STATE REGULATIONS

No state or local agencies have specific jurisdiction over paleontological resources on private lands. No state agency requires a paleontological collecting permit to allow for the recovery of fossil remains discovered as a result of construction-related earthmoving on state or private land at a project site.

LOCAL PLANS AND POLICIES

There are no regional and local plans, policies, regulations, or laws related to paleontological resources that apply to the General Plan update.

PROFESSIONAL PALEONTOLOGICAL STANDARDS

The Society of Vertebrate Paleontology, a national scientific organization of professional vertebrate paleontologists, has established standard guidelines that outline acceptable professional practices in the conduct of paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, specimen preparation, analysis, and curation (Society of Vertebrate Paleontology 1995, 1996). Most practicing professional paleontologists in the nation adhere to the Society of Vertebrate Paleontology assessment, mitigation, and monitoring requirements, as specifically spelled out in its standard guidelines.

3.10.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to paleontological resources would be considered significant if it would exceed the following threshold of significance, in accordance with Appendix G of the CEQA Guidelines:

• Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

In its standard guidelines for assessment and mitigation of adverse impacts on paleontological resources, the Society of Vertebrate Paleontology (1995) established three categories of sensitivity for paleontological resources: high, low, and undetermined. Areas where fossils have been previously found are considered to have a high sensitivity and a high potential to produce fossils. Areas that are not sedimentary in origin and that have not been known to produce fossils in the past typically are considered to have low sensitivity. Areas that have not had any previous

paleontological resource surveys or fossil finds are considered to be of undetermined sensitivity until surveys and mapping are performed to determine their sensitivity. After reconnaissance surveys, observation of exposed cuts, and possibly subsurface testing, a qualified paleontologist can determine whether the area should be categorized as having high or low sensitivity. In keeping with the significance criteria of the Society of Vertebrate Paleontology (1995), all vertebrate fossils are generally categorized as being of potentially significant scientific value.

A "unique paleontological resource or site" is one that is considered significant under the professional paleontological standards described below.

An individual vertebrate fossil specimen may be considered unique or significant if it is identifiable and well preserved, and it meets one of the following criteria:

- a type specimen (i.e., the individual from which a species or subspecies has been described);
- a member of a rare species;
- a species that is part of a diverse assemblage (i.e., a site where more than one fossil has been discovered) wherein other species are also identifiable, and important information regarding life history of individuals can be drawn;
- a skeletal element different from, or a specimen more complete than, those now available for its species; or
- a complete specimen (i.e., all or substantially all of the entire skeleton is present).

The value or importance of different fossil groups varies depending on the age and depositional environment of the rock unit that contains the fossils, their rarity, the extent to which they have already been identified and documented, and the ability to recover similar materials under more controlled conditions (such as for a research project). Marine invertebrates are generally common; the fossil record is well developed and well documented, and marine invertebrates would generally not be considered a unique paleontological resource. Identifiable vertebrate marine and terrestrial fossils are generally considered scientifically important because they are relatively rare.

3.10.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

PALEONTOLOGICAL RESOURCES

The City of West Hollywood is completely built out with very limited availability of unconstrained vacant property. Future development within the City 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 under the Society of Vertebrate Paleontology guidelines (1995), suggesting that there is a potential for uncovering additional similar fossil remains during construction-related earthmoving activities in the City. Therefore, the potential for damage to previously unknown unique paleontological resources during earthmoving activities resulting from implementation of the General Plan is considered a **potentially significant** impact.

With implementation of Mitigation Measure 3.10-1, program-level impacts to paleontological resources would be **less than significant**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.10.5 MITIGATION MEASURES

Implementation of the following programmatic mitigation measure will reduce potential impacts to a **less-than-significant** level at this Program EIR level of analysis. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

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.

3.10.6 SIGNIFICANCE AFTER MITIGATION

With the implementation of Mitigation Measure 3.10-1, impacts to paleontological resources would be reduced to a **less-than-significant** level. Also, in the event that resources were encountered, fossil specimens would be recovered and recorded and would undergo appropriate curation.

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3.11 POPULATION AND HOUSING

This section describes and evaluates the potential impacts on population, housing, and employment associated with the proposed General Plan. This section is based on data taken from the U.S. Census Bureau, the California Department of Finance (DOF), and SCAG. Since each of these organizations uses different methods of data collection and calculation, they do not always arrive at precisely the same results. Accordingly, the population, housing, and employment numbers used in this section's analysis may vary, depending upon the source cited. However, the sources are relatively consistent with each other and data from all of them have been incorporated into this analysis. This section is also based on review of the West Hollywood General Plan Baseline Land Use Background Report, May 2008.

3.11.1 EXISTING ENVIRONMENTAL SETTING

The most recent U.S. Census was published in 2000. Ten years have passed since the census data were collected. As data gathering for the 2010 census is ongoing, compiled census data will not be available for this analysis. To allow for meaningful analysis, updated estimates from the above cited sources were used as a supplement. DOF provides annually updated data regarding population, housing and employment. In 2008, SCAG, as part of its mandated planning functions, developed and published population, household, and employment growth projections for each jurisdiction in the region. The most current available SCAG projections were incorporated into the agency's 2008 Regional Transportation Plan Growth Forecast.

The Growth Forecast contains projections for each 5-year increment between 2005 and 2035. The numbers projected by SCAG in 2008 may vary when compared to 2008 DOF estimates of population for the City of West Hollywood. The SCAG 2008 Growth Forecast was used for purposes of future projection, while DOF estimates are used to provide a 2008 baseline for analysis.

U.S. CENSUS 2000

The U.S. Census is taken and published every 10 years and includes population and housing data for the entire United States. Census data are the baseline from which most demographic projections are calculated. As the City of West Hollywood was incorporated in 1984, census data have only been available for 1990 and 2000. In the 2000 U.S. Census, the population of West Hollywood was approximately 35,794 persons, a 1.2% decrease from its 1990 population of 36,118.

