General Plan. These include policies for more multi-modal transportation in the Mobility and Land Use Elements; for more energy efficiency, waste reduction, and water conservation in the Infrastructure, Resources, and Conservation Element; and for more trees and open space in the Parks and Recreation Element. In addition to these, the General Plan also commits the City to maintaining and regularly updating a greenhouse gas emissions inventory and Climate Action Plan (see Policy IRC-6.3). The Climate Action Plan, completed in 2010, adds implementation details to the supporting policies found throughout the General Plan. It also provides a timeline for achieving specific greenhouse gas emissions reduction targets. As an implementation measure for the General Plan, it is a separate document that may be updated numerous times throughout the life of the General Plan, as conditions change and different reduction strategies are implemented.”
p. 35 and p. 116	The term “built-out” on pages 35 and 116 will be deleted from the General Plan in order to avoid confusion. The term was used to indicate that the City has no undeveloped land. It was not intended to mean that there is no further development capacity.

<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
p. 48	Change the description on the R1B zone from “R1B allows for 2 dwelling units per lot on lots larger than 8,499 square feet with a maximum height of 25 feet and 2 stories” to the following: “R1B allows for: <ul style="list-style-type: none"> <li>• 2 units per lot of less than 8,499 square feet</li> <li>• 3 units per lot between 8,500 and 11,999 square feet</li> <li>• Plus 1 additional unit per lot, for each 3,500 square feet or fraction thereof in excess of 11,999 square feet”</li> </ul>
p. 52 and other locations	Change the name of the “Transit Overlay District (TOD)” to the “Transit Overlay Zone (TOZ)”
P. 55	Street names and General Plan Designation labels were added to Figure 3-4: General Plan Designations map.
p. 57 (Policy LU-1.2)	Rephrase the policy to: “Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.”
p. 58 (Policy LU-1.15)	Change the term “drive through land uses” to “drive through commercial land uses.”
p. 58 (Policy LU-1.19)	Rephrase the policy to: “Update the City’s CEQA thresholds of significance to ensure conformance with the vision identified in this General Plan.”
p. 59 (Policy LU-2.2)	<del>Rephrase the policy to: “Consider the scale and character of existing neighborhoods when approving new infill development projects.”</del>
p. 62 (Policy LU-4.1)	Rephrase the policy to: “Implement land use patterns that locate a wide range of destinations within a short walk of every West Hollywood resident in order to encourage walking as a desirable mode of transportation.”
p. 63 (Policies LU-5.2, 5.4 and 5.5)	Combine these three policies into a single policy as follows: “Review and evaluate development proposals during the design review process for the following: <ul style="list-style-type: none"> <li>• The internal integrity of each proposed building or project and its relationship to adjacent properties.</li> <li>• The effects that the frontage design of each proposal for a new or renovated building will have upon the experience of the passing or approaching pedestrian.</li> <li>• How the landscaping is coordinated with and contributes to the overall design of the project and the public landscape.”</li> </ul>
p. 64 (LU-6.4)	Rephrase the policy to: “Strive for all new street lights in commercial areas to be pedestrian-oriented, attractively designed, compatible in design with other street furniture, and to provide adequate visibility and security.”
p. 66 (Policy LU-8.1)	Delete LU-8.1
p. 66 (Policy LU-8.2)	Rephrase the policy to: “Consider the scale and character of existing residential neighborhoods during the approval of new development.”
p. 67 (Policy LU-10.1)	Rephrase the policy to: “Consider the building scale, form, and setbacks within the block when approving new single-family dwellings and additions to existing housing.”
p. 67 (Policies LU-10.2, 10.3 and 10.4)	Combine these policies into a single policy as follows: “Design new carports and garages to be subordinate in scale to the primary dwelling, to minimize views from the street, and to not occupy the majority of the street frontage of buildings.”



<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
p. 67	Add a policy (LU-10.6) to read: "Encourage new homes to be individually designed to integrate with the neighborhood."
p. 67	Add a policy (LU-10.7) to read: "Consider creating conservation overlay zones for the West Hollywood West, Norma Triangle, Laurel Park and Greenacre-Poinsettia neighborhoods."
p. 68 (Intent of Goal LU-11)	In the last sentence of the Intent paragraph change "street life" to "pedestrian activity."
p. 69 (Policy LU-11.7)	In the policy language, change "wide sidewalks" to "wider sidewalks" since sidewalks already exist.
p. 71 (Policy LU-12.7)	Rephrase the policy to: "Require that development projects adjacent to West Hollywood Park take into consideration the West Hollywood Park Master Plan and provide connectivity to the Park."
p. 77 (Goal LU-16)	Add a new policy (LU 16-10) as follows: "Consider impacts to surrounding neighborhoods when evaluating off-site signage."
pp. 82-84	<p>P. 82 refers to 'seven thematic districts.' This should be changed to "six historic districts and groups".</p> <p>A detailed description of Old Sherman should be added after the Lingenbrink Commercial Grouping that says:</p> <p>"The Old Sherman District contains some of the original residences of West Hollywood, then known as Sherman. Built between 1899 and 1907, these dwellings were homes for many of the workers at the Pacific Electric Railway. The buildings contain common architectural elements including hipped roofs, narrow wood clapboard sidings, simple endboards, and window trim, front porches and simple floor plans. Known as the "Plains Cottages," these homes pre-date the craftsman-style dwellings, which were built after 1910. They reflect the housing styles familiar to the Midwestern emigrant workers that settled in Sherman. The homes in this Old Sherman District are representative of West Hollywood's birth as a distinctive city and evoke its modest beginnings."</p>
p. 89 (Policy HP-3.5)	Rephrase the policy to: "Develop post-disaster policies and plans for designated cultural resources to encourage preservation of damaged cultural resources."
p. 93 and other locations in the Draft General Plan	Change the name of the "Avenues of Arts and Design" to "The Avenues – Art, Fashion & Design District"
p. 96 (Policy ED-3.6)	Delete this policy.
p. 111 (Figure 6-1)	Fairfax Avenue will be reclassified as an Arterial roadway.
p. 117 (Figure 6-3)	Fairfax Avenue will be reclassified as an Arterial roadway.
p. 119	A sentence will be added that reads: "The Draft Hollywood General Plan for the City of Los Angeles shows provisions for a right-of-way along Santa Monica Boulevard that may ultimately allow for up to six lanes of traffic east of the West Hollywood border."
p. 119	The Ventura Freeway is mistakenly numbered the "134"; it will be revised to be "101". It will now read "Ventura Freeway (101)."
p. 122 (Policy M-1.3)	Rephrase the policy to: "Consider requiring development projects to include transit amenities and transit incentive programs."

<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
p. 123 (Policy M-2.3)	A bullet will be added to the list in Policy M-2.3 to address the need to collaborate with adjacent jurisdictions on roadway improvements. The new bullet will read: "Planning for key roadways on streets that connect with adjacent jurisdictions."
p. 124 (Policy M-3.3)	Delete the phrase "and ADA Transition Plan" because this plan, which was created in 1992, was implemented.
p. 124 (Policy M-3.5)	Change the term "street" to "streetscape"
p. 125 (Policy M-3.12)	Delete this policy because it duplicates Policy M-3.4
p. 135 (Policy HS-1.5)	Rephrase the policy to: "Obtain community input on the planning, funding prioritization, implementation and evaluation of the City's social services."
p. 168 (Policy IRC-7.1)	Rephrase the policy to: "Seek to improve overall respiratory health for residents through regulation of stationary and mobile sources of air pollution, as feasible."

<b>Housing Element</b>	
<p><i>Note: As part of the required review process, the City received comments on the Draft Housing Element from the State Department of Housing and Community Development (HCD) on July 1, 2010, requesting clarifications to the proposed Housing Element. The City has revised and clarified the Draft Housing Element in response to comments by HCD and submitted the revised Draft to HCD on August 11, 2010. The revisions to the Draft Housing Element are illustrated in the table below and the direct responses to HCD comments are set forth in Exhibit Q of the staff report.</i></p>	
<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
p. 213	<p>Two bullet points will be added to the Timeframe and Objectives for Program No. 1: Code Compliance:</p> <ul style="list-style-type: none"> <li>• "Identify soft-story buildings in the redevelopment area by 2010-2011.</li> <li>• Revise pro-active inspection program to include identification of mechanical and electrical deficiencies (based on consultants' reports) by 2013."</li> </ul>
p. 214	<p>Three bullet points will be added to the Timeframe and Objectives for Program No. 2: Housing Conditions Survey/Multi-Family Rehabilitation Study:</p> <ul style="list-style-type: none"> <li>• "Identify soft story buildings in the redevelopment area by 2010-2011.</li> <li>• Hire structural engineer to develop options for seismic rehabilitation by 2010-2011.</li> <li>• Hire consultant to evaluate mechanical and electrical needs of typical buildings built at different periods by 2010-2011."</li> </ul> <p>Three bullet points will be modified to read:</p> <ul style="list-style-type: none"> <li>• "Conduct a study to determine the feasibility of providing seismic upgrades to soft-story structures and making electrical and mechanical system improvements to deteriorating multi-family structures by 2012. The study will evaluate the cost-effectiveness of various prototypical ways to perform upgrades and identify potential funding sources, including 80 percent tax increment funds.</li> </ul>

	<ul style="list-style-type: none"> <li>• Establish a multi-family housing rehabilitation program by 2013 that incorporates green building standards and offers incentives and financial/technical assistance to encourage participation.</li> <li>• Provide financial assistance to nonprofit housing providers to upgrade the City’s affordable housing stock with green building improvements by 2010. (The City recently provided \$500,000 to the West Hollywood Community Housing Corporation (WHCHC) to make improvements to several WHCHC buildings.)”</li> </ul>
p. 215	The description of Program No. 3: Multi-Family Rehabilitation and Acquisition/Rehabilitation will be modified to read: “The acquisition and rehabilitation of deteriorated residential properties or properties at risk of being Ellised is a key program in West Hollywood’s overall strategy to provide long-term affordable housing for lower income families (particularly those of extremely low incomes) and/or special needs households, including seniors, disabled persons, persons with HIV/AIDS, single parents and large families.”
p. 215	One bullet point of the Timeframe and Objectives for Program No. 3: Multi-Family Rehabilitation and Acquisition/Rehabilitation will be modified to read: <ul style="list-style-type: none"> <li>• “Acquire approximately 50 units for rehabilitation, with a portion of the units targeted for extremely low income households and persons with special needs. Projects that provide the largest proportion of housing units for extremely and very low income households will receive priority for funding from the City.”</li> </ul>
p. 218	Two bullet points will be added to the Timeframe and Objectives for Program No. 8: Housing Choice Vouchers (Section 8): <ul style="list-style-type: none"> <li>• “Include information in annual mailings to property owners outlining the benefits of the Section 8 program.</li> <li>• Meet annually with the County Housing Authority to review analysis of market rents and Section 8 payment standards.”</li> </ul>
p. 219	One bullet point will be added to the Timeframe and Objectives for Program No. 9: Preservation of Publicly Assisted Housing: <ul style="list-style-type: none"> <li>• “Conduct Tenant Education: Educate the public regarding “at-risk” housing. It has been a long-established City strategy to create permanent affordable housing in the City. Virtually all affordable housing units in the City are available either in perpetuity or for a very long term. For the three projects that require short-term renewal of subsidy contracts, communicate to the public regarding the limited potential for and required process of conversion and available tenant protection and assistance. In the unlikely event that the owners decide not to renew the Section 8 contracts, work with tenants of at-risk units and provide them with education regarding tenant rights and conversion procedures. Hold tenant meetings one year prior to expiration of any Section 8 contracts to educate tenants of their rights and options.”</li> </ul>
p. 220	One bullet point of the Timeframe and Objectives for Program No. 10: Condominium Conversion Ordinance will be modified to read: <ul style="list-style-type: none"> <li>• “Monitor conversion activities annually to ensure the ordinance continues to work effectively in the protection of the City’s rental housing stock and tenant rights.”</li> </ul>

<p>p. 222</p>	<p>One bullet point of the Timeframe and Objectives for Program No. 13: Inclusionary Housing Ordinance will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Monitor market conditions and development trends by 2012 to ensure that the Ordinance works effectively to provide affordable housing in the community but does not unduly constrain housing development in general. If constraints are identified, the City will make necessary improvements to the ordinance to enhance its effectiveness in facilitating the development of housing for all income groups.”</li> </ul>
<p>p. 223</p>	<p>One bullet point of the Timeframe and Objectives for Program No. 14: Affordable Housing Development through Partnerships with Non-Profits. One bullet point will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Continue to support WHCHC and other non-profit organizations in the development of affordable and special needs housing through the provision of financial and regulatory incentives. Projects with the largest proportion of units set aside for extremely low and very low income households will receive priority for funding.”</li> </ul>
<p>p. 224</p>	<p>Three bullet points of the Timeframe and Objectives for Program No. 15: Workforce Housing, Family Housing, and Ownership Housing Opportunities will be modified to read:</p> <ul style="list-style-type: none"> <li>• “As appropriate and feasible, pursue a portion of the inclusionary housing units as affordable ownership units. The City Council will conduct a discussion and provide direction on affordable ownership units as part of the inclusionary housing program by 2012.</li> <li>• Encourage the use of Mortgage Credit Certificates (MCC) by including a presentation on MCCs in the first-time homebuyers educational program annually. This program is administered by the County Community Development Commission. The qualified homebuyer who is awarded an MCC may take an annual credit against their federal income taxes paid on the homebuyer's mortgage. The credit is subtracted dollar-for-dollar from his or her federal income taxes. The qualified buyer is awarded a tax credit of up to 15 percent with the remaining 85 percent taken as a deduction from the income in the usual manner.</li> <li>• Annually explore funding potential for homebuyer assistance from other State programs that can complement the City’s Inclusionary Housing Ordinance.”</li> </ul>
<p>p. 224</p>	<p>One bullet will be added to the Timeframe and Objectives for Program No. 16: Commercial Development Impact Fee:</p> <ul style="list-style-type: none"> <li>• “Study the effectiveness of the Commercial Impact Fee program by 2013.”</li> </ul>
<p>p. 226</p>	<p>Modified the Timeframe and Objectives for Program No. 18: Potential Sites for RHNA. The following bullet point will be deleted:</p> <ul style="list-style-type: none"> <li>• “Annually evaluate the land availability to meet the remaining RHNA.”</li> </ul> <p>Five bullet points will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Conduct a public hearing and commit financial assistance (\$10.3 million in Affordable Housing Trust Funds and \$1.5</li> </ul>

	<p>million in HOME funds) for the acquisition/rehabilitation of 1234 Hayworth Avenue by June 30, 2010. (The Council approved the project and its funding in 2009.)</p> <ul style="list-style-type: none"> <li>• Deed-restrict the project as affordable housing for at least 20 years.</li> <li>• Review status of the project by June 30, 2011. If project is not implemented by June 30, 2011, the City will ensure adequate sites are available by June 30, 2012 to make up the 48-unit capacity required for the RHNA. (At the writing of this Housing Element, the 1234 Hayworth Avenue project is scheduled to begin rehabilitation works in the fall of 2010.)</li> <li>• Document the implementation of the 1234 Hayworth Avenue project and its compliance with the requirements of State law (Government Code Section 65583.1c(7)) in the Annual Report to HCD on Housing Element Implementation by July 1, 2011.</li> <li>• Annually monitor the City’s progress toward meeting the RHNA and evaluate the land availability to meet the remaining RHNA. If there is a shortfall in sites, the City will identify additional sites to replenish the sites inventory to fully accommodate the remaining RHNA.”</li> </ul>
p. 230	<p>Two bullet points of the Timeframe and Objectives for Program No. 21: Streamlined Processing will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Review the City’s permit processing procedures to further streamline the review and approval process by 2012 in conjunction with the Zoning Code update.</li> <li>• Provide a development handbook to guide developers through City processes and requirements by 2013 upon completion of the Zoning Code update.”</li> </ul>
p. 230	<p>Two bullet points of the Timeframe and Objectives for Program No. 21: Streamlined Processing will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Review the City’s permit processing procedures to further streamline the review and approval process by 2012 in conjunction with the Zoning Code update.</li> <li>• Provide a development handbook to guide developers through City processes and requirements by 2013 upon completion of the Zoning Code update.”</li> </ul>
p. 230	<p>One bullet point of the Timeframe and Objectives for Program No. 22: Fee Waivers for Affordable Housing will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Annually review the City’s various planning and development fees to ensure they are reasonable and do not unduly constrain housing development.”</li> </ul>
p. 232	<p>One bullet point of the Timeframe and Objectives for Program No. 25: Tenant Eviction Protection Program will be modified to read:</p> <ul style="list-style-type: none"> <li>• “Annually review current laws and recommend any needed modifications to ensure protection of tenants to the maximum extent legally possible.”</li> </ul> <p>The following bullet point will be added:</p> <ul style="list-style-type: none"> <li>• “Renew contracts with mediation service providers annually.”</li> </ul>
p. 232	<p>Two bullet points will be added to the Timeframe and Objectives for Program No. 26: Services for Special Needs Populations:</p> <ul style="list-style-type: none"> <li>• “Continue to provide financial support to non-profit services</li> </ul>

	<p>providers that help meet the supportive services needs of West Hollywood's diverse community, especially those with extremely low incomes.</p> <ul style="list-style-type: none"> <li>• Annually update the social services directory, and make it available to residents at public counters and on City website."</li> </ul>
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<b>Housing Element Technical Appendix</b>	
<p><i>Note: As part of the required review process, the City received comments on the Draft Housing Element Technical Appendix from the State Department of Housing and Community Development (HCD) on July 1, 2010, requesting clarifications to the proposed Housing Element. The City has revised and clarified the Housing Element Technical Appendix in response to comments by HCD and submitted the revised Draft to HCD on August 11, 2010. The revisions to the Draft Housing Element are illustrated in the table below and the direct responses to HCD comments are set forth in Exhibit Q of the staff report.</i></p>	
<p>p. 66</p>	<p>Additional information on the Emergency Shelter Overlay Zone will be added. The new information describes the characteristics of properties within the proposed Overlay Zone. The paragraph will read: "The overlay zone will encompass at least 100 underutilized properties with older one- and two-story structures that can easily be renovated and expanded to accommodate emergency shelter facilities in its upper levels. Nearly all of the properties along Santa Monica Boulevard in the potential area for the overlay zone are no taller than two stories, and a majority of the buildings are single-story, which offer opportunities for expansion by adding a second or third story. A map that illustrates the height characteristics of the structures in the potential overlay zone area can be found in Appendix D. In addition, approximately one-third of the structures in the potential area for the overlay zone are over 50 years old (built before 1960), making renovation feasible and desirable. According to a 2010 report, the Santa Monica Boulevard commercial property market had an overall vacancy rate of seven percent, with a number of properties directly along Santa Monica Boulevard currently listed as vacant and for sale."</p>
<p>p. 74</p>	<p>New paragraphs providing information on neighborhood meetings will be added: "A neighborhood meeting is required for all projects that:</p> <ul style="list-style-type: none"> <li>• Require development permit approval by the Commission;</li> <li>• Are located in the Sunset Specific Plan (SSP) zoning district with 10,000 square feet or more of total gross floor area; or,</li> <li>• Are residentially zoned with five or more units.</li> </ul> <p>A neighborhood meeting consists of the applicant conducting a meeting with property owners and tenants located within a 500-foot radius of the subject site to present the project and discuss identified concerns prior to action by the reviewing body. The meeting must be held within 60 days of the application date and not less than 28 days before the public hearing date.</p> <p>Neighborhood meetings help to resolve many of the issues faced by developers prior to review by the Planning Commission. Often these neighborhood meetings help streamline the review/approval process. As these meetings are held after the application has been submitted but before the public hearing is held, they do not and are, therefore, not</p>

	<p>considered impact the timeframe of the review/approval process and therefore not considered a an additional constraint in the approval process.”</p>
<p>p. 74</p>	<p>Additional information on processing times will be added, and the paragraphs modified to read: “West Hollywood’s development approval process is designed to further housing development. The Planning Department has established a time table for processing applications. Often, processing time depends on CEQA requirements and the Permit Streamlining Act provides strict timelines that the City must abide by. To further streamline processing times, in 2010, the City eliminated the public hearing requirement for EIR comments.</p> <p>Given the City built out character and market conditions, new single-family subdivisions are rare in the community. A new single-family unit can be processed in six weeks after the application is deemed complete. A typical multi-family project requiring Planning Commission approval can be processed in two to three months from date when the application is deemed complete. These timeframes are typical and do not constrain housing development. As evidenced by the large number of approved projects and pending projects in the City that have already received Planning Commission approval (shown in Appendix A), the City review and approval process is not onerous and does not constrain housing development.”</p>
<p>p. 76</p>	<p>A new paragraph regarding the City’s planning and development impact fees will be added: “Based on a sample of recent projects, total planning and development impact fees average approximately \$51,332 for a single-family unit and \$33,751 per unit for a multi-family unit. These fees have minimal cost impacts to the overall development costs, given the high land costs in West Hollywood. As demonstrated by the numerous recently approved and pending projects in the City, planning and development impact fees do not constrain residential or mixed use developments in the City.”</p>
<p>p. 78</p>	<p>A new paragraph regarding the Inclusionary Housing Ordinance will be added: “Beginning in December 2006 the City Council and Planning Commission began to explore methods to enhance the effectiveness of the Ordinance and to better respond to the housing need in the community by requiring more units to be built on-site rather than allowing in-lieu fee payments and by encouraging smaller units. Additionally SB1818 was passed, requiring the City to permit additional market-rate units (a density bonus), allow reduced requirements in the form of “concessions” or modifications to development standards (height, setbacks, open space), and permit lower minimum parking requirements for projects that include affordable housing. On July 18, 2007 the Council adopted changes to the Inclusionary Housing and Density Bonus Ordinance in order to comply with new requirements as well as encourage new affordable housing development. Additional changes to the Ordinance will also be made to ensure compliance with SB1818. The 2007 changes to the Ordinance include:”</p>
<p>p. 80</p>	<p>A new paragraph regarding the Inclusionary Housing Ordinance will be added: “The City undertook extensive outreach efforts to consult with the development community before making these changes to the Inclusionary Housing Program. The specific changes were made in response to comments from both for-profit and non-profit housing</p>

	<p>developers. A feasibility study was conducted to ensure that the changes to the Inclusionary Housing Ordinance do not unduly constrain housing development, and the flexibility offered by the Ordinance facilitates and encourages new residential development. As evidenced by the number of development applications that occurred since amendment of the Inclusionary Housing Program, the amendment has not constrained development applications. Despite a dampened housing market in the region since 2007, development activities in the City have not been affected significantly. Since amendment of the Inclusionary Housing Ordinance, the City received 33 development applications, compared to 47 applications received during the prior three years. However, the 33 applications received since 2007 totaled to 976 units compared to only 875 units from the 47 applications received prior to the Ordinance amendment. The increased number of housing units is a direct result of the amended Ordinance which encourages a mixture of unit sizes in a development. Specifically, the amended Ordinance encourages the inclusion of smaller units, increasing development densities and enhancing affordability. Overall, the Inclusionary Housing Ordinance has proven to be an effective tool in the community, creating permanently affordable units for lower and moderate income residents.”</p>
p. 89	<p>The title of Section V will be changed to “Projected Housing Needs.”</p>
p. 91	<p>Additional information on units constructed will be added. The paragraph will now read:          “As of December 31, 2009, 352 housing units have been finalized in West Hollywood since January 1, 2006. Among these 352 units, seven are inclusionary units (four low income and three moderate income units, based on the City’s Inclusionary Housing Ordinance). These affordable units are deed-restricted as long-term affordable housing via development agreements pursuant to the City’s Inclusionary Housing Ordinance.</p> <p>In addition to the affordable units discussed above, the 42-unit Sierra Bonita project celebrated its grand opening in April 2010. This affordable housing project by WHCDC provides 13 extremely low income units and 29 very low income units. The Sierra Bonita project was financed with a variety of funding sources, including County of Los Angeles HOME funds, Tax Credits, State HCD Multi-family Housing Program fund (Proposition 1C), Federal Home Loan Bank Affordable Housing Program, State Affordable Housing Trust Fund Grant (Proposition 46), City Commercial Loan, and City Residential Gap Loan and Grant. These units are deed-restricted as long-term affordable housing based according to the requirements of funding programs.”</p>
p. 91	<p>A new paragraph regarding units under construction will be added: “As of August 2010, three projects were under construction in the City with a total of 64 units. Among these 64 units, four low income units and four moderate income units are provided as inclusionary units for a 40-unit condominium development. The inclusionary units are deed-restricted as long-term affordable housing pursuant to the City’s Inclusionary Housing Ordinance.”</p>
p. 91	<p>A new paragraph regarding units approved will be added: “Several projects have been approved by the City to be developed on underutilized sites. These approved projects provide 828 condominium units and 160 apartment units. The largest of these projects is</p>



	<p>Movietown, a mixed use project 371 units, including 38 very low income and 38 low income inclusionary units. Overall, the approved projects include 165 affordable units are provided (38 very low income units, 83 low income units and 44 moderate income units). The number of affordable units is based on the development agreements and all affordable units will be deed-restricted as long-term affordable housing according to the development agreements.”</p>																																																						
<p>p. 91</p>	<p>A new paragraph regarding pending projects will be added: “Seventeen projects are pending, with several of these pending projects having already received Planning approval. These projects total 790 units, including 370 condominium units and 420 apartment units. A total of 70 low income units and 75 moderate income units are provided. The number of affordable units from pending projects is based on the requirements of the City’s Inclusionary Housing Ordinance or as negotiated with the developers; all affordable units will be deed-restricted for the life of the project via development agreements.”</p>																																																						
<p>p. 91</p>	<p>A new information on acquisition/rehabilitation will be added: “Pursuant to AB 438, the City may fulfill up to 25 percent of its very low and low income RHNA using existing units either through acquisition/rehabilitation, conversion from market-rate housing, or preservation of housing at risk of converting to market-rate. The City is partnering with WHCDC to acquire and rehabilitate a 48-unit existing building located at 1234 Hayworth Avenue. This building has been vacated and abandoned for several years and would be demolished if not rehabilitated. The City has committed \$10.3 million in Affordable Housing Trust Funds (AHTF) and \$1.5 million in HOME funds for this project. In addition, WHCDC is pursuing Section 202 funds and LIHTC as additional leverage. The project is recommended for \$7 million under the TCAC 9 percent tax credits. Furthermore, the City will work with WHCDC to identify other funding sources to implement the project if necessary. When completed, 47 units at this 48-unit project will be deed-restricted for at least 55 years as affordable housing (5 extremely low, 38 very low, and 4 low income units, with an additional unit being reserved as the manager’s unit).”</p>																																																						
<p>p. 92</p>	<p>Table 47 will be updated to reflect the current status of the City’s projects. The table will read as follows:</p> <table border="1" data-bbox="493 1432 1421 1925"> <thead> <tr> <th colspan="6"><b>Table 47: RHNA Status (as of December 31, 2009)</b></th> </tr> <tr> <th></th> <th><b>Extremely Low/ Very Low</b></th> <th><b>Lo w</b></th> <th><b>Moderate</b></th> <th><b>Above Moderate</b></th> <th><b>Total</b></th> </tr> </thead> <tbody> <tr> <td><b>2008-2014 RHNA</b></td> <td><b>142</b></td> <td><b>91</b></td> <td><b>99</b></td> <td><b>252</b></td> <td><b>584</b></td> </tr> <tr> <td>Units Constructed</td> <td>42</td> <td>4</td> <td>3</td> <td>303</td> <td>352</td> </tr> <tr> <td>Units Legalized</td> <td>0</td> <td>0</td> <td>0</td> <td>25</td> <td>25</td> </tr> <tr> <td>Units Under Construction</td> <td>0</td> <td>4</td> <td>4</td> <td>56</td> <td>64</td> </tr> <tr> <td>Units Approved</td> <td>38</td> <td>83</td> <td>44</td> <td>823</td> <td>988</td> </tr> <tr> <td>Units at Review/ Plan Check</td> <td>0</td> <td>0</td> <td>0</td> <td>52</td> <td>52</td> </tr> <tr> <td>Pending Projects</td> <td>0</td> <td>70</td> <td>75</td> <td>645</td> <td>790</td> </tr> </tbody> </table>	<b>Table 47: RHNA Status (as of December 31, 2009)</b>							<b>Extremely Low/ Very Low</b>	<b>Lo w</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>	<b>2008-2014 RHNA</b>	<b>142</b>	<b>91</b>	<b>99</b>	<b>252</b>	<b>584</b>	Units Constructed	42	4	3	303	352	Units Legalized	0	0	0	25	25	Units Under Construction	0	4	4	56	64	Units Approved	38	83	44	823	988	Units at Review/ Plan Check	0	0	0	52	52	Pending Projects	0	70	75	645	790
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	Acquisition/Rehab (1234 Hayworth)	43	4	0	0	47
	<b>Remaining RHNA</b>	<b>19</b>	<b>(74)</b>	<b>(27)</b>	<b>(1,644)</b>	<b>19</b>
	2000-2008 RHNA Penalty	0	0	0	40	40
	<b>Overall RHNA Obligation</b>	<b>19</b>	<b>(74)</b>	<b>(27)</b>	<b>(1,604)</b>	<b>19</b>
Note: Where there is a surplus of above moderate income units, these units cannot be used to fulfill the RHNA for lower or moderate income units.						
p. A-15	Table A-3 will be amended to include a “Status” and “Next Step” column for projects currently in the Plan Check stage.					
p. A-17	Table A-4 will be amended to include a “Status” column for the City’s pending projects.					

## West Hollywood General Plan Policy Language Re-Formatting

Re-Formatting “Rules”	
Convention:	Convention becomes:
“The City will [verb, clause]”	“[verb, clause]”
“The City [present tense verb, clause]”	“Continue to [verb, clause]”
“The City should [verb, clause]”	Options, in decreasing order of “optional” or “qualifier” strength: <ul style="list-style-type: none"> <li>• “Seek to [verb, clause]”</li> <li>• “Seek opportunities to [verb, clause]”</li> <li>• “When possible, [verb, clause]”</li> <li>• “As feasible, [verb, clause]”</li> <li>• “The City should encourage [clause]” could simply become “Encourage [clause]” because “encourage” implies some level of qualification – i.e. it’s not a mandate for a particular action.</li> </ul>
“The City may [verb clause].”	“Allow [clause].” When necessary, re-insert “City” or other subject to clarify.

Example Policy Language		
Policy Number	Existing Policy	Policy “Re-Format” Example
G-1.7	The City hosts periodic public forums on issues important to the community, facilitating these forums with the purpose of guiding City policy.	Continue to host periodic public forums on issues important to the community, facilitating these forums with the purpose of guiding City policy.
G-3.4	The City should establish a “virtual” public counter through an on-line permitting system.	As feasible, establish a “virtual” public counter through an on-line permitting system.
LU-1.3	New development will enhance the	Require new development to enhance

<b>Example Policy Language</b>		
<b>Policy Number</b>	<b>Existing Policy</b>	<b>Policy “Re-Format” Example</b>
	pedestrian experience.	the pedestrian experience.
LU-1.9	The City may manage land use designations through use of overlay districts.	Allow City management of land use designations through the use of overlay districts.
LU-2.3	The City allows mixed-use development in all commercial corridors, including as described in adopted specific plans.	Continue to allow mixed-use development in all commercial corridors, including as described in adopted specific plans.
LU-7.6	The City should encourage the use of permeable paving and reduce the use of impervious pavement.	Encourage the use of permeable paving and reduce the use of impervious pavement.
LU-14.5	The La Brea/Santa Monica intersection should be enhanced as a major gateway to West Hollywood. This should be achieved through building architecture, streetscape design, and signage.	As feasible, enhance the La Brea/Santa Monica intersection as a major gateway to West Hollywood. This should be achieved through building architecture, streetscape design, and signage.
LU-17.1	The City prohibits the use of roof signs, pole signs, and flashing and animated signs, except as part of a creative sign program.	Prohibit the use of roof signs, pole signs, and flashing and animated signs, except as part of a creative sign program.
HP-2.1	The City should continue to revise and update the West Hollywood Historic Resources Survey.	As feasible, continue to revise and update the West Hollywood Historic Resources Survey.
HP-2.3	The City should provide assistance in applications for designated West Hollywood Cultural Resources to be nominated as properties in the California and National Registers.	When possible, provide assistance in applications for designated West Hollywood Cultural Resources to be nominated as properties in the California and National Registers.
HP-3.4	The City allows for the adaptive reuse of cultural resources.	Continue to allow for the adaptive reuse of cultural resources.
ED-8.2	The City should support educational institutions and career education programs such as job fairs, career academies, internships, job shadowing, career speaker programs, Career Day, and other programs.	When possible, support educational institutions and career education programs such as job fairs, career academies, internships, job shadowing, career speaker programs, Career Day, and other programs.
ED-9.3	The City will encourage mixed-use development at key intersections in the Eastside Redevelopment Area.	Encourage mixed-use development at key intersections in the Eastside Redevelopment Area.
M-1.7	The City should create incentives for discretionary transit riders, such as visitors to cultural and entertainment destinations and others.	Seek opportunities to create incentives for discretionary transit riders, such as visitors to cultural and entertainment destinations and others.
M-1.8	The City will engage in outreach and education to publicize transit options to City residents.	Engage in outreach and education to publicize transit options to City residents.
M-1.9	The City seeks to optimize its traffic	Continue to optimize the City’s traffic

<b>Example Policy Language</b>		
<b>Policy Number</b>	<b>Existing Policy</b>	<b>Policy “Re-Format” Example</b>
	infrastructure and works with transit agencies to make bus travel times more competitive with automobile travel times.	infrastructure and work with transit agencies to make bus travel times more competitive with automobile travel times.
HS-1.6	The City supports innovative HIV prevention education strategies.	Continue to support innovative HIV prevention education strategies.
HS-2.3	The City should provide space in public facilities for use by local artists, cultural groups and institutions.	Seek opportunities to provide space in public facilities for use by local artists, cultural groups and institutions.
HS-2.5	The City may allow local artists, cultural groups and institutions to operate from residentially zoned areas where they do not unreasonably disrupt their neighbors.	Allow local artists, cultural groups and institutions to operate from residentially zoned areas where they do not unreasonably disrupt their neighbors.
PR-1.1	The City continues to enhance existing parks and recreational facilities.	Continue to enhance existing parks and recreational facilities.
PR-1.9	The City should develop methods to increase its supply of parks and open space.	Seek to develop methods for increasing the City’s supply of parks and open space.
PR-1.10	Creating new parks and open spaces should be a high priority for public funding.	As feasible, prioritize public funding for creating new parks and open spaces.
IRC-3.7	The City should encourage existing residential and non-residential buildings to pursue strategies for water conservation, including:	Encourage existing residential and non-residential buildings to pursue strategies for water conservation, including:
IRC-4.1	The City will promote building energy efficiency improvements through strategies that may include the following:	Promote building energy efficiency improvements through strategies that may include the following:
IRC-6.1	The City will proactively consult with the State and appropriate agencies to effectively implement climate change legislation, including . . .	Proactively consult with the State and appropriate agencies to effectively implement climate change legislation, including . . .
IRC-11.3	The City should utilize advanced technology and green building techniques to operate and maintain City buildings and facilities.	When possible, utilize advanced technology and green building techniques to operate and maintain City buildings and facilities.
SN-3.4	The City requires all proposed development within the 65 dB Ldn contour as shown on Figure 10-5 in the Safety and Noise Chapter of the General Plan to comply with Title 24, as amended.	Continue to require all proposed development within the 65 dB Ldn contour as shown on Figure 10-5 in the Safety and Noise Chapter of the General Plan to comply with Title 24, as amended.
SN-4.3	The City should establish and designate a system of truck routes on specified arterial streets to	Seek to establish and designate a system of truck routes on specified arterial streets to minimize the negative

<b>Example Policy Language</b>		
<b>Policy Number</b>	<b>Existing Policy</b>	<b>Policy “Re-Format” Example</b>
	minimize the negative impacts of trucking through the City.	impacts of trucking through the City.