DEPARTMENT OF FINANCE

DOF provides annually updated population and housing estimates for cities and counties in California. In January 2008, DOF's estimated population of West Hollywood was 37,348, a 4.6% increase when compared to the 2000 Census baseline. During this same time period, Los Angeles County as a whole experienced a population increase of 8.2%. In 2008, the population of West Hollywood constituted less than 0.4% of the total population of Los Angeles County.

Table 3.11-1 shows the City's population as shown in the decennial censuses over the last 19 years and compares its population changes with those of neighboring cities and Los Angeles County.

			% Change		2000-
Jurisdiction	1990	2000	1990-2000	2008	2008
West Hollywood	36,118	35,794	-1.2%	37,348	4.6%
Beverly Hills	31,971	33,784	5.7%	35,774	5.9%
Los Angeles City	3,485,398	3,694,820	6.0%	4,022,450	8.9%
Los Angeles County	8,863,164	9,519,338	7.4%	10,301,658	8.2%

Table 3.11-1. Total Population, 1990–2008

Source: U.S. Census 1990, 2000; California Department of Finance 2009b

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

SCAG is the federally designated metropolitan planning organization for the Southern California region, which covers six counties: Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura. West Hollywood is located in Los Angeles County, in the Westside Cities Subregion. In 2008, SCAG developed and published population, household, and employment projections for each jurisdiction in the region in 5-year increments, beginning in 2005 and extending to 2035. Using the 2000 U.S. Census data as its baseline, SCAG's growth forecast projects 11.5% growth in the population of West Hollywood by 2035, numerically an increase of a little more than 4,100 people between 2000 and 2035.

PROJECTIONS

Table 3.11-2 presents population, households, and employment projections through 2035 for the City of West Hollywood taken from SCAG's 2008 Regional Transportation Plan (RTP). The table also includes data for Los Angeles County derived from the same source, for purposes of comparison. According to the 2008 RTP projections, the number of households within the City

limits will increase at a rate of 1.1% to 24,940 by 2035, a net increase of 1,820 households over the 2000 U.S. Census baseline or a rate of 2.0% annually.

	2005	2010	2015	2020	2025	2030	2035
Population	37,678	38,223	38,515	38,864	39,197	39,515	39,821
Households	23,415	23,718	24,001	24,298	24,531	24,755	24,940
Employment	31,379	32,185	32,825	33,233	33,714	34,227	34,719
Jobs/Housing Ratio	1.34	1.36	1.37	1.37	1.37	1.38	1.39

 Table 3.11-2. SCAG Growth Projections, City of West Hollywood

Source: SCAG 2008 Growth Forecast

According to SCAG projections, the population in West Hollywood will increase to 39,821 in 2035. Under the proposed General Plan, however, the population at buildout could increase to a total of 44,182, which is a difference of 4,361 over SCAG projections. SCAG projections likely do not consider the growth potential of West Hollywood to the level of specificity identified in the proposed General Plan. Population projections in the proposed General Plan are based on 1.6 persons per household. Development projections in the proposed General Plan include primarily infill development in five commercial subareas. Much of the infill development in the subareas will occur in the form of mixed-use development on previously commercial, residential, and/or underutilized land. Additionally, existing development throughout the planning area that has not reached the potential allowed under the General Plan designations, is also included in future development potential.

SCAG also projects employment to increase approximately 10.6% from 2005 through 2035 to 34,719. In 2010, West Hollywood had 1.36 jobs for every household and is projected to increase to 1.39 jobs per housing unit in 2035 (SCAG 2008). According to detailed growth projections, in 2008, the City actually had 22,911 jobs and 24,573 housing units, for a jobs-to-housing unit ratio of 0.93 (Raimi and Associates 2010). In 2035, proposed General Plan projections indicate an increase of 5,794 jobs to 28,705 jobs. Based on 2035 projected housing units, the jobs-to-housing unit ratio would increase slightly to 0.95 (Raimi and Associates 2010).

Table 3.11-3 shows the number of housing units in the City in 1990, 2000, and 2008. In 2008, the majority (96%) of all housing units in West Hollywood were composed of multi-family housing totaling 23,554 while only slightly over 1,000 housing units were traditional single-family homes. This means that West Hollywood, unlike other jurisdictions in the greater Los Angeles area, is predominantly multi-family and thus more urban in character (West Hollywood 2010). Based on a projected buildout under the General Plan, housing units are projected to increase by 4,274 or approximately 17.4% from 2008 to 2035.

Dwelling Type	1990	2000	2008
Single-Family Dwelling	2,517	2,496	1,019
Multi-Family Dwelling	21,244	21,660	23,554
Total	23,761	24,156	24,573

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1 able 3.11-3.	Housing	inventory	' DY	Unit	i ype

Source: U.S. Census 1990, 2000; Raimi and Associates 2010

It should be noted that the decrease in single-family homes from 2000 to 2008 and the increase in multi-family dwellings during the same time period are primarily related to how single-family and multi-family dwelling units are defined. Different data sources define single-family and multi-family dwelling units differently. Data shown in Table 3.11-3 from 2000 are based on U.S. Census data, while 2008 data are based on data compiled by Raimi and Associates. In actuality, during the 2000–2008 time period, single-family residential units declined by approximately 35, while multi-family units increased by approximately 417.

While discrepancies exist between General Plan projections and SCAG projections, it should be noted that General Plan projections are based on proposed land use changes and are intended chiefly for environmental analysis purposes within this Program EIR. Because the majority of proposed land use changes are designated as mixed-use and multi-family redevelopment projects, the actual population, housing, and employment changes that are generated will ultimately depend on project-specific development within the planning period.

3.11.2 REGULATORY SETTING

FEDERAL REGULATIONS

There are no federal regulations that apply to population, housing, and employment.

STATE REGULATIONS

Regional Housing Needs Assessment

State law requires that all cities and counties provide a certain amount of housing to accommodate the demands of the growing population. The California Department of Housing and Community Development is responsible for determining the statewide housing need, while local governments and councils of governments determine the specific housing needs within their jurisdictions and prepare a Regional Housing Needs Assessment (RHNA). SCAG prepares the RHNA for the County of Los Angeles, of which the City of West Hollywood is a part. The

housing needs identified for a particular city are based on four income categories: very low income, low income, moderate income, and above moderate income households.

SCAG's RHNA for the planning years January 1, 2006, through June 30, 2014, projected a need for the construction of an additional 584 housing units within the City of West Hollywood, allocated as follows: very low income (142 units), low income (91 units), moderate income (99 units), and above moderate income (252 units). Construction of new housing is not mandated by the RHNA, which is intended as a planning tool and a guide to an equitable distribution of housing.

LOCAL PLANS AND POLICIES

Southern California Association of Governments Regional Transportation Plan

A key component of SCAG's Regional Comprehensive Plan that addresses regional issues, goals, objectives, and policies for the Southern California region is the RTP. The RTP sets broad goals for the region and provides strategies to reduce problems associated with congestion and mobility. In recognition of the close relationship between traffic and air quality issues, the assumptions, goals, and programs contained in the RTP parallel those used to prepare the Air Quality Management Plan (AQMP).

On May 8, 2008, the Regional Council of SCAG adopted the 2008 RTP: Making the Connections. The 2008 RTP strives to provide a regional investment framework to address the region's transportation and related challenges, and looks to strategies that preserve and enhance the existing transportation system and integrate land use into transportation planning. The RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socioeconomic, geographic, and commercial limitations.

3.11.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to population and housing would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the CEQA Guidelines:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

3.11.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA

According to SCAG projections, the population in West Hollywood will increase to 39,821 in 2035, an approximate 6.6% increase from 2008. Under the proposed General Plan, however, population could increase to 44,182, an increase of about 18.3% over 2008 at some point in time after 2035 based on the capacity of the land use plan. The population capacity of the proposed General Plan is higher than SCAG's 2035 estimate; therefore, the Plan provides for additional population capacity not anticipated by SCAG. However, SCAG projections are based on the existing General Plan. It is likely that West Hollywood's growth projections would be revised upward in future SCAG planning documents to reflect proposed General Plan projections.

Under the proposed General Plan, housing units are projected to increase by more than 4,274 or approximately 17.4% from 2008 to 2035. Most new housing opportunities in the City will occur through infill development and redevelopment, primarily in the five commercial subareas established within the Land Use and Urban Form Element of the proposed General Plan. Most of the City is not anticipated to experience land use change as a result of the proposed General Plan.

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 (18.3% over 2008 levels) and housing units (17.4% over 2008 levels). 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. In particular, the Infrastructure, Resources, and Conservation Element contains specific policies to manage future growth including the following:

- Supporting city-wide access to water, gas, power and telephone and other telecommunications services.
- Requiring development projects and redevelopment or remodel projects to provide a "will serve" letter or similar proof of the availability of necessary infrastructure and services by outside service providers during the permit review process.
- Requiring development projects to be responsible to pay for their share of the costs of improvements to water, gas, power and other utilities that they necessitate.
- Sharing information, on an ongoing basis, on projected growth in jobs and housing with service providers and regional agencies to ensure that there is sufficient infrastructure capacity to support future population growth in the City.
- Not allowing for the construction of new development until it is demonstrated that there will be sufficient water to supply the development, as determined by the service provider.

Therefore, impacts from population growth are considered **less than significant**. No mitigation is required.

DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING OR PEOPLE

New housing opportunities in the City will occur through infill development and redevelopment primarily in the five commercial subareas within the City. Additional development potential exists where current development has not reached the potential allowed by the existing General Plan designations. However, most of the City is not anticipated to experience land use change as a result of the proposed General Plan.

The proposed Land Use and Urban Form Element of the General Plan contains numerous goals and policies to ensure that infill and redevelopment activities in the commercial subareas and throughout the City address potential displacement, including single-family residential areas. The Housing Element, in particular, contains the following policies:

- Addressing the effects of the vacancy de-control regulation (aka Costa-Hawkins) on the rent stabilized housing stock through local measures and legislative efforts.
- Retaining and maintaining existing affordable rental housing.
- ► Working to prevent or minimize displacement of existing residents.

- Encouraging the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households.
- Maintaining a condominium conversion ordinance aimed at preserving the City's rental housing stock, and providing tenant protections for units approved for conversion.

Development allowed under the proposed General Plan would not displace substantial numbers of housing or people necessitating the construction of replacement housing elsewhere. Most of the development will occur through infill, adaptive reuse, or new mixed-use development in the commercial subareas where existing residential units are not the dominant use. Therefore, impacts relating to displacement of a substantial number of housing or people necessitating the construction of replacement housing are **less than significant**. No mitigation measures are necessary.

3.11.5 MITIGATION MEASURES

No mitigation is required because population and housing impacts are less than significant at the program level of analysis.

3.11.6 SIGNIFICANCE AFTER MITIGATION

At the program level of analysis, impacts will be less than significant. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.12 PUBLIC SERVICES AND UTILITIES

This section describes the public services and utilities that serve the City of West Hollywood. Specifically, this section includes an examination of police protection, fire protection, schools, libraries, water infrastructure and supply, wastewater service, solid waste service, stormwater and drainage facilities, and electrical and natural gas services. Each subsection includes descriptions of existing facilities, service standards when applicable, potential environmental impacts resulting from implementation of the General Plan, and mitigation measures where appropriate.

3.12.1 EXISTING ENVIRONMENTAL SETTING

POLICE PROTECTION

The Public Safety and Community Services Division of the City Manager's office oversees crime prevention services in West Hollywood. The Division coordinates with the Los Angeles County Sheriff's Department, which contracts with the City to provide police services out of the West Hollywood Sheriffs' Station.

The West Hollywood Sheriff's Station is located at 780 North San Vicente Boulevard in West Hollywood. Figure 3.12-1 shows the location of the Sheriff's station. This station has approximately 136 sworn personnel and 35 civilian personnel serving the City of West Hollywood.