### **Additional Changes Recommended by Planning Commission**

<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
P. 55 (Figure 3-4)	Modify the Proposed General Plan Designations Map to replace the CN2 designation along portions of Melrose Avenue between Doheny and West Knoll Drives with the CN1 designation.
P. 59 (Policy LU-2.2)	Rephrase the policy to: “Consider the scale and character of existing neighborhoods and whether new development improves and enhances the neighborhood when approving new infill development projects.”
P. 60 (Policy LU-2.9(b))	Rephrase the policy to: “Exemplary green buildings”
P. 64 (Policy LU-6.5)	Rephrase the policy to: “The streetscape of high volume corridors, including Sunset Boulevard, Santa Monica Boulevard, San Vicente Boulevard, La Cienega Boulevard, La Brea Avenue, Fairfax Avenue, and Fountain Avenue will be designed to balance regional traffic flow with pedestrian movement and safety and the unique physical environment of the area.”
P. 66 (Policy LU-8.7)	Move the policy to become LU-9.5, under Goal LU-9 (multi-family residential neighborhoods), as follows: “Allow for the reconstruction or replacement of nonconforming residential buildings with an equivalent number of units and parking spaces to what was previously developed on the same parcel even if that number of units is greater than the maximum permitted density.”
P. 70 (Policy LU-11.8)	Rephrase the policy to: “As feasible, develop planning studies for the Greater Melrose Triangle Area and Melrose Avenue between Doheny and West Knoll Drives.”
P. Implementation 4 (Implementation Action LU-A.11)	Change the Action from Medium to a Short time frame, and rephrase to read: “Prepare planning studies for the Greater Melrose Triangle area and Melrose Avenue between Doheny and West Knoll Drives. The plans should create a unified design and land use vision for the area to enhance its role as a center of arts and design. Specifically, the studies should examine: <ul style="list-style-type: none"> <li>- Development standards, particularly height and density, for buildings in the following three segments of Melrose Avenue: <ul style="list-style-type: none"> <li>o South side of Melrose Avenue between Doheny Drive and Robertson Boulevard</li> <li>o South side of Melrose Avenue between Robertson and San Vicente Boulevards</li> <li>o North and south sides of Melrose Avenue between San Vicente Boulevard and West Knoll Drive</li> </ul> </li> </ul>

<b>Public Draft GP Page # or Policy #</b>	<b>Proposed Change</b>
	<ul style="list-style-type: none"> <li>- Increase the role of West Hollywood Park in the community</li> <li>- Create mid-block paseos or walking paths</li> <li>- Identify redevelopment opportunities</li> <li>- Create design specifications for buildings in the area</li> <li>- Increase the physical relationship between the Pacific Design Center and the commercial neighborhood, including better pedestrian connections to the Pacific Design Center.”</li> </ul>
<p>P. Implementation 4  (Implementation Action LU-A.14)</p>	<p>Add a new short-term Implementation Action (LU-A.14) as follows: “Create informational materials for the public that describe standards for planting and maintenance of private landscaping in parkways.”</p>
<p>P. 151 (Policy PR-1.2)</p>	<p>Rephrase the policy to: “Seek to maintain a diversity of park spaces throughout the City, including recreation areas, hardscaped plazas, children’s play areas, open fields, and dog parks.”</p>
<p>P. 151 (Policy PR-1.9)</p>	<p>Rephrase the policy to: “Actively seek opportunities to increase the supply of parks and open space, including on rooftops.”</p>
<p>P. Implementation 21  (Implementation Action IRC-A.29)</p>	<p>Add a new Implementation Action (IRC-A.29) as follows: “Study the feasibility of and potential funding sources for installing electricity, gas, and water meters for each unit, and for installing other energy-saving features in existing multi-family residential buildings.”</p>

## RESOLUTION NO. PC 10-945

### **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD RECOMMENDING CITY COUNCIL APPROVAL OF THE CLIMATE ACTION PLAN, AN IMPLEMENTATION ACTION OF THE WEST HOLLYWOOD GENERAL PLAN.**

The Planning Commission of the City of West Hollywood hereby resolves as follows:

SECTION 1. On August 17, 2009, the City Council directed staff to prepare a Climate Action Plan (CAP) as part of the General Plan Update. The City of West Hollywood Climate Action Plan Public Review Draft, dated June 2010 (Draft CAP), was developed through broad community participation. The CAP is a document that combines analysis and policies to meet the greenhouse gas (GHG) reduction goals of the community.

SECTION 2. Notice of the public hearing before the Planning Commission was advertised in the Beverly Press and the West Hollywood Independent on September 2, 2010, and notices were mailed to property owners, residents, and businesses on September 3, 2010. Constituents requesting notification of hearings were also notified by mail on September 3.

SECTION 3. Pursuant to the California Environmental Quality Act ("CEQA"), The City, acting as Lead Agency, circulated a Notice of Preparation ("NOP") for the project on September 30, 2009, beginning a 30-day review period. As part of the EIR scoping process, the City held a public scoping meeting at the Planning Commission meeting of Thursday, October 15, 2009, at the West Hollywood Park Auditorium. The NOP and letters received in response to the NOP from both public agencies and members of the public are included in Appendix 1.0 of the Draft EIR. The Draft EIR was circulated for a 45-day review period beginning June 25, 2010 and ending on August 9, 2010. The Final EIR was made public on September 9, 2010. All required notifications were provided pursuant to CEQA (Public Resources Code Section 21092.5) and all comment letters were incorporated into the Final EIR.

SECTION 4. Assembly Bill (AB) 32, the *California Global Warming Solutions Act of 2006*, requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs the California Air Resources Board (ARB) to develop and implement regulations that reduce statewide GHG emissions. ARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State commitment to reduce GHGs. The Plan identifies California's cities and counties as essential partners within the overall statewide effort and recommends that local governments set a GHG reduction target of 15 percent below today's levels by the year 2020. Senate Bill (SB) 375 established a process whereby regional targets for reduced vehicle miles travelled and other GHG emissions will

be established by ARB, in collaboration with Metropolitan Planning Organizations throughout the state, including the Southern California Association of Governments (SCAG) and the Westside Cities Council of Governments.

SECTION 5. Reducing the City's greenhouse gas emissions will help achieve numerous City goals, including the Vision 2020 goal of taking responsibility for the environment, will support the City's Environmental Task Force Report recommendations, and will build upon West Hollywood's position of leadership on environmental issues. Greenhouse gas reductions will also support the state's initiative to combat global warming through Assembly Bill (AB) 32, and Senate Bill (SB) 375.

SECTION 6. At a Joint Study Session with the Planning Commission and Transportation Commission on January 25, 2010, the City Council received a presentation on the CAP, and directed staff and the consultant team to establish an aggressive GHG emissions reduction target of 20-25% over 2008 levels by 2035. The measures proposed in the Draft CAP are expected to achieve GHG emissions reductions of 25.2% over 2008 levels as measured from business-as-usual conditions in 2035.

SECTION 7. The City received community input regarding the development of the Draft CAP during Community Workshops on January 30, 2010 and July 10, 2010. Public comment regarding the Draft CAP was received during the Joint Study Session of January 25, 2020.

SECTION 8. The Draft EIR, Draft General Plan, and Draft Climate Action Plan were made available to the public on June 25, 2010 as follows: a copy of each document was available at the Planning Counter and at the City Clerk's Counter at City Hall; several copies were made available for loan from the City Clerk, digital copies were posted on the City's website, [www.weho.org/generalplan](http://www.weho.org/generalplan); the Draft EIR was available at the West Hollywood Library; and copies of each document were available for purchase at a discount directly from the WeHo Copy Center. The comments letters on the Draft General Plan and Draft Climate Action Plan and responses were incorporated into the Final EIR.

SECTION 9. The West Hollywood Planning Commission has held duly noticed public hearings on the adoption of the Draft General Plan, Draft CAP and EIR on September 16, September 23, and September 30, 2010, and has given all interested persons an opportunity to be heard.

SECTION 10. Based on comments received from the public, other public agencies, and further staff review of the Draft CAP, the City has prepared a matrix of proposed changes to be incorporated in the final CAP. The Planning Commission has considered these proposed changes, and revised the matrix to reflect its recommendation to the City Council. This matrix is attached as Exhibit A to this Resolution and incorporated herein by reference.

SECTION 11. The Planning Commission of the City of West Hollywood has reviewed and considered the City of West Hollywood Climate Action Plan Public Review



Draft, dated June 2010, and hereby recommends that the City Council approve the Draft CAP subject to the modifications listed in Exhibit A.

**APPROVED BY A MOTION OF THE PLANNING COMMISSION ON THIS 30<sup>TH</sup> DAY  
OF SEPTEMBER, 2010.**

**ATTEST:**

\_\_\_\_\_  
**DIRECTOR OF COMMUNITY DEVELOPMENT**

\_\_\_\_\_  
**CHAIRPERSON**

DRAFT

## EXHIBIT A

### Proposed Changes to the West Hollywood Draft Climate Action Plan

Following is a list of changes to the Draft Climate Action Plan proposed following the release of the public draft document, including a description of the proposed change as well as where in the Climate Action Plan it can be found. In some instances, specific language changes are identified; in others, a general description of the change is included.

Public Draft CAP Page # or Measure #	Proposed Change
p. 1-7	Include use of hybrid or electric cars in item 1. Include farmers markets as a source of locally-grown healthy food in item 9.
p. 2-2	In the first paragraph under “Greenhouse Gas Emissions Sources”, change 21% to 22%.
pages 2-3, 3-2, 3-3, 3-48, 3-49, A-3, A-5, B-2, B-1	<p>The traffic analysis for the Draft EIR undercounted 220 net additional PM peak hour trips and 2,620 net additional daily trips by allocating 400,000 square feet of office space at the PDC Red building as gallery space instead of office space. To correct the error, VMT was adjusted upwards, which increased the 2035 GHG projections from transportation sources (and the overall inventory) by approximately 4,000 MT CO<sub>2</sub>e. This increase of 4,000 MT CO<sub>2</sub>e will be addressed throughout the CAP as follows:</p> <ul style="list-style-type: none"> <li>• Baseline 2035 transportation emissions are now 456,600 instead of 452,600 MT CO<sub>2</sub>e.</li> <li>• Percentage reduction below 2008 emission levels as measured from 2035 business as usual conditions decreased from 25.9% to 25.2% (which still exceeds the City Council goal of 20 to 25%).</li> </ul> <p>In addition, since office space has a higher job generation rate than gallery space, total jobs were undercounted by 1,243. Thus, the Draft EIR and CAP have been revised to indicate a 2035 jobs estimate of 28,705. This increase in jobs affects the CAP as follows:</p> <ul style="list-style-type: none"> <li>• Baseline 2035 GHG emissions per service population decreases from 9.9 to 9.8 in 2035.</li> </ul>
p. 3-1	The Energy Use and Efficiency Icon shown on this page is

<b>Public Draft CAP Page # or Measure #</b>	<b>Proposed Change</b>
	incorrect and will be replaced with the icon as shown on page 3-25.
p. 3-2, Figure 3-2	Add footnote to read: "Community Engagement and Leadership measures are key to successful implementation of the CAP. Many of these measures cannot be individually quantified for GHG reduction, but are necessary for the implementation of other programs in the CAP."
p. 3-16, Measure T-2.1	Add a new Action F to read: "Review and implement recommendations from the City's Bicycle Task Force, as feasible."
p. 3-38, Measure W-1.1	Correct the target for Performance Indicator (i) to 30% by 2020 and 2035.
p. 3-42, Measure SW-1.2	Add a sentence to the Measure Description: "The City of West Hollywood is an active member of the California Product Stewardship Council, which advocates for shifting our state's product waste management system to a system that relies on producer responsibility in order to reduce public costs and drive further improvements in product design that will promote environmental sustainability."
4-2	Insert a sentence to read: "In addition to full evaluation reports every five years, the Community Development Department will submit annual reports to City Council summarizing progress and milestones in CAP implementation."

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## RESOLUTION NO. PC 10-944

### **A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING THAT THE CITY COUNCIL CERTIFY THE FINAL ENVIRONMENTAL IMPACT REPORT (“EIR”), ADOPT A MITIGATION MONITORING AND REPORTING PROGRAM, AND ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE WEST HOLLYWOOD GENERAL PLAN AND CLIMATE ACTION PLAN, WEST HOLLYWOOD, CALIFORNIA.**

The Planning Commission of the City of West Hollywood hereby resolves as follows:

SECTION 1. On August 20, 2007, the City Council initiated a comprehensive update to the General Plan. This was the first comprehensive update since the adoption of the foundation document in 1988. The three year update process has resulted in preparation of the Public Review Draft General Plan (Draft General Plan), Public Review Draft Climate Action Plan (Draft CAP), and Environmental Impact Report (EIR).

SECTION 2. Notice of the public hearing before the Planning Commission was advertised in the Beverly Press and the West Hollywood Independent on September 2, 2010, and notices were mailed to property owners, residents, and businesses on September 3, 2010. Constituents requesting notification of hearings were also notified by mail on September 3.

SECTION 3. Pursuant to the California Environmental Quality Act (“CEQA”), The City, acting as Lead Agency, circulated a Notice of Preparation (“NOP”) for the project on September 30, 2009, beginning a 30-day review period. As part of the EIR scoping process, the City held a public scoping meeting at the Planning Commission meeting of Thursday, October 15, 2009, at the West Hollywood Park Auditorium. The NOP and letters received in response to the NOP from both public agencies and members of the public are included in Appendix 1.0 of the Draft EIR. The Draft EIR was circulated for a 45-day review period beginning June 25, 2010 and ending on August 9, 2010. The Final EIR was made public on September 9, 2010. All required notifications were provided pursuant to CEQA (Public Resources Code Section 21092.5) and all comment letters were incorporated into the Final EIR.

SECTION 4. In accordance with Public Resources Code Section 21092.5, the City provided written proposed responses to public agencies that commented on the Draft EIR ten (10) days prior to certification of the Final EIR.

SECTION 5. The City prepared the West Hollywood General Plan and Climate Action Plan Program Environmental Impact Report (“EIR”) (State Clearinghouse #2009091124) in its capacity as lead agency under CEQA and in compliance with CEQA. The Final EIR consists of the Initial Study, NOP, Notice of Availability, Draft EIR, Technical Studies, the Responses to Comments, Final Corrections and Additions, Mitigation Monitoring and Reporting Program, and the Findings of Fact for Adoption of a Final EIR for the West Hollywood General Plan, including a Statement of Overriding Considerations. Hereafter, these documents will be referred to collectively as the “Final EIR.” These Findings are based on the entire record before the Planning Commission, including the Final EIR.

SECTION 6. In accordance with CEQA Section 21082.1, the Planning Commission independently reviewed and analyzed the Final EIR and the administrative record relating to the proposed project. The Final EIR constitutes an accurate and complete statement of the environmental impacts of the proposed project. The Final EIR reflects the independent judgment of the Planning Commission and it hereby recommends that the City Council adopt the facts and analysis in the Final EIR and certify the Final EIR. The omission of some detail or aspect of the Final EIR does not mean that it has been rejected by the Planning Commission.

SECTION 7. Pursuant to Section 15091 (a)(1) of the CEQA Guidelines, the Planning Commission finds that changes or alterations have been required in the project that, to the extent feasible, substantially lessen the significant environmental effects identified in the EIR. These changes or alterations are included in the Mitigation Monitoring and Reporting Program (Attachment A). In accordance with Section 15091 (d), and Section 15097 of the CEQA Guidelines, which require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Planning Commission hereby recommends that the City Council adopt the Mitigation Monitoring and Reporting Program incorporated herein as Attachment A.

SECTION 8. The Planning Commission hereby recommends that the City Council makes the findings described in Attachment B (Findings of Fact for Adoption of a Final EIR for the West Hollywood General Plan) and adopts the Statement of Overriding Considerations.

APPROVED BY A MOTION OF THE PLANNING COMMISSION ON THIS 30<sup>TH</sup>  
DAY OF SEPTEMBER, 2010.

\_\_\_\_\_  
CHAIRPERSON

ATTEST:

\_\_\_\_\_  
COMMUNITY DEVELOPMENT DIRECTOR

DRAFT

# ATTACHMENT A

## Mitigation Monitoring and Reporting Program

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action	Implementation Responsibility	Verification Responsibility
<b>3.2-1</b>	<p>The City shall implement the following measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from parking lots and construction sites.</p> <ul style="list-style-type: none"> <li>• Require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM<sub>10</sub>, in accordance with SCAQMD Rule 403: <ul style="list-style-type: none"> <li>○ Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers</li> <li>○ Wheel washers for construction equipment</li> <li>○ Watering down of all construction areas</li> <li>○ Limit speeds at construction sites to 15 miles per hour</li> <li>○ Cover aggregate or similar material during transportation of material</li> </ul> </li> <li>• Adopt incentives, regulations, and/or procedures to reduce paved road dust emissions through targeted street sweeping of roads subject to high traffic levels and silt loadings.</li> </ul>	Ongoing	Community Development Department (Building and Safety)	Community Development Department (Director)
<b>3.2-2</b>	<p>The City shall require each project applicant, as a condition of project approval, to implement the following measures to</p>	Ongoing	Community Development Department (Building)	Building and Safety (Manager/Building Official)



No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p><b>Implementation Time Frame</b>                      Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing: Recurring or continuous action</p>	<p><b>Implementation Responsibility</b></p>	<p><b>Verification Responsibility</b></p>
	<p>reduce exhaust emissions from construction equipment.</p> <ul style="list-style-type: none"> <li>• Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas-powered electric generators and equipment.</li> <li>• Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).</li> <li>• To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions.</li> <li>• On-site equipment shall not be left idling when not in use.</li> <li>• The hours of operation of heavy-duty equipment and/or the amount of equipment in use at any one time shall be limited.</li> <li>• Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors.</li> <li>• Before construction contracts are issued, the project applicants shall perform a review of new technology, in consultation with SCAQMD, as it relates to heavy-duty equipment, to determine what (if any) advances in emissions reductions are available for use and are economically feasible. Construction contract and bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is</li> </ul>		<p>and Safety)</p>	

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing; Recurring or continuous action	Implementation Responsibility	Verification Responsibility
	<p>anticipated that in the near future, both NO<sub>x</sub> and PM<sub>10</sub> control equipment will be available.</p>			
<b>3.2-3</b>	<p>The City shall distribute public information regarding the polluting impacts of two-stroke engines and the common types of machinery with two-stroke engines.</p>	Ongoing	Public Information Department; Public Works Department (Code Compliance)	Public Works Department (Director)
<b>3.2-4</b>	<p>The City shall work with SCAQMD and SCAG to implement the AQMP and meet all federal and state air quality standards for pollutants. The City shall participate in any future amendments and updates to the AQMP. The City shall also implement, review, and interpret the proposed General Plan and future discretionary projects in a manner consistent with the AQMP to meet standards and reduce overall emissions from mobile and stationary sources.</p>	Ongoing	Community Development Department (Planning)	Community Development Department (Director)
<b>3.2-5</b>	<p>The City shall implement the following measures to minimize exposure of sensitive receptors and sites to health risks related to air pollution.</p> <ul style="list-style-type: none"> <li>• Encourage the applicants for sensitive land uses to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts of air pollution on sensitive receptors.</li> <li>• Activities involving idling trucks shall be oriented as far away from and downwind of existing or proposed sensitive receptors as feasible.</li> <li>• Strategies shall be incorporated to reduce the idling time of diesel engines through alternative technologies such as IdleAire, electrification of truck parking, and</li> </ul>	Ongoing	Community Development Department (Planning and Building and Safety)	Community Development Department (Director)

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action	Implementation Responsibility	Verification Responsibility
<b>NOISE</b>	alternative energy sources for TRUs to allow diesel engines to be completely turned off.			
<b>3.9-1</b>	<p>The City shall use the following thresholds and procedures for CEQA analysis of proposed projects, consistent with policies adopted within the General Plan:</p> <ul style="list-style-type: none"> <li>The City shall apply the noise standards specified in Table 10-1 and Table 10-2 of the Safety and Noise Element to proposed projects analyzed under CEQA.</li> <li>In addition to the foregoing, an increase in ambient noise levels is assumed to be a significant noise concern if a proposed project causes ambient noise levels to exceed the following: <ul style="list-style-type: none"> <li>Where the existing ambient noise level is less than 60 dB, a project-related permanent increase in ambient noise levels of 5 dB <math>L_{dn}</math> or greater.</li> <li>Where the existing ambient noise level is greater than 60 dB, a project-related permanent increase in ambient noise levels of 3 dB <math>L_{dn}</math> or greater.</li> <li>A project-related temporary increase in ambient noise levels of 10 dB <math>L_{eq}</math> or greater.</li> </ul> </li> </ul>	Ongoing	Community Development Department (Planning)	Community Development Department (Director)
<b>3.9-2</b>	<p>The City shall require construction contractors to implement the following measures during construction activities through contract provisions and/or conditions of approval as appropriate:</p> <ul style="list-style-type: none"> <li>Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers,</li> </ul>	Ongoing	Community Development Department (Planning and Building and Safety)	Community Development Department (Director)

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p><b>Implementation Time Frame</b>                      Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing: Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
	<ul style="list-style-type: none"> <li>• silencers, wraps, etc).</li> <li>• Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.</li> <li>• Construction operations and related activities associated with the proposed project shall comply with the operational hours outlined in the WHMC Noise Ordinance, or mitigate noise at sensitive land uses to below WHMC standards.</li> <li>• Construction equipment should not be idled for extended periods of time in the vicinity of noise-sensitive receptors.</li> <li>• Locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers). Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment.</li> <li>• Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated STC rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.</li> <li>• Music from a construction site shall not be audible at</li> </ul>			

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p style="text-align: center;"><b>Implementation Time Frame</b></p> <p>Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action</p>	<p style="text-align: center;"><b>Implementation Responsibility</b></p>	<p style="text-align: center;"><b>Verification Responsibility</b></p>
<p><b>3.9-3</b></p>	<p>offsite locations.</p> <p>The City will develop noise impact analysis guidelines that describe the City's desired procedure and format for acoustical studies. Acoustical studies will be required for all discretionary, non-residential projects that will cause future traffic volumes to increase by 25% or more on any roadway in front of or near blocks where the majority land uses are residential or institutions (e.g., schools). The noise analysis guidelines should include the following elements:</p> <ul style="list-style-type: none"> <li>• Be prepared by a qualified person experienced in the fields of environmental noise assessment and architectural acoustics, as determined by the City.</li> <li>• Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and predominant noise sources.</li> <li>• Estimate existing and projected cumulative (20 years) transportation noise levels in terms of Ldn, and compare those noise levels to the adopted standards and policies of the Safety and Noise Chapter.</li> <li>• Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and predominant noise locations.</li> <li>• Recommend appropriate mitigation to achieve the adopted policies of the proposed General Plan Noise Element.</li> <li>• Estimate noise exposure after the prescribed mitigation</li> </ul>	<p>Short</p>	<p>Community Development Department (Planning)</p>	<p>Community Development Department (Director)</p>

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p style="text-align: center;"><b>Implementation Time Frame</b></p> <p>Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing; Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
	<p>measures have been implemented.</p> <ul style="list-style-type: none"> <li>Describe a post-project assessment program that could be used to evaluate the effectiveness of the proposed mitigation measures, as necessary.</li> </ul>			
<b>3-9-4</b>	<p>Revise the City's Noise Ordinance to achieve the following:</p> <ul style="list-style-type: none"> <li>Limit the hours of deliveries to commercial, mixed-use, and industrial uses adjacent to residential and other noise-sensitive land uses.</li> <li>Limit noise levels generated by commercial and industrial uses.</li> <li>Limit the hours of operation for refuse vehicles and parking lot sweepers if their activity results in an excessive noise level that adversely affects adjacent residential uses.</li> <li>Require the placement of loading and unloading areas so that commercial buildings shield nearby residential land uses from noise generated by loading dock and delivery activities. If necessary, additional sound barriers shall be constructed on the commercial sites to protect nearby noise-sensitive uses.</li> <li>Require all commercial heating, ventilation, and air conditioning (HVAC) machinery to be placed within mechanical equipment rooms wherever possible.</li> <li>Require the provision of localized noise barriers or rooftop parapets around HVAC, cooling towers, and mechanical equipment so that line of sight to the noise source from the property line of the noise-sensitive receptors is blocked.</li> </ul>	Short	Community Development Department (Planning); Public Works Department (Code Compliance)	Community Development Department (Director)

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action	Implementation Responsibility	Verification Responsibility
3.9-5	<p>When the City exercises discretionary review, provides financial assistance, or otherwise facilitates residential development within a mixed-use area, provide written warnings to potential residents about noise intrusion and condition of that approval, assistance, or facilitation. The following language is provided as an example:</p> <p>“All potential buyers and/or renters of residential property within mixed-use areas in the City of West Hollywood are hereby notified that they may be subject to audible noise levels generated by business- and entertainment-related operations common to such areas, including amplified sound, music, delivery and passenger vehicles, mechanical noise, pedestrians, and other urban noise sources. Binding arbitration is required for disputes regarding noise in mixed-use buildings that require legal action.”</p>	Ongoing	Community Development Department (Planning)	Community Development Department (Director)
3.9-6	<p>The City shall require future developments to implement the following measures to reduce the potential for human annoyance and architectural/structural damage resulting from elevated groundborne noise and vibration levels.</p> <ul style="list-style-type: none"> <li>• Pile driving within a 50-foot radius of historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers). Specifically, geo pier style cast-in-place systems or equivalent shall be used where feasible as an alternative to impact pile driving to reduce the number and amplitude of impacts required for seating the pile.</li> <li>• The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction</li> </ul>	Ongoing	Community Development Department (Building and Safety)	Community Development Department (Director)

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action	Implementation Responsibility	Verification Responsibility
	<p>activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage will be repaired back to its preexisting condition.</p> <ul style="list-style-type: none"> <li>• Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.</li> <li>• Provide protective coverings or temporary shoring of on-site or adjacent historic features as necessary, in consultation with the Community Development Director or designee.</li> </ul>			
<b>Paleontological Resources</b>				
<b>3.10-1</b>	<p>If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures,</p>	Ongoing	Community Development Department (Planning)	Community Development Department (Director)



No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing; Recurring or continuous action	Implementation Responsibility	Verification Responsibility
<b>PUBLIC SERVICES AND UTILITIES</b>				
3.12-1	<p>Update the City's assessment of the impacts of new development on the level of police and fire services provided to the community following adoption of the General Plan.</p>	Short	Community Development Department (Planning); City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)
3.12.2	<p>During updates to the Capital Improvement Program process, coordinate with service providers to evaluate the level of fire and police service provided to the community. Continue to use state-of-the-art techniques and technology to enhance public safety and assess adequacy and plan for upgrades during updates to the Capital Improvement Program and updates to the City's Operating Budget.</p>	Short; ongoing	Community Development Department (Planning); City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)
3.12-3	<p>Establish a public safety impact fee to fund capital facilities and operations for police and fire protection services.</p>	Short	Community Development Department (Planning); City Manager's Department (Public Safety)	Community Development Department (Director)
3.12-4	<p>Update the West Hollywood Emergency Management Plan as appropriate to reflect current conditions in the city and prepare for expected future growth. The Emergency Management Plan should include plans for police and fire services, vulnerable populations, and sensitive facilities as</p>	Short	City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p> <p>well as plans for the continuity of community following a disaster. The plan should also include potential impacts from global climate change.</p>	<p><b>Implementation Time Frame</b> Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
3.12-5	Continue public education programs to enhance public safety about fire safety and crime prevention as well as emergency preparedness.	Ongoing	City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)
3.12-6	Establish communication forums between police and fire department staff and the community to obtain community feedback regarding service, service needs and, to engage the community in crime prevention.	Short	City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)
3.12-7	Support existing and expand neighborhood watch programs for both residential and commercial areas.	Ongoing	City Manager's Department (Public Safety)	City Manager's Department (Public Safety Manager)
3.12-8	Create design recommendations to minimize the risk of crime by facilitating "eyes on the street" and defensible space concepts, and utilizing best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape.	Medium	Community Development Department (Planning); City Manager's Department (Public Safety)	Community Development Department (Director)
3.12-9	Create an enforcement plan to support the water conservation ordinance.	Short	Public Works Department (Engineering and Code Compliance)	Public Works Department (Director)
3.12-10	Create a master plan for retrofitting municipal facilities and public rights-of-way with fixtures and materials that reduce water consumption.	Short	Human Services Department (Facilities and Landscape Maintenance)	Human Services Department (Director)
3.12-11	Update ordinances to achieve more stringent water	Short	Community Development	Community Development

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing; Recurring or continuous action	Implementation Responsibility	Verification Responsibility
	reduction strategies.		Department (Planning)	Department (Director)
3.12-12	Work with water providers to continue education efforts on water conservation.	Ongoing	Public Works Department (Engineering); Public Information Department	Public Works Department (Director)
3.12-13	Amend Green the Building Ordinance to promote reuse of sump pump water.	Short	Community Development Department (Planning)	Community Development Department (Director)
<b>RECREATION</b>				
3.13-1	Conduct a study to identify current, potential, and new parks and open space opportunities in the City, including both public land and private land that can be purchased for open space. As part of the study, prioritize open space opportunities based on community need. Modify the plan over time as conditions change.	Short, Ongoing	Human Services Department (Facilities and Landscape Maintenance)	Human Services Department (Director)
3.13-2	Review existing and explore new funding mechanisms for acquiring additional park land and open space.	Short	Finance and Technology Department (Revenue Management); Human Services Department (Facilities and Landscape Maintenance)	Finance and Technology Department (Director)
3.13-3	Improve Plummer Park and West Hollywood Park according to their master plans.	Medium	Human Services Department (Facilities and	Human Services Department (Director)

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing; Recurring or continuous action	Implementation Responsibility	Verification Responsibility
3.13-4	Study the feasibility of adopting a parkland dedication ordinance to exact and receive parkland fees from new development that does not include subdivision of land or airspace.	Short	Landscape Maintenance) Community Development Department (Planning); Human Services Department (Facilities and Landscape Maintenance)	Community Development Department (Director)
3.13-5	Implement a Parks Master Plan to guide operations, specific improvements, and expansion of parks and open spaces, including new pocket parks throughout the City.	Medium	Human Services Department (Facilities and Fields Services and Recreation)	Human Services Department (Director)
3.13-6	Establish joint-use agreements with LAUSD to allow neighborhood use of playgrounds as open space.	Medium	Human Services Department (Recreation and Facilities and Fields Services)	Human Services Department (Director)
3.13-7	Create an incentive program for developers that includes pocket parks, increased open space and other new open space as part of programming for new development.	Short	Community Development Department (Planning)	Community Development Department (Director)
<b>TRANSPORTATION AND CIRCULATION</b>				
3.14-1	As increasing traffic volumes warrant, the City shall implement intersection improvements, including: <ul style="list-style-type: none"> <li>Implementing protected-permissive left turn on Fountain Avenue at Fairfax Avenue and striping a right-turn lane on southbound Fairfax Avenue for vehicles turning onto Fountain Avenue.</li> </ul>	Long	Public Works Department (Engineering)	Public Works Department (Director)

No.	MITIGATION MEASURE	Implementation Time Frame Short: 1-2 years Medium: 3-5 years Long: 5+ years Ongoing: Recurring or continuous action	Implementation Responsibility	Verification Responsibility
	<ul style="list-style-type: none"> <li>• Providing an exclusive right-turn lane on southbound Fairfax Avenue for vehicles turning onto Santa Monica Boulevard.</li> <li>• Providing protected-permissive phasing for the eastbound left-turn movement from Santa Monica Boulevard to Gardner Street.</li> <li>• Providing protected-permissive phasing for left-turn movements on San Vicente Boulevard at Beverly Boulevard during the afternoon peak period.</li> </ul>			
<b>3.15-1</b>	<p><b>GLOBAL CLIMATE CHANGE</b></p> <p>To further reduce construction-generated GHG emissions, the project applicant(s) of all project phases shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction.</p> <p>Prior to releasing each request for bid to contractors for the construction of each development phase, the project applicant(s) shall obtain the most current list of GHG reduction measures that are recommended by the City and stipulate that these measures be implemented in the respective request for bid as well as the subsequent construction contract with the selected primary contractor.</p> <p>The project applicant(s) for any particular development phase may submit to the City a report that substantiates why specific measures are considered infeasible for construction of that particular development phase and/or at that point in time. The report, including the substantiation for not implementing particular GHG reduction measures, shall be</p>	Ongoing	Community Development Department (Planning)	Community Development Department (Director)

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p><b>Implementation Time Frame</b>                      Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing: Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
	<p>approved by the City prior to the release of a request for bid by the project applicant(s) for seeking a primary contractor to manage the construction of each development phase. By requiring that the list of feasible measures be established prior to the selection of a primary contractor, this measure requires that the ability of a contractor to effectively implement the selected GHG reduction measures be inherent to the selection process.</p> <p>The City's recommended measures for reducing construction-related GHG emissions at the time of writing this EIR are listed below. The list will be updated as new technologies or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following:</p> <ul style="list-style-type: none"> <li>• Improve fuel efficiency of construction equipment:                             <ul style="list-style-type: none"> <li>○ reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort);</li> <li>○ perform equipment maintenance (inspections, detect failures early, corrections);</li> <li>○ train equipment operators in proper use of equipment;</li> <li>○ use the proper size of equipment for the job; and</li> <li>○ use equipment with new technologies (repowered engines, electric drive trains).</li> </ul> </li> <li>• Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power.</li> <li>• Use an ARB-approved low-carbon fuel, such as biodiesel</li> </ul>			

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p><b>Implementation Time Frame</b>                      Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing; Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
	<p>or renewable diesel for construction equipment. (emissions of oxides of nitrogen [NO<sub>x</sub>] from the use of low carbon fuel must be reviewed and increases mitigated.) Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program (ARB 2010g).</p> <ul style="list-style-type: none"> <li>• Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes.</li> <li>• Reduce electricity use in the construction office by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.</li> <li>• Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75% by weight).</li> <li>• Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials).</li> <li>• Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option.</li> <li>• Produce concrete on-site if determined to be less emissive than transporting ready mix.</li> <li>• Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from ARB's Heavy-Duty Vehicle Greenhouse Gas Measure (ARB 2010h) and EPA (EPA 2010f).</li> </ul>			

No.	<p style="text-align: center;"><b>MITIGATION MEASURE</b></p>	<p><b>Implementation Time Frame</b>                      Short: 1-2 years                      Medium: 3-5 years                      Long: 5+ years                      Ongoing: Recurring or continuous action</p>	Implementation Responsibility	Verification Responsibility
	<ul style="list-style-type: none"> <li>Develop a plan to efficiently use water for adequate dust control. This may consist of the use of nonpotable water from a local source.</li> </ul>			

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# **ATTACHMENT B**

**Findings of Fact for Adoption of a  
Final Environmental Impact Report  
For the  
West Hollywood General Plan**

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# CHAPTER 1 INTRODUCTION

## 1.1 INTRODUCTION

The City of West Hollywood has prepared the West Hollywood General Plan and associated Climate Action Plan (the Project) and has evaluated the environmental impacts of implementation of the Project by preparing a Program Environmental Impact Report (EIR) (State Clearinghouse Number 2009091124). The Program EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Administrative Code Section 15000 et seq., as amended). The findings discussed in this document are made relative to the conclusions of the Program EIR.