In response to the community's unique demographics, West Hollywood Sheriff's Deputies use innovative and progressive law enforcement programs such as Community-Oriented Policing, Russian-Speaking Community Outreach, Domestic Violence Prevention Programs, and Hate Crimes Enforcement. The West Hollywood Sheriff's station has also created a Community Impact Team that provides specialized services, entertainment policing, and special events staffing.

As part of the Community-Oriented Policing Program, the City operates under the "broken window theory," which holds that broken windows, graffiti, and dirty neighborhoods invite and propagate crime and therefore should be repaired as soon as possible. Citizen involvement is also a vital component in crime prevention. There are several active Neighborhood Watch Groups within the City's 1.9 square miles. Most of those participate in the annual National Night Out Against Crime, an annual citywide event to reinforce safe night life and public gathering. The City of West Hollywood also has an active Sheriff's Volunteer Program and Community

Emergency Response Training composed of volunteer citizens trained to respond to emergencies and natural disasters, particularly providing assistance to the disable and elderly. The City also engages in a number of emergency preparedness outreach programs, such as community fairs, hand-outs, and an emergency mass notification system. West Hollywood firefighters provide public education outreach to schools, residents, seniors, and staff and teach Community Emergency Response Training.

The West Hollywood Sheriff's Station currently has a sworn personnel-to-population ratio of 3.6 sworn personnel to 1,000 population. The current ratio is considered adequate. Growth within the service area of the West Hollywood station and crime trends require that the ratio of police officers to population be periodically reassessed. The Sheriff's Department officer-to-population standard is set by the Sheriff's Contract Law Enforcement Bureau and is based on a city's individual needs (County of Los Angeles Sheriff's Department 2010).

The Uniform Crime Report contains official data on crime that are reported to law enforcement agencies across the country, and then provided to the FBI. It is a summary-based reporting system, with data aggregated to the city, county, state, and other geographic levels. Part I crimes are reported into two categories: violent crimes and property crimes. Violent crimes include murder, forcible rape, robbery, and aggravated assault. Property crimes include burglary, larceny-theft, vehicle theft, and arson. In 2008, there were 1,805 Part I crimes committed in West Hollywood.

The West Hollywood Station's citywide response time to emergency calls for service is 3.4 minutes, and 6.6 minutes for priority calls for service. For routine calls, the station's goal is to respond to calls within 20 minutes. The response times are currently within established norms for emergency and priority calls. At the present time, there are no plans for a new station, new equipment, or increased manpower (County of Los Angeles Sheriff's Department 2010).

The Los Angeles County Sheriff's Department has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills police departments.

FIRE PROTECTION

Fire protection services are provided to the City of West Hollywood through the Consolidated Fire Protection District by the Los Angeles County Fire Department (LACFD). The City of West Hollywood is located in Battalion 1, which comprises six fire stations (two located within City



Scale: 1 = 15,000; 1 inch = 1,250 feet

Public Facilities Locations

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boundaries). Table 3.12-1 shows Battalion 1 fire stations. Figure 3.12-1 shows the locations of fire stations serving the City of West Hollywood.

Battalion 1 Stations				
Fire Station #7 – Battalion	864 N San Vicente Blvd.			
Headquarters	West Hollywood, 90069			
Fire Station #9	7643 W Santa Monica Blvd.			
File Station #8	West Hollywood, 90046			
Fire Station #29	3907 W 54th St.			
Fire Station #38	Los Angeles, 90043			
Fire Station #51	3900 Lankershim Blvd.			
File Station #31	Universal City, 91608			
Fire Station #59	5757 South Fairfax Ave.			
Fire Station #38	Los Angeles, 90056			
Eiro Station #110	4433 Admiralty Way			
rite Station #110	Marina Del Rey, 90292			

Table 3.12-1. Fire Stations Serving West Hollywood

The two stations within West Hollywood are staffed by more than 60 firefighters, a deputy chief, and an assistant chief. The City's contract with Los Angeles County also provides immediate access to the Urban Search and Rescue and HazMat teams, Air Operations, and other sophisticated resources.

LACFD participates in automatic and mutual aid agreements with several neighboring agencies. Automatic aid provides for the routine exchange of services across jurisdictional boundaries under predefined conditions, while mutual aid is designed to provide additional resources during unusual or catastrophic events. While these types of agreements are beneficial, they do not have a significant impact on the day-to-day provision of fire protection services in the City; Station #7 and Station #8 handle typical response calls within the City. Station #7 houses six personnel who staff a paramedic engine and paramedic squad. Station #8 houses 13 personnel who staff an engine, paramedic squad, and a "light force" that is made up of a truck and engine company.

LACFD generally operates three shifts of 20 personnel out of Fire Stations #7 and #8. LACFD is responsible for emergency medical calls, fire response, and inspection and plan check services.

During 2009, LACFD had an average emergency response time for first arriving units of 3 minutes 55 seconds, and nonemergency response time of 5 minutes 20 seconds.

EDUCATION

Public Schools

The Los Angeles Unified School District (LAUSD) provides public school services to West Hollywood residents for grades kindergarten through 12. Only two public schools, West Hollywood Elementary, at 970 North Hammond Street, and West Hollywood Community Day School, at 1049 North Fairfax Avenue, are within the City boundaries. Other elementary, middle, and high school students attend LAUSD schools at locations in the City of Los Angeles. These include four elementary schools (Laurel, Gardner, Rosewood, and Vine), two middle schools (Bancroft and Burroughs), and two high schools (Fairfax and Hollywood).

Table 3.12-2 indicates the public schools serving the City of West Hollywood, including location, capacity, and enrollment. Figure 3.12-1 shows the location of schools serving the City of West Hollywood.

			2009-2010
School	Address	Capacity	Enrollment
Gardner Elementary School	7450 Hawthorne Avenue	618	488
Laurel Elementary School	925 North Hayworth Avenue	438	233
Rosewood Elementary School	503 North Croft Avenue	584	356
Vine Elementary School	955 North Vine Street	826	532
West Hollywood Elementary School	970 North Hammond	398	294
Bancroft Middle School	929 North Las Palmas Avenue	1,601	1,315
Burroughs Middle School	6700 South McCadden Place	2,048	1,962
Fairfax High School	7850 Melrose Avenue	3,600	2,528
Hollywood High School	1521 North Highland Avenue	1,826	1,763

Table 3.12-2. Public Schools Serving the City of West Hollywood

Source: LAUSD 2010

In addition to the public schools mentioned in Table 3.12-2 and illustrated in Figure 3.12-1, there are several affiliated charter schools, magnet schools, and other LAUSD facilities that serve the City of West Hollywood. Enrollment and capacity information was not included for these facilities that did not report any resident attendance (LAUSD 2010).

Private Schools

There are a number of private schools in West Hollywood and in the surrounding area that offer alternative education options for City residents.

LIBRARIES

The West Hollywood Public Library is located at West Hollywood Park on San Vicente Boulevard, as shown in Figure 3.12-1. It is a part of and is operated by the Los Angeles County Library system. The library principally serves City residents, though its users are also drawn from adjacent City of Beverly Hills and the City of Los Angeles areas. The existing facility is approximately 5,000 square feet.

The library collection includes over 95,310 books; 45 magazine and newspaper subscriptions, and over 18,000 audiovisual titles. Special materials include local history materials, Spanish and Russian books, the Ron Shipton HIV Information Center, and a gay and lesbian materials collection.

The City has planned for some time for a new library to be built as a part of the redevelopment of West Hollywood Park. The West Hollywood Park Master Plan, approved by the City Council in 2004, calls for a three-story, 44,000-square-foot building and includes the new library, community meeting rooms, CATV offices and Friends of the West Hollywood Library Bookstore. The library itself will be approximately 32,500 square feet (Worland 2010). Project construction began in May 2009 and is anticipated to be completed by September 2012.

WATER

Water in the City of West Hollywood is supplied by the City of Beverly Hills and the Los Angeles Department of Water and Power (LADWP). Figure 3.12-2 indicates the respective service areas for each of the water providers.

City of Beverly Hills

The City of Beverly Hills provides water service to 368 acres of the western portion of West Hollywood, bounded on the west by Doheny Drive, on the North by Sunset Boulevard, and on the south by Beverly Boulevard. The eastern boundary of the Beverly Hills water service areas varies, as indicated in Figure 3.12-3. A total of 17.8 miles of water lines exist in the portion of West Hollywood served by the Beverly Hills water service area.

The following water discussion is taken from the most recently adopted 2005 City of Beverly Hills Urban Water Management Plan, and the 2009/2010 City of Beverly Hills Capital Improvement Program.

The Water Service Division of the City of Beverly Hills Public Works and Transportation Department operates the water distribution system. The Beverly Hills water distribution system is gravity based and consists of 13 separate pressure zones, two of which supply a portion of the City of West Hollywood. Beverly Hills has 10 water storage reservoirs, including above-ground and below-ground reservoirs, providing a storage capacity of 44.2 million gallons (MG). Beverly Hills' water system includes two emergency interconnections with the LADWP water system. These emergency interconnections are established for emergency water supply for the mutual benefit of both municipalities.

The City of Beverly Hills provided water to the equivalent of approximately 8,000 people in the City of West Hollywood in 2000 (which includes residential, commercial, and other uses as explained below). According to SCAG, the population of West Hollywood in 2000 was 35,851 people. This indicates that Beverly Hills served approximately 22.3% of the West Hollywood population. The City of Beverly Hills Urban Water Management Plan (UWMP) calculates water demand projections based on average gallons per capita per day. This assumption does not express the amount of water actually used by an individual, because it includes all categories of urban water use, including residential, commercial, industrial, fire fighting, and other water uses. Therefore, the Beverly Hills UMWP water calculations include all categories of water use.

The City of Beverly Hills receives approximately 90% of its water supply from imported surface water purchased from the MWD. Based on historic agreements, the City of Beverly Hills has a preferential right to 1.01% of all MWD water. MWD imports its water from the State Water Project (SWP) and the Colorado River. In addition to imported surface water from MWD, the City of Beverly Hills is currently operating four groundwater wells, Nos. 2, 4, 5, and 6, that pump water from the Hollywood Basin. Beverly Hills' reverse osmosis treatment plant, which has a capacity of 3 million gallons per day (MGD), treats all of the groundwater Beverly Hills produces. The plant supplies the City of Beverly Hills water service area with approximately 10% of the average annual consumption, or approximately 1,500 acre-feet per year (AFY).

The City of Beverly Hills beneficially uses approximately 88% of the total annual water supplied to it by MWD. West Hollywood receives the remaining 12% from the City of Beverly Hills.

The City of Beverly Hill's Capital Improvement Program (CIP) allocates ongoing funding to repair and replace water infrastructure in the service area. The 2009/2010 adopted CIP includes funding and programs to replace and/or rehabilitate undersized, deteriorated, or old water mains. In addition, the CIP contains funding and programs to investigate new sources of water and repair and rehabilitate wells to ensure maximum production of the Hollywood Basin.



Figure 3.12-2

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0 940 1,880 3,760 Feet



Figure 3.12-3 Sewer Lines

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The City of Beverly Hills has drilled an exploratory borehole at a property in West Hollywood to see if a deep well is feasible at this site. Should the West Hollywood borehole prove to be successful, the City of Beverly Hills would begin designing a well at this location. The City of Beverly Hills is also replacing the existing Coldwater Canyon Reservoir with a larger reservoir with almost an additional 1 MG of storage.

Los Angeles Department of Water and Power

LADWP provides water service to approximately 78% of the City of West Hollywood. LADWP water mains within West Hollywood were installed between 1915 and 1975. The major trunk line in Sunset Boulevard was installed in 1916 and a cement mortar line in 1962. While the smaller distribution mains were installed in the 1920s, the majority of the pipe network was installed in 1960 (City of West Hollywood 1988).