Public Resources Code section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The same statute states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles announced in Public Resources Code Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The three possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects as identified in the environmental impact report.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can and should be, adopted by that other agency.

## 1.0 Introduction

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- (3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Public Resources Code Section 21081, subd (a); see also CEQA Guidelines Sections 15091, subd. (a) .)

Public Resources Code section 21061.1 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.” CEQA Guidelines section 15364 adds another factor: “legal” considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d 553, 565).

The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*)). “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*Ibid.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (*Sequoyah Hills*)).

For the purposes of these Findings, the term “avoid” refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term “substantially lessen” refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less than significant level. These interpretations appear to be mandated by the holding in *Laurel Hills Homeowners Assn v. City Council*, 83 Cal.App.3d 515, 519-527, 147 Cal.Rptr. 842 (1978), in which the Court of Appeals held that an agency had satisfied its obligation to substantially lessen or avoid significant effects by adopting numerous mitigation measures, not all of which rendered the significant impacts in question (e.g., the “loss of biological resources”) less than significant.

Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is “avoid[ed] *or* substantially lessen[ed],” these Findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less than significant level, or has simply been substantially lessened but remains significant.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found

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that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (California, Code Regs. tit. 14 § 15093, 15043(b); see also Pub. Res. Code § 21081(b).)

Because the Program EIR identified significant effects that may occur as a result of the Project, and in accordance with the provisions of the Guidelines presented above, the City of West Hollywood hereby adopts these findings set forth in this document as part of the approval of the West Hollywood General Plan. These findings constitute the City's best efforts to set forth the evidentiary and policy bases for its decision to approve the General Plan in a manner consistent with the requirements of CEQA. These findings, in other words, are not solely informational, but rather constitute a binding set of obligations that come into effect with the City's approval of the project.

## 1.2 ORGANIZATION OF CEQA FINDINGS OF FACT

The content and format of this CEQA Findings of Fact is designed to meet the latest CEQA statutes and Guidelines. The Findings of Fact is organized into the following sections:

**Chapter 1, Introduction** outlines the organization of this document and identifies the location and custodian of the record of proceedings.

**Chapter 2, Project Description** describes the location, overview, objectives, and the required permits and approvals for the Proposed Project.

**Chapter 3, CEQA Review and Public Participation** describes the steps the City has undertaken to comply with the CEQA Guidelines as they relate to public input, review, and participation during the preparation of the Draft and Final EIRs.

**Chapter 4, Less Than Significant Environmental Effects without Mitigation** provides a summary of impacts determined to be below the threshold of significance without the incorporation of mitigation measures.

**Chapter 5, Less Than Significant Environmental Effects with Mitigation** provides a summary of potentially significant environmental effects for which implementation of identified feasible mitigation measures would avoid or substantially reduce the environmental effects to less than significant levels.

**Chapter 6, Significant Environmental Effects** provides a summary of potentially significant environmental effects for which no feasible mitigation measures are identified or for which implementation of identified feasible mitigation measures would not avoid or substantially reduce the environmental effects to less than significant levels.

**Chapter 7, Findings Regarding Project Alternatives** provides a summary of the alternatives considered for the Proposed Project.

## 1.0 Introduction

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**Chapter 8, Statement of Overriding Considerations** provides a summary of all of the project's significant unavoidable adverse impacts. In addition, this section identifies the project's substantial benefits that outweigh and override the project's significant unavoidable impacts, such that the impacts are considered acceptable.

**Chapter 9, Findings Regarding Changes to the Draft EIR and Recirculation** provides a summary of the changes to the Draft EIR in response to public comments received and findings that changes to the Draft EIR does not require recirculation of the Draft EIR for public review.

### **1.3 RECORD OF PROCEEDINGS**

The documents and other materials that constitute the record of proceedings upon which City project approval is based are located at 8300 Santa Monica Boulevard, West Hollywood. The West Hollywood Community Development Department is the custodian of such documents and other materials that constitute the record of proceedings. The record of proceedings is provided in compliance with Public Resources Code Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

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## 1.0 Introduction

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## **CHAPTER 2 PROJECT DESCRIPTION**

### **2.1 ENVIRONMENTAL SETTING**

West Hollywood is located in western Los Angeles County, about 8 miles northwest of downtown Los Angeles. West Hollywood is within a highly urbanized area of greater Los Angeles region and is entirely built out.

The City of Los Angeles surrounds West Hollywood to the north, south and east. To the west, the City is bounded by the City of Beverly Hills.

West Hollywood lies at the base of the Hollywood Hills. Major east-west roadways are Santa Monica Boulevard, Sunset Boulevard, and to a lesser extent Melrose Avenue and Beverly Boulevard. No freeways directly access the City, with the nearest freeway, State Route 101, located over 2 miles to the east and accessed via either Santa Monica Boulevard in Los Angeles or Highland Avenue near the Hollywood Bowl. The City is served by major bus lines operated by the Metropolitan Transit Authority of Los Angeles County (Metro). Metro operates Metro local and Metro rapid buses through West Hollywood. The Metro lines provide connections throughout the Los Angeles basin. West Hollywood also operates its own bus system, the Cityline bus system.

The City of West Hollywood is 1.9 square miles in size and approximately 1,216 acres, and supports a population of approximately 37,348 people as of 2008. The planning area for West Hollywood consists solely of areas within the City limits and is identical to the City's jurisdictional boundary. Since all land surrounding West Hollywood is under the jurisdiction of other cities, the City does not have a sphere of influence or any planning authority outside of its jurisdictional boundaries.

### **2.2 PROJECT CHARACTERISTICS**

The proposed project analyzed in the Program EIR is the adoption and implementation of the West Hollywood General Plan and associated CAP. References to the proposed General Plan within this document include analysis of the CAP.

#### **2.2.1 GENERAL PLAN**

The West Hollywood General Plan serves as a blueprint or policy guide for determining the appropriate physical development and character of the City and establishes an overall development capacity. As a blueprint for the future, the plan contains policies and programs designed to provide decision makers with a solid basis for decisions related to land use and development as well as other topics. These policies and programs are contained within the chapters of the General Plan.

## 2.0 Project Description

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Per the California Government Code, seven topics are mandatory for the General Plan: Land Use; Circulation; Housing; Conservation; Open Space; Noise; and Safety. The West Hollywood General Plan addresses these mandatory topics. Additionally, the General Plan addresses nonmandatory topics such as governance, economic development, infrastructure, social services, arts and culture, and schools/education. The West Hollywood General Plan is organized into 12 chapters or elements.

### **GENERAL PLAN ELEMENTS**

#### **Land Use and Urban Form**

The Land Use and Urban Form chapter of the General Plan describes the economic, physical, and cultural aspects of West Hollywood. Determining the general permitted uses, future location, type, intensity, and character of new development and redevelopment projects, and establishing the desired mix and relationship between such projects are the primary objectives of the chapter.

The goals and policies contained in this chapter are designed to maintain and enhance the quality of existing residential neighborhoods; provide adequate housing to meet the diverse needs of the community; promote and facilitate environmental sustainability; facilitate development and public improvements that foster economic growth; and support and enhance the City's unique image.

The urban form portion of this chapter addresses the physical aspects of West Hollywood that contribute to the image and character of the built environment. Topics and associated goals and policies addressed in this portion of the chapter include urban form and pattern, urban design, creating more public spaces; and enhancing streetscapes and landscaping. This chapter also contains a discussion of signage and associated signage goals and policies.

The land use designations outlined in the Land Use and Urban Form chapter of the General Plan identify the types and nature of development permitted throughout West Hollywood. The proposed land use designations are specifically designed to implement the vision established for West Hollywood. This chapter establishes 21 land use designations; 16 of which are identical to existing zoning designations, but will result in a change in nomenclature, but no change to development standards, from the existing General Plan designations.

All residential and commercial General Plan land use designations establish a permitted density or intensity of development. Residential density is expressed as dwelling units allowed per lot area, except for residential uses in commercial areas. The density of residential uses located in commercial areas is expressed through floor area ratio (FAR), which is a measure of the total building floor area allowed divided by the total lot area. The intensity of commercial development allowed is also determined through FAR.



Each General Plan land use designation in the proposed General Plan establishes a maximum density or intensity of allowed development. The development that actually occurs is influenced by the physical characteristics of a parcel, access and infrastructure issues, and compatibility considerations, among other factors. Based on market factors and past development trends in the City, actual development intensities are expected to be lower than the maximum allowed by the proposed land use designations.

Therefore, the growth projections for West Hollywood are based on expected levels of density and intensity, not the maximum allowed by the General Plan land use designations. The City anticipates most development will occur at or below these expected development factors, although on any single property, development up to the maximum is allowed.

Table 2-4 compares the expected development capacity resulting from long-term implementation of General Plan policy to existing land use conditions.

Expected buildout of land uses by 2035 pursuant to the proposed General Plan could result in an increase of 4,274 dwelling units and approximately 2,613,128 square feet of nonresidential building floor area over existing conditions. Based on a population of 1.6 persons per household, an increase of approximately 6,834 persons in West Hollywood could occur by 2035.

**Table 2-1. West Hollywood Development Capacity 2035**

Land Use Category	Units	Existing	Expected Buildout 2035	Anticipated Net Change by 2035
<b>Residential</b>				
Single-family	du	1,019	1,003	-16
Multi-family	du	23,554	27,844	4,290
<b>Total Residential</b>	<b>du</b>	<b>24,573</b>	<b>28,847</b>	<b>4,274</b>
<b>Nonresidential</b>				
Commercial and Retail	sf	4,729,616	5,594,770	865,154
Hotel	sf	1,506,422	2,257,673	751,251
Office	sf	3,691,031	4,573,105	882,074
Industrial	sf	104,300	102,635	-1,665
Subtotal – Commercial and Retail, Hotel, Office, Industrial	sf	10,031,369	12,528,183	2,496,814
<b>Public/Institutional/Civic</b>	sf	1,002,913	1,027,415	24,502
<b>Human Services</b>				
Library/Museum/Senior Center/ Other Recreational	sf	302,449	394,262	91,812
<b>Total Nonresidential</b>	<b>sf</b>	<b>11,336,731</b>	<b>13,949,860</b>	<b>2,613,128</b>

du = dwelling unit; sf = square feet

Notes: Existing conditions are based on 2008 land use survey

## 2.0 Project Description

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Future development potential in West Hollywood primarily exists within five commercial subareas and in other limited locations throughout the City where existing development has not reached the development potential allowed by existing General Plan designations. Most of the City is not anticipated to experience land use change as a result of the General Plan update.

Future development within the City will primarily take the form of redevelopment and infill development focused in the five commercial subareas shown in Figure 2-3 of the Program EIR. The commercial subareas include Melrose/Beverly District; Santa Monica Boulevard West; Santa Monica/Fairfax Transit District; Santa Monica/La Brea Transit District; and Sunset Strip. The commercial subareas are districts along the City's major commercial corridors for which cohesive visions have been developed. The subareas, each of which represents one of the City's key commercial districts, have distinct identities based on factors such as business type, land use, culture, pedestrian activity, and more.

The commercial subareas include areas within the City adjacent to existing or planned transit services, areas with underutilized commercial properties, areas ripe for redevelopment, and/or areas experiencing current interest for future commercial or mixed-use development. These sites also offer the best potential for fulfilling the community's vision for its commercial districts, and for carrying out the 10 guiding principles developed to steer the direction of the General Plan (the project objectives). For example, by focusing development potential in commercial areas, the General Plan intends to reduce development pressure in residential neighborhoods, in keeping with the guiding principle regarding Neighborhood Character.

In some of the commercial subareas, increases in allowable height and FAR are proposed while in other areas no increases are proposed but additional policy incentives (such as shared parking and parking districts) are expected to spur additional development and enhance existing businesses. Each commercial subarea has unique future development objectives established through a unique vision for each subarea.

### **Historic Preservation**

This chapter of the General Plan provides the City's approach to preserving and protecting its unique cultural resources and encouraging the maintenance, rehabilitation, and reuse of existing structures.

### **Economic Development**

This chapter of the General Plan describes the existing conditions, key issues, and long-term strategies related to economic development in West Hollywood. This chapter addresses both the economic and fiscal health of West Hollywood. The economy of West Hollywood is diverse and is centered on the hospitality, entertainment, retail, and art and design industries.

### **Mobility**

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

### **Human Services**

The Human Services chapter of the General Plan addresses the social services and social services delivery system in the City. Topics addressed include arts and culture programs, social services and programs, and education.

The provision of public and private school education within West Hollywood is addressed in this chapter. Population groups that are fundamental parts of the City’s identity are also discussed in the Human Services Chapter, including:

- ▶ People living with HIV/AIDS,
- ▶ Families with children,
- ▶ Seniors,
- ▶ People living with disabilities,
- ▶ Gay, lesbian, bisexual, and transgender community members,
- ▶ Russian-speaking immigrants, and
- ▶ People who are homeless.

### **Parks and Services**

This chapter of the General Plan discusses the management of existing and expansion of the City’s parks and other community facilities. Accessible, well-maintained parks, open space, public facilities, and recreational programs are a critical amenity for an urban city like West Hollywood. They help create community and make the City more livable and attractive, provide a place of relaxation and relief from the urban environment, encourage physical activity and health, provide a forum for community gathering and interaction, and reduce urban heat islands. Many urban areas—including West Hollywood—have

## 2.0 Project Description

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both high demand for public spaces and limited options for providing them. This puts these elements at a premium and reinforces their importance for the overall success and health of the City.

### **Infrastructure, Resources, and Conservation**

This chapter of the General Plan describes the City's management and provision of infrastructure resources in a sustainable manner. It covers topics such as water infrastructure and conservation, energy conservation, climate change, storm water, and management of the streets and other public and private infrastructure necessary for a high-quality urban development.

### **Safety and Noise**

The purpose of the Safety and Noise chapter of the General Plan is to identify and address those features existing in or near the City that represent a potential danger to the citizens, structures, public facilities, and infrastructure located in West Hollywood. The Health and Safety chapter establishes goals and policies to minimize dangers to residents, workers, and visitors, by addressing police and fire services, emergency management, and noise.

### **Housing**

The Housing chapter of the General Plan identifies the current and future housing needs within West Hollywood. This chapter includes a comprehensive discussion of the community's profile, including population, employment, household, and housing stock characteristics. This chapter also identifies sites within the City suitable for housing development and addresses the constraints associated with housing production in the City. This chapter also discusses the provision of additional affordable housing, strategies to protect vulnerable populations from being displaced by increased housing costs, and opportunities to enter a high-cost market. Equal housing opportunities and policies for the implementation and monitoring of the housing plans set forth in this chapter are also discussed in detail.

### **Implementation**

The General Plan includes an Implementation chapter that serves to ensure the overall direction provided in each General Plan element is translated from general terms to specific actions. The Implementation chapter provides strategies to implement the adopted policies and plans identified in each of the General Plan elements. The various programs within the Implementation chapter serve as a basis for making future programming decisions related to the assignment of staff and the expenditure of City funds. The programs specifically identify individual program responsibility, funding sources, and time-frame for completion.

## **2.2.2 CLIMATE ACTION PLAN**

Adopted concurrently with the General Plan, the CAP is an implementing action of the General Plan that describes measures intended to reduce GHG emissions within City operations and the community at-large and assist in the fight against climate change. Overall, the goal of the CAP is to reduce West Hollywood's community-wide GHG emissions by 20 to 25% below current emission levels by the year 2035. The CAP provides general information about climate change and how GHG emissions within the community contribute to it, as well as an analysis of the potential effects of climate change on the community. In addition, the CAP describes the baseline GHG emissions produced in West Hollywood, and projects GHG emissions that could be expected if the CAP was not implemented. The CAP establishes a comprehensive, community-wide GHG emissions reduction strategy for West Hollywood with regard to seven elements: (a) community leadership and engagement, (b) land use and community design, (c) transportation and mobility, (d) energy use and efficiency, (e) water use and efficiency, (f) waste reduction and recycling, and (g) green space and open space. The CAP defines community strategies and GHG reduction measures through text and maps and recommends implementation actions for each quantified GHG reduction measure. The recommended actions serve as the basis for future programming decisions subject to the availability of staff and funding.

## **2.3 PROJECT OBJECTIVES**

As a result of the community input received through the extensive public outreach process, 10 guiding principles were developed to steer the direction of the General Plan. These guiding principles below comprise the project objectives for the West Hollywood General Plan:

**QUALITY OF LIFE:** Maintain the high quality of life enjoyed by West Hollywood residents.

**DIVERSITY:** Value the social, economic and cultural diversity of our people, and work to protect people who are vulnerable.

**HOUSING:** Continuously protect and enhance affordable housing, and support Rent Stabilization laws. Recognize the need for preserving our housing stock as well as understand the need to positively shape new construction to meet our future housing needs. Support diverse income levels in new housing development.

**NEIGHBORHOOD CHARACTER:** Recognize the need to maintain and enhance the quality of life in our residential neighborhoods. Investigate standards to ensure buildings enhance the City's eclectic neighborhoods. Emphasize opportunities to meet housing needs and economic development goals along the commercial boulevards.

**ECONOMIC DEVELOPMENT:** Support an environment where our diverse and eclectic businesses can flourish. Recognize that economic development supports public services, provides benefits associated with the City's core values, and adds character to our community.

## 2.0 Project Description

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**ENVIRONMENT:** Support innovative programs and policies for environmental sustainability to ensure health, and proactively manage resources. Provide leadership to inspire others outside City limits.

**TRAFFIC AND PARKING:** Recognize that automobile traffic and parking are key concerns in our community. Strive to reduce our dependence on the automobile while increasing other options for movement such as walking, public transportation, shuttles, cars, and bicycles within our borders and beyond. Continue to investigate innovative shared parking solutions.

**GREENING:** Seek new areas to increase park space and landscape areas in our streets, sidewalks, and open areas to create space for social interaction and public life.

**ARTS AND CULTURE:** Enhance the cultural and creative life of the community. Continue to expand cultural and arts programming including visual and performing arts, and cultural and special events.

**SAFETY:** Protect the personal safety of people who live, work and play in West Hollywood. Recognize the challenges of public safety within a vibrant and inclusive environment.

As environmental concerns have grown increasingly urgent, West Hollywood residents, employees and elected officials have in turn expressed a strong desire for the City to take even more aggressive action to do its part to reduce its ecological footprint and remain a national leader in environmental and social initiatives. Furthering the 10 guiding principles of the General Plan, particularly the guiding principle on Environment, project objectives have also been developed for the CAP.

The project objectives for the CAP are:

- ▶ Adopt a Climate Action Plan that will comply with and implement State law, advance Citywide sustainability, and reflect community values.
- ▶ Place the City on a path to reduce annual community-wide GHG emissions by 20% to 25% below current emission levels by 2035.
- ▶ Provide clear guidance to City staff and decision makers regarding when and how to implement key actions to reduce GHG emissions.
- ▶ Inspire residents and businesses to participate in community efforts to reduce GHG emissions.

## 2.5 DISCRETIONARY ACTIONS

For the purposes of CEQA, the project is the City's discretionary approval of the West Hollywood General Plan and the associated CAP. The City would review subsequent implementation projects for

consistency with the Program EIR and prepare appropriate environmental documentation pursuant to CEQA provisions for Program EIRs and subsequent projects. Subsequent discretionary actions under the West Hollywood General Plan Program EIR may include the following implementation activities:

- ▶ Zoning text amendments
- ▶ Rezoning of properties
- ▶ Approval of specific plans
- ▶ Approval of development plans, including tentative maps, variances, conditional use permits, and other land use permits
- ▶ Approval of development agreements
- ▶ Approval of facility and service master plans and financing plans
- ▶ Approval and funding of public improvements projects
- ▶ Approval of resource management plans
- ▶ Issuance of municipal bonds
- ▶ Issuance of permits and other approvals necessary for implementation of the General Plan
- ▶ Acquisition of property by purchase or eminent domain
- ▶ Transfer or sale of property
- ▶ Issuance of permits and other approvals necessary for public and private development projects

## CHAPTER 3 CEQA REVIEW AND PUBLIC PARTICIPATION

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum.

**Notice of Preparation.** In compliance with Public Resources Code section 21092, the City published a Notice of Preparation (NOP), which was sent to responsible agencies and interested individuals for a 30-day review period from September 30, 2009 to October 29, 2009. The NOP, identifying the scope of environmental issues, was distributed to organizations, interested parties, and state, federal, and local agencies. The NOP and the responses to the NOP from agencies and individuals are included in Appendix A to the Draft EIR. A total of 11 comment letters were received. Information requested and input provided during the 30-day NOP comment period regarding the scope of the EIR are included in the EIR.

**Public Scoping Meeting.** A Public Scoping Meeting was held on October 15, 2009 at the West Hollywood Park Auditorium to give the public the opportunity to provide comments as related to the West Hollywood General Plan and the issues the public would like addressed in the EIR.

**Draft EIR.** The Draft EIR was distributed for public review on June 25, 2010, for the 45-day review period with the comment period expiring on August 9, 2010. 63 comment letters were received at the close of the public comment period. The specific and general responses to comments are in Appendix H of the Final EIR. Responses to public agency comments were distributed to those public agencies on September 9, 2010.

A Notice of Availability (NOA) was distributed to over 29 interested parties and agencies, as well as mailed to all West Hollywood residents, businesses, and property owners, which informed them of where they could view the document and how to comment. The Draft EIR document was available to the public at the City Hall Planning Counter, City Clerk's Office, and the West Hollywood Library. A copy of the document was also posted online at [www.weho.org](http://www.weho.org). Notices were filed with the County Clerk on June 25, 2010.

**Notice of Completion.** A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse on June 24, 2010.

**Final EIR.** The Final EIR was distributed on September 9, 2010. The Final Program EIR has been prepared by the City in accordance with CEQA, as amended, and State Guidelines for the implementation of CEQA. The Final EIR is a Program EIR prepared in accordance with CEQA Guidelines Section 15168(a). The City has relied on Section 15084(d)(2) of the CEQA Guidelines, which allows contracting with another entity, public or private, to prepare the Draft EIR. The City has reviewed drafts of all



### 3.0 CEQA Review and Public Participation

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portions of the Program EIR and subjected them to its own review and analysis. The Draft EIR which was released for public review reflected the independent judgment of the City.

**Certification.** On September 18 and 25, 2010, the City Council will hold a public hearing on the City of West Hollywood General Plan Program EIR and certify the Final Program EIR.

DRAFT

## **CHAPTER 4**

# **LESS THAN SIGNIFICANT ENVIRONMENTAL EFFECTS WITHOUT MITIGATION**

Effects of the project found to be less than significant in the Program EIR, and which require no mitigation, are identified in the discussion below. The impact area and the appropriate section number follow the impact titling and follow the numbering conventions used in the FEIR. The City has reviewed the record and agrees with the conclusion that the following impacts would not be significantly affected by the project, and therefore no additional findings are needed.

### **4.1 AESTHETICS**

The Final EIR discussed the effects related to aesthetics in Section 3.1.

#### **Scenic Vistas**

Future development in some areas of West Hollywood could result in taller structures than would be permitted with current floor area ratios (FAR); these structures could block or obscure an existing scenic view. However, the Sunset Specific Plan, City Code requirements, and development standards would impose conditions upon new development, requiring view preservation, as well as enhancement of the surrounding streetscape and limiting adverse visual impacts on adjacent uses. Therefore, program-level impacts would be less than significant. No mitigation is required.

#### **Scenic Resources within a State Scenic Highway**

There are currently no designated state scenic highways or eligible state scenic highways in the City of West Hollywood. Therefore, no impact would occur with implementation of the proposed General Plan. No mitigation is required.

#### **Visual Character**

Future development occurring as a result of the land uses permitted by the General Plan update would be subject to subsequent environmental and design review, which would include analysis of visual impacts. The General Plan includes policies regarding aesthetic improvements such as landscaping, pedestrian amenities, and design standards for architecture and lighting. Not only would new development be required to conform to General Plan standards, such development would also be subject to existing building and development standards specified in the City's Zoning Code. Therefore, although the visual

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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character could change as development intensity increases, the impact to visual quality would be less than significant. No mitigation is required.

#### **Light, Glare and Signage**

New infill development pursuant to the General Plan land use and urban form policies may increase the amount of light and glare in the community. Nonresidential uses in particular have the greatest potential to increase light and glare effects. Most of the new development made possible by the land uses proposed in the General Plan would be located in areas that commonly experience at least minimal impacts from existing light sources. While adjacent residential areas are already impacted by light and glare from commercial sources, more intense uses, especially if they result in increases in building heights adjacent to residential uses, could intensify existing, potentially adverse light and glare impacts. Additionally, the iconic signage in West Hollywood consisting of billboards, large screen videos, and tall walls, particularly on Sunset Boulevard, also has the potential to contribute to light and glare impacts in the City. However, the proposed General Plan does not propose an increase in the size, location, or amount of signage allowed compared with existing conditions.

All new development, including signage, will be required to comply with the regulations, development standards, and design guidelines in the City's Zoning Code and all development will be reviewed through the design review process to make sure that individual development projects do not include materials that would create adverse glare effects. No light-sensitive uses, such as an observatory, are located in or near the City. Thus, continued application of standard review processes will reduce light and glare impacts to a less-than-significant level. No mitigation is required.

#### **Shade or Shadow**

Future development in some of the commercial subareas pursuant to the General Plan could result in taller structures than would be permitted with current FARs by at least 10 feet or one story. As a built-out urban environment, new development would be located in areas that already experience at least minimal impacts from shade and shadow. The increase in mass and height could intensify existing, potentially adverse shade and shadow impacts. However, as shade and/or shadow impacts are related to specific building design, the level of impacts would be determined at the project level. At the program level of analysis, impacts will be less than significant. No mitigation is required.

### **4.1.1 FINDINGS**

Based on the EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant aesthetics impacts relating to scenic vistas; scenic resources; visual character; light, glare, and signage; and shade and shadow.

## **4.2 AIR QUALITY**

The Final EIR discussed the effects related to air quality in Section 3.2.

### **Toxic Air Contaminants (TAC) – Construction-Related Emissions**

Construction-related activities pursuant to the General Plan would result in short-term emissions of diesel Particulate Matter (PM) from the exhaust of off-road heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing); paving; application of architectural coatings; and other miscellaneous activities. Because the use of off-road heavy-duty diesel equipment would be temporary and diesel PM is expected to disperse quickly, reductions in exhaust emissions would occur pursuant to emission reduction standards being implemented, and construction-related activities would not be expected to expose sensitive receptors to substantial emissions of TACs. As a result, this impact would be less than significant. No mitigation is required.

### **Toxic Air Contaminants – Operational Emissions – Stationary Sources**

The proposed General Plan anticipates construction of commercial land uses that may potentially include stationary sources of TACs, such as hospitals, dry-cleaning establishments, restaurants operating large grills, gasoline-dispensing facilities, and diesel-fueled backup generators. These types of stationary sources, in addition to any other stationary sources that may emit TACs, would be subject to SCAQMD's rules and regulations. If it is determined that the sources would emit TACs in excess of SCAQMD's applicable significance threshold, maximum or best available control technology would be implemented to reduce emissions. As a result, given compliance with applicable rules and regulations, operation of stationary sources would not result in the exposure of sensitive receptors to TACs at levels exceeding SCAQMD's significance thresholds, and this impact would be less than significant. No mitigation is required.

### **Toxic Air Contaminants – Operational Emissions – On-Road Mobile Sources**

Sensitive receptors pursuant to implementation of the General Plan could be sited within 500 feet of major roadways in the City. However, the average daily traffic (ADT) on these roadways would be less than the Air Resources Board recommendation of 100,000 vehicles per day in future (2035) conditions with the project. Therefore, risk associated with implementation of the proposed General Plan would not exceed ARB's recommendation. Thus, this impact would be less than significant. No mitigation is required.

### **Local CO Hotspots**

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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Due to stricter vehicle emissions, future CO emission factors under future buildout conditions (year 2035) would be substantially lower than those under existing conditions. Thus, even though there would be more vehicle trips under the proposed General Plan at buildout than under existing conditions, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the 1-hour or 8-hour ambient air quality standards for CO. As a result, this impact would be less than significant. No mitigation is required.

#### **Objectionable Odors**

There are no major sources of odor in the City and the proposed General Plan does not propose the development of any major odor sources. Therefore, land use conflicts between major odor sources and sensitive receptors are not expected to occur. Minor sources of odors associated with the proposed General Plan would be associated with the construction of the proposed land uses. Odors generated during project construction would be temporary and disperse rapidly with distance from the source. Therefore, impacts related to objectionable odors would be less than significant. No mitigation is required.

#### **4.2.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant air quality impacts relating to TACs – Construction-Related Emissions; TACs – Operational Emissions – Stationary Sources; TACs – Operational Emissions – On-Road Mobile Sources; Local CO Hotspots; and objectionable odors;.

#### **4.3 BIOLOGICAL RESOURCES**

The Final EIR discussed the effects related to biological resources in Section 3.3.

#### **Sensitive Species**

As a built urban environment, West Hollywood does not support sensitive vegetation or wildlife habitat. Lacking these resources, no impacts to biological resources as a result of the goals, policies, and objectives of the General Plan will occur. Therefore, no impact would occur. No mitigation is required.

#### **Riparian Habitat or Other Sensitive Habitats**

There are no riparian or sensitive habitats that are known to occur in the City of West Hollywood. Lacking these resources, no impacts to such biological resources as a result of the goals, policies, and objectives of the General Plan will occur. Therefore, no impact would occur. No mitigation is required.

### **Wetlands**

Based on the Beverly Hills and Hollywood USGS 7.5-minute series Quadrangle Topographic maps, the City does not contain any blue-line streams. Lacking these resources within City limits, no impacts to biological resources as a result of the goals, policies, and objectives of the General Plan will occur. Therefore, no impact would occur. No mitigation is required.

### **Movement of Wildlife Species**

While some local movement of wildlife can be expected to occur throughout the City, the City of West Hollywood is not recognized as an existing or proposed Significant Ecological Area that links migratory wildlife populations, as designated by the County of Los Angeles. Additionally, land use changes under the proposed General Plan would occur primarily on developed land that does not currently allow overland wildlife movement. Therefore, no impact would occur. No mitigation is required.

### **Conflict with Any Local Policies or Ordinances Protecting Biological Resources**

Implementation of the proposed General Plan would be subject to all applicable federal, state, regional, and local policies and regulations related to the protection of important biological resources. With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations, program-level impacts related to conflicts with adopted plans or ordinances for biological resources would be less than significant. No mitigation is required.

### **Habitat Conservation Plan/Natural Community Conservation Plan**

There is no habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plans that applies to the City. Therefore, the proposed General Plan would have no impact on conflicts with habitat conservation or other habitat plans. No mitigation is required.

## **4.3.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant biological resource impacts relating to sensitive species; riparian or habitat or other sensitive species; wetlands; movement of wildlife species; conflict with any local policies or ordinances protecting biological resources; habitat conservation plan/natural community conservation plan.

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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## 4.4 CULTURAL RESOURCES

The Final EIR discussed the effects related to cultural resources in Section 3.4.

### Historical Resources

Development pursuant to implementation of the proposed General Plan could impact designated historic resources. Actions that could directly affect historical structures include demolition, seismic retrofitting, and accidents or vibration caused by nearby construction activities. However, policies in the proposed General Plan include a variety of actions aimed at protecting historic resources. With adherence to and implementation of regulations, and proposed General Plan policies, program-level historical resources impacts would be less than significant. No mitigation is required.

### Archaeological Resources and Human Remains

Development pursuant to implementation of the proposed General Plan would involve excavation and earth-moving activities which could impact previously unidentified archaeological resources or human remains. However, policies in the proposed General Plan include a variety of actions aimed at protecting archaeological and cultural resources. With adherence to and implementation of regulations, and proposed General Plan policies, program-level archaeological resource impacts and human remains impacts would be less than significant. No mitigation is required.

#### 4.4.1 FINDINGS

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant cultural resource impacts relating to historical resources; and archaeological resources and human remains.

## 4.5 GEOLOGY, SOILS, AND MINERAL RESOURCES

The Final EIR discussed the effects related to geology, soils, and mineral resources in Section 3.5.

### Fault Rupture

Future development in West Hollywood pursuant to implementation of the General Plan would occur through infill and redevelopment activities primarily in five commercial subareas. Any future development that could occur on or near known faults under the proposed General Plan would be required to comply with the requirements of the City's fault precaution zones. The City also requires that structures or habitable buildings must be a minimum of 50 feet from the fault, measured between the closest portion of the fault to the closest edge of the structure or building foundation. With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of

existing federal, state, and local laws and regulations concerning seismic safety, program-level impacts related to fault rupture would be less than significant. No mitigation is required.

### **Ground Shaking**

Future development allowed under the General Plan would expose additional people and structures to hazards related to seismic ground shaking. However, policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from seismic hazards. With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety, program-level impacts related to seismic ground shaking would be less than significant. No mitigation is required.

### **Liquefaction and Ground Failure**

Future development allowed under the General Plan would expose additional people and structures to hazards related to liquefaction and ground failure. However, policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from seismic hazards.

With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic, program-level impacts related to liquefaction and ground failure would be less than significant. No mitigation is required.

### **Earthquake-Induced Landslides**

Future development allowed under the General Plan could expose additional people and structures to hazards related to landslides. However, policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from seismic hazards.

With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety, program-level impacts related to landsliding and slope failure would be less than significant. No mitigation is required.

### **Soil Erosion or Loss of Topsoil**

Future development in the City of West Hollywood pursuant to implementation of the General Plan would occur through infill and redevelopment activities primarily in five commercial subareas. Construction in these areas could expose soil to erosion from wind and stormwater runoff associated with development activities. However, policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from natural hazards, including seismic and soil hazards. Adherence to



#### 4.0 Less Than Significant Environmental Effects without Mitigation

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federal, state, and local regulations and adherence to policies in the proposed General Plan will reduce the effects of erosion to a less-than-significant level. No mitigation is required.

#### **Soil Hazards: Landslides, Subsidence, Lateral Spreading, Expansive Soils**

Future development allowed under the General Plan would expose additional people and structures to soil hazards, including landsliding, debris flows, expansive soils, and collapsible soils. However, policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from geologic hazards.

With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety, program-level impacts related to soil hazards, including landslides, debris flows, subsidence, expansive soils, and collapsible soils would be less than significant. No mitigation is required.

#### **Mineral Resources**

No state-designated or locally designated mineral resource zones exist in the City. There are several existing wells in the Salt Lake oil field in the southern portion of the City, near Beverly Boulevard. Currently, only marginal extraction is occurring from the Salt Lake oil field in West Hollywood. Although implementation of the proposed General Plan would result in future development, primarily through infill and redevelopment activities in five commercial subareas, this development or redevelopment would not likely represent a change from the current urban conditions in the City with respect to the continued or expanded extraction of oil and gas resources. This impact would be less than significant. No mitigation is required.

#### **4.5.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant geology, soils and mineral resource impacts relating to fault rupture; ground shaking; liquefaction and ground failure; earthquake-induced landslides; soil erosion or loss of topsoil; soil hazards – landslides, subsidence, lateral spreading, expansive soils; and mineral resources.

#### **4.6 HAZARDS AND HAZARDOUS MATERIALS**

The Final EIR discussed the effects related to hazards and hazardous materials in Section 3.6.

#### **Routine Use, Transportation Disposal, and Release of Hazardous Materials**

New residential development pursuant to the proposed General Plan would result in increased use, storage, and disposal of household hazardous materials. New commercial development would also result

in increased use, storage, and/or disposal of hazardous materials during routine operations. Implementation of current state and federal regulations, as well as the policies of the proposed General Plan may not prevent all potential releases of hazardous materials but would serve to minimize both the frequency and the magnitude, if such a release occurs. In combination with existing federal and state regulations, these policies would also reduce the potential impacts of the routine transportation of hazardous materials in the city. This impact would be less than significant. No mitigation is required.

#### **Interference with an Adopted Emergency Plan**

Implementation of the proposed General Plan would create additional traffic and develop new residences and businesses requiring evacuation in case of an emergency. Policies in the proposed General Plan include a variety of actions aimed at ensuring emergency response readiness. Implementation of current state and federal regulations, the policies of the proposed General Plan, and the City's existing Hazard Mitigation Plan and SEMS/NIMS procedures would serve to reduce the potential impacts on emergency preparedness in the city. This impact would be less than significant. No mitigation is required.

#### **Development on a Known Hazardous Materials Site**

Review of the California Environmental Protection Agency databases indicates that a number of sites within the City of West Hollywood are included on the Cortese List developed according to Government Code Section 65962.5. Activities at these sites may have resulted in contamination of soil and groundwater. Implementation of the proposed General Plan could result in development or redevelopment on one or more of these sites. Implementation of current regulations and the policies of the proposed General Plan would not absolutely prevent exposure to hazardous materials but would use existing facility information to identify areas of hazardous materials use. In combination with existing federal and state regulations pertaining to hazardous site cleanup, these policies would also reduce the potential impacts of development on listed hazardous materials sites in the City under the proposed General Plan. This impact would be less than significant. No mitigation is required.

#### **Fire Hazards**

The northern edge of the City, at the base of the Hollywood Hills, includes areas of moderate and high wildfire hazard severity. A fire in the Hollywood Hills could spread to the northern region of West Hollywood. In addition, urban fires are possible from careless human activity, or in the event of an earthquake, subsurface gas explosion or hazardous material combustion. Policies in the proposed General Plan include a variety of actions aimed at protecting residents and structures from natural hazards, including fire. Implementation of current local, state, and federal regulations; the policies of the proposed General Plan; and the City's existing building code procedures would serve to reduce the potential impacts related to wildland fires in the City. Any new infill development or redevelopment within the City would be required to comply with Section 4702.1 of the Los Angeles County Fire Code, which

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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requires a plan to minimize and mitigate fire hazard for any new development project within a wildfire hazard severity zone area. This impact would be less than significant. No mitigation is required.

#### **Underground Gas Hazards**

New development and redevelopment consistent with the proposed General Plan would allow construction of additional residential and commercial uses, which could occur in the vicinity of subsurface gas which is present beneath the City. Policies in the proposed General Plan include a variety of actions aimed at protecting residents and structures from natural hazards, including hazards related to the presence of underground gas. Implementation of current local, state, and federal regulations; the policies of the proposed General Plan; and the City's existing building code procedures would serve to reduce the potential impacts related to underground gas hazards in the City. This impact would be less than significant. No mitigation is required.

#### **Hazardous Materials within 0.25 Mile of Schools**

The proposed land uses in the General Plan include commercial and mixed-use designations within 0.25 mile of schools. However, the California Department of Education enforces school siting requirements, and new facilities would not be constructed within 0.25 mile of facilities emitting or handling materials based on these requirements. Furthermore, permitting requirements for individual hazardous material handlers or emitters, including enforcement of PRC Section 21151.4, would require evaluation and notification where potential material handling and emission could occur in proximity to schools. Compliance with existing regulations would result in a less-than-significant impact. No mitigation is required.

#### **4.6.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant hazards and hazardous materials impacts relating to routine use, transportation, disposal, and release of hazardous materials; interference with an adopted emergency plan; development of a known hazardous materials site; fire hazards; underground gas hazards; and hazardous materials within 0.25 mile of schools.

### **4.7 HYDROLOGY AND WATER QUALITY**

The Final EIR discussed the effects related to hydrology and water quality in Section 3.7.

#### **Violation of Water Quality Standards**

Construction activities related to implementation of the proposed General Plan could contribute additional pollutants, including sediments from grading activities and contaminants associated with construction

materials, construction waste, vehicles, and equipment, among others. Future development and redevelopment are not expected to substantially increase the amount of existing impervious surfaces and, in fact, site redevelopment may provide opportunities to create new pervious surfaces through new landscaping and use of porous pavements, which could reduce the amount of runoff and associated pollutants. Since the early 1990s with the RWQCB's first issuance of a Municipal NPDES, the City has implemented a variety of programs and policies aimed at reducing the amount of waste that is carried to the ocean and released into the environment. Additionally, policies in the proposed General Plan include a variety of actions aimed at protecting water quality, through reducing runoff of pollutants, and increasing on-site treatment or detention of stormwater. Impacts related to pollutants associated with impervious surfaces are reduced primarily by City implementation of RWQCB waste discharge permits and through preparation and implementation of a SWPPP and SUSMP, including identification of required BMPs for both construction and postconstruction discharges. Additionally, because much of the new development with implementation of the proposed General Plan would be infill and redevelopment, site conditions and runoff filtration measures would improve through retrofitting and the development review process. With adherence to and implementation of these permits, existing City programs and practices, proposed General Plan policies, and existing water conservation and drought-tolerant landscaping regulations, water quality impacts would be less than significant. No mitigation is required.

### **Groundwater Resources**

Development associated with the proposed General Plan would not convert new land to urban uses or create substantial new areas of impervious surfaces. Groundwater recharge in the Hollywood Basin occurs primarily in the Santa Monica Mountains, since the lowland portion of the basin, including the City of West Hollywood, is urbanized. Future infill development and redevelopment are not expected to substantially increase the amount of existing impervious surfaces and, in fact, site redevelopment may provide opportunities to create new pervious surfaces through new landscaping and use of porous pavements, increasing groundwater recharge. This impact would be less than significant. No mitigation is required.

### **Surface Hydrology and Drainage**

Future infill development in the City's existing urban areas is not expected to substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of storm water runoff. In fact, site redevelopment may provide opportunities to create new pervious surfaces to facilitate groundwater infiltration through new landscaping and use of porous pavements. Additionally, because much of the new development with implementation of the proposed General Plan would be infill and redevelopment, site conditions and runoff filtration measures would improve through retrofitting and the development review process. With adherence to and implementation of these permits, proposed General Plan policies, and existing water conservation and drought-tolerant landscaping regulations,

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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surface hydrology, and drainage program-level impacts would be less than significant. No mitigation is required.

##### **Flooding and Dam Inundation**

No areas of the City are located within the 1% AEP boundary (100-year floodplain). Because implementation of the proposed General Plan would not expose people or structures to hazards related to a 100-year flood, this impact would be less than significant. No mitigation is required.

Portions of West Hollywood are also susceptible to flood events related to dam failure. The Lower Franklin Dam and the Mulholland Dam are located in the Hollywood Hills above West Hollywood. Areas below (downstream from) the dams, including portions of the City of West Hollywood, have high potential for inundation in the unlikely event of catastrophic dam failure.

Policies in the proposed General Plan include a variety of actions aimed at protecting people and structures from flood risks through design guidelines to minimize flood risks and increase use of permeable materials, and aimed at ensuring adequate stormwater systems to reduce stormwater contribution to flooding. With adherence to and implementation of the proposed regulations and policies, program-level flooding and dam inundation impacts would be less than significant. No mitigation is required.

##### **Mudflows**

There would be a potential for mudflows and associated erosion adjacent to hillsides on the northern edge of the City (north of Sunset Boulevard), especially following removal of natural vegetation or creation of steep graded slopes, including following construction activities or after wildfires. However, standard erosion-prevention practices during grading and avoidance of over-steepened slopes near existing development would reduce the potential for mudflow impacts to a less-than-significant level. No mitigation is required.

#### **4.7.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant hydrology and water quality impacts relating to violation of water quality standards; groundwater resources; surface hydrology and drainage; flooding and dam inundation; and mudflows.

## **4.8 LAND USE AND PLANNING**

The Final EIR discussed the effects related to land use and planning in Section 3.8.

### **Divide an Established Community**

Since the City is built out, new development in West Hollywood will occur primarily in the City's five commercial subareas through redevelopment and infill development. The parcels where development would occur are surrounded by existing development and are not large enough to physically divide areas within the City or to create barriers to adjacent development. Additionally, the General Plan update does not propose the addition of roadways, or roadway widening that could serve to create barriers or divide areas within the City. Therefore, implementation of the General Plan will have a less-than-significant impact with regard to division of an established community. No mitigation is required.

### **Conflict with an Adopted Land Use Plan**

Implementation of the General Plan may impact the existing land use plans, policies, and regulations that have been adopted to avoid or mitigate an environmental effect. However, the proposed General Plan is consistent with the 2008 RTP and Compass Growth Visioning Principles administered by SCAG. Additionally, upon adoption of the proposed General Plan, the City will review its currently adopted specific plans, redevelopment plan, and Municipal Code to revise these where necessary within a reasonable timeframe to reflect changes made in the proposed General Plan. Therefore, impacts between the proposed General Plan and all other applicable land use plans for the City of West Hollywood would be less than significant. No mitigation is required.

### **Conflict with an Applicable Habitat Conservation Plan**

The City of West Hollywood does not have any currently adopted habitat conservation plans or natural community conservation plans. The City of West Hollywood is a completely built-out City located in an urban setting. West Hollywood does not contain natural habitat and no measureable habitat exists capable of supporting sensitive species or sensitive ecological areas.

Implementation of the proposed General Plan would not conflict with an applicable habitat conservation plan or natural community conservation plan. Impacts would be less than significant. No mitigation is required.

### **4.8.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant land use and planning impacts relating to division of an established community; conflict with an adopted land use plan; and conflict with applicable habitat conservation plan.

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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## 4.9 NOISE

The Final EIR discussed the effects related to noise in Section 3.9.

### **Transportation Noise**

Implementation of the proposed General Plan would allow new development and redevelopment within the City. Such development, primarily within the five commercial subareas, would generate additional traffic, which would potentially increase ambient noise levels at existing land uses along roadways. However, implementation of the proposed General Plan under future conditions would not result in a substantial change in traffic noise level, relative to existing noise levels and 2035 noise levels without implementation of the proposed General Plan. As a result, long-term noise levels from new traffic generated in association with implementation of the proposed General Plan would not result in a substantial permanent increase in ambient noise levels. With adherence to and implementation of the proposed General Plan policies, program-level traffic noise impacts would be less than significant. No mitigation is required.

### **Aircraft Noise**

Aircraft noise from Burbank-Glendale-Pasadena Airport, Santa Monica Airport, and Los Angeles International Airport may be considered an intermittent, disturbing noise to some residents in the area. Additionally, activity associated with private, police, emergency medical, and news helicopters also contributes to the general noise environment in West Hollywood, particularly approaching the West Hollywood Sheriff's Station, and the Cedar-Sinai Medical Center, located just west of the City boundary.

Alterations of land use designations within the vicinity of overflight areas may result in greater exposure to aircraft noise. However, West Hollywood is located more than 8 miles outside the established noise contours for the nearest airport. Therefore, proposed modifications to land use designations within West Hollywood would not result in the exposure of new or existing noise-sensitive land uses to excessive aircraft noise levels. As a result, aircraft-generated noise levels are a less-than-significant impact. No mitigation is required.

### **Vehicular Traffic-Induced Vibration**

Due to the rapid drop-off rate of groundborne vibration and the short duration of the associated events, vehicular traffic-induced groundborne vibration is rarely perceptible outside the roadway right-of-way, or results in vibration levels that cause damage to building in the roadway vicinity.

Implementation of the proposed General Plan does not propose the construction or realignment of any roadway projects. Additionally, it is not anticipated that land use changes associated with implementation of the General Plan will result in the exposure of persons within the City to groundborne vibration levels

exceeding the Federal Transit Administration (FTA) and Caltrans guidelines. As a result, this impact is considered less than significant. No mitigation is required.

### **Industrial and Commercial Operations Vibration**

Distribution of materials to and from industrial and commercial land uses can have the potential to generate more substantial levels of groundborne vibration than that of the mechanical equipment. However, the groundborne vibration induced by heavy truck traffic at industrial or commercial land uses is not anticipated to be perceptible at distances greater than 25 feet.

Based on the operational characteristics of mechanical equipment and distribution methods used for general light industrial and commercial land uses, it is not anticipated that light industrial and commercial operations would result in groundborne vibration levels that approach or exceed the FTA and Caltrans guidelines. As a result, this impact is considered less than significant. No mitigation is required.

### **4.9.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant noise impacts relating to transportation noise; aircraft noise; vehicular traffic-induced vibration; and industrial and commercial operations vibration.

## **4.10 POPULATION AND HOUSING**

The Final EIR discussed the effects related to population and housing in Section 3.11.

### **Induce Substantial Population Growth Noise**

Even though the proposed General Plan does not propose new development, the development capacity allowed by the proposed General Plan could result in a moderate increase in population and housing units. However, the proposed General Plan anticipates and plans for this growth through numerous policies aimed at reducing the impacts associated with population and housing unit growth in the City. Therefore, impacts from population growth are considered less than significant. No mitigation is required.

### **Displace Substantial Numbers of Existing Housing or People**

Development pursuant to the General Plan will occur through infill, adaptive reuse, or new mixed-use development in the commercial subareas where existing residential units are not the dominant use. Additionally, the proposed Housing Element policies facilitate and promote a variety of rental and ownership housing types in the City aimed at all income levels. Development allowed under the proposed General Plan would not displace substantial numbers of housing or people necessitating the construction of replacement housing elsewhere. Therefore, impacts relating to displacement of a substantial number of



#### 4.0 Less Than Significant Environmental Effects without Mitigation

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housing or people necessitating the construction of replacement housing are less than significant. No mitigation is required.

### **4.10.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant population and housing impacts relating to inducing substantial population growth; and displacing substantial numbers of existing housing or people.

## **4.11 PUBLIC SERVICES AND UTILITIES**

The Final EIR discussed the effects related to public services and utilities in Section 3.12.

### **Education**

Development of land uses by 2035 pursuant to the proposed General Plan could result in an increase of an estimated 4,274 dwelling units. Based on LAUSD's student generation rates, an estimated 1,762 new students would be generated in the City of West Hollywood. Assuming that current enrollment rates remain constant over the span of the General Plan, it is not anticipated that capacity at any of the schools serving the City of West Hollywood would be exceeded in the future. Because the schools used by West Hollywood are operated by LAUSD and others, the City does not control school programming or facilities. Therefore, impacts to schools are considered less than significant. No mitigation other than the mandatory payment of school fees is required.

### **Libraries**

Implementation of the proposed General Plan would add additional population in the City of West Hollywood increasing the demand for library services. A new West Hollywood Library is under construction as part of the redevelopment of West Hollywood Park. The library will replace the existing library. The impacts of the redevelopment of West Hollywood Park, including library construction, have been previously evaluated in the West Hollywood Park Master Plan Mitigated Negative Declaration. Therefore, impacts would be less than significant. No mitigation is required.

### **Water – Water Infrastructure**

Development of land uses pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. The increase in residential and nonresidential development could result in an increase in the need for new water infrastructure. Both the City of Beverly Hills and LADWP, as the City's water providers, would be required to review development proposals, in consultation with the City of West Hollywood, 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. Additionally, the proposed General Plan contains policies to ensure adequate water infrastructure is available to serve new development in West Hollywood. Therefore, impacts associated with water infrastructure are less than significant. No mitigation is required.

### **Wastewater**

The increased population resulting from implementation of the proposed General Plan will generate additional demand for increased wastewater collection and treatment facilities. The Hyperion Treatment Plant has sufficient capacity to treat the full increase in wastewater attributable to buildout of the proposed General Plan. Impacts to wastewater treatment facilities would be less than significant. No mitigation is required.

### **Storm Drain System**

Implementation of the proposed General Plan would result in new residential and nonresidential development through infill and redevelopment activities in areas that are already urbanized. This new development would not substantially increase the amount of impervious surfaces within the City resulting in the need for additional storm drain facilities. In fact, redevelopment activities may provide opportunities to create new pervious surfaces to facilitate groundwater infiltration through new greenspace, landscaping, or use of porous pavements. Additionally, the proposed General Plan contains numerous stormwater policies. With adherence to and implementation of the proposed General Plan policies, program-level impacts to the City's storm drain system would be less than significant. No mitigation is required.

### **Energy**

The increased population resulting from implementation of the proposed General Plan will create demand for additional electricity and natural gas as well as transmission infrastructure. This increased demand may exceed the capacity of these existing facilities and result in the need for new, upgraded, or expanded facilities. Southern California Edison provides capacity to meet the electricity load and demand of the City of West Hollywood. Southern California Gas Company (SoCalGas) has facilities to provide natural gas services for the City. Additionally, SoCalGas will provide services for anticipated development in accordance with the company's policies and extension rules on file with the California Public Utilities Commission. Therefore, impacts related to energy infrastructure would be less than significant. No mitigation is required.

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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### **Solid Waste**

New development and population growth with implementation of the proposed General Plan will generate an increase in demand for solid waste collection services and disposal capacity. Adequate capacity exists in the Mesquite Regional Landfill and Eagle Mountain Landfill to dispose of the City of West Hollywood's solid waste. Additionally, the General Plan contains policies to encourage waste reduction and recycling. With adherence to and implementation of the proposed General Plan policies, program-level impacts to solid waste impacts would be less than significant. No mitigation is required.

#### **4.11.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant public services and utilities impacts relating to education; libraries; water; wastewater; storm drain system; energy; and solid waste.

### **4.12 RECREATION**

The Final EIR discussed the effects related to recreation in Section 3.13.

#### **Construction or Expansion of Existing Facilities**

The increased population resulting from implementation of the proposed General Plan will create a demand for additional park improvements to increase the availability of recreational opportunities within the City of West Hollywood. This would likely require expansion of existing facilities and/or construction of new park and recreation facilities.

No new construction or expansion of existing park and recreational facilities is currently proposed by the City. The specific environmental impact from the construction of new parkland or expansion of existing park and recreation facilities in West Hollywood cannot be determined at this General Plan level of analysis because no location or designs for specific park projects are available at this time. Therefore, impacts would be less than significant at the programmatic level of analysis. No mitigation is required.

#### **4.12.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant recreation impacts relating to construction or expansion of existing recreation facilities.

## **4.13 TRANSPORTATION AND CIRCULATION**

The Final EIR discussed the effects related to transportation and circulation in Section 3.14.

### **Design Hazards**

Traffic generated by new development allowed under the proposed General Plan would not increase hazards due to design features or incompatible uses. No new roadways are planned within the planning area and those that may be proposed for expansion or alteration would be subject to existing City design standards for roadways that ensure that no hazards would result. No impacts would result with implementation of the proposed General Plan. No mitigation is required.

### **Air Traffic Hazards**

No airport or airstrip is located within or adjacent to the planning area. As a result, air traffic patterns would not be altered with implementation of the proposed General Plan. Current patterns utilized by helicopters accessing facilities within the City and surrounding area, including these areas with existing and proposed mid- to high-rise buildings, would not be considerably altered with implementation of the General Plan. The proposed project would have a less-than-significant impact on air traffic patterns. No mitigation is required.

### **Emergency Access**

Intersection LOS impacts as summarized in Table 3.14-6 of Section 3.14 of the EIR will generate traffic congestion at intersections that will also have the potential to impede emergency access.

Policies in the proposed General Plan include a variety of actions aimed at ensuring emergency response readiness. Implementation of current state and federal regulations, the policies of the proposed General Plan, and the City's existing Hazard Mitigation Plan and SEMS/NIMS procedures would serve to reduce the potential impacts on emergency preparedness and emergency access in the city. With adherence to and implementation of the proposed General Plan policies and regulations, emergency access program-level impacts will be reduced to a less-than-significant level. No mitigation is required.

### **Public Transit, Bicycle, and Pedestrian Facilities**

The City's existing pattern of development is dense and varied, with most residents and destinations in the City located near public transit services, and implementation of the proposed General Plan would increase, rather than reduce, the density or mix of uses. Sidewalks and pedestrian infrastructure are available throughout the City. Although existing bicycle infrastructure is limited, the proposed General Plan includes policies and programs to improve bicycle circulation and infrastructure in the City.

#### 4.0 Less Than Significant Environmental Effects without Mitigation

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Policies in the proposed General Plan include a variety of actions aimed at maintaining the City's transportation system, with a focus on public transit, bicycle, and pedestrian facilities. With adherence to and implementation of the proposed General Plan policies and regulations, program-level impacts to alternative transportation would be less than significant. No mitigation is required.

#### **Parking**

Changes in the number of residential units, number of employees, and number of visitors that would affect parking needs would occur primarily in the five commercial subareas pursuant to implementation of the General Plan. Parking occupancy studies were conducted in two commercial areas of the City. The parking occupancy study results indicate that the number of spaces available in the study areas exceeds the demand. However, the current allocation of these spaces may not function efficiently to provide access to adequate parking, particularly during peak periods.

Policies in the proposed General Plan include a variety of actions aimed at making efficient use of parking facilities in the City. In addition to policies and programs focused on parking, the Mobility Element includes policies and programs to reduce vehicle trips, with a corresponding reduction in parking needs, as discussed in the analysis of peak hour intersection LOS.

Implementation of the parking policies and programs proposed in the General Plan would improve access to parking through more efficient use of existing facilities. With adherence to and implementation of the proposed General Plan policies and regulations, program-level impacts related to the availability of adequate parking would be less than significant. No mitigation is required.

#### **4.13.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant transportation and circulation impacts relating to design hazards; air traffic hazards; emergency access; public transit, bicycle, and pedestrian facilities; and parking.

#### **4.14 GROWTH INDUCING IMPACTS**

The purpose of a general plan is to guide growth and development in a community. Accordingly, the general plan is premised on a certain amount of growth taking place. Los Angeles County, as well as the entire southern California region, has experienced dramatic growth for decades and this trend is expected to continue. The focus of the general plan, then, is to provide a framework in which the growth can be managed and to tailor it to suit the needs of the community and surrounding area.

Based on the proposed General Plan, the City of West Hollywood could have approximately 44,182 residents, 28,847 housing units, and 13.9 million square feet of nonresidential building floor area. These

changes represent an increase of approximately 4,274 dwelling units, 6,834 residents, and approximately 2.6 million square feet of nonresidential building floor area over existing conditions.

The proposed General Plan contains policies and an Implementation Plan that provides a framework for accommodating the orderly growth of the planning area. The proposed General Plan provides the necessary tools to accommodate future growth and provides direction for new development and redevelopment projects and establishes the desired mix and relationship between land use types.

Development under the proposed General Plan would primarily occur within five commercial subareas through infill, redevelopment and intensification, which would not result in the urbanization of undeveloped land. The commercial subareas are adjacent to existing employment, transit, and commercial services, which would reduce vehicle trips and emissions. The proposed General Plan also ensures that the City will have a diversity of land uses and housing types, encourages mixed-use development in proximity to transit, promotes commercial enterprise, and encourages public involvement in land use planning decisions. As noted in Section 3.8, "Land Use and Planning," of the EIR, this growth strategy is consistent with the SCAG RTP and Compass Growth Strategy for the SCAG region. Therefore, the proposed General Plan would not be growth inducing or set any new precedents for growth. Instead, the proposed General Plan adequately plans for expected growth to occur in the Southern California region. Additionally, the proposed General Plan provides appropriate land use designations, and a land use pattern that provides sufficient land for orderly development. The proposed General Plan also contains policies that address the provision of sufficient services and infrastructure as growth occurs and to accommodate projected growth.

#### **4.14.1 FINDINGS**

Based on the Final EIR analysis and the whole of the record, the City finds that the proposed project would result in less than significant growth inducing impacts.

## CHAPTER 5 LESS THAN SIGNIFICANT ENVIRONMENTAL EFFECTS WITH MITIGATION

The Final EIR determined that the proposed project has potentially significant environmental effects in the areas discussed in the following paragraphs. The Final EIR identified feasible mitigation measures to avoid or substantially reduce the environmental effects in these areas to a level less than significant. Based on the information and analysis set forth in the Final EIR, the project would not have any significant environmental effects in these areas as long as all identified feasible mitigation measures are incorporated into the proposed project.

### 5.1 NOISE

#### 5.1.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to Noise in Section 3.9.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects could result in potentially significant impacts related to **construction noise in excess of standards; exposure of sensitive receptors to stationary and area-source noise levels due to changes in land use and other noise sources; and construction-induced vibration.**

New development and redevelopment activities pursuant to implementation of the General Plan would generate noise during construction activities, have the potential to expose noise-sensitive receptors to stationary and area-source noise levels due to changes in land use and exposure to other noise sources such as point source levels associated with commercial and industrial land uses. Further, new development and redevelopment pursuant to the General Plan has the potential to expose sensitive receptors to vibration due to construction activities. This would result in significant impacts to these noise issue areas.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the following mitigation measures are feasible and will reduce potentially significant impacts related to **construction noise in excess of standards; exposure of sensitive receptors to stationary and area-source noise levels due to changes in land use and other noise sources; and construction induced vibration to less than significant levels**, thereby avoiding any significant effects:

3.9-1 The City shall use the following thresholds and procedures for CEQA analysis of proposed projects, consistent with policies adopted within the General Plan:

5.0 Less Than Significant Environmental Effects with Mitigation Incorporated

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- The City shall apply the noise standards specified in Table 10-1 and Table 10-2 of the Safety and Noise Element to proposed projects analyzed under CEQA.
- In addition to the foregoing, an increase in ambient noise levels is assumed to be a significant noise concern if a proposed project causes ambient noise levels to exceed the following:
  - Where the existing ambient noise level is less than 60 dB, a project-related permanent increase in ambient noise levels of 5 dB Ldn or greater.
  - Where the existing ambient noise level is greater than 60 dB, a project-related permanent increase in ambient noise levels of 3 dB Ldn or greater.
  - A project-related temporary increase in ambient noise levels of 10 dB Leq or greater.

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

- Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc).
- Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.
- Construction operations and related activities associated with the proposed project shall comply with the operational hours outlined in the WHMC Noise Ordinance, or mitigate noise at sensitive land uses to below WHMC standards.
- Construction equipment should not be idled for extended periods of time in the vicinity of noise-sensitive receptors.
- Locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers). Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment.
- Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source



and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated STC rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.

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

3.9-3 The City will develop noise impact analysis guidelines that describe the City's desired procedure and format for acoustical studies. Acoustical studies will be required for all discretionary, non-residential projects that will cause future traffic volumes to increase by 25% or more on any roadway in front of or near blocks where the majority land uses are residential or institutions (e.g., schools). The noise analysis guidelines should include the following elements:

- Be prepared by a qualified person experienced in the fields of environmental noise assessment and architectural acoustics, as determined by the City.
- Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and predominant noise sources.
- Estimate existing and projected cumulative (20 years) transportation noise levels in terms of Ldn, and compare those noise levels to the adopted standards and policies of the Safety and Noise Chapter.
- Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and predominant noise locations.
- Recommend appropriate mitigation to achieve the adopted policies of the proposed General Plan Noise Element.
- Estimate noise exposure after the prescribed mitigation measures have been implemented.
- Describe a post-project assessment program that could be used to evaluate the effectiveness of the proposed mitigation measures, as necessary.

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3.9-4 Revise the City's Noise Ordinance to achieve the following:

- Limit the hours of deliveries to commercial, mixed-use, and industrial uses adjacent to residential and other noise-sensitive land uses.
- Limit noise levels generated by commercial and industrial uses.
- Limit the hours of operation for refuse vehicles and parking lot sweepers if their activity results in an excessive noise level that adversely affects adjacent residential uses.
- Require the placement of loading and unloading areas so that commercial buildings shield nearby residential land uses from noise generated by loading dock and delivery activities. If necessary, additional sound barriers shall be constructed on the commercial sites to protect nearby noise-sensitive uses.
- Require all commercial heating, ventilation, and air conditioning (HVAC) machinery to be placed within mechanical equipment rooms wherever possible.
- Require the provision of localized noise barriers or rooftop parapets around HVAC, cooling towers, and mechanical equipment so that line of sight to the noise source from the property line of the noise-sensitive receptors is blocked.

3.9-5 When the City exercises discretionary review, provides financial assistance, or otherwise facilitates residential development within a mixed-use area, provide written warnings to potential residents about noise intrusion and condition of that approval, assistance, or facilitation. The following language is provided as an example:

“All potential buyers and/or renters of residential property within mixed-use areas in the City of West Hollywood are hereby notified that they may be subject to audible noise levels generated by business- and entertainment-related operations common to such areas, including amplified sound, music, delivery and passenger vehicles, mechanical noise, pedestrians, and other urban noise sources. Binding arbitration is required for disputes regarding noise in mixed-use buildings that require legal action.”

3.9-6 The City shall require future developments to implement the following measures to reduce the potential for human annoyance and architectural/structural damage resulting from elevated groundborne noise and vibration levels.