The LADWP water service area is larger than the legal boundary of the City of Los Angeles and consists of 295,000 acres of land. LADWP provides water service to Los Angeles, portions of West Hollywood, Culver City, and minor portions adjacent to the Los Angeles City limits.

The following discussion is based on the most recently adopted 2005 LADWP UWMP.

Water Supply

The Los Angeles Aqueduct (LAA), local groundwater, and supplemental water purchased from MWD are the primary sources of water supply for the City of Los Angeles water service area. These three sources have historically delivered an adequate and reliable supply to serve the water service area's needs. Implementation of recycled water projects is progressing and is expected to fill a larger role in Los Angeles' water supply portfolio. Conservation programs have been effective in decreasing water use within LADWP's service area.

Los Angeles Aqueduct

The LAA system extends approximately 340 miles from the Mono Basin to Los Angeles. Water is conveyed the entire distance by gravity alone. There are seven reservoirs in the system with a combined storage capacity of 300,560 acre-feet (AF).

The LAA is fed by runoff from the eastern slopes of the Sierra Nevada. Runoff from this watershed peaks during late spring and summer, after most of the year's precipitation has already occurred. During very wet years, the LAA can provide more than 400,000 AF annually, while

very dry years can produce less than 95,000 AF. From 1995 through 2004, LAA deliveries supplied about half of the City of Los Angeles' water needs.

Local Groundwater

Local groundwater provides approximately 15% of the total water supply for the Los Angeles water service area and has provided nearly 30% of the total supply in drought years. The City of Los Angeles owns water rights in three Upper Los Angeles River Area (ULARA) groundwater basins: San Fernando, Sylmar, and Eagle Rock, as well as the Central and West Coast basins. On average, about 86% (90,755 AFY) of the water service areas' groundwater supply is extracted from ULARA groundwater basins, while the Central Basin provides 14% (15,000 AFY). The City of Los Angeles also owns 1,503 AFY of West Coast Basin groundwater rights. Groundwater entitlements amount to 107,258 AFY.

Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in California. MWD owns and operates the Colorado River Aqueduct (CRA) and is a contractor for water from the SWP. The City of Los Angeles purchases water from MWD to supplement its supplies from local groundwater, the LAA, and recycled water. The City of Los Angeles is one of 26 MWD member public agencies.

LADWP has historically purchased MWD water to make up the deficit between demand and other City supplies. The City of Los Angeles has made significant investments in MWD and will continue to rely on the wholesaler to meet its current and future supplemental water needs.

MWD's basic apportionment of Colorado River water is 503,000 AFY. MWD began receiving water from the SWP in 1972. MWD is the largest contractor for water from the SWP, holding a contract for 2.01 million AFY of the project's 4.23 million AFY ultimate delivery capacity. Variable hydrology and environmental issues in the San Francisco Bay/Sacramento-San Joaquin River Delta (Bay-Delta) can reduce the quantity of water that the SWP delivers to MWD. MWD projects a minimum dry-year supply from the SWP of 650,000 AFY, and average deliveries of 1.5 million AFY. These amounts do not include water from transfer and storage programs along the SWP.

MWD's goal is to receive a minimum of 650,000 AF during dry years from the SWP. MWD's policy objective includes receiving an average 1.5 million AFY of supply, exclusive of transfers and storage programs along the SWP. Additional transfer and storage programs that are current

or under development are projected to yield up to an additional 445,000 AFY into MWD's service territory.

Water Recycling

Almost 65,000 AFY of the City of Los Angeles's wastewater is recycled annually. Approximately 1,950 AFY of recycled water is used for municipal and industrial (M&I) purposes. Recycled water used for M&I purposes reduces demands for imported water supplies for the LADWP service area. Another 28,000 AFY of recycled water is also used for environmental enhancement and recreation in the Sepulveda Basin. Finally, the City of Los Angeles delivers approximately 34,000 AFY of secondary-treated wastewater sold from the Hyperion Treatment Plant (HTP) to West Basin Municipal Water District, which then provides further treatment to meet demands within its service area.

LADWP is expanding its recycled water program for irrigation in the East and South Valley areas and Central City area, which will be supplied by the Tillman Water Reclamation Plant and the Los Angeles/Glendale Water Reclamation Plant. A recycled water project also exists near Los Angeles International Airport.

Table 3.12-3 summarizes the LADWP water service area's existing, planned, and potential recycled water for nonpotable municipal and industrial purposes.

	Year					
	2005	2010	2015	2020	2025	2030
Existing	1,950	1,950	1,950	1,950	1,950	1,950
Planned	-	15,000	18,000	20,000	25,000	29,000
Subtotal	1,950	16,950	19,950	21,950	26,950	30,950
Dotontial				20,050 to	15,050 to	11,050 to
Potential	-	-	-	34,150	29,150	25,150
Total with				42,000 to	42,000 to	42,000 to
Potential ²	-	-	-	56,100	56.100	56,100

Table 3.12-3. Recycled Water Supplies for Municipal andIndustrial Purposes within LADWP Service Area (AFY)¹

¹ These recycled water supplies offset the demand for imported water within LADWP's service area but do not include recycled water used for environmental benefits or delivered to West Basin MWD.

² Represents potential supply with the implementation of City of Los Angeles' Integrated Resource Plan (IRP). The IRP utilizes a unique approach of technical integration and community involvement to guide water resources policy decisions and facilities planning. The Los Angeles IRP recognizes the interrelationship of water, wastewater, and runoff management in forming a future vision for water resources activities and functions. The IRP alternatives examine ways to decrease potable water needs by expanding the recycled water program and encouraging rainwater harvesting; increase water efficiency by installing smart irrigation devices that reduce irrigation demands; and increase groundwater resources by using wet weather runoff to recharge the aquifer. Source: LADWP 2005

WASTEWATER

Within the City of West Hollywood, the City's sewer system consists of 39 miles of gravity piping. This gravity sewer system includes over 850 pipe reaches and manholes, providing local sewer service to every parcel within the City. Approximately 75% of the Citywide sewer system was constructed in the 1920s; the other 25% was constructed in the 1960s. The City has an annual assessment for a sewer service charge. This funds the ongoing operation and maintenance of the sewer system. These services include routine cleaning, root and grease control, and spot repairs, as well as 24-hour emergency call-out service for line blockages. The City is under contract with the County of Los Angeles to provide routine and emergency sewer maintenance services. Also, the City uses private contractors for specialized sewer maintenance services such as root control and video inspection.

The City of West Hollywood requires developers to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction. The fee is based on net sewage unit of proposed land use for projects with new construction (City of West Hollywood 2009).

In addition to routine maintenance, the City of West Hollywood budgets for capital improvements to provide capacity upgrades to accommodate the increased sewage generation. Increased demand for sewer capacity results from both new development as well as revitalization of existing areas within the City. In 1992, the City prepared a comprehensive Master Plan of Sewers. One component of the Master Plan included a computer model to analyze the operation and capacity of the sewer system under current conditions and buildout based on existing General Plan data. In 2000, the Master Plan and computer model were updated to reflect the Sunset Specific Plan. The Master Plan and computer model identify the following sewer segments that likely will require improvements if parcels build out to the maximum potential allowed per the General Plan within the next 20 years:

- Formosa Avenue Area: Development along Santa Monica Boulevard and Formosa Avenue could encounter capacity deficiencies for sewer lines located in Formosa Avenue as well as deficiencies in the downstream sewer lines owned by the City of Los Angeles. Sewer capacity could be gained by construction of a new segment of sewer to bypass deficient segments of existing downstream sewer.
- Santa Monica Boulevard Area, between La Cienega Boulevard and Sweetzer Avenue: Potential capacity deficiencies could occur for the sewer lines in Santa Monica Boulevard between Sweetzer Avenue and Kings Road, as well as a sewer line running parallel to Santa Monica Boulevard in an alley between Kings Road and La Cienega Boulevard. In

2000, the City installed vinyl liners inside some of these sewer lines. With the new liners, the smoother pipe walls could create a slightly greater flow capacity.

Melrose Avenue area: Potential capacity deficiencies could occur for portions of the sewer lines in Melrose Avenue. In a worst case scenario, the Master Plan identifies the need for replacement of 625 linear feet of 8-inch-diameter pipe with an equal amount of 10-inch-diameter pipe to mitigate the impacts.

Because portions of the City's sewer system are nearing 90 years in age, the City has a program of cyclic repairs, in addition to the routine maintenance program. This includes repair of structural defects when identified through video and manhole inspection (cracked and broken pipes). Since the mid 1990s, the City has installed vinyl liners to resolve structural deterioration to sewers and manholes in portions of Sunset Boulevard, Santa Monica Boulevard, Melrose Avenue, Robertson Boulevard, and some neighborhood streets. By inspecting 10% of the City's sewer network each year, deficient sites can be identified for vinyl lining projects that would be implemented approximately every 4 years.

Sewer infrastructure within the City is made up of City-owned local sewers and County-owned trunk sewer lines. The County trunk sewers then discharge into a number of City of Los Angeles sewers. Figure 3.12-3 shows all the locations where County sewers feed into City of Los Angeles sewers. In general, all sewer flows in the City of West Hollywood feed into one of the following locations: Robertson Primary, La Cienega Interceptor Sewer (LCIS), and La Cienega San Fernando Valley Relief Sewer (LCSFVRS) (City of Los Angeles 2010b).

The City of West Hollywood wastewater feeds into the City of Los Angeles sewer system at 42 locations. Based on existing gauging information from 2007 through 2009, the capacity of the main primary sewers is as follows:

- ► Robertson Primary: The Robertson Primary has several flow gauge stations that have recorded depth of flow/diameter of sewer pipe (d/D) of 58–59% full. Based on the planning window of the proposed General Plan, currently no projected relief projects are required.
- LCIS: The LCIS has several flow gauge stations that have recorded d/Ds ranging from 5– 17% full. Based on the planning window of the proposed General Plan, currently no projected relief projects are required.

 LCSFVRS: The LCSFVRS has a flow gauge station that has recorded d/Ds of 50% full. Based on the planning window of the proposed General Plan, currently no projected relief projects are required (City of Los Angeles 2010b).

The City of Los Angeles has a contract with Sanitation District No. 4 of Los Angeles County (Sanitation Districts) to receive sewage generated in West Hollywood and transport that sewage to the City of Los Angeles Sanitation Bureau's trunk, interceptor, and outfall sewer system, which convey wastewater to the HTP in the Playa Del Rey area of the City of Los Angeles.

The Sanitation Districts own, operate, and maintain the large trunk sewers that connect to the City of Los Angeles' regional wastewater conveyance system. Per the Sanitation Districts, no deficiencies currently exist in the Sanitation Districts' facilities that serve the City of West Hollywood (Sanitation Districts 2010).

Sanitation District trunk sewers that serve the City of West Hollywood are described in Table 3.12-4. As indicated in the table, none of the regional trunk sewers are at or near capacity.

Name	Location	Size (inches)	Design Capacity (MGD)	Peak Flow (MGD)	Last Measured
Sherman Trunk Sewer	In Huntley Drive at Santa Monica Boulevard	12	3.7	0.7	2009
Sherman Relief Trunk Sewer	In San Vicente Boulevard at Santa Monica Boulevard	18	4.1	2.0	2009
La Cienega Boulevard Trunk Sewer	In La Cienega Boulevard at Santa Monica Boulevard	12	4.9	1.2	2009
Waring Avenue Trunk Sewer	In Havenhurst Drive at Romaine Street	8	1.2	0.1	2002
Fairfax Avenue Trunk Sewer	In Fairfax Avenue at Fountain Avenue	8	2.0	0.3	2009
Gardner Avenue Trunk Sewer	In Gardner Street at Hampton Avenue	10	2.1	0.3	2009
La Brea Avenue Trunk Sewer	In La Brea Avenue at Lexington Avenue	9	1.6	0.1	2009

 Table 3.12-4. Regional Trunk Sewers and Capacity

Source: County Sanitation Districts 2010

The HTP, which receives wastewater from West Hollywood, processes approximately 340 MGD. The dry weather capacity is 450 MGD and 850 MGD wet weather capacity (City of Los Angeles Bureau of Sanitation 2010).