- Pile driving within a 50-foot radius of historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers). Specifically, geo pier style cast-in-place systems or equivalent shall be used where feasible as an alternative to impact pile driving to reduce the number and amplitude of impacts required for seating the pile.
- The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage will be repaired back to its preexisting condition.
- Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.
- Provide protective coverings or temporary shoring of on-site or adjacent historic features as necessary, in consultation with the Community Development Director or designee.

### **5.1.2 FINDINGS**

The City Council finds that Mitigation Measures 3.9-1 through 3.9-6 are hereby incorporated into the project which avoid or substantially lessen the significant effects to a less than significant level as identified in the environmental impact report.

## **5.2 PALEONTOLOGICAL RESOURCES**

### **5.2.1 EFFECTS AND MITIGATION MEASURES**

The Final EIR discussed the effects and mitigation measures related to Paleontological Resources in Section 3.10.

## 5.0 Less Than Significant Environmental Effects with Mitigation Incorporated

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Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects could result in potentially significant impacts related to **directly or indirectly destroying a unique paleontological resource or site or unique geological feature**.

Future development within the City pursuant to implementation of the General Plan will primarily take the form of redevelopment and infill development focused in the five commercial subareas. Site redevelopment could involve earthmoving and excavation activities. Because of the large number of fossils that have been recovered from alluvial fan deposits similar to those that underlie the City, these units are considered paleontologically sensitive rock units, suggesting that there is a potential for uncovering additional similar fossil remains during construction-related earthmoving activities in the City. This would result in a significant impact.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the following mitigation measure is feasible and will reduce potentially significant impacts related to **directly or indirectly destroying a unique paleontological resource or site or unique geological feature**:

- 3.10-1 If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

### 5.2.2 FINDINGS

The City Council finds that Mitigation Measure 3.10-1 is hereby incorporated into the project which avoids or substantially lessens the significant effects to a less than significant level as identified in the environmental impact report.

## 5.3 PUBLIC SERVICES AND UTILITIES

### 5.3.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to Public Services and Utilities, police protection and fire protection, in Section 3.12.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects could result in potentially significant impacts related to **police protection or fire protection**.

Future development within the City pursuant to implementation of the General Plan will result in an increase in population and new development in West Hollywood. Additional police and fire protection personnel and facilities will be needed over the course of the General Plan buildout because increased development and associated population will lead to an increased demand for service.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the following mitigation measures are feasible and will reduce potentially significant impacts related to **police protection and fire protection** impacts pursuant to implementation of the General Plan:

- 3.12-1 Update the City's assessment of the impacts of new development on the level of police and fire services provided to the community following adoption of the General Plan.
- 3.12-2 During updates to the Capital Improvement Program process, coordinate with service providers to evaluate the level of fire and police service provided to the community. Continue to use state-of-the-art techniques and technology to enhance public safety and assess adequacy and plan for upgrades during updates to the Capital Improvement Program and updates to the City's Operating Budget.
- 3.12-3 Establish a public safety impact fee to fund capital facilities and operations for police and fire protection services.
- 3.12-4 Update the West Hollywood Emergency Management Plan as appropriate to reflect current conditions in the city and prepare for expected future growth. The Emergency Management Plan should include plans for police and fire services, vulnerable populations, and sensitive facilities as well as plans for the continuity of community following a disaster. The plan should also include potential impacts from global climate change.
- 3.12-5 Continue public education programs to enhance public safety about fire safety and crime prevention as well as emergency preparedness.

## 5.0 Less Than Significant Environmental Effects with Mitigation Incorporated

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- 3.12-6 Establish communication forums between police and fire department staff and the community to obtain community feedback regarding service, service needs and, to engage the community in crime prevention.
- 3.12-7 Support existing and expand neighborhood watch programs for both residential and commercial areas.
- 3.12-8 Create design recommendations to minimize the risk of crime by facilitating “eyes on the street” and defensible space concepts, and utilizing best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape.

### 5.3.2 FINDINGS

The City Council finds that Mitigation Measures 3.12-1 through 3.12-9 are hereby incorporated into the project which avoid or substantially lessen the significant effects to a less than significant level as identified in the environmental impact report.

## 5.4 RECREATION

### 5.4.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to Recreation in Section 3.13.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project’s effects could result in potentially significant impacts related to **increased use and physical deterioration of existing recreational facilities**.

Development of land uses by 2035 pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. Additional development and associated population resulting from implementation of General Plan policies may result in increased use of existing City parks and other recreational facilities, which may cause or accelerate substantial physical deterioration of these facilities. This would result in a significant impact.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the following mitigation measures are feasible and will reduce potentially significant impacts related to **increased use and physical deterioration of existing recreational facilities** pursuant to implementation of the General Plan:

- 3.13-1 Conduct a study to identify current, potential, and new parks and open space opportunities in the City, including both public land and private land that can be purchased for open space. As part of the study, prioritize open space opportunities based on community need. Modify the plan over time as conditions change.
- 3.13-2 Review existing and explore new funding mechanisms for acquiring additional park land and open space.
- 3.13-3 Improve Plummer Park and West Hollywood Park according to their master plans.
- 3.13-4 Study the feasibility of adopting a parkland dedication ordinance to exact and receive parkland fees from new development that does not include subdivision of land or airspace.
- 3.13-5 Implement a Parks Master Plan to guide operations, specific improvements, and expansion of parks and open spaces, including new pocket parks throughout the City.
- 3.13-6 Establish joint-use agreements with LAUSD to allow neighborhood use of playgrounds as open space.
- 3.13-7 Create an incentive program for developers that includes pocket parks, increased open space and other new open space as part of programming for new development.

### **5.3.2 FINDINGS**

The City Council finds that Mitigation Measures 3.13-1 through 3.12-7 are hereby incorporated into the project which avoid or substantially lessen the significant effects to a less than significant level as identified in the environmental impact report.

## CHAPTER 6

# SIGNIFICANT ENVIRONMENTAL EFFECTS

The Final EIR determined that the proposed project would result in potentially significant environmental effects related to the issue areas of air quality, traffic, global climate change and public services and utilities. The Final EIR identified feasible mitigation measures for many of the issue areas that may reduce these impacts; however, even with implementation of mitigation measures, impacts would remain significant and unavoidable for the following:

- Air Quality – compliance with South Coast Air Quality Management District Air Quality Management Plan; violation of air quality standards – short-term (construction related emissions); violation of air quality standards – long-term impacts (operational emissions); Cumulatively considerable increase in criteria air pollutants
- Public Services and Utilities – water supply
- Transportation and Traffic – intersection level of service, congestion management program level of service
- Global Climate Change – construction related GHG emissions; operations related GHG emissions; conflicts with applicable plans, polices, or regulations

### 6.1 AIR QUALITY

#### 6.1.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to Air Quality in Section 3.2.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects on **conflicts with the SCAQMD Air Quality Management Plan, short-term (construction-related) impacts, long-term (operation-related) impacts, and increases in criteria air pollutants** are significant and unavoidable at the project and cumulative level.

The proposed General Plan would increase population (and thus VMT) beyond that anticipated by SCAG. Additionally, the proposed General Plan would result in emissions in excess of thresholds for criteria air pollutants and precursors for which the region is in nonattainment. This would conflict with SCAQMD air quality planning efforts. This is a significant impact.

Construction-related activities associated with implementation of the proposed General Plan would result in emissions of criteria air pollutants and precursors from site preparation (e.g., demolition, excavation, grading, and clearing); exhaust from off-road equipment, material delivery trucks, and worker commute



## 6.0 Significant Environmental Effects

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vehicles; vehicle travel on roads; and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings, and trenching for utility installation). Because the proposed General Plan identifies future land uses and does not contain specific development proposals, construction-related emissions that may occur at any one time in the Planning Area are speculative and cannot be accurately determined at this stage of the planning process. Construction-related emissions could lead to the violation of an applicable air quality standard or contribute substantially to an existing or projected air quality violation. This is a significant impact.

Regional area- and mobile-source emissions of criteria air pollutants and ozone precursors were modeled using URBEMIS, which is designed to estimate emissions for land use development projects (SCAQMD 2008). Based on the modeling conducted, operational activities of future specific projects allowed pursuant to the General Plan could result in emissions of ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> that exceed SCAQMD's applicable thresholds. Thus, operational emissions of these pollutants could violate or contribute substantially to an existing or projected air quality violation. This is a potentially significant impact.

Because construction-related criteria air pollutant and precursor emissions could exceed SCAQMD's significance thresholds with buildout of the proposed General Plan; implementation of the proposed General Plan would result in a net increase of long-term operation-related emissions from mobile, stationary, and area sources; and the proposed General Plan would increase population (and thus VMT) beyond that anticipated by SCAG project-generated emissions would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. As a result, this impact is considered potentially significant.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the following mitigation measures are feasible and will reduce the project's effects on **conflicts with the SCAQMD Air Quality Management Plan, short-term (construction-related) impacts, long-term (operation-related) impacts and increases in criteria air pollutants:**

- 3.2-1 The City shall implement the following measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from parking lots and construction sites.
- Require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM<sub>10</sub>, in accordance with SCAQMD Rule 403:
    - Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers

- Wheel washers for construction equipment
- Watering down of all construction areas
- Limit speeds at construction sites to 15 miles per hour
- Cover aggregate or similar material during transportation of material
- Adopt incentives, regulations, and/or procedures to reduce paved road dust emissions through targeted street sweeping of roads subject to high traffic levels and silt loadings.

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

- Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas-powered electric generators and equipment.
- Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).
- To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions.
- On-site equipment shall not be left idling when not in use.
- The hours of operation of heavy-duty equipment and/or the amount of equipment in use at any one time shall be limited.
- Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors.
- Before construction contracts are issued, the project applicants shall perform a review of new technology, in consultation with SCAQMD, as it relates to heavy-duty equipment, to determine what (if any) advances in emissions reductions are available for use and are economically feasible. Construction contract and bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is

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anticipated that in the near future, both NO<sub>x</sub> and PM<sub>10</sub> control equipment will be available.

3.2-3 The City shall distribute public information regarding the polluting impacts of two-stroke engines and the common types of machinery with two-stroke engines.

3.2-4 The City shall work with SCAQMD and SCAG to implement the AQMP and meet all federal and state air quality standards for pollutants. The City shall participate in any future amendments and updates to the AQMP. The City shall also implement, review, and interpret the proposed General Plan and future discretionary projects in a manner consistent with the AQMP to meet standards and reduce overall emissions from mobile and stationary sources.

3.2-5 The City shall implement the following measures to minimize exposure of sensitive receptors and sites to health risks related to air pollution.

- Encourage the applicants for sensitive land uses to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts of air pollution on sensitive receptors.
- Activities involving idling trucks shall be oriented as far away from and downwind of existing or proposed sensitive receptors as feasible.
- Strategies shall be incorporated to reduce the idling time of diesel engines through alternative technologies such as IdleAire, electrification of truck parking, and alternative energy sources for TRUs to allow diesel engines to be completely turned off.

Implementation of Mitigation Measures 3.2-1 through 3.2-5 would substantially lessen impacts related to air quality. However, the project area lies in a nonattainment air basin and growth associated with proposed General Plan implementation will continue to contribute pollutant emissions in that nonattainment context. Construction-related emissions of criteria air pollutants and precursors would still exceed significance thresholds; for this reason, and because of the nonattainment status of the Basin, such emissions could violate or contribute substantially to an existing or projected air quality violation, lead to a cumulatively considerable net increase in nonattainment pollutants, and/or expose sensitive receptors to substantial pollutant concentrations. Operational emissions pursuant to implementation of the proposed General could violate or contribute substantially to an existing or projected air quality violation, lead to a cumulatively considerable net increase in nonattainment pollutants, conflict with the AQMP, and/or

expose sensitive receptors to substantial pollutant concentrations. For these reasons, implementation of the General Plan would not reduce project and cumulative level air quality effects to a less than significant level even with the incorporation of these mitigation measures.

### **6.1.2 FINDINGS**

The City Council finds that Mitigation Measures 3.2-1 through 3.2-5 are hereby incorporated into the project. These mitigation measures will substantially lessen but not avoid the significant effects identified for these air quality issue areas in the environmental impact report.

Mitigation Measures 3.2-1 through 3.2-5 will not avoid the project's significant air quality impacts. The City is located in an existing nonattainment region (South Coast Air Basin) and development pursuant to the General Plan would continue to contribute to the larger regional air quality issue. Being that air quality is a regional issue, attainment would only be achieved through the implementation of a long-range air quality management plan at the regional level. While Mitigation Measures 3.2-1 through 3.2-5 will help to reduce the air quality impacts associated with implementation of the General Plan, they would not reduce impacts to a level less than significant. Therefore, conflicts with the SCAQMD Air Quality Management Plan, short-term (construction-related) impacts, long-term (operation-related) impacts, and increases in criteria air pollutants are significant and unavoidable at both the project and cumulative level. As set forth in the Statement of Overriding Considerations, these air quality effects are acceptable in light of the project's benefits.

## **6.3 PUBLIC SERVICES AND UTILITIES**

### **6.3.1 EFFECTS AND MITIGATION MEASURES**

The Final EIR discussed the effects and mitigation measures related to public services and utilities in Section 3.12.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's **water supply** effects are significant and unavoidable at the project and cumulative level.

Development of land uses by 2035 pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. The increase in residential and nonresidential development would result in an increase in the need for additional water supply and water pressure for fire flow (particularly for mixed-use and multi-story development), which could strain water supply sources. This is a potentially significant impact.

Adherence to and implementation of the proposed General Plan policies would reduce water consumption in the City of West Hollywood and would reduce the impact to water supply. Additionally, implementation of Mitigation Measures 3.12-10 through 3.12-14 would also reduce water consumption in

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West Hollywood and reduce the water supply impact. However, the long-term supply of water to the City of West Hollywood from the City of Beverly Hills and LADWP is uncertain. Although both agencies that supply water to West Hollywood indicate an adequate water supply as of 2005, both agencies are reliant on water from MWD. Water supply from MWD is more uncertain now than in 2005 given potential climate change impacts and variable hydrology and environmental issues in the Bay-Delta, among other factors. Therefore, implementation of the proposed General Plan would have a potentially significant and unavoidable water supply impact.

- 3.12-10 Create an enforcement plan to support the water conservation ordinance.
- 3.12-11 Create a master plan for retrofitting municipal facilities and public rights-of-way with fixtures and materials that reduce water consumption.
- 3.12-12 Update ordinances to achieve more stringent water reduction strategies.
- 3.12-13 Work with water providers to continue education efforts on water conservation.
- 3.12-14 Amend the Green Building Ordinance to promote reuse of sump pump water.

Mitigation Measure 3.12-10 through 3.12-14 will help to reduce water supply impacts pursuant to implementation of the General Plan but not to a less than significant level. Therefore, water supply impacts are significant and unavoidable at both the project and cumulative level.

### **6.3.2 FINDINGS**

The City Council finds that Mitigation Measures 3.12-10 through 3.12-14 are hereby incorporated into the project. These mitigation measures will substantially lessen but not avoid the significant effects identified in the environmental impact report.

Mitigation Measures 3.12-10 through 3.12-14 will not avoid the project's significant water supply impacts. Water conservation efforts and water use reduction strategies pursuant to mitigation measures 3.12-10 through 3.12-14 would reduce the impacts to water supply. However, uncertainty exists in long-term water supply to the City of West Hollywood and impacts would remain significant and unavoidable. As set forth in the Statement of Overriding Considerations, water supply impacts are acceptable in light of the project's benefits.

## 6.3 TRANSPORTATION AND TRAFFIC

### 6.3.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to transportation and traffic in Section 3.14.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects on **intersection level of service and congestion management program (CMP) level of service** are significant and unavoidable at the project and cumulative level.

Future development in the City of West Hollywood would occur through infill and redevelopment activities primarily in five commercial subareas. These infill and redevelopment activities would result in increases to the resident population, number of employees, and number of visitors to the City, resulting in increases in traffic volumes. Implementation of the proposed General Plan would result in significant impacts at the following intersection intersections during the morning peak hour, the afternoon peak hour, or both morning and afternoon peaks:

- Doheny Drive & Sunset Boulevard (no feasible mitigation exists)
- San Vicente Boulevard & Sunset Boulevard (no feasible mitigation exists)
- La Cienega Boulevard/Miller Drive & Sunset Boulevard (no feasible mitigation exists)
- Crescent Heights Boulevard & Sunset Boulevard (outside of the jurisdiction of West Hollywood)
- La Cienega Boulevard & Fountain Avenue (no feasible mitigation exists)
- Crescent Heights Boulevard & Fountain Avenue (no feasible mitigation exists)
- Fountain Avenue & Fairfax Avenue (Mitigation Measure 3.14-1 would reduce impact but not to a level less than significant)
- Gardner Street & Fountain Avenue (no feasible mitigation exists)
- La Brea Avenue & Fountain Avenue (outside of the jurisdiction of West Hollywood)
- Holloway Drive/Horn Avenue & Sunset Boulevard (no feasible mitigation exists)
- La Cienega Boulevard & Holloway Drive (no feasible mitigation exists)
- Doheny Drive & Cynthia Street (traffic signal at this intersection is not warranted)

## 6.0 Significant Environmental Effects

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- Doheny Drive & Santa Monica Boulevard & Melrose Avenue (no feasible mitigation exists)
- Robertson Boulevard & Santa Monica Boulevard (no feasible mitigation exists)
- San Vicente & Santa Monica Boulevard (no feasible mitigation exists)
- La Cienega Boulevard & Santa Monica Boulevard (Mitigation Measure 3.14-1 would reduce impact but not to a level less than significant)
- Croft Avenue/Holloway Drive & Santa Monica Boulevard (no feasible mitigation exists)
- Crescent Heights Boulevard & Santa Monica Boulevard (no feasible mitigation exists)
- Fairfax Avenue & Santa Monica Boulevard (Mitigation Measure 3.14-1 would reduce impact but not to a level less than significant)
- Gardner Street & Santa Monica Boulevard (Mitigation Measure 3.14-1 would reduce impact but not to a level less than significant)
- Formosa Avenue & Santa Monica Boulevard (no feasible mitigation exists)
- La Brea Avenue & Santa Monica Boulevard (no feasible mitigation exists)
- Doheny Drive & Beverly Boulevard ((no feasible mitigation exists)
- San Vicente Boulevard & Beverly Boulevard (Mitigation Measure 3.14-1 would reduce impact but not to a level less than significant)
- La Cienega Boulevard & Beverly Boulevard (outside of the jurisdiction of West Hollywood)

No feasible mitigation exists to reduce impacts at these intersections to below a level less than significant. Therefore, intersection level of service impacts will remain significant and unavoidable.

Implementation of the proposed General Plan would also result in an exceedence of LOS standards established by a CMP, resulting in a significant impact at Doheny Drive and Santa Monica Boulevard. There is no feasible mitigation for these intersection LOS impacts within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible. This impact would remain significant and unavoidable.

3.14-1 As increasing traffic volumes warrant, the City shall implement intersection improvements, including:

- Implementing protected-permissive left turn on Fountain Avenue at Fairfax Avenue and striping a right-turn lane on southbound Fairfax Avenue for vehicles turning onto Fountain Avenue.
- Providing an exclusive right-turn lane on southbound Fairfax Avenue for vehicles turning onto Santa Monica Boulevard.
- Providing protected-permissive phasing for the eastbound left-turn movement from Santa Monica Boulevard to Gardner Street.
- Providing protected-permissive phasing for left-turn movements on San Vicente Boulevard at Beverly Boulevard during the afternoon peak period.

Mitigation Measure 3.14-1 will help to reduce the intersection level of service impacts at some intersections associated with implementation of the General Plan, this mitigation measure would not reduce impacts to a level less than significant. Therefore, the intersection level of service effects pursuant to implementation of the General Plan are significant and unavoidable at both the project and cumulative level.

### **6.3.2 FINDINGS**

The City Council finds that Mitigation Measure 3.14-1 is hereby incorporated into the project. This mitigation measure will substantially lessen but not avoid the significant effects identified in the environmental impact report.

With the implementation of Mitigation Measures 3.14-1, which requires intersection improvements, delays at these intersections would be reduced. However, the LOS at these intersections would still exceed acceptable levels and the intersection level of service impacts would still be significant and unavoidable. Therefore, the intersection level of service effects pursuant to implementation of the General Plan are significant and unavoidable at both the project and cumulative level. As set forth in the Statement of Overriding Considerations, the intersection level of service effects are acceptable in light of the project's benefits.



## 6.0 Significant Environmental Effects

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### 6.4 GLOBAL CLIMATE CHANGE

#### 6.4.1 EFFECTS AND MITIGATION MEASURES

The Final EIR discussed the effects and mitigation measures related to global climate change in Section 3.15.

Based on the information and analysis set forth in the Final EIR and the record of proceedings, the project's effects on **construction related greenhouse gas emissions (GHGs), operations related GHGs, and conflicts with applicable plans, policies and regulations** are significant and unavoidable at the project and cumulative level.

Heavy-duty off-road equipment, materials transport, and worker commutes during construction activities pursuant to implementation of the General Plan would result in exhaust emissions of GHGs. Due to the intensity and duration of construction activities, construction-generated GHG emission levels would make an incremental contribution to GHGs that cause climate change. Although the construction-generated emissions would be temporary and short term, and although a new regime of regulations is expected to come into place under AB 32 and existing regulatory efforts will help reduce GHG emissions generated by construction activity throughout the state, given the information available today, GHG emissions associated with construction of the proposed project would result in a cumulatively considerable incremental contribution to this significant cumulative impact.

GHG emissions would be generated throughout the operational life of the proposed project. Operational emissions would be generated by area, mobile, and stationary sources. Operational GHG emissions were estimated for buildout of the proposed General Plan, in the Year 2035. The annual operational emissions level under the proposed General Plan was estimated using the best available methodologies and emission factors available at the time of writing this EIR. Because the total GHG emissions associated with project operations under the proposed project would be considered substantial, the proposed project would result in a cumulatively considerable contribution to a significant cumulative impact related to long-term operational generation of GHGs.

Because the total GHG emissions associated with project operations under the proposed project would be considered substantial, and due to the uncertainty about whether the future regulations developed through implementation of AB 32 would cause operational emissions to be 15% lower than business-as-usual emission levels, the proposed project would result in a cumulatively considerable contribution to the significant cumulative impact related to long-term operational generation of GHGs. Therefore, implementation of the proposed project could hinder California's ability to attain the goals identified in AB 32.

3.15-1 To further reduce construction-generated GHG emissions, the project applicant(s) of all project phases shall implement all feasible measures for reducing GHG emissions

associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction.

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

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

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

- Improve fuel efficiency of construction equipment:
  - reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort);
  - perform equipment maintenance (inspections, detect failures early, corrections);
  - train equipment operators in proper use of equipment;
  - use the proper size of equipment for the job; and
  - use equipment with new technologies (repowered engines, electric drive trains).

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- Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power.
- Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment. (emissions of oxides of nitrogen [NO<sub>x</sub>] from the use of low carbon fuel must be reviewed and increases mitigated.) Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program (ARB 2010g).
- Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes.
- Reduce electricity use in the construction office by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75% by weight).
- Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials).
- Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option.
- Produce concrete on-site if determined to be less emissive than transporting ready mix.
- Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from ARB's Heavy-Duty Vehicle Greenhouse Gas Measure (ARB 2010h) and EPA (EPA 2010f).
- Develop a plan to efficiently use water for adequate dust control. This may consist of the use of nonpotable water from a local source.

Mitigation Measure 3.15-1 will help to reduce construction-related GHG emissions associated with implementation of the General Plan but not to a level less than significant. Therefore, construction-related GHG emissions are significant and unavoidable at both the project and cumulative level.

## 6.4.2 FINDINGS

The City Council finds that Mitigation Measure 3.15-1 is hereby incorporated into the project. This mitigation measure will substantially lessen but not avoid the significant effects identified in the environmental impact report.

Implementation of Mitigation Measure 3.15-1 would result in reductions in GHG emissions associated with construction activity. The measure is programmatic in that it recognizes that emission control technologies will continue to evolve and the feasibility of more GHG reductions will likely increase over the 25-year buildout period of the project. It is also recognized that a framework for understanding GHG emissions embodied in construction materials (e.g., concrete) may continue to evolve such that embodied emissions can be reduced through project-level mitigation. However, the extent to which feasible technologies and GHG reduction measures will continue to be developed is not known at the time of writing this EIR. Therefore, this analysis concludes that these reductions would not be sufficient to fully reduce the construction-generated GHGs to the extent that they would not be cumulatively considerable. The regulatory changes that are likely under AB 32 and other legislation may result in additional, more substantial reductions in emissions through the use of low carbon fuels or off-road engine standards. Because of the uncertainty with respect to GHG reductions from regulations that have not yet been developed, and because the GHGs generated by construction of land uses envisioned under the General Plan could be considerable, the incremental contribution of GHG emissions from project-related construction would be cumulatively considerable and significant and unavoidable.

Adherence to state regulations, proposed General Plan regulations and policies, and the CAP would reduce operations-related incremental GHG emissions associated with implementation of the proposed General Plan. In addition, mitigation measures outlined in Chapter 3.2, “Air Quality” of the Final EIR, that reduce construction and operational criteria air pollutant emissions would also reduce GHG emissions to some extent. The CAP includes measures intended to reduce GHG emissions within City operations and the community at large. Implementation of the CAP as proposed would reduce GHG

emissions approximately 16.9% below 2008 emission levels as measured from business-as-usual

conditions in 2020. Thus, the recommended CAP measures as proposed would enable the City to meet AB 32 goals by exceeding a 15% below current emissions level standard by 2020. Achievement of the AB 32 goal could potentially allow the City to conclude less than significant for operations-related GHG emissions due to implementation of the General Plan. However, uncertainty exists whether, when, and to what degree the emission reduction measures proposed in the CAP would be implemented, and if the City would be able to achieve AB 32 goals. The CAP is a new program for the City, containing non-standard programs, with which the City has limited or no experience with implementation. Although adherence to

## 6.0 Significant Environmental Effects

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state regulations, proposed General Plan policies, and the CAP would reduce operations-related incremental GHG emissions associated with implementation of the proposed General Plan, due to uncertainty with the degree of CAP implementation, the cumulatively considerable incremental contribution to the worldwide increase in GHG emissions represented by implementation of the proposed General Plan is considered significant and unavoidable.

Because the total GHG emissions associated with project operations under the proposed project would be considered substantial, and due to the uncertainty about whether the future regulations developed through implementation of AB 32 would cause operational emissions to be 15% lower than business-as-usual emission levels, the proposed project would result in a cumulatively considerable contribution to the significant cumulative impact related to long-term operational generation of GHGs. Therefore, implementation of the proposed project could hinder California's ability to attain the goals identified in AB 32. Uncertainty exists whether, when, and to what degree the emission reduction measures proposed in the CAP would be implemented, and if the City would be able to achieve AB 32 goals. The CAP is a new program for the City, containing non-standard programs, with which the City has limited or no experience with implementation. Although adherence to state regulations, proposed General Plan policies, implementation of Mitigation Measure 3.15-1, and the CAP would reduce the incremental GHG emissions associated with implementation of the proposed General Plan, due to uncertainty with the degree of CAP implementation, impacts to conflicts with applicable plans would remain significant and unavoidable.

Therefore, the project's effects on construction related GHGs, operations related GHGs, and conflicts with applicable plans, policies and regulations are significant and unavoidable at the project and cumulative level. As set forth in the Statement of Overriding Considerations, these global climate change effects are acceptable in light of the project's benefits.

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## **CHAPTER 7 FINDINGS REGARDING PROJECT ALTERNATIVES**

Chapter 5, Project Alternatives, of the Final EIR discussed several alternatives to the proposed project in order to present a reasonable range of options. The alternatives evaluated included:

- Alternative 1: No Project/Existing General Plan
- Alternative 2: Growth Constrained to Two Transit Overlay Areas Only
- Alternative 3: Extensive Transportation Demand Management Program.

To facilitate this comparison, the objectives of the project contained in Section 2.2 of the EIR are re-stated here:

**QUALITY OF LIFE:** Maintain the high quality of life enjoyed by West Hollywood residents.

**DIVERSITY:** Value the social, economic and cultural diversity of our people, and work to protect people who are vulnerable.

**HOUSING:** Continuously protect and enhance affordable housing, and support Rent Stabilization laws. Recognize the need for preserving our housing stock as well as understand the need to positively shape new construction to meet our future housing needs. Support diverse income levels in new housing development.

**NEIGHBORHOOD CHARACTER:** Recognize the need to maintain and enhance the quality of life in our residential neighborhoods. Investigate standards to ensure buildings enhance the City's eclectic neighborhoods. Emphasize opportunities to meet housing needs and economic development goals along the commercial boulevards.

**ECONOMIC DEVELOPMENT:** Support an environment where our diverse and eclectic businesses can flourish. Recognize that economic development supports public services, provides benefits associated with the City's core values, and adds character to our community.

**ENVIRONMENT:** Support innovative programs and policies for environmental sustainability to ensure health, and proactively manage resources. Provide leadership to inspire others outside City limits.

**TRAFFIC AND PARKING:** Recognize that automobile traffic and parking are key concerns in our community. Strive to reduce our dependence on the automobile while increasing other options for movement such as walking, public transportation, shuttles, cars, and bicycles within our borders and beyond. Continue to investigate innovative shared parking solutions.

## 7.0 Findings Regarding Project Alternatives

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**GREENING:** Seek new areas to increase park space and landscape areas in our streets, sidewalks, and open areas to create space for social interaction and public life.

**ARTS AND CULTURE:** Enhance the cultural and creative life of the community. Continue to expand cultural and arts programming including visual and performing arts, and cultural and special events.

**SAFETY:** Protect the personal safety of people who live, work and play in West Hollywood. Recognize the challenges of public safety within a vibrant and inclusive environment.

The project objectives for the CAP are:

- Adopt a Climate Action Plan that will comply with and implement State law, advance Citywide sustainability, and reflect community values.
- Place the City on a path to reduce annual community-wide GHG emissions by 20% to 25% below current emission levels by 2035.
- Provide clear guidance to City staff and decision makers regarding when and how to implement key actions to reduce GHG emissions.
- Inspire residents and businesses to participate in community efforts to reduce GHG emissions.

### **7.1 ALTERNATIVE 1: NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE**

The Final EIR discusses the Alternative 1, and compares this alternative with the project, in Section 5.0 and in the Responses to Comments.

Alternative 1 assumes that the proposed General Plan would not be adopted and implemented. Instead, the City of West Hollywood would be developed according to the existing General Plan's land use designations and circulation plan. The existing General Plan would not allow for changes in land use in the five commercial subareas pursuant to the proposed project. Additionally, under this alternative, the City of West Hollywood would be developed in accordance with existing General Plan goals and policies.

#### **7.1.1 ENVIRONMENTAL EFFECTS**

Buildout under Alternative 1 would result in approximately 228 fewer dwelling units, approximately 190,606 fewer square feet of nonresidential development, and approximately 361 fewer people than would be forecast under the proposed project, a difference of about 1%. This alternative would result in similar environmental impacts to the proposed General Plan in the areas of aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and



housing, and recreation. This alternative would result in greater environmental impacts to air quality, hydrology and water quality, paleontological resources, public services and utilities, transportation and circulation, and global climate change. Lesser impacts can be expected to occur under this alternative for land use and planning. Therefore, Alternative 1 is not environmentally superior to the proposed project.

## **7.1.2 FINDINGS**

Alternative 1 would not meet the updated goals and policies clearly expressed by the City of West Hollywood and set forth in the General Plan such as reducing dependence on the automobile, increasing other options for movement, and meeting GHG reduction targets. The City is committed to providing the community with a current, long-range planning document that is reflective of the changing conditions and new state requirements (i.e., AB 32 and SB 375), as well as consistent with current planning trends, as proposed in the General Plan update. The existing General Plan does not address current planning trends or new state requirements. Because of these factors, the existing General Plan would not adequately address the economic, environmental, and social needs of the community.

## **7.2 ALTERNATIVE 2: GROWTH CONSTRAINED TO TWO TRANSIT OVERLAY AREAS ONLY**

The Final EIR discusses Alternative 2, and compares it with the project, in Section 5.3.2.

This alternative includes all development in the City's existing project pipeline as of November 2009, as well as new development allowed by the General Plan in two of the three areas identified as transit overlay zones. To achieve this alternative, the City would need to adopt a policy that would stop all growth in the City except for projects in the pipeline as of 2009 and projects in two of the three transit overlay areas of the City. New development in other areas would not be allowed.

Existing General Plan land use designations would be maintained in all areas of the City except for two of the three transit nodes. FAR and height development standards would be increased compared to the existing General Plan on some parcels in two of the three transit nodes. This alternative assumes that the new Redline subway extension would open toward the end of the General Plan time horizon and that development would be focused only in these two areas (except for projects already in the pipeline). Policies to encourage development in the two transit overlay areas—such as parking reductions, TDM, etc.—are included in the alternative. Policies would also be included to prohibit new development in areas outside of the two designated transit node, growth areas. All other policies in the proposed General Plan would be expected to remain the same.

## 7.0 Findings Regarding Project Alternatives

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### **7.2.1 ENVIRONMENTAL EFFECTS**

Alternative 2 would result in similar environmental impacts to the proposed General Plan in the areas of aesthetics, biological resources, cultural resources, hydrology and water quality, and land use and planning. Lesser impacts can be expected to occur under this alternative for air quality, geology and soils, hazards and hazardous materials, noise, paleontological resources, population and housing, public services and utilities, recreation, transportation and traffic, and global climate change. Some significant intersection LOS impacts of the proposed project would be avoided under this alternative, but no other impacts would be reduced to a less-than-significant level. Therefore, Alternative 2 is environmentally superior to the proposed project.

### **7.2.2 FINDINGS**

Because Alternative 2 would restrict additional development in most areas of the City and keep the majority of existing General Plan policies in place, the alternative would not achieve most of the objectives of the proposed General Plan, such as emphasizing opportunities to meet housing needs and economic development goals along the commercial boulevards, providing economic development to support public services, supporting innovative programs and policies for environmental sustainability, or adopting strategies to reduce GHG emissions.

Alternative 2 would not meet the City's goals of improving the overall economic conditions and economic future of the community, furthering environmental sustainability, and addressing climate change because Alternative 2 would not propose such policies. Because Alternative 2 would stop all growth in the City except for projects in the pipeline as of 2009 and projects in two of the three transit overlay areas of the City, Alternative 2 would not allow for, nor successfully contribute to, economic development, housing and sustainability goals throughout the City. Therefore, Alternative 2 would not meet the economic, environmental, and social needs of the community to the degree of the policies proposed in the General Plan update.

## **7.3 ALTERNATIVE 3: EXTENSIVE TRANSPORTATION DEMAND MANAGEMENT PROGRAM**

The Final EIR discusses the Extensive Transportation Demand Management Program Alternative, and compares it with the project, in Section 5.3.3.

Alternative uses the same basic land use and policy assumptions as the project but includes more aggressive TDM policies. The additional TDM policies would shift a number of existing and new trips to transit, biking, and walking from private automobile use by increasing mobility options, providing incentives to use transit, and adjusting parking requirements and costs. Examples of TDM policies that would shift trips from private automobile use to other modes include elimination of minimum parking

requirements, unbundling parking, demand responsive parking costs, additional biking and pedestrian improvements, transit subsidies, and a fare free transit zone. The overall amount of development is expected to be the same as the proposed General Plan but traffic impacts could be reduced due to the TDM program.

### **7.3.1 ENVIRONMENTAL EFFECTS**

Alternative 3 would result in similar environmental impacts to the proposed General Plan in the areas of aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, paleontological resources, population and housing, public services and utilities, and recreation. No issue areas would have greater environmental impacts. Lesser impacts can be expected to occur under this alternative for air quality, hazards and hazardous materials, transportation and traffic, and global climate change. Therefore, Alternative 3 is environmentally superior to the proposed project.

### **7.3.2 FINDINGS**

Alternative 3 would implement the proposed General Plan, with the addition of more stringent policies and programs managing transportation demand. Implementation of these more stringent policies and programs would potentially increase costs for the development of new residential and nonresidential uses. For example, under Alternative 3, all new residential and commercial development would be required to provide a 100 percent transit subsidy for all employees/residents for the lifetime of the building compared with a 50 percent transit subsidy for the proposed General Plan. In addition, Alternative 3 would create a fare-free transit zone with the City of West Hollywood so that all transit trips originating within City boundaries are fare free. This policy is not proposed in the proposed project. Although the City supports assertive transportation demand management strategies, stringent transportation demand management policies and programs would potentially increase development costs, potentially reducing the ability to meet the City's housing and economic development objectives.

7.0 Findings Regarding Project Alternatives

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## **CHAPTER 8**

# **STATEMENT OF OVERRIDING CONSIDERATIONS**

The State CEQA Guidelines provide that:

“CEQA requires the decision-maker to balance the benefits of a proposed project against its unavoidable adverse risks in determining whether to approve a project. If the benefits of the proposed project outweigh the unavoidable adverse environmental effects, the adverse impacts may be considered acceptable. Where the decisions of the public agency allows the occurrence of significant effects which are identified in the Final Environmental Impact Report (EIR) but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. This statement may be necessary if the agency also makes the finding under Section 15091 (a)(2) or (a)(3). If an agency makes a statement of overriding considerations, that statement should be included in the record of the project approval and should be mentioned in the Notice of Determination.” (Section 15093 of the State CEQA Guidelines)

Pursuant to these Guidelines, and to the extent that any impacts from adoption of the General Plan and associated Climate Action Plan (the project) are significant and have not been mitigated to a level of insignificance, the City of West Hollywood adopts and makes the following Statement of Overriding Considerations regarding the potential unavoidable significant environmental impacts of the project and the anticipated economic, social, and other benefits or considerations of the project.

All of the project’s significant adverse impacts can be mitigated to a level of insignificance through implementation of feasible mitigation measures identified in the Final EIR, except for the following significant adverse impacts:

- Air Quality – compliance with South Coast Air Quality Management District Air Quality Management Plan; violation of air quality standards – short-term (construction related emissions); violation of air quality standards – long-term impacts (operational emissions); Cumulatively considerable increase in criteria air pollutants
- Public Services and Utilities – water supply
- Transportation and Traffic – intersection level of service, congestion management program level of service
- Global Climate Change – construction related GHG emissions; operations related GHG emissions; conflicts with applicable plans, policies, or regulations

## 8.0 Statement of Overriding Considerations

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These significant adverse impacts would remain even after implementation of all feasible mitigation measures identified in the Final EIR. Thus, these significant adverse impacts are unavoidable.

The City Council has balanced the project's benefits against the project's significant and unavoidable impacts on air quality, transportation and traffic, water supply, and global climate change. The City Council finds that the project's benefits outweigh the project's significant unavoidable impacts, and the impacts are therefore considered acceptable in light of the project's benefits. The City Council finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the project notwithstanding the project's significant unavoidable impact:

1. The General Plan and Climate Action Plan, as proposed, would provide a long-range planning document for the City, fulfilling the State laws requiring cities to maintain a General Plan, as the new requirements relating to General Plans set forth in AB 32 and SB 375. The proposed General Plan would replace a General Plan that is 25 years old with one that utilizes all the experience of 25 years of Cityhood to better articulate the City's vision for its future. The proposed General Plan is more focused and user-friendly, comprehensively addresses recent changing conditions in the City, and would implement smart growth principles, concepts of sustainable development and resource management, and environmental protection.
2. Pursuant to State law, the proposed General Plan identifies current and future housing needs and sets forth an integrated set of goals, policies, and programs to assist in the preservation, improvement, and development of housing to meet the needs of all income segments of the community.
3. Through the land use policy map and related policies and programs, the General Plan would promote economic development and a broad range of employment opportunities in West Hollywood by increasing opportunities for the development of commercial, office, and retail, primarily in five commercial subareas of the City.
4. The General Plan would encourage sustained economic growth recognizing the importance of economic generators, job generators and a balance between jobs and housing, as well as supporting a diverse economy and continued fiscal stability as well as supporting a diverse economy and continued fiscal stability.
5. The General Plan would promote a high quality of life for the community by ensuring that future development is provided with adequate public facilities and services when that development occurs. In addition, the General Plan would encourage integration of these services with the latest available advancements in technology to proactively manage growth and meet the needs of residents.

6. The circulation system of the proposed General Plan strategically links land use and transportation to make efficient use of the existing roadway capacity through the promotion of a multi-modal circulation system, including improvements to the pedestrian, transit, and bicycling environment in the City of West Hollywood.
7. Through its conservation policies and programs, the General Plan, and in particular the Climate Action Plan, would help promote energy efficiency, the conservation of water resources, and encourage the reduction of waste through recycling, providing a local, statewide, national and ultimately global benefit.
8. The General Plan, through the implementation of the Climate Action Plan, addresses expected impacts of global climate change through the implementation of policies and programs that facilitate sustainable development, including planning additional development around planned transit stations; facilitating a multi-modal transportation system; conserving energy; utilizing alternative energy sources; and promoting green buildings.

These policies place the City on a path to reducing annual community-wide GHG emissions by 20% to 25% below current emission levels by 2035; provide clear guidance to City staff and decision makers regarding when and how to implement key actions to reduce GHG emissions; and contribute to the reduction of greenhouse gas emissions within the City and the promotion of a more energy efficient built environment. These policies provide additional benefits to the community such as cleaner air, cost savings, energy savings, and a greener City.

Finally, the General Plan and Climate Action Plan fulfill the requirements set forth in AB 32 and SB 375 to support the state's efforts to address and mitigate the effects of climate change.

## **CHAPTER 9 FINDINGS ON CHANGES TO THE DRAFT EIR AND RECIRCULATION**

### **9.1 CHANGES TO THE DRAFT EIR**

In response to comments from the public and other public agencies, the project has incorporated changes subsequent to publication of the Draft EIR. All of the changes to the Draft EIR are described in Chapter 6 of the Final EIR.

### **9.2 FINDINGS REGARDING FINAL EIR**

Pursuant to CEQA, on the basis of the review and consideration of the Final EIR, the City finds:

1. Factual corrections and minor changes have been set forth as clarifications and modifications to the Draft EIR;
2. The factual corrections and minor changes to the Draft EIR are not substantial changes in the Draft EIR that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Proposed Project, a feasible way to mitigate or avoid such an effect, or a feasible project alternative;
3. The factual corrections and minor changes to the Draft EIR will not result in new significant environmental effects or substantially increase the severity of the previously identified significant effects disclosed in the Draft EIR;
4. The factual corrections and minor changes in the Draft EIR will not involve mitigation measures or alternatives which are considerably different from those analyzed in the Draft EIR that would substantially reduce one or more significant effect on the environment; and
5. The factual corrections and minor changes to the Draft EIR do not render the Draft EIR so fundamentally inadequate and conclusory in nature that meaningful public review and comment would be precluded.

Thus, none of the conditions set forth in CEQA requiring recirculation of a Draft EIR have been met. Incorporation of the factual corrections and minor changes to the Draft EIR into the Final EIR does not require the Final EIR be circulated for public comment.



9.0 Findings on Changes to the Draft EIR and Recirculation

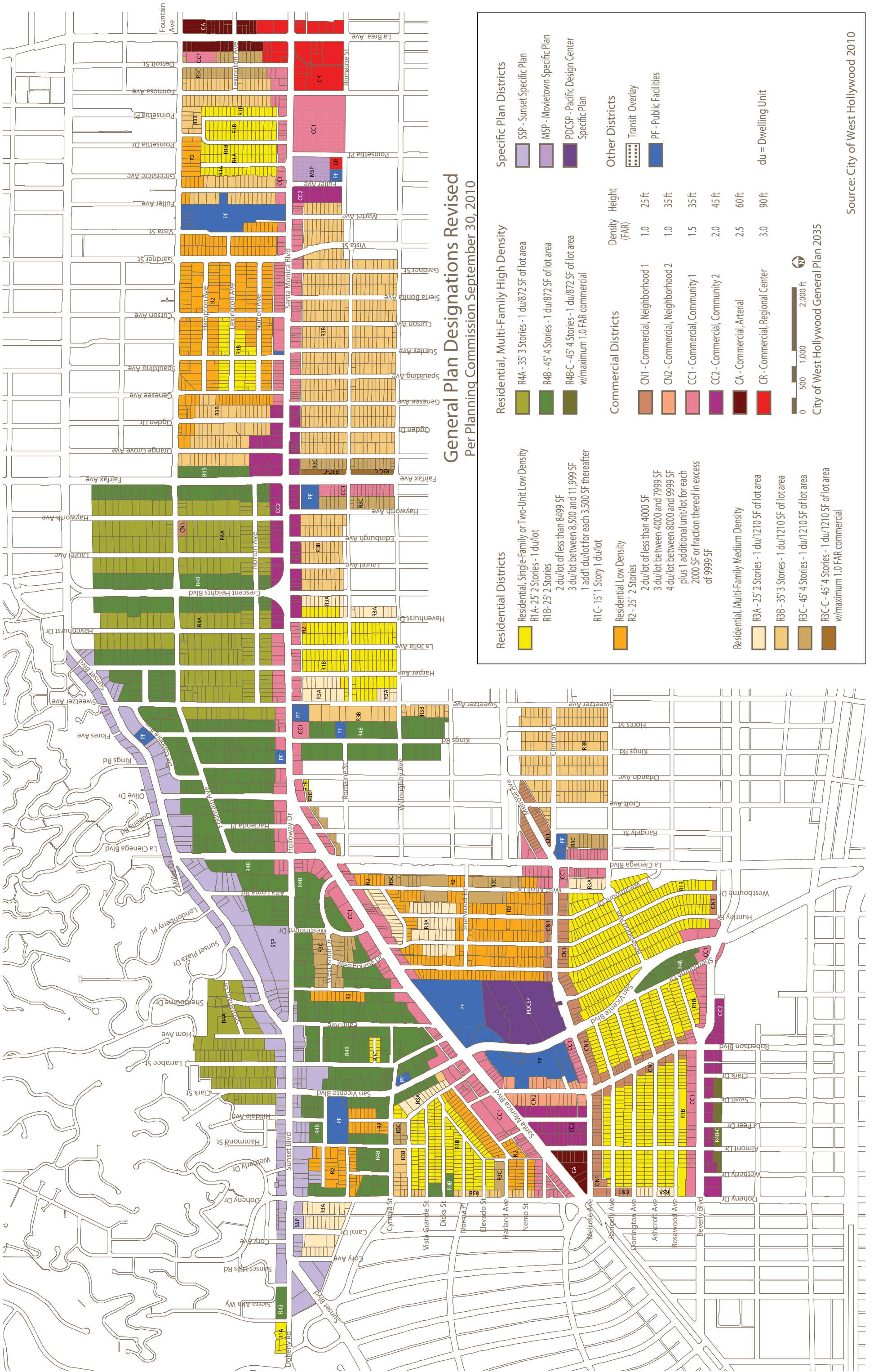
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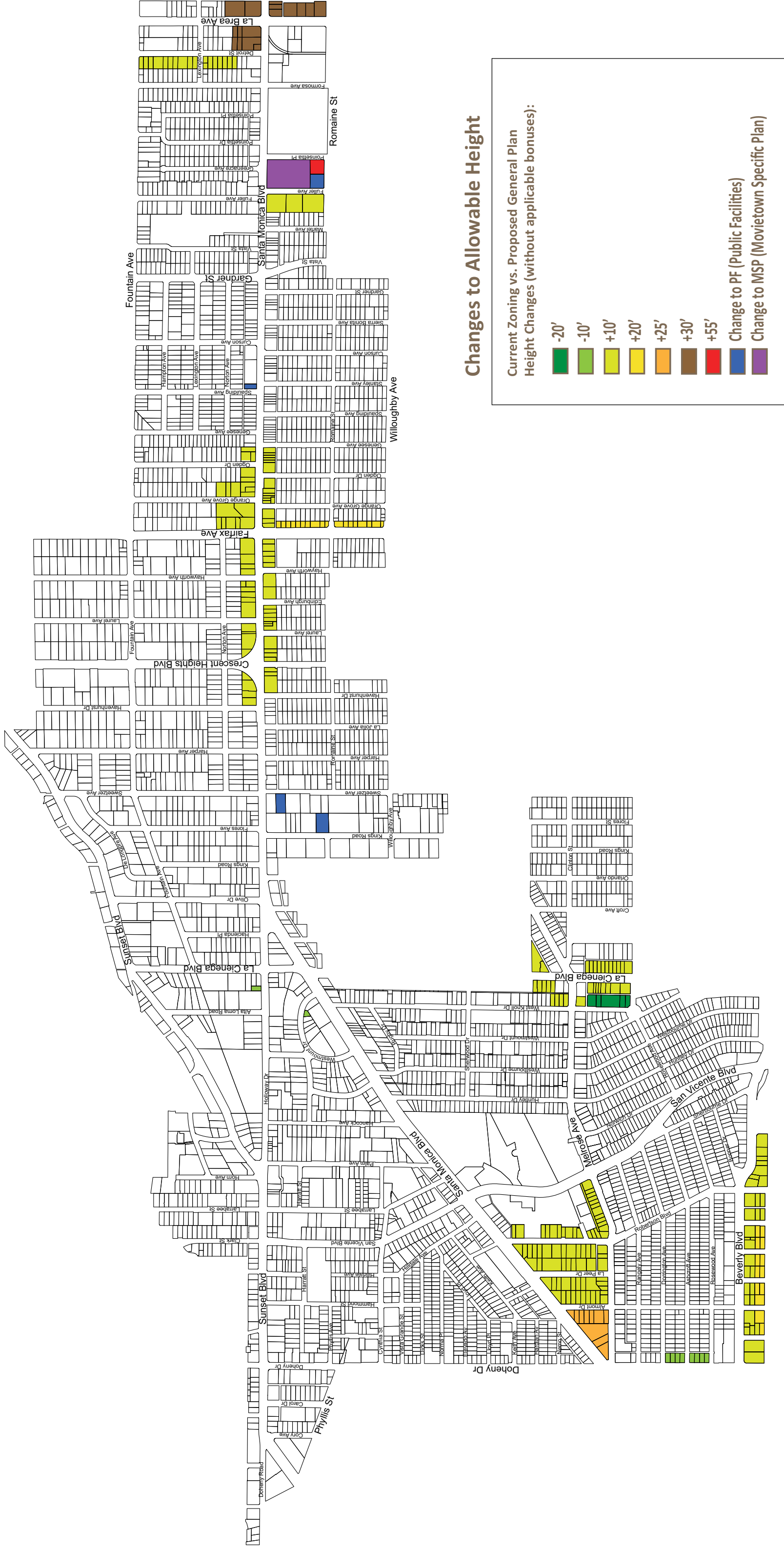
# ITEM 9.A. EXHIBIT D



# Parcels with Proposed Land Use Designation Changes - Height

## West Hollywood Public Review Draft General Plan

Revised September 30, 2010



**EXHIBIT E**  
**Draft General Plan Parcels Proposed for Use, Height, or Density Changes,**  
**and Parcels Included in the Transit Overlay**

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
5529007037	1011	N	ALFRED ST	R3.3	no change	Y
5529007028	1020	N	ALFRED ST	R3.3	no change	Y
4335004027	145	N	ALMONT DR	R2	R4B-C	
4335003030	146	N	ALMONT DR	R2	R4B-C	
4335003002	152	N	ALMONT DR	C2.1	CC2	
4336025011	603	N	ALMONT DR	C2.1	CA	
4336011001	606	N	ALMONT DR	C2.1	CC2	
4336025010	607	N	ALMONT DR	C2.1	CA	
4336011003	612	N	ALMONT DR	C2.1	CC2	
4336011004	614	N	ALMONT DR	C2.1	CC2	
4336025009	617	N	ALMONT DR	C2.1	CA	
4336011005	620	N	ALMONT DR	C2.1	CC2	
4336025008	623	N	ALMONT DR	C2.1	CA	
4336011006	626	N	ALMONT DR	C2.1	CC2	
4336025007	629	N	ALMONT DR	C2.1	CA	
4336011007	632	N	ALMONT DR	C2.1	CC2	
4336025006	633	N	ALMONT DR	C2.1	CA	
4336011008	634	N	ALMONT DR	C2.1	CC2	
4336011009	642	N	ALMONT DR	C2.1	CC2	
4336011010	646	N	ALMONT DR	C2.1	CC2	
4336021001	9050		ASHCROFT AVE	R3.3	R3A	
4334002033	8750		BEVERLY BLVD	C2.1	CC2	
4334002021	8756		BEVERLY BLVD	C2.1	CC2	
4334002007	8764		BEVERLY BLVD	C2.1	CC2	
4334002006	8770		BEVERLY BLVD	C2.1	CC2	
4334002005	8772		BEVERLY BLVD	C2.1	CC2	
4334002004	8784		BEVERLY BLVD	C2.1	CC2	
4334001020	8800		BEVERLY BLVD	C2.1	CC2	
4334001001	8816		BEVERLY BLVD	C2.1	CC2	
4335001039	8840		BEVERLY BLVD	C2.1	CC2	
4335001001	8844		BEVERLY BLVD	C2.1	CC2	
4335001003	8850		BEVERLY BLVD	C2.1	CC2	
4335001030	8850		BEVERLY BLVD	C2.1	CC2	
4335002023	8900		BEVERLY BLVD	C2.1	CC2	
4335002001	8920		BEVERLY BLVD	C2.1	CC2	
4335003024	8936		BEVERLY BLVD	C2.1	CC2	
4335003027	8950		BEVERLY BLVD	C2.1	CC2	
4335004029	9000		BEVERLY BLVD	C2.1	CC2	
4335004001	9012		BEVERLY BLVD	C2.1	CC2	
4335004002	9018		BEVERLY BLVD	C2.1	CC2	

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4335005025	9040		BEVERLY BLVD	C2.1	CC2	
4335001033	141	N	CLARK DR	R2	R4B-C	
4334001003	142	N	CLARK DR	C2.1	CC2	
4335001038	145	N	CLARK DR	R2	R4B-C	
4334001002	146	N	CLARK DR	C2.1	CC2	
5554014020	1111	N	CRESCENT HEIGHTS BLVD	C2.1	CC2	Y
5554014013	1114	N	CRESCENT HEIGHTS BLVD	C2.1	CC2	Y
5554014001	1122	N	CRESCENT HEIGHTS BLVD	R4	no change	Y
5529007021	1031	N	CROFT AVE	R3.3	no change	Y
5529007020	1035	N	CROFT AVE	R3.3	no change	Y
5531009001 and 5531009002	1107	N	DETROIT ST	C2.1	no change	Y
5531009003	1121	N	DETROIT ST	C2.1	no change	Y
5531010019	1122	N	DETROIT ST	R3.3	CR	Y
5531009004	1123	N	DETROIT ST	R3.3	R3C	Y
5531010018	1124	N	DETROIT ST	R3.3	CR	Y
5531009005	1127	N	DETROIT ST	R3.3	R3C	Y
5531010023	1130	N	DETROIT ST	R3.3	no change	Y
5531009006	1133	N	DETROIT ST	R3.3	R3C	Y
5531010015	1138	N	DETROIT ST	R3.3	no change	Y
5531009007	1139	N	DETROIT ST	R3.3	R3C	Y
5531009008	1141	N	DETROIT ST	R3.3	R3C	Y
5531010014	1144	N	DETROIT ST	R3.3	no change	Y
5531010013	1148	N	DETROIT ST	R3.3	no change	Y
5531009009	1151	N	DETROIT ST	R3.3	R3C	Y
5531009010	1155	N	DETROIT ST	R3.3	R3C	Y
5531008001	1201	N	DETROIT ST	R3.3	R3C	Y
5531011023	1202	N	DETROIT ST	R3.3	no change	Y
5531011022	1206	N	DETROIT ST	R3.3	no change	Y
5531008002	1207	N	DETROIT ST	R3.3	R3C	Y
5531008003	1211	N	DETROIT ST	R3.3	R3C	Y
5531011021	1212	N	DETROIT ST	R3.3	no change	Y
5531011020	1216	N	DETROIT ST	R3.3	no change	Y
5531008004	1221	N	DETROIT ST	R3.3	R3C	Y
5531011011	1222	N	DETROIT ST	R3.3	no change	Y
5531008005	1225	N	DETROIT ST	R3.3	R3C	Y
5531008006	1231	N	DETROIT ST	R3.3	R3C	Y
5531008007	1235	N	DETROIT ST	R3.3	R3C	Y
5531008008	1247	N	DETROIT ST	R3.3	R3C	Y
5531008009	1251	N	DETROIT ST	R3.3	R3C	Y
5531011011	1254	N	DETROIT ST	R3.3	no change	Y
5531008010	1257	N	DETROIT ST	R3.3	R3C	Y
4335005025	156	N	DOHENY DR	C2.1	CC2	
4336021023	350	N	DOHENY DR	R3.3	R3A	

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4336021022	356	N	DOHENY DR	R3.3	R3A	
4336021002	360	N	DOHENY DR	R3.3	R3A	
4336022023	400	N	DOHENY DR	R3.3	R3A	
4336022022	408	N	DOHENY DR	R3.3	R3A	
4336022002	412	N	DOHENY DR	R3.3	R3A	
4336022001	416	N	DOHENY DR	R3.3	R3A	
4336012018	500	N	DOHENY DR	C1.1	CN2	
4336007904	8752	N	EL TOVAR PL	C1.1	PF	
5530027006	900	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020047	901	N	FAIRFAX AVE	C2.1	no change	Y
5529020034	905	N	FAIRFAX AVE	C2.1	no change	Y
5530027025	908	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020033	913	N	FAIRFAX AVE	C2.1	no change	Y
5530027005	914	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020032	919	N	FAIRFAX AVE	C2.1	no change	Y
5530027021	920	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020031	923	N	FAIRFAX AVE	C2.1	no change	Y
5529020030	927	N	FAIRFAX AVE	C2.1	no change	Y
5530027004	928	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530027026	934	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020029	935	N	FAIRFAX AVE	C2.1	no change	Y
5529020028	937	N	FAIRFAX AVE	C2.1	no change	Y
5530027003	940	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020027	941	N	FAIRFAX AVE	C2.1	no change	Y
5529020026	945	N	FAIRFAX AVE	C2.1	no change	Y
5530027024	948	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529020025	949	N	FAIRFAX AVE	C2.1	no change	Y
5530012023	1000	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529009034	1001	N	FAIRFAX AVE	C2.1	no change	Y
5530012014	1006	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530012026	1012	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529009033	1015	N	FAIRFAX AVE	C2.1	no change	Y
5529009032	1019	N	FAIRFAX AVE	C2.1	no change	Y
5530012011	1022	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530012010	1026	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530012009	1030	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529009031	1031	N	FAIRFAX AVE	C2.1	no change	Y
5530012008	1038	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530012006 and 5530012007	1042	N	FAIRFAX AVE	C1.1	R3C-C	Y
5530012005	1054	N	FAIRFAX AVE	C1.1	R3C-C	Y
5529009900	1055	N	FAIRFAX AVE	P	no change	Y
5554013010	1111	N	FAIRFAX AVE	C2.1	CC2	Y
5530001017	1116	N	FAIRFAX AVE	C2.1	CC2	Y

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
5554013009	1121	N	FAIRFAX AVE	R4	no change	Y
5554013007	1125	N	FAIRFAX AVE	R4	no change	Y
5530001016	1130	S	FAIRFAX AVE	C2.1	CC2	Y
5530001015	1140	N	FAIRFAX AVE	C2.1	CC2	Y
5530001049	1200	N	FAIRFAX AVE	C2.1	CC2	Y
5554012014	1203	N	FAIRFAX AVE	R4	no change	Y
5531018001	1041	N	FORMOSA AVE	C2.1	no change	Y
5531007022	1111	N	FORMOSA AVE	C2.1	no change	Y
5531007023	1117	N	FORMOSA AVE	C2.1	no change	Y
5531012014	7070		FOUNTAIN AVE	C2.1	no change	Y
5531011029	7120		FOUNTAIN AVE	R3.3	no change	Y
5531021006	1011	N	FULLER AVE	C2.1	CC2	Y
5531021021	1023	N	FULLER AVE	C2.1	CC2	Y
5531021024	1049	N	FULLER AVE	C2.1	CC2	Y
4339010900	901		HANCOCK AVE	C2.1	no change	Y
5529020045	910	N	HAYWORTH AVE	R3.3	no change	Y
5529020044	914	N	HAYWORTH AVE	R3.3	no change	Y
5529020043	920	N	HAYWORTH AVE	R3.3	no change	Y
5529020042	924	N	HAYWORTH AVE	R3.3	no change	Y
5529020041	934	N	HAYWORTH AVE	R3.3	no change	Y
5529020040	940	N	HAYWORTH AVE	R3.3	no change	Y
5529020039	946	N	HAYWORTH AVE	R3.3	no change	Y
5529020038	954	N	HAYWORTH AVE	R3.3	no change	Y
5529009040	1000	N	HAYWORTH AVE	R3.3	no change	Y
5529014033	1009	N	HAYWORTH AVE	R3.3	no change	Y
5529009039	1014	N	HAYWORTH AVE	R3.3	no change	Y
5529009038	1018	N	HAYWORTH AVE	R3.3	no change	Y
5529014032	1019	N	HAYWORTH AVE	R3.3	no change	Y
5529009037	1022	N	HAYWORTH AVE	R3.3	no change	Y
5529014031	1023	N	HAYWORTH AVE	R3.3	no change	Y
5529009036	1028	N	HAYWORTH AVE	R3.3	no change	Y
5529014030	1029	N	HAYWORTH AVE	R3.3	no change	Y
5529009035	1032	N	HAYWORTH AVE	R3.3	no change	Y
5529014029	1035	N	HAYWORTH AVE	R3.3	no change	Y
5529014028	1043	N	HAYWORTH AVE	R3.3	no change	Y
5529014027	1049	N	HAYWORTH AVE	R3.3	no change	Y
5554013022	1105	N	HAYWORTH AVE	C2.1	CC2	Y
5554013021	1111	N	HAYWORTH AVE	C2.1	CC2	Y
5554013020	1119	N	HAYWORTH AVE	R4	no change	Y
5554013027	1122	N	HAYWORTH AVE	R4	no change	Y
5554012018	1206	N	HAYWORTH AVE	R4	no change	Y
4339003007	8500		HOLLOWAY DR	C2.1	no change	Y
5555005008	8505		HOLLOWAY DR	C2.1	no change	Y
4339003006	8508		HOLLOWAY DR	C2.1	no change	Y



APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4339003005	8510		HOLLOWAY DR	C2.1	no change	Y
5555005009	8517		HOLLOWAY DR	R4	CC	Y
4337016027	566		HUNTLEY DR	C1.1	CN2	
4337014056	607		HUNTLEY DR	C1.1	CN2	
4337013034	866		HUNTLEY DR	C2.1	no change	Y
5529008902	1000	N	KINGS RD	R4	PF	
5531014015	1000	N	LA BREA AVE	C2.1	CR	Y
5531017005	1001	N	LA BREA AVE	C2.1	no change	Y
5531014016	1014	N	LA BREA AVE	C2.1	CR	Y
5531014017	1020	N	LA BREA AVE	C2.1	CR	Y
5531017003	1025	N	LA BREA AVE	C2.1	no change	Y
5531017900	1033	N	LA BREA AVE	C2.1	no change	Y
5531017002	1037	N	LA BREA AVE	C2.1	no change	Y
5531014022	1040	N	LA BREA AVE	C2.1	CR	Y
5531010024	1111	N	LA BREA AVE	C3A	CR	Y
5531010025	1127	N	LA BREA AVE	C2.1	CR	Y
5531013024	1130	N	LA BREA AVE	C2.1	CR	Y
5531010022	1133	N	LA BREA AVE	C2.1	no change	Y
5531013006	1134	N	LA BREA AVE	C2.1	no change	Y
5531013005	1138	N	LA BREA AVE	C2.1	no change	Y
5531010009	1145	N	LA BREA AVE	C2.1	no change	Y
5531013002	1146	N	LA BREA AVE	C2.1	no change	Y
5531010010	1149	N	LA BREA AVE	C2.1	no change	Y
5531013001	1150	N	LA BREA AVE	C2.1	no change	Y
5531010011	1157	N	LA BREA AVE	C2.1	no change	Y
5531012020	1200	N	LA BREA AVE	C2.1	no change	Y
5531011001	1201	N	LA BREA AVE	C2.1	no change	Y
5531012019	1204	N	LA BREA AVE	C2.1	no change	Y
5531011002	1205	N	LA BREA AVE	C2.1	no change	Y
5531011003	1209	N	LA BREA AVE	C2.1	no change	Y
5531012018	1212	N	LA BREA AVE	C2.1	no change	Y
5531012017	1216	N	LA BREA AVE	C2.1	no change	Y
5531012016	1222	N	LA BREA AVE	C2.1	no change	Y
5531012015	1226	N	LA BREA AVE	C2.1	no change	Y
5531011029	1233	N	LA BREA AVE	C2.1	no change	Y
5531011009	1257	N	LA BREA AVE	C2.1	no change	Y
5531011010	1259	N	LA BREA AVE	C2.1	no change	Y
5528018043	500	N	LA CIENEGA BLVD	C1.1	CC	
4337009050	501	N	LA CIENEGA BLVD	C1.1	CC	
5528018042	505	N	LA CIENEGA BLVD	C1.1	CC	
4337009049	513	N	LA CIENEGA BLVD	C1.1	CC	
5528018041	514	N	LA CIENEGA BLVD	C1.1	CC	
5528018040	518	N	LA CIENEGA BLVD	C1.1	CC	
5528018039	522	N	LA CIENEGA BLVD	C1.1	CC	

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4337009048	523	N	LA CIENEGA BLVD	C1.1	CC	
5528018038	526	N	LA CIENEGA BLVD	C1.1	CC	
5528018037	530	N	LA CIENEGA BLVD	C1.1	CC	
4337009047	531	N	LA CIENEGA BLVD	C1.1	CC	
4337009046	533	N	LA CIENEGA BLVD	C1.1	CC	
5528018036	534	N	LA CIENEGA BLVD	C1.1	CC	
4337009045	535	N	LA CIENEGA BLVD	C1.1	CC	
4337009044	537	N	LA CIENEGA BLVD	C1.1	CC	
5528018035	538	N	LA CIENEGA BLVD	C1.1	CC	
5528018034	542	N	LA CIENEGA BLVD	C1.1	CC	
5528018033	546	N	LA CIENEGA BLVD	C1.1	CC	
4337009065	547	N	LA CIENEGA BLVD	C1.1	CC	
4337003045	615	N	LA CIENEGA BLVD	C1.1	CC	
4337003046 and 4337003047	621	N	LA CIENEGA BLVD	C1.1	CC	
5528017070	624	N	LA CIENEGA BLVD	C1.1	CC	
4337003048	629	N	LA CIENEGA BLVD	C1.1	CC	
5528017071	630	N	LA CIENEGA BLVD	C1.1	CC	
4337003049	637	N	LA CIENEGA BLVD	C1.1	CC	
5529007040	980	N	LA CIENEGA BLVD	R3.3	no change	Y
4339003009	1005	N	LA CIENEGA BLVD	C2.1	no change	Y
4339003008	1017	N	LA CIENEGA BLVD	C2.1	no change	Y
5555004089	1112	N	LA CIENEGA BLVD	C2.1	no change	Y
5555004001	1100	S	LA CIENEGA BLVD	C2.1	no change	Y
5555005007	1107	S	LA CIENEGA BLVD	C2.1	no change	Y
5555005006	1111	S	LA CIENEGA BLVD	C2.1	no change	Y
4335002004	142	N	LA PEER DR	R2	R4B-C	
4335003021	145	N	LA PEER DR	R2	R4B-C	
4335002003	146	N	LA PEER DR	R2	R4B-C	
4335003022	147	N	LA PEER DR	R2	R4B-C	
4335002002	152	N	LA PEER DR	C2.1	CC2	
4335003023	155	N	LA PEER DR	C2.1	CC2	
4336010012	614	N	LA PEER DR	C2.1	CC2	
4336011027	623	N	LA PEER DR	C2.1	CC2	
4336011019	627	N	LA PEER DR	C2.1	CC2	
4336011018	633	N	LA PEER DR	C2.1	CC2	
4336010017	634	N	LA PEER DR	C2.1	CC2	
4336011017	637	N	LA PEER DR	C2.1	CC2	
4336010002	638	N	LA PEER DR	C2.1	CC2	
4336011016	641	N	LA PEER DR	C2.1	CC2	
4336010004	646	N	LA PEER DR	C2.1	CC2	
4336009007	648	N	LA PEER DR	C2.1	CC2	
4336011014	653	N	LA PEER DR	C2.1	CC2	
4336011013	657	N	LA PEER DR	C2.1	CC2	

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4336011012	663	N	LA PEER DR	C2.1	CC2	
4336009010	672	N	LA PEER DR	C2.1	CC2	
5554014008	1105	N	LAUREL AVE	C2.1	CC2	Y
5554014007	1117	N	LAUREL AVE	R4	no change	Y
5554013014	1120	N	LAUREL AVE	R4	no change	Y
5531012021	7065		LEXINGTON AVE	C2.1	no change	Y
5531013026	7068		LEXINGTON AVE	C2.1	no change	Y
5531010012	7120		LEXINGTON AVE	R3.3	no change	Y
5531009011	7154		LEXINGTON AVE	R3.3	R3C	
4337009064	8516		MELROSE AVE	C1.1	CC	
4337003100	8525		MELROSE AVE	C1.1	CC	
4336007020	8711		MELROSE AVE	C1.1	CC	
4336007021	8723		MELROSE AVE	C1.1	CC	
4336007029	8725		MELROSE AVE	C1.1	CC	
4336007022	8731		MELROSE AVE	C1.1	CC	
4336007023	8735		MELROSE AVE	C1.1	CC	
4336007024	8739		MELROSE AVE	C1.1	CC	
4336007025	8747		MELROSE AVE	C1.1	CC	
4336007026	8751		MELROSE AVE	C1.1	CC	
4336007027	8755		MELROSE AVE	C1.1	CC	
4336007903	8759		MELROSE AVE	C1.1	CC	
4336010015	8807		MELROSE AVE	C1.1	CN2	
4336010014	8811		MELROSE AVE	C1.1	CN2	
4336010013	8825		MELROSE AVE	C2.1	CC2	
4336011023	8901		MELROSE AVE	C2.1	CC2	
4336011021 and 4336011022	8907		MELROSE AVE	C2.1	CC2	
4336011026	8917		MELROSE AVE	C2.1	CC2	
5554012037	7911		NORTON AVE	R4	no change	Y
5554013006	7914		NORTON AVE	R4	no change	Y
5554013005	7918		NORTON AVE	R4	no change	Y
5554013004	7922		NORTON AVE	R4	no change	Y
5554012016	7925		NORTON AVE	R4	no change	Y
5554012017	7927		NORTON AVE	R4	no change	Y
5554013019	7956		NORTON AVE	R4	no change	Y
5554013018	7962		NORTON AVE	R4	no change	Y
5554013017	7964		NORTON AVE	R4	no change	Y
5554013016	7972		NORTON AVE	R4	no change	Y
5554013015	7976		NORTON AVE	R4	no change	Y
5554014006	8008		NORTON AVE	R4	no change	Y
5554014005	8010		NORTON AVE	R4	no change	Y
5554014004	8016		NORTON AVE	R4	no change	Y
5554014003	8022		NORTON AVE	R4	no change	Y
5554014002	8028		NORTON AVE	R4	no change	Y

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
5554014019	8102		NORTON AVE	R4	no change	Y
5554014018	8106		NORTON AVE	R4	no change	Y
5554014017	8110		NORTON AVE	R4	no change	Y
5554014016	8116		NORTON AVE	R4	no change	Y
5554014015	8120		NORTON AVE	R4	no change	Y
5554014014	8130		NORTON AVE	R4	no change	Y
5530013019	1001	N	OGDEN DR	R3.3	no change	Y
5530013020	1011	N	OGDEN DR	R3.3	no change	Y
5530013021	1017	N	OGDEN DR	R3.3	no change	Y
5530013022	1021	N	OGDEN DR	R3.3	no change	Y
5530013023	1027	N	OGDEN DR	R3.3	no change	Y
5530013024	1031	N	OGDEN DR	R3.3	no change	Y
5530013025	1037	N	OGDEN DR	R3.3	no change	Y
5530013026	1041	N	OGDEN DR	R3.3	no change	Y
5530013027	1047	N	OGDEN DR	R3.3	no change	Y
5530013028	1051	N	OGDEN DR	R3.3	no change	Y
5530003022	1102	N	OGDEN DR	C2.1	CC2	Y
5530027027	901	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027010	905	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027011	909	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027012	917	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027013	919	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027014	925	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027015	931	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027016	937	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027017	943	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027018	947	N	ORANGE GROVE AVE	R3.3	no change	Y
5530027028	953	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013018	1000	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012016	1001	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012017	1005	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013017	1006	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013016	1010	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012018	1011	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013015	1016	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012019	1019	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012020	1021	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013014	1022	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012021	1029	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013013	1030	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012022	1031	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013012	1036	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012800	1037	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013011	1042	N	ORANGE GROVE AVE	R3.3	no change	Y

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5530013010	1044	N	ORANGE GROVE AVE	R3.3	no change	Y
5530012801	1045	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013009	1050	N	ORANGE GROVE AVE	R3.3	no change	Y
5530013002	1062	N	ORANGE GROVE AVE	C2.1	CC2	Y
5530002019	1114	N	ORANGE GROVE AVE	C2.1	CC2	Y
5530002018	1128	N	ORANGE GROVE AVE	C2.1	CC2	Y
5530001039	1129	N	ORANGE GROVE AVE	C2.1	CC2	Y
5530002017	1132	N	ORANGE GROVE AVE	C2.1	CC2	Y
4339012022	803		PALM AVE	C2.1	no change	Y
5531021002	1001	N	POINSETTIA PL	C2.1	CR	Y
4334002001	142	N	ROBERTSON BLVD	C2.1	CC2	
4334001018	145	N	ROBERTSON BLVD	C2.1	CC2	
4334001019	151	N	ROBERTSON BLVD	C2.1	CC2	
4334002023	158	N	ROBERTSON BLVD	C2.1	CC2	
4336007035	600	N	ROBERTSON BLVD	C1.1	CN2	
4336007002	610	N	ROBERTSON BLVD	C1.1	CN2	
4336007003	614	N	ROBERTSON BLVD	C1.1	CN2	
4336007033	616	N	ROBERTSON BLVD	C1.1	CN2	
4336010270 and 4336010271	623	N	ROBERTSON BLVD	C1.1	CN2	
4336008911	626	N	ROBERTSON BLVD	C1.1	CN2	
4336010008	627	N	ROBERTSON BLVD	C1.1	CN2	
4336010007	631	N	ROBERTSON BLVD	C1.1	CN2	
4336008002	634	N	ROBERTSON BLVD	C1.1	CN2	
4336010016	641	N	ROBERTSON BLVD	C1.1	CN2	
4336008003	642	N	ROBERTSON BLVD	C1.1	CN2	
4336010005	645	N	ROBERTSON BLVD	C1.1	CN2	
4336008028	646	N	ROBERTSON BLVD	C1.1	CN2	
4336008013	650	N	ROBERTSON BLVD	C1.1	CN2	
4336009006	653	N	ROBERTSON BLVD	C1.1	CN2	
4336008014	656	N	ROBERTSON BLVD	C1.1	CN2	
4336008015	662	N	ROBERTSON BLVD	C1.1	CN2	
4336009007	665	N	ROBERTSON BLVD	C1.1	CN2	
4336008016	666	N	ROBERTSON BLVD	C1.1	CN2	
4336009003 and 4336009004 and 4336009005	681	N	ROBERTSON BLVD	C1.1	CN2	
4336009002	685	N	ROBERTSON BLVD	C1.1	CN2	
4336008017	686	N	ROBERTSON BLVD	C1.1	CN2	
4336008018	694	N	ROBERTSON BLVD	C1.1	CN2	
5531021003	7317		ROMAINE ST	C2.1	PF	Y
5530027019	7860		ROMAINE ST	R3.3	no change	Y
5529020036	7920		ROMAINE ST	R3.3	no change	Y
5529020037	7924		ROMAINE ST	R3.3	no change	Y

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5529014034	7949		ROMAINE ST	R3.3	no change	Y
4337006050	8583		RUGBY DR	R3.1	no change	Y
4337018026	540	N	SAN VICENTE BLVD	C1.1	CN2	
4336006038	555	N	SAN VICENTE BLVD	C1.1	CN2	
4337017900 and 4337017904	720	N	SAN VICENTE BLVD	P	no change	Y
5531014004	7066		SANTA MONICA BLVD	C3	CR	Y
5531014005	7070		SANTA MONICA BLVD	C3	CR	Y
5531013023	7073		SANTA MONICA BLVD	C3	CR	Y
5531014021	7080		SANTA MONICA BLVD	C3	CR	Y
5531017001	7102		SANTA MONICA BLVD	C3	no change	Y
5531010020	7113		SANTA MONICA BLVD	C3	CR	Y
5531017006	7116		SANTA MONICA BLVD	C3	no change	Y
5531017006	7118		SANTA MONICA BLVD	C2.1	no change	Y
5531010021	7125		SANTA MONICA BLVD	C3	CR	Y
5531009022	7141		SANTA MONICA BLVD	C2.1	no change	Y
5531009021	7155		SANTA MONICA BLVD	C2.1	no change	Y
5531017010	7174		SANTA MONICA BLVD	C2.1	no change	Y
5531007020	7201		SANTA MONICA BLVD	C2.1	no change	Y
5531007021	7207		SANTA MONICA BLVD	C2.1	no change	Y
5531007054	7215		SANTA MONICA BLVD	C2.1	no change	Y
5531006019	7231		SANTA MONICA BLVD	C2.1	no change	Y
5531006020	7235		SANTA MONICA BLVD	C2.1	no change	Y
5531006021	7243		SANTA MONICA BLVD	C2.1	no change	Y
5531006001 and 5531006022	7255		SANTA MONICA BLVD	C2.1	no change	Y
5531005027	7265		SANTA MONICA BLVD	C2.1	no change	Y
5531005028	7273		SANTA MONICA BLVD	C2.1	no change	Y
5531005029	7277		SANTA MONICA BLVD	C2.1	no change	Y
5531021001	7302		SANTA MONICA BLVD	C2.1	MSP	Y
5531004051	7317		SANTA MONICA BLVD	C2.1	no change	Y
5531004049	7321		SANTA MONICA BLVD	C2.1	no change	Y
5531004024	7335		SANTA MONICA BLVD	C2.1	no change	Y
5531003001	7347		SANTA MONICA BLVD	C2.1	no change	Y
5531023002	7494		SANTA MONICA BLVD	C2.1	no change	Y
5531023001	7496		SANTA MONICA BLVD	C2.1	no change	Y
5530010013	7501		SANTA MONICA BLVD	C2.1	no change	Y
5530010014	7503		SANTA MONICA BLVD	C2.1	no change	Y
5530019005	7504		SANTA MONICA BLVD	C2.1	no change	Y
5530019004	7506		SANTA MONICA BLVD	C2.1	no change	Y
5530019003	7508		SANTA MONICA BLVD	C2.1	no change	Y
5530010015	7509		SANTA MONICA BLVD	C2.1	no change	Y
5530019002	7512		SANTA MONICA BLVD	C2.1	no change	Y
5530010016	7513		SANTA MONICA BLVD	C2.1	no change	Y

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5530010017	7517		SANTA MONICA BLVD	C2.1	no change	Y
5530010018	7521		SANTA MONICA BLVD	C2.1	no change	Y
5530010019	7525		SANTA MONICA BLVD	C2.1	no change	Y
5530019001	7530		SANTA MONICA BLVD	C2.1	no change	Y
5530010020	7531		SANTA MONICA BLVD	C2.1	no change	Y
5530010021	7541		SANTA MONICA BLVD	C2.1	no change	Y
5530018005	7542		SANTA MONICA BLVD	C2.1	no change	Y
5530010022	7545		SANTA MONICA BLVD	C2.1	no change	Y
5530018004	7546		SANTA MONICA BLVD	C2.1	no change	Y
5530018003	7548		SANTA MONICA BLVD	C2.1	no change	Y
5530010023	7549		SANTA MONICA BLVD	C2.1	no change	Y
5530018002	7550		SANTA MONICA BLVD	C2.1	no change	Y
5530010024	7555		SANTA MONICA BLVD	C2.1	no change	Y
5530010025	7557		SANTA MONICA BLVD	C2.1	no change	Y
5530018001	7564		SANTA MONICA BLVD	C2.1	no change	Y
5530017006	7600		SANTA MONICA BLVD	C2.1	no change	Y
5530011039	7603		SANTA MONICA BLVD	C2.1	no change	Y
5530017005	7604		SANTA MONICA BLVD	C2.1	no change	Y
5530017004	7612		SANTA MONICA BLVD	C2.1	no change	Y
5530017003	7616		SANTA MONICA BLVD	C2.1	no change	Y
5530011037	7617		SANTA MONICA BLVD	C2.1	no change	Y
5530017002	7624		SANTA MONICA BLVD	C2.1	no change	Y
5530017001	7630		SANTA MONICA BLVD	C2.1	no change	Y
5530011900	7643		SANTA MONICA BLVD	C2.1	PF	Y
5530016006	7700		SANTA MONICA BLVD	C2.1	no change	Y
5530011034	7701		SANTA MONICA BLVD	C2.1	no change	Y
5530016005	7702		SANTA MONICA BLVD	C2.1	no change	Y
5530011035	7705		SANTA MONICA BLVD	C2.1	no change	Y
5530016004	7706		SANTA MONICA BLVD	C2.1	no change	Y
5530016003	7708		SANTA MONICA BLVD	C2.1	no change	Y
5530011036	7711		SANTA MONICA BLVD	C2.1	no change	Y
5530016002	7712		SANTA MONICA BLVD	C2.1	no change	Y
5530011011	7715		SANTA MONICA BLVD	C2.1	no change	Y
5530016001	7718		SANTA MONICA BLVD	C2.1	no change	Y
5530011010	7721		SANTA MONICA BLVD	C2.1	no change	Y
5530015009	7722		SANTA MONICA BLVD	C2.1	no change	Y
5530011009	7725		SANTA MONICA BLVD	C2.1	no change	Y
5530015008	7728		SANTA MONICA BLVD	C2.1	no change	Y
5530011008	7731		SANTA MONICA BLVD	C2.1	no change	Y
5530011007	7735		SANTA MONICA BLVD	C2.1	no change	Y
5530015007	7738		SANTA MONICA BLVD	C2.1	no change	Y
5530011006	7739		SANTA MONICA BLVD	C2.1	no change	Y
5530015006	7740		SANTA MONICA BLVD	C2.1	no change	Y
5530015005	7742		SANTA MONICA BLVD	C2.1	no change	Y

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
5530015004	7744		SANTA MONICA BLVD	C2.1	no change	Y
5530015003	7746		SANTA MONICA BLVD	C2.1	no change	Y
5530015002	7748		SANTA MONICA BLVD	C2.1	no change	Y
5530015001	7750		SANTA MONICA BLVD	C2.1	no change	Y
5530003052	7755		SANTA MONICA BLVD	C2.1	no change	Y
5530014006	7756		SANTA MONICA BLVD	C2.1	CC2	Y
5530014005	7760		SANTA MONICA BLVD	C2.1	CC2	Y
5530003049	7761		SANTA MONICA BLVD	C2.1	no change	Y
5530014004	7764		SANTA MONICA BLVD	C2.1	CC2	Y
5530003024	7767		SANTA MONICA BLVD	C2.1	CC2	Y
5530014003	7768		SANTA MONICA BLVD	C2.1	CC2	Y
5530003023	7771		SANTA MONICA BLVD	C2.1	CC2	Y
5530014002	7772		SANTA MONICA BLVD	C2.1	CC2	Y
5530014001	7780		SANTA MONICA BLVD	C2.1	CC2	Y
5530013031	7800		SANTA MONICA BLVD	C2.1	CC2	Y
5530002025	7807		SANTA MONICA BLVD	C2.1	CC2	Y
5530013006	7814		SANTA MONICA BLVD	C2.1	CC2	Y
5530002067	7819		SANTA MONICA BLVD	C2.1	CC2	
5530013005	7820		SANTA MONICA BLVD	C2.1	CC2	Y
5530002022	7823		SANTA MONICA BLVD	C2.1	CC2	Y
5530002020	7827		SANTA MONICA BLVD	C2.1	CC2	Y
5530013004	7828		SANTA MONICA BLVD	C2.1	CC2	Y
5530013003	7832		SANTA MONICA BLVD	C2.1	CC2	Y
5530013001	7836		SANTA MONICA BLVD	C2.1	CC2	Y
5530012004	7854		SANTA MONICA BLVD	C2.1	CC2	Y
5530001038	7857		SANTA MONICA BLVD	C2.1	CC2	Y
5530012003	7868		SANTA MONICA BLVD	C2.1	CC2	Y
5530012025	7870		SANTA MONICA BLVD	C2.1	CC2	Y
5530001018	7881		SANTA MONICA BLVD	C2.1	CC2	Y
5529009030	7900		SANTA MONICA BLVD	C2.1	CC2	Y
5529009029	7906		SANTA MONICA BLVD	C2.1	CC2	Y
5529009028	7916		SANTA MONICA BLVD	C2.1	CC2	Y
5529009027	7924		SANTA MONICA BLVD	C2.1	CC2	Y
5554013011	7925		SANTA MONICA BLVD	C2.1	CC2	Y
5554013012	7929		SANTA MONICA BLVD	C2.1	CC2	Y
5554013013	7935		SANTA MONICA BLVD	C2.1	CC2	Y
5529009026	7936		SANTA MONICA BLVD	C2.1	CC2	Y
5529014047	7950		SANTA MONICA BLVD	C2.1	CC2	Y
5529014035	7960		SANTA MONICA BLVD	C2.1	CC2	Y
5554013023	7961		SANTA MONICA BLVD	C2.1	CC2	Y
5554013024	7965		SANTA MONICA BLVD	C2.1	CC2	Y
5529015051	7970		SANTA MONICA BLVD	C2.1	CC2	Y
5529015050	7976		SANTA MONICA BLVD	C2.1	CC2	Y
5554013025	7977		SANTA MONICA BLVD	C2.1	CC2	Y



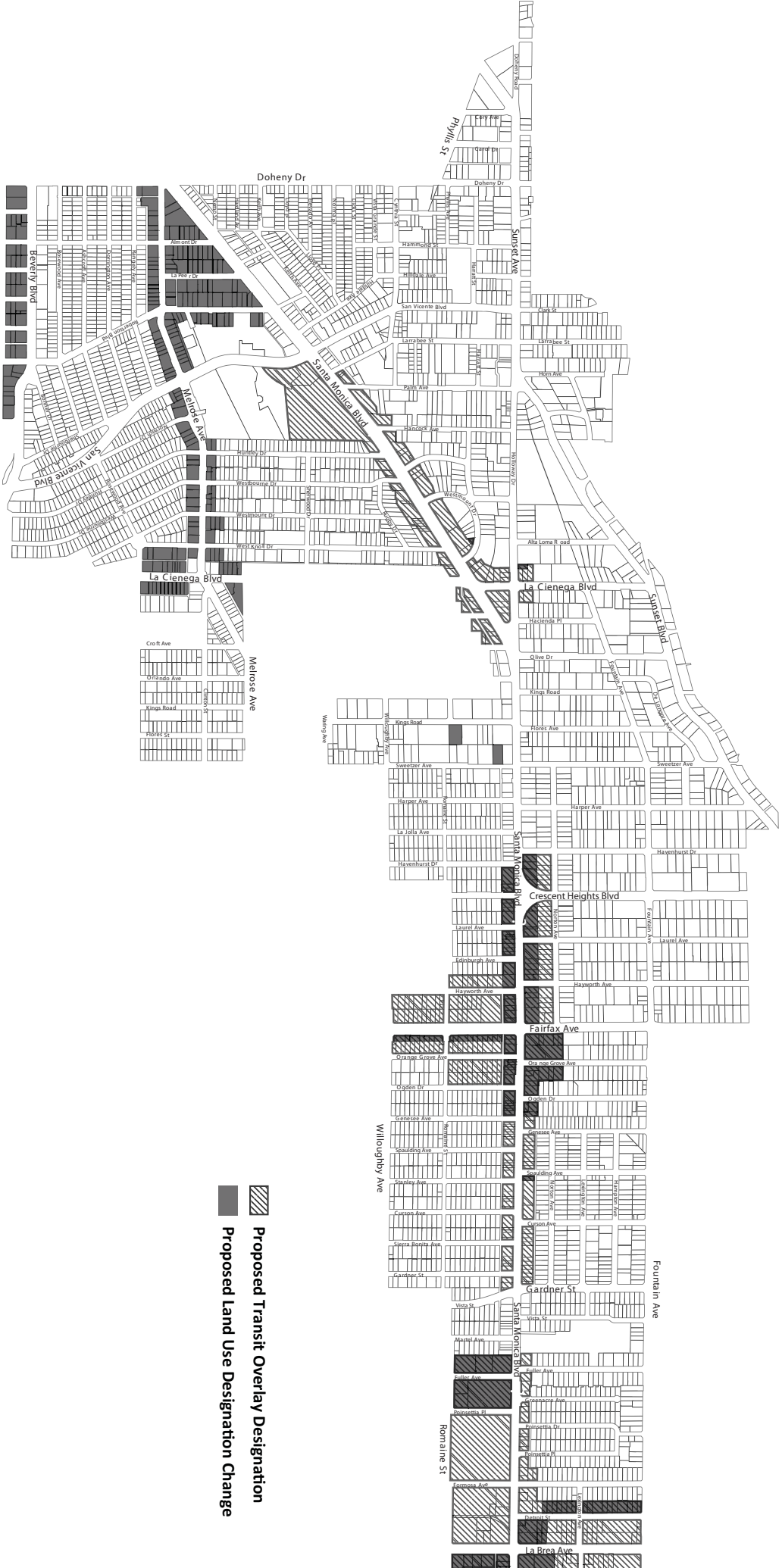
APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
5529015049	7978		SANTA MONICA BLVD	C2.1	CC2	Y
5529015029	7982		SANTA MONICA BLVD	C2.1	CC2	Y
5554013026	7985		SANTA MONICA BLVD	C2.1	CC2	Y
5529015028	7990		SANTA MONICA BLVD	C2.1	CC2	Y
5529015027	7994		SANTA MONICA BLVD	C2.1	CC2	Y
5529015026	7998		SANTA MONICA BLVD	C2.1	CC2	Y
5554014009	8009		SANTA MONICA BLVD	C2.1	CC2	Y
5529024026	8020		SANTA MONICA BLVD	C2.1	CC2	Y
5554014011	8025		SANTA MONICA BLVD	C2.1	CC2	Y
5529024003	8032		SANTA MONICA BLVD	C2.1	CC2	Y
5529024002	8036		SANTA MONICA BLVD	C2.1	CC2	Y
5529024001	8042		SANTA MONICA BLVD	C2.1	CC2	Y
5529019030	8100		SANTA MONICA BLVD	C2.1	CC2	Y
5529019029	8104		SANTA MONICA BLVD	C2.1	CC2	Y
5529019033	8120		SANTA MONICA BLVD	C2.1	CC2	Y
5554014026	8151		SANTA MONICA BLVD	C2.1	CC2	Y
5554014023	8161		SANTA MONICA BLVD	C2.1	CC2	Y
5554014024	8171		SANTA MONICA BLVD	C2.1	CC2	Y
5529008901	8383		SANTA MONICA BLVD	R3.3	PF	
5529007016	8432		SANTA MONICA BLVD	C2.1	no change	Y
5529007017	8440		SANTA MONICA BLVD	C2.1	no change	Y
5529007019	8448		SANTA MONICA BLVD	C2.1	no change	Y
5529007018	8450		SANTA MONICA BLVD	C2.1	no change	Y
5529007033	8460		SANTA MONICA BLVD	C2.1	no change	Y
4339002001	8461		SANTA MONICA BLVD	C2.1	no change	Y
4339002002	8465		SANTA MONICA BLVD	C2.1	no change	Y
5529007034	8470		SANTA MONICA BLVD	C2.1	no change	Y
5529007035	8474		SANTA MONICA BLVD	C2.1	no change	Y
4339002003	8477		SANTA MONICA BLVD	C2.1	no change	Y
5529007036	8490		SANTA MONICA BLVD	C2.1	no change	Y
4339002004	8491		SANTA MONICA BLVD	C2.1	no change	Y
4337001013	8500		SANTA MONICA BLVD	C2.1	no change	Y
4339003015	8505		SANTA MONICA BLVD	C2.1	no change	Y
4337001014 and 4337001033	8512		SANTA MONICA BLVD	C2.1	no change	Y
4339003011	8515		SANTA MONICA BLVD	C2.1	no change	Y
4337001016	8520		SANTA MONICA BLVD	C2.1	no change	Y
4339003012	8525		SANTA MONICA BLVD	C2.1	no change	Y
4337001015	8530		SANTA MONICA BLVD	C2.1	no change	Y
4339005013	8531		SANTA MONICA BLVD	C2.1	no change	Y
4339005025	8543		SANTA MONICA BLVD	C2.1	no change	Y
4337006029	8560		SANTA MONICA BLVD	C2.1	no change	Y
4337006030	8568		SANTA MONICA BLVD	C2.1	no change	Y
4337006031	8572		SANTA MONICA BLVD	C2.1	no change	Y

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4337006051	8576		SANTA MONICA BLVD	C2.1	no change	Y
4337006052	8578		SANTA MONICA BLVD	C2.1	no change	Y
4337006053	8582		SANTA MONICA BLVD	C2.1	no change	Y
4339005040	8585		SANTA MONICA BLVD	C2.1	no change	Y
4337006049	8590		SANTA MONICA BLVD	C2.1	no change	Y
4339006029	8601		SANTA MONICA BLVD	C2.1	no change	Y
4337006054	8610		SANTA MONICA BLVD	C2.1	no change	Y
4337006046	8612		SANTA MONICA BLVD	C2.1	no change	Y
4339006022	8623		SANTA MONICA BLVD	C2.1	no change	Y
4339006027	8631		SANTA MONICA BLVD	C2.1	no change	Y
4337013016	8700		SANTA MONICA BLVD	C2.1	no change	Y
4339007012	8703		SANTA MONICA BLVD	C2.1	no change	Y
4337013017 and 4337013055	8704		SANTA MONICA BLVD	C2.1	no change	Y
4337013046	8714		SANTA MONICA BLVD	C2.1	no change	Y
4339007013	8715		SANTA MONICA BLVD	C2.1	no change	Y
4339007014	8719		SANTA MONICA BLVD	C2.1	no change	Y
4337014065	8730		SANTA MONICA BLVD	C2.1	no change	Y
4339007034	8741		SANTA MONICA BLVD	C2.1	no change	Y
4339010032	8787		SANTA MONICA BLVD	C2.1	no change	Y
4339012021	8809		SANTA MONICA BLVD	C2.1	no change	Y
4339012020	8811		SANTA MONICA BLVD	C2.1	no change	Y
4337017903	8872		SANTA MONICA BLVD	C2.1	no change	Y
4336009001	8954		SANTA MONICA BLVD	C1.1	CN2	
4336009011	8980		SANTA MONICA BLVD	C2.1	CC2	
4336011011	9016		SANTA MONICA BLVD	C2.1	CC2	
4336025005	9040		SANTA MONICA BLVD	C2.1	CA	
4336025004	9060		SANTA MONICA BLVD	C2.1	CA	
4336025003	9080		SANTA MONICA BLVD	C2.1	CA	
4336025012	9098		SANTA MONICA BLVD	C2.1	CA	
4335002021	141	N	SWALL DR	R2	R4B-C	
4335002022	145	N	SWALL DR	R2	R4B-C	
4335001005	146	N	SWALL DR	R2	R4B-C	
4335001004	148	N	SWALL DR	R2	R4B-C	
5531023023	1055	N	VISTA ST	C2.1	no change	Y
4337009034	506		WEST KNOLL DR	R3.3	R3A	
4337009035	510		WEST KNOLL DR	R3.3	R3A	
4337009036	520		WEST KNOLL DR	R3.3	R3A	
4337009037	536		WEST KNOLL DR	R3.3	R3A	
4337009053	540		WEST KNOLL DR	R3.3	R3A	
4337003081	606		WEST KNOLL DR	C1.1	CC	
4337003080	612		WEST KNOLL DR	R2	CC	
4337003079	616		WEST KNOLL DR	R2	CC	
4339005012	8532	W	WEST KNOLL DR	R4	CC	Y

APN	Number	Direction	Street	Existing General Plan Designations	Proposed General Plan Designations	Property in Transit Overlay
4337008156	606		WESTBOURNE DR	C1.1	CN2	
4337011045	607		WESTBOURNE DR	C1.1	CN2	
4339007011	903		WESTBOURNE DR	C2.1	no change	Y
4337009025	560		WESTMOUNT DR	C1.1	CN2	
4337004137	606		WESTMOUNT DR	C1.1	CN2	
4337008018	607		WESTMOUNT DR	C1.1	CN2	
4337004070	612		WESTMOUNT DR	R2	R2	
4337004080	616		WESTMOUNT DR	R2	R2	
4335004006	144	N	WETHERLY DR	R2	R4B-C	
4335004005	148	N	WETHERLY DR	R2	CC2	
4335004004	152	N	WETHERLY DR	C2.1	CC2	
5530027008	7863		WILLOUGHBY AVE	R3.3	no change	Y
5530027007	7865		WILLOUGHBY AVE	R3.3	no change	Y
5529020046	7917		WILLOUGHBY AVE	R3.3	no change	Y

# Parcels with Proposed Land Use Designation Changes and Transit Overlay

## West Hollywood Public Review Draft General Plan



**Melrose Avenue Parcels No Longer Proposed for Use, Height, or Density Changes**

<b>APN</b>	<b>Number</b>	<b>Direction</b>	<b>Street</b>	<b>Existing General Plan Designations</b>	<b>Proposed General Plan Designations</b>
4337009028	8532		MELROSE AVE	C1.1	no change
4337004072 and 4337004137	8533		MELROSE AVE	C1.1	no change
4337009027	8540		MELROSE AVE	C1.1	no change
4337009026	8546		MELROSE AVE	C1.1	no change
4337010020	8564		MELROSE AVE	C1.1	no change
4337008056	8565		MELROSE AVE	C1.1	no change
4337010019	8568		MELROSE AVE	C1.1	no change
4337008069	8573		MELROSE AVE	C1.1	no change
4337010033	8580		MELROSE AVE	C1.1	no change
4337008135	8581		MELROSE AVE	C1.1	no change
4337008157	8585		MELROSE AVE	C1.1	no change
4337010015	8586		MELROSE AVE	C1.1	no change
4337016036	8600		MELROSE AVE	C1.1	no change
4337011064	8607		MELROSE AVE	C1.1	no change
4337011068	8609		MELROSE AVE	C1.1	no change
4337011080	8611		MELROSE AVE	C1.1	no change
4337016028	8612		MELROSE AVE	C1.1	no change
4337014061	8623		MELROSE AVE	C1.1	no change
4337019045	8628		MELROSE AVE	C1.1	no change
4337019013	8632		MELROSE AVE	C1.1	no change
4337019012	8636		MELROSE AVE	C1.1	no change
4337019011	8642		MELROSE AVE	C1.1	no change
4337019010	8650		MELROSE AVE	C1.1	no change
4337018064	8670		MELROSE AVE	C1.1	no change
4337018063	8674		MELROSE AVE	C1.1	no change
4337018062	8680		MELROSE AVE	C1.1	no change
4337018061	8684		MELROSE AVE	C1.1	no change
4337018060	8686		MELROSE AVE	C1.1	no change
4336006015 and 4336006016	8710		MELROSE AVE	C1.1	no change
4336006042	8732		MELROSE AVE	C1.1	no change
4336006011	8734		MELROSE AVE	C1.1	no change
4336006010	8738		MELROSE AVE	C1.1	no change

<b>APN</b>	<b>Number</b>	<b>Direction</b>	<b>Street</b>	<b>Existing General Plan Designations</b>	<b>Proposed General Plan Designations</b>
4336006009	8742		MELROSE AVE	C1.1	no change
4336006008	8746		MELROSE AVE	C1.1	no change
4336006007	8750		MELROSE AVE	C1.1	no change
4336006041	8764		MELROSE AVE	C1.1	no change
4336024012	8808		MELROSE AVE	C1.1	no change
4336024011	8810		MELROSE AVE	C1.1	no change
4336024010	8816		MELROSE AVE	C1.1	no change
4336024009	8818		MELROSE AVE	C1.1	no change
4336024008	8822		MELROSE AVE	C1.1	no change
4336024028	8900		MELROSE AVE	C1.1	no change
4336024005	8906		MELROSE AVE	C1.1	no change
4336024004	8908		MELROSE AVE	C1.1	no change
4336024003	8914		MELROSE AVE	C1.1	no change
4336024029	8920		MELROSE AVE	C1.1	no change
4336012007	9006		MELROSE AVE	C1.1	no change
4336012006	9012		MELROSE AVE	C1.1	no change
4336012025	9014		MELROSE AVE	C1.1	no change
4336012023	9026		MELROSE AVE	C1.1	no change
4336012024	9038		MELROSE AVE	C1.1	no change
4336012020	9056		MELROSE AVE	C1.1	no change

STAFF CHRIS CORRAO stated the purpose of the item which was to answer questions and update the Commission regarding the Draft General Plan Update that was previously brought to the Commission for review.

He reiterated that there have not been drastic changes from the original Historic Preservation Element and that one of the major changes was that it has been incorporated into the General Plan whereas before, it was a stand-alone, separate chapter.

He said the update has been streamlined in the same format as the entire General Plan and that there were changes regarding CEQA.

COMMISSIONER TORGAN commented on his previous suggestion of adding TDR's to the General Plan; he requested to cancel that suggestion.

He commented about other potential incentives for property owners of designated sites such as waiving plan check fees, expediting plan check and incorporating language referencing other means of granting incentives other than what currently exists in the General Plan.

VICE-CHAIR OSTERGREN said she agreed with Commissioner Torgans comments however; that language is listed in section HP-5.3 *The City should explore new financial incentives such as grants and loans for maintenance, rehabilitation or restoration of cultural resources.*

She also said that the Old Sherman District was excluded from the section which lists the cluster of Historic Districts.

COMMISSIONER KAYE commented on HP-4 *Increase the public's awareness of the City's history and Cultural Resources* and section HP-4.2 where it states, *The City should memorialize significant people, places, and events in the history of West Hollywood through plaques and public art.*

He said he was glad to see the information listed in the General Plan Update however it is currently in-active by the Commission and that it should be conveyed more practically in the implementation guidelines.

COMMISSIONER CASTRO asked what the criteria set for demolitions due to economic hardships for owners listed in the Cultural Resource Survey was based on, see section, *Buildings may only be demolished if their preservation will result in economic hardship for the owner.*

STAFF CHRIS CORRAO said that would require further research and he would provide that information to the Commission at a later date.

COMMISSIONER CASTRO also commented favorably on the structure of the document he said it was an easy read and enjoyable as well. He said he appreciated the streamlining of it and that the document is very user friendly.

## ITEM 9.A. EXHIBIT F

CHAIR LEVIN also commended Staff for the user friendly restructure of the document. He commented negatively on the previous structure and stated that may have delayed implementation of previous goals and policies.

He asked what steps will be taken to ensure implementation measures as matters of legislation more than simply policy statements.

STAFF CHRIS CORRAO said the update has an implementation matrix of all the measures within the General Plan that are tied to different departments which will heighten the responsibility of each individual and that he would provide a copy of the matrix to the Commission.

He said that one of the major goals of the update was to make the document more user friendly and thanked the Commission for their feedback and input.

Item 12.A. General Plan/Historic Preservation Element Closed. **Motion carried by the consensus of the Commission.**

### **13. ITEMS FROM STAFF AND UPCOMING PROJECTS:**

#### **A. Historic Preservation Element / Disaster Relief Implementation Measure 3.5– Craig Charles, HPC Volunteer**

STAFF CRAIG CHARLES stated the purpose of this discussion was to advise the Commission of implementation measures relating to the unforeseen event of a citywide disaster.

The purpose is to protect Historic Landmarks within the immediate aftermath of a disaster. It would be to develop both a preparedness plan and disaster relief policies for cultural resources and should be incorporated into the City's existing policies and programs.

He commented on implementation action item number HP-A.10 of the Historic Preservation element relating to the Disaster Relief and Preparedness Plan as well as, HP 3.5 that states that it would be implemented by the Community Development Department, the City Manager's Department and should be completed in the "Short" time frame which is a range from 1-2 years.

He commented on Code number 19.58.170 and stated that it was poorly written specifically where it states the procedures for a property owner reporting irresolvable safety issues of structural damages that would result in the demolition of a landmark.

He said he'd provide the commission with a copy of an existing code from a neighboring city as reference for proposed changes and said that there are also proposed changes regarding temporary fee waivers.





## West Hollywood West Residents Association

PO Box 691427

West Hollywood, CA 90069

Phone: 310.659.3379; Email: president@whwra.org

September 27, 2010

Ms. Bianca Siegl  
Associate Planner  
City of West Hollywood  
8300 Santa Monica Boulevard  
West Hollywood, CA 90069

### RE: Draft General Plan and FEIR — Comment Letter

Dear Bianca:

Thank you for giving West Hollywood West Residents Association (“WHWRA”) the opportunity to comment on the proposed General Plan and Final Environmental Impact Report (“DEIR”) for the City of West Hollywood.

First, I’d like to emphasize my previous comments regarding the draft **Guiding Principles** because the Guiding Principles “serve as the foundation for the goals and policies in the West Hollywood General Plan 2035.” In general, there is a lack of precision in the Guiding Principles. As currently written, the City could probably come up with *any* policy decision and say that it falls under one of the ten guiding principles that you’ve drafted.

Here are some comments and suggestions:

- #1. QUALITY OF LIFE. “Maintain the high quality of life enjoyed by West Hollywood residents.” “Quality of life” has a different meaning for different people. In a city like West Hollywood, where the constituency is so diverse, this statement is vague and needs to be clarified.
- #2. DIVERSITY. “Value the social, economic and cultural diversity of our people, and work to protect people who are vulnerable.” It’s a nice statement, but it’s not linked to a direction.
- #4. NEIGHBORHOOD CHARACTER. How does “Emphasize opportunities to meet housing needs and economic development goals along the commercial boulevards” fit with NEIGHBORHOOD CHARACTER? This should be removed from NEIGHBORHOOD CHARACTER. We suggest adding: West Hollywood will cherish its distinctive, diverse, and eclectic neighborhoods by recognizing that future changes must preserve their unique character.
- #5. ECONOMIC DEVELOPMENT. This statement does not adequately address our small-scale, neighborhood businesses that meet residents’ daily shopping and service needs, and should be revised.

Preserving our City’s unique character as an urban village and creative center, low-scale development, improving traffic and parking conditions, providing social services and workforce housing, and ensuring a decision-making process that provides a high level of community input were consistent themes throughout the community outreach.

We recommend that the following be added to the Guiding Principles:

- Promote policies that recognize, cherish and preserve our unique, urban village.
- New development will respect and harmonize with the City’s existing character.
- West Hollywood’s city government will operate in an open, transparent and responsive manner.

ITEM 9.A. EXHIBIT G

## **WEST HOLLYWOOD GENERAL PLAN, CLIMATE ACTION PLAN, AND FPEIR (FEIR)**

According to our planning and traffic consultants, the City's response to comments, while adding hundreds of new pages of material to the EIR document, still did not adequately address many of the issues that were raised in response to the DEIR.

We respectfully request that you not certify the FPEIR, but instead, send it back to the Planning Department to be revised and recirculated as a Draft EIR. Attached to this document, you will find our consultants' letters regarding the City's response to comments.

My comments below have been submitted for the record previously, but I would like to emphasize some points as these seemed to be "hot-button" issues at the Planning Commission hearings.

### **FUTURE DIRECTION OF THE CITY**

As stated previously, we would like to see General Plan 2035 place more emphasis on preserving West Hollywood's small-town feel (urban village), encouraging neighborhood-serving businesses and pedestrian-friendly streets, limiting the scale and intensity of new buildings, and making responsible planning and land use decisions – i.e., taking into account infrastructure and the current environment. We feel this would be consistent with the extensive community outreach conducted by the City.

### **OUR RESIDENTIAL AND COMMERCIAL NEIGHBORHOOD**

#### Neighborhood Conservation Overlay Zone

As we move forward with the General Plan update, an important goal for us is to preserve the unique nature of our neighborhood. As you know, our neighborhood is comprised primarily of low density residential (R1B) and neighborhood-serving, low impact businesses. We'd like to preserve and maintain that composition. As such, we believe that West Hollywood West and the Melrose/Robertson/Beverly commercial area will remain a thriving residential and business community and continue to be an asset to the city. We support the Neighborhood Conservation Overlay Zone and would also like to see a more detailed definition of the overlay zone than what is in the current General Plan – which is extremely vague. We'd also like to see the Conservation Overlay Zone be developed to include the Avenues of Design.

As you are aware, we are opposed to any zoning changes that increase density or height in the West Hollywood West area. We believe that any increases to height or density: (1) is not consistent with the community's vision, (2) will lead to development that is not compatible with our neighborhood, (3) will cause significant environmental impacts, and (4) will affect the quality of life in our neighborhood. Furthermore, if we take into account the possibility of a height and/or density bonus, a project/development will have the potential to reach the maximum height/density that is being proposed in the draft General Plan by applying just one bonus.

#### Melrose Triangle

The current zoning of the Melrose Triangle is CC (Commercial, Community) – which allows for a maximum FAR of 1.5 FAR and 35 ft. The General Plan draft proposes a 71% increase in height and a 66% increase in FAR for the Melrose Triangle – in other words, a 60 ft. tall project with a 2.5 FAR — pre-bonus. Environmental impacts aside, changing the zoning to CA (Commercial, Arterial) will make the zoning of this property incompatible with the surrounding neighborhoods.

As a direct neighbor of the Avenues of Design and West Hollywood West, we believe that the CC zoning is more appropriate. It seems like the designation change from CC to CA was made to accommodate the developer's proposed project, which is already quite large; and, in addition, would allow the developer to have an even taller and denser project than what is currently on the table.

Any zoning changes for the Melrose Triangle area must take into consideration: (1) that the Melrose Triangle is a gateway into our City and must have above-average architecture and design value and (2) that Melrose Avenue and Santa Monica Boulevard have two entirely different landscapes (and neighbors), and a "one size fits all" approach will not work on this site.

## Sherbourne Triangle

The Sherbourne Triangle, north of the commercial section, is zoned R4B. We know that the property currently has its entitlements, so if the property were to be down-zoned, those entitlements would be "grand-fathered." However, assuming the entitlements do expire, we would like to see a more compatible zoning in place that takes into consideration the current environment with respect to traffic, water and other utilities, parking, public safety, green space, solar access, etc., as well as fits in with the character and integrity of the surrounding neighborhood. A lower zoning designation would be more compatible with the surrounding R1B neighborhood in terms of mass and scale. Down-zoning would reduce potential environmental impacts and growth-inducing impacts. Down-zoning would be consistent with the City of West Hollywood's Vision 2020 core values: "Quality of Residential Life" and "Responsibility for the Environment."

## Bonuses

In the General Plan draft, it states that the City can give bonuses to developers of commercial projects and residential projects with 5 or more units and that "where multiple possible bonuses are indicated in a particular designation, individual projects may be able to cumulatively apply each bonus, as described in the Zoning Ordinance."

Just because the City currently allows for cumulative bonuses does not mean that it is a good policy. We feel that no more than one bonus should be allowed for any development/project in a commercial or residential zone. Also, no bonus should be applied if, by doing so, it would result in a significant environmental impact and/or a project that is not compatible with the surrounding neighborhood. Even SB1818 has a provision that allows a City to reject or modify an SB1818 project if the bonus would cause a significant environmental impact. Height and density bonuses allow a developer to build a much larger project that is not compatible with the surrounding neighborhood. In a low-density neighborhood, where homes are only up to 25 ft. in height, even an additional 10 ft. in the adjacent commercial zone will have a major impact.

We have concerns about light, glare, sun and shade. For example, staff is proposing taller buildings on Melrose – an additional 10 feet on the south side. With multiple bonuses, we could be looking at buildings that are 55 ft. tall, and those buildings will be towering over single-family homes 15 to 25 ft. tall, creating significant environmental impacts as well as impinging on residents' privacy and overall quality of life. There also exists a 'fair argument' that the drastic changes in the area's aesthetics that would be caused by bigger or taller buildings would be a significant impact.

Regarding the Green Building bonus – in a progressive City like West Hollywood, shouldn't green buildings be mandatory for any new development? Green should not be "optional" and the City shouldn't have to give incentives to developers to be green. Offering additional height and/or density or a lower parking requirement to a green building is counter-productive. We would like to see the progressive City of West Hollywood establish a strict threshold on the standards of significance for shade and shadow so as to encourage lower buildings and more solar panel use.

## Transitional Zoning

Transitional Zoning can be an important planning tool, particularly since many of our residential neighborhoods abut commercial zones without the benefit of a buffer such as an alley. We hope the City will incorporate Transitional Zoning into the Land Use section of the updated General Plan as well as its Zoning Ordinance.

## Parking – "Unbundling"

While in theory, "unbundling parking" might seem like a progressive idea, the reality is, there are many potential negative impacts that the City is clearly not anticipating. For instance, we have seen many cases in West Hollywood West, where a landlord has a rental unit with an accessible garage but doesn't offer it to the prospective tenant. Instead, he/she rents it out to a nearby business for storage purposes because he/she can get more money for the commercial use.

Unbundling parking would encourage these types of activities and create more on-street parking problems.

Off-Site Signage – Billboard And Tall Walls

WHWRA supported the Sunset Specific Plan, which kept tall walls and billboards on Sunset. We believe that permitting tall walls/billboards is inappropriate for the commercial streets surrounding West Hollywood West as it would negatively impact the integrity of the residential neighborhood and could have significant environmental impacts as well. We also believe that tall walls and billboards would take away from the unique character of the surrounding commercial area, particularly, the Avenues of Design.

Utilities – Water Resources

Approving the draft General Plan as proposed would be inconsistent with State and local policies regarding water conservation. Water is a limited resource that cannot be replaced like electricity can with solar energy. Every drop of water that goes towards this program is a drop being literally taken away from current customers. Every raise in current customers' rates to force conservation is effectively forcing current customers to subsidize new developments.

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On behalf of WHWRA, thank you, again, for the opportunity to submit our comments. Attached please find the additional (two) comment letters from our consultants, Sandra Genis of Planning Resources and Tom Brohard of Tom Brohard & Associates, written on behalf of WHWRA and submitted for the record.

Sincerely,



Lauren Meister  
President, West Hollywood West Residents Association

*Attachments (Letters from Sandra Genis and Tom Brohard)*

*Cc w/att.: Doug Carstens, Chatten-Brown & Carstens*

September 23, 2010

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

Subject: West Hollywood General Plan and Climate Action Plan  
Environmental Impact Report (SCH No. 2009091124)

Dear Ms. Siegl:

Thank you for the opportunity to comment on the Program Environmental Impact Report (PEIR) for the West Hollywood General Plan and Climate Action Plan (SCH No. 2009091124). These comments are submitted on behalf of the West Hollywood West Residents Association.

The Final PEIR documents contain significantly more pages than the previously circulated Draft EIR, with the main body of the Final PEIR containing twenty pages more than the Draft and the Appendices containing over three hundred pages of additional material. In light of the significant amount of new material provided, the documents must be recirculated pursuant to Guidelines Section 15088.5.

Review is further complicated because the Final PEIR does not identify what material is new, what is original, and what may be a revised version of the original. It is not clear if all of the additional pages include new material or if some of them may just be spacer pages, as appears to be the case with at least some of the additional pages added to the main body of the PEIR. Without a listing of changes or at least a strikeout/underline approach, one is forced to carefully compare over two thousand pages of material to attempt to determine if new, useful information has been provided. This is clearly not reasonable.

Some new, useful information has been provided in Appendix H to the Final PEIR, for example the explanation of some of the broad land use assumptions. However, the Response to Comments generally fails to remedy the many deficiencies in the Draft PEIR. Many, if not most, of the responses are non-responsive, only partially responsive and/or dismissive.

Rather than endlessly re-iterate previously submitted comments, just a few of the major failings are discussed below. Failure to re-iterate previously submitted comments on the DEIR regarding significant impacts and unsupported conclusions herein should not be interpreted as acquiescence that those deficiencies no longer exist.

Perhaps most critical is the failure to provide breakdowns of existing and anticipated land use by area. While some general information has been provided as to future use (p. 5), one still is left in the dark as to how a given neighborhood would be expected to change. We are told that a parcel by parcel analysis was performed, but are given only the broad brush, city-wide results. While different assumptions are presented, the EIR does not reveal whether each assumption was applied to just a few parcels or to numerous parcels, whether a neighborhood is anticipated to change radically, or remain the same. For questions regarding density bonuses, which could have a significant impact on future land use, one is merely referred to the Municipal Code and General Plan documents, left to wonder how these were interpreted for EIR analysis purposes.

The Response to Comments repeatedly dismisses requests for information as not relevant to CEQA review, even though the questions raised are in direct response to material provided in the DPEIR, including reference to the applicable page in the DPEIR. For example, the DPEIR repeatedly asserts that no impacts will occur due to application of the City Municipal Code. When asked how those provisions will actually reduce impacts, the response to comments asserts that it is not a CEQA issue (E5-67).

The DPEIR states that light in glare will not create impacts on any observatories, as none exist in the area. When a comment, noting the relevant page, asks about Griffith Park Observatory, a mere three miles from the City boundary, the response to comments is that it is not a CEQA issue (E5-86).

Although the comments submitted are numbered separately, referencing specific pages, as many as fifteen separate comments are lumped together with the response addressing only one or two of those comments (E5-58, 63, 64). The Response to comments must address ALL comments.

The response to comments asserts that certain issues have been “analyzed” when only generalized or conclusory statements or limited information are offered. For example, in response to a question regarding impacts on solar panels (E-5-25) the response simply states that aesthetic impacts were already analyzed in Section 3.1, when the information requested was not addressed in that section. It is asserted that intersections in the surrounding area, outside the City were analyzed when the material in the appendices shows that the only intersection outside the City boundary that were included in the analysis were within a couple of hundred feet of the City boundary.

The response to comments repeatedly asserts that requested information can be found in either the DPEIR or elsewhere in the response to comments, when the requested information is not provided. For example, E5-53, 54, 62, and 63 request specific information regarding land use, which is not provided in the generalized discussion referenced in the response. Response E5-77 regarding increases in building height references the building height information in the General Plan and DPEIR, which provide only information regarding the future, with no description of

baseline heights and hence no basis upon which to identify potential increases. Policies listed on Page 3.9-28 are asserted to limit exposure to construction noise, but instead address other noise issues such as location of sensitive land uses and alternate transportation technologies. When this is questioned (E5-150) the response says the policies are “self-explanatory”. In response to a question regarding jobs/housing balance, one is referred to a portion of the DPEIR which provides none of the requested information (E5-162). In response to a question regarding paramedic service, one is referred back to the DPEIR which fails to provide the requested information (E5-171).

The Response to Comments improperly defers analysis to future dates, asserting that “the General Plan does not propose any development (E5-25)” and that “no specific projects are proposed (E5-30). CEQA requires that environmental analysis be conducted as early as possible in the planning process, not deferred to future project approvals that may or may not be subject to CEQA review (E5-60, 78, 105, 118).

Some of the responses are only tenuously related to the original comment or misstate the comment. For example, the DPEIR states that view terraces could preserve views of the basin, hence the question, referencing p. 3.1-6, as to whether a roof top restaurant would be considered a “view terrace”. The response simply states that the Sunset Specific Plan contains some unstated policies which would preserve views, not addressing what is meant by the term “view terraces” in the DPEIR at all. In response to questions regarding future impacts on emergency response, the response to comments states that *existing* services and response times are adequate (E5-117). In response to the comment that “it is not enough to merely state the proposed project utilizes only a small portion of the potential service or utility”, response E5-244 dismisses the comment on the basis that Section 4.12 does not include such an assertion. However, the comment does not reference Section 4.12 and such an assertion is indeed included in Section 3.12.

The responses do not reflect knowledge of current conditions and technology. For example, the South Coast Air Quality Management District advised long ago that there were problems with modeling issues for certain mitigation measures and those measures should therefore not be assumed to mitigate impacts, yet the DPEIR continues to assert that those measures are consistent with SCAQMD policy (E5-95).

Perhaps most disconcerting is the suggestion that the public do the research themselves. In some cases this would simply require reference to the General Plan document itself (E5-50) even for the most basic information regarding future land use. In other cases, one is referred to the Municipal Code, for very basic information. For example, the DPEIR states that impacts related to mixed use will be identified and mitigated at the project review stage. When it was asked if mixed use development was discretionary, i.e. subject to CEQA, the response merely referred to the Municipal Code, rather than offer a simple yes or no answer (E5-80). Similarly, E5-82 asks if all future development resulting from changes in the general plan would be subject to discretionary approval and thus subject to the environmental review asserted to analyze and mitigate future impacts by the DPEIR (E5-82). Once again, rather than a simple yes or no, one is referred to the Municipal Code. It is asked is all development in the I and FP-1 zone would be required to conduct a fault location investigation inasmuch as the DPEIR asserts that seismic

hazards will not be significant due to such investigations. Again, rather than respond with a simple yes or no, the response directs the inquirer to the Municipal Code.

Although a brief discussion of impacts on schools is included in the DPEIR, little specific information is provided. When information regarding numbers of children is requested, which is definitely relevant to impacts on schools, one is referred to the US Census (E5-172). The DPEIR makes numerous assertions regarding availability of water, but when these are questioned, the response to comments merely refers on to the Los Angeles Department of Water and Power (E5-176) or the City of Beverly Hills (E5-190). Similarly, in response to a question regarding existing and remaining capacity in wastewater facilities one is referred to the Sanitation Districts of Los Angeles County. It is not reasonable to expect members of the public to independently research such issues as infrastructure capacity or use of public facilities in relation to the proposed project and its project level and/or cumulative impacts. That is the purpose of the EIR.

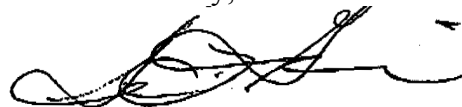
Some responses are apparently contradictory. Response E5-149 indicates that intervening structures will result in lower noise levels, but response E5-145 indicates that construction at greater heights, elevated above the surrounding area would not affect predicted noise levels.

Perhaps most annoying are conclusory responses that pretty much state that "we did it that way because we chose to do it that way". This was in response to questions regarding various issues including view impacts (E5-73) and historic resources (E5-100).

The materials on the public record for this project fail to support findings of no significant impact for the numerous areas where it is claimed no impact would occur or where full mitigation is claimed. The examples cited above are but a small portion of the numerous flaws in the documentation for the proposed project. It is important that all environmental issues for this critical project be fully investigated and mitigated to the fullest extent possible, including approval of an alternate, reduced project.

Thank you for this opportunity to comment.

Yours truly,

A handwritten signature in black ink, appearing to read "Sandra L. Genis", with a stylized flourish at the end.

Sandra L. Genis



# Tom Brohard and Associates

September 10, 2010

Ms. Lauren Meister, President  
West Hollywood West Residents Association  
PO Box 691427  
West Hollywood, California 90069

## **SUBJECT: Review of the Final Environmental Impact Report (Final EIR) for the City of West Hollywood General Plan – Continuing Traffic Issues**

Dear Ms. Meister:

Tom Brohard, P.E., has reviewed Section 3.14 (Transportation and Traffic), Appendix H (Response to Comments on the Draft EIR), and other portions of the October 2010 Final Environmental Impact Report (Final EIR) for the City of West Hollywood General Plan and Climate Action Plan prepared by AECOM. Other documents including Final EIR Appendix F, the June 22, 2010 Traffic Study prepared by Fehr & Peers, have also been reviewed. This review focused on the responses to comments in my July 29, 2010 letter regarding inadequacies in the Draft EIR, with my letter included with your comments in Letter E5 in Appendix H.

As discussed in this letter, the Final EIR fails to adequately address the majority of my prior comments on the Draft EIR. Until these various issues and concerns are addressed, there is at least a “fair argument” that the Proposed Project may have adverse traffic impacts that have not been properly disclosed, analyzed, and mitigated. Accordingly, the EIR must be revised and recirculated.

### **Continuing Traffic Issues**

Based on the October 2010 Final EIR for the City of West Hollywood General Plan, my review indicates these traffic issues and concerns remain unaddressed:

#### 1) Comment E5-257 - Alternatives Analysis Remains Inadequate

- a) Monitoring and Enforcement - In response to my prior comment, Page 301 of Appendix H in the Final EIR states “Effective and on-going compliance monitoring and enforcement are necessary to ensure the desired traffic-reducing effects of some TDM strategies included in the Preferred General Plan alternative... For those TDM strategies that require monitoring and enforcement to be effective, the Preferred General Plan alternative explicitly commits the City to pursue implementation of all feasible measures to ensure compliance.”

Provisions for periodic monitoring, necessary enforcement, and penalties for non-compliance must be added to the “Robust TDM Plan”. The specifics of monitoring, enforcement, and penalties have not been

provided, and are being deferred to some future time in violation of CEQA. In light of the lack of monitoring, enforcement, and penalties for non-compliance associated with the City's current TDM Plan, the trip reduction goals specified in the "Robust TDM Plan" will not be achieved. Continued lack of compliance together with failure to detail plans for monitoring and enforcement voids the EIR analysis which postulates that these trip reductions will actually occur.

- b) Application of Robust TDM Plan – In response to my prior comment, Page 301 of Appendix H in the Final EIR states "The most aggressive package of traffic-reducing strategies was applied to the General Plan Alternative with the highest growth projections. This was done to understand if this package of TDM strategies would be sufficient to fully or partially mitigate potential traffic impacts associated with the higher growth General Plan alternatives."

The "Robust TDM Plan" is a mitigation measure that was applied only to the Preferred General Plan. Application of the various strategies in the "Robust TDM Plan" reduces the traffic volumes associated with the highest land use intensities contained in the Preferred General Plan. The EIR's failure to apply the "Robust TDM" strategies to the other land use alternatives masks and distorts the comparison of environmental impacts associated with the different land use alternatives being considered.

The Final EIR identifies and acknowledges a number of significant and unavoidable traffic impacts associated with each land use alternative that has been studied. CEQA requires the application of all feasible mitigation measures before concluding impacts are "significant and unavoidable". The "Robust TDM Plan" mitigation measure must be applied to all land use intensities being considered, not just to the Preferred General Plan.

2) Comment E5-258 – Defective Mitigation Analyses

- a) Robertson Boulevard/Beverly Boulevard - In response to my prior comment, Page 303 of Appendix H in the Final EIR states "The commenter requests potential mitigation measures for the Robertson Boulevard at Beverly Boulevard intersection." The response indicates why this intersection is one of 27 significantly impacted intersections and also states "Left turn pockets are provided at each approach to the intersection. Limited right of way makes improvements to this intersection infeasible."

The Final EIR fails to include this response in the discussion of impacted intersections beginning on Page 3.14-19, and this discussion has also been omitted from the June 22, 2010 Traffic Study.

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- b) Incomplete Analyses of Impacted Intersections - In response to my prior comment, Page 303 of Appendix H in the Final EIR states “The EIR traffic study analyzed *all* feasible mitigation measures at significantly impacted intersections. Pages 3.14-19 through 3.14-34 provide a thorough discussion of impacted intersections, detailing site-specific characteristics and constraints. Also please see Pages 19 through 27 of Appendix F...”

Each of the discussions of the “detailed site-specific characteristics and constraints” in the Final EIR beginning on Page 3.14-19 are the same as those in the Traffic Study beginning on Page 19. The descriptions of the characteristics are incomplete, extremely brief, and similar to the 11 words used to describe characteristics at Robertson Boulevard and Beverly Boulevard (“Left turn pockets are provided at each approach to the intersection.”) Similarly, the descriptions of the constraints are incomplete, extremely brief, and similar to the 10 words used to describe constraints at Robertson Boulevard and Beverly Boulevard (“Limited right of way makes improvements to this intersection infeasible.”)

Discussion of the characteristics and constraints must be expanded to fully describe both of these items in detail, including specific potential mitigation measures that were considered and rejected. If potential mitigation conflicts with other goals of the community, then the EIR must explain these issues so that the public and the City’s decision-makers can resolve the conflicts. Without providing detail, the generalized claim in the Final EIR that “The EIR traffic study analyzed *all* feasible mitigation measures at significantly impacted intersections” cannot be supported.

My July 29, 2010 letter suggested that the City identify intersections forecast to experience significant delays together with plans for localized widening to add a lane or lanes at the “problem intersections” as the property redevelops over time. While the Final EIR did not respond to my suggestion, Comment E1-2 noted that additional right of way was conditioned on a proposed project at Crescent Heights Boulevard and Santa Monica Boulevard so that a northbound left turn lane could be added. This intersection is one of the 23 intersections identified as having traffic impacts that are “significant and unavoidable” in the Final EIR.

CEQA requires that all feasible mitigation measures be studied before concluding that the traffic impacts are “significant and unavoidable.” The Final EIR and the Traffic Study have failed to evaluate all feasible mitigation measures that could reduce or eliminate significant traffic impacts, and that would result in few if any secondary impacts.

- 3) Comment E5-259 – Deferred Adoption of Different Performance Standards – In response to my prior comment, Page 304 of Appendix H in the Final EIR

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**September 10, 2010**

states “No alternative performance measures have been developed or adopted by the City... If and when the City adopts new performance standards to analyze traffic and transportation impacts, development projects would use the adopted performance standards to determine whether significant impacts occur.”

Measure M-5.15 on Page 127 in the Mobility Section of the City of West Hollywood General Plan 2035 states “The City should replace Level of Service (LOS) with performance measures for the City’s transportation system that reflect priorities established in the General Plan.” Measure M5-15 incorrectly and improperly defers adoption of new performance measures to identify significant traffic impacts of future projects. This defers mitigation of the traffic impacts that will occur. New performance measures recommended in Measure M-5.15 have not been developed, analyzed or detailed in a definitive plan, and such a plan has not been adopted by the City.

The approach to establishing performance measures in the future to identify significant traffic impacts and necessary mitigation is exactly backwards. The development of new performance measures to identify significant traffic impacts and the required mitigation must be conducted as part of the EIR, not after project approval. Alternatives to LOS performance measures subject to public review and comment must be developed now, not later.

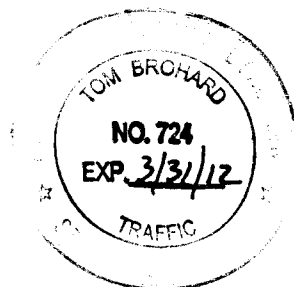
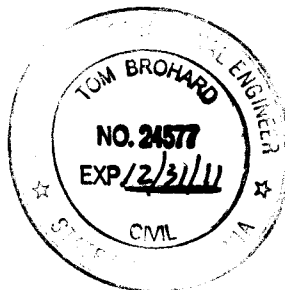
As discussed in this letter, there is at least a “fair argument” that the Proposed Project, West Hollywood General Plan 2035, will have adverse traffic impacts that have not been properly disclosed, analyzed, and mitigated in the EIR. A Recirculated Draft EIR must be prepared to address the issues and concerns raised in this letter and those expressed by others. If you have questions regarding these comments, please call me at your convenience.

Respectfully submitted,

**Tom Brohard and Associates**

*Tom Brohard*

Tom Brohard, PE  
Principal



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September 28, 2010

Planning Commission  
City of West Hollywood Planning Commission  
8300 Santa Monica Boulevard  
West Hollywood, CA 90069

**Re: General Plan Update Proposal**

Dear Honorable Commissioners:

I am writing on behalf of my client, BMB Investment Group, who owns a substantial amount of property on Melrose Avenue between La Cienega Blvd. and San Vicente Blvd.

We are very supportive of staff's proposal for Melrose Avenue, and are extremely concerned about the pre-disposition of the Planning Commission to modify some of those recommendations to the detriment of property owners along Melrose.

Melrose Avenue is one of the few commercial corridors that exist in West Hollywood. It is unique in that it is the home of the Avenue of Arts and Design. It is an international destination for people who wish to connect to the design industry. In the past two years, Melrose Avenue has suffered and there are a shockingly high number of "For Rent" signs and vacant properties throughout the corridor. In response to this, there is an interest in rehabilitating Melrose Avenue and redeveloping certain sites. There are applications pending and any provocative action that Commission may take to make that redevelopment infeasible could cause irreparable harm to the resurgence of Melrose Avenue and the Avenue of Arts and Design as a dynamic destination and sales location in West Hollywood.

Additionally, West Hollywood is not like any other city. The General Plan does not give people permission to develop projects. It simply provides a framework that still requires property owners to go through an entitlement process even for projects that are consistent with the General Plan. If you did have a process that allowed people to directly develop sites that were consistent with the General Plan, it may make some sense to have a more restricted plan. But because your process requires discretionary approval for all projects, along with an onerous appeals process, it only makes sense to have a General Plan that has broad enough flexibility to invite creativity, landmark architecture, and important and unique uses. A General Plan that is geared for the future should address the direction of planning, land use and environmental issues over the next 25 years.



**ITEM 9.A. EXHIBIT H**

2<sup>nd</sup> Page  
September 28, 2010

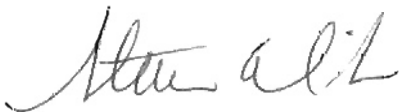
Twenty-five years ago, no one had ever heard of LEED Certification. No one ever heard of studying green house gases either. Technology and design opportunities did not exist that would have allowed for unique ways of showing view corridors or dealing with issues such as shade/shadow etc. Traffic solutions exist today that did not exist 25 years ago. And traffic patterns can and will change. Public transportation opportunities may or may not exist. And the plan has to provide the necessary flexibility to allow for all these environmental and mitigation measures to evolve and change.

To encourage the Avenue of Arts and Design to be successful, larger floor heights and floor plates need to exist to encourage showroom space. Unique design considerations that could impact height have to be taken into account to encourage creative office uses. There needs to be flexibility for setbacks and height to allow architectural articulation that could include sidewalk dining or the creative use of landscaping and green space to allow for additional public benefits such as open space. All of these proposals can be evaluated, considered, and accepted or rejected by the Planning Commission and City Council through the entitlement and permit process. Why should the city set itself up for the additional challenge of having to overcome plan amendments as often as on the Sunset Strip because that plan was too restrictive and too limiting as land use, environmental considerations, transportation and economic needs evolved. The General Plan for West Hollywood should be a framework with some flexibility.

I would urge you to keep the plan as proposed by staff. Foremost, the proposed land use designations were the result of years of collaboration with the community. These proposals allow flexibility, an evolving future while protecting the public through a vehicle that West Hollywood has established for the independent evaluation of any and all projects. Specifically, we would urge you to keep the higher height on the south side of Melrose (35ft. minimum) as you have on the north side of Melrose, as well as the higher proposed FAR of 1.5 minimum. We would urge you to keep the bonuses that are proposed intact, and we would urge you to be guided by the fact that all projects would have to be evaluated through the discretion of the Planning Commission and City Council.

Thank you for your consideration.

Sincerely,



STEVEN AFRIAT  
President