West Hollywood does not have a specific wastewater discharge entitlement with HTP. Previously, Sanitation District No. 4 (i.e., the City of West Hollywood and small portions of the Cities of Beverly Hills and Los Angeles) had a specific entitlement for a wastewater discharge of approximately 6.6 MGD and paid fees for this amount regardless of usage. Under the new system, Sanitation District No. 4 pays for the equivalent of actual flow on an annual basis, which is approximately 5 MGD. As wastewater discharge demand increases with implementation of the General Plan, new wastewater connections would pay connection fees for the increased flow. Thus, there is no theoretical limit on how much flow an agency (such as Sanitation District No. 4) can discharge (Sanitation Districts of Los Angeles County 2010c).

STORM DRAIN SYSTEM

The storm drain infrastructure in the City is owned and operated by the City of West Hollywood or the County of Los Angeles. The Los Angeles County Flood Control District maintains the backbone flood control system, a network of catch basins and underground storm drain pipes. The City owns and maintains a few catch basins and small storm drain pipes that directly flow into the Los Angeles County Flood Control District system. On an annual basis, the City performs maintenance to clean catch basins (storm drain inlets); the City also stencils no-dumping logos, and installs debris excluder devices to prevent entry of trash into the storm drains.

ENERGY

Electricity

Southern California Edison (SCE) provides electricity to West Hollywood residents and businesses. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across Central and Southern California. SCE administers various energy efficiency and conservation programs that may be available to residents, businesses, and other organizations in West Hollywood.

SCE's only Southern California energy generation facility is the San Onofre Nuclear Generating Station, which is owned in partnership with San Diego Gas & Electric and the City of Riverside. In addition to these company-owned facilities, SCE's other electrical energy generation sources include natural gas, coal, nuclear, renewable energy (geothermal, small hydroelectric, solar, and wind), and large hydroelectric facilities.

SCE distributes electricity purchased through the California Power Exchange, which is the electricity marketplace for approximately 80% of California's electricity customers. The California Independent System Operator coordinates the scheduling and dispatch of electricity that is bought and sold through the Power Exchange, which is essentially a statewide electricity generation and distribution grid.

In 2008, total electricity consumption within the City of West Hollywood amounted to 335,380,279 kilowatts per hour (kWh) (SCE 2009).

Natural Gas

The Southern California Gas Company, a division of Sempra Energy, provides the City with natural gas service. The company's service territory encompasses approximately 20,000 square miles and more than 500 communities. A gas company service yard is within the City limits, adjacent to the West Hollywood Gateway Center on Formosa Avenue at Romaine Street.

Most of the natural gas used in California comes from out-of-state natural gas basins. In 2008, California customers received 46% of their natural gas supply from basins located in the Southwest, 19% from Canada, 22% from the Rocky Mountains, and 13% from basins located within California.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California consumers are the Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, and Mojave Pipeline. Most of the natural gas transported via the interstate pipelines, as well as some of the California-produced natural gas, is delivered into SoCalGas's intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" natural gas pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or to natural gas storage fields. The California Public Utilities Commission has regulatory jurisdiction over 100,000 miles of utility-owned natural gas pipelines, which transported 79% of the total amount of natural gas delivered to California's gas consumers in 2008 (California Public Utilities Commission 2010).

Total natural gas consumption in 2008 in the City of West Hollywood amounted to 16,940,221 therms (SoCalGas 2009).

SOLID WASTE

The City of West Hollywood contracts with a private company for the collection, transport, and disposal of solid waste and recyclables from all business and residential uses in West Hollywood.

Waste generated within the City is driven to a materials recovery facility near the City of Industry and then disposed of primarily in the Puente Hills Landfill in unincorporated Los Angeles County, next to the City of Whittier in the San Gabriel Valley. The Puente Hills Landfill has a currently permitted site capacity of 74 million cubic yards. As of 2009, 38.8 million cubic yards had been used, with a remaining capacity of 35.2 (48%) million cubic yards. Estimated closure date is October 31, 2013. The maximum daily permitted capacity is 13,200 tons per day.

In 2008, approximately 35,400 tons of municipal solid waste were generated by West Hollywood residents and disposed of primarily in the Puente Hills Landfill (CalRecycle 2010a). This represents a decrease from approximately 38,478 tons disposed of in 2007, 51,926 tons disposed of in 2006, and 45,132 tons disposed of 2005 (Calrecycle 2010a).

The Puente Hills Landfill is scheduled to close in 2013. After closure, solid waste will be transferred by rail from Puente Hills to the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The Mesquite Regional Landfill is located on 4,245 acres of land in Imperial County. The landfill will provide capacity for approximately 600 million tons of residual municipal solid waste (approximately 100 years of capacity).

The Eagle Mountain Landfill has a total capacity of 708 million tons and is currently permitted to accept up to 460 million tons. Initially, up to 10,000 tons per day of municipal solid waste may be disposed at the site. The property totals 4,643 acres and the landfill footprint will eventually encompass 2,164 acres of the property. The eventual operation of the Eagle Mountain Landfill is contingent upon successful resolution of pending federal legislation (Sanitation Districts of Los Angeles County 2010a).

Senate Bill (SB) 1016 requires that the 50% diversion requirement mandated by Assembly Bill (AB) 939 be measured in terms of pounds per person per day, instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for resident and employee per capita per day disposal rates. The target for residents is 5.8 and 7.7 for employees. In 2007 and 2008, the per capita disposal rate per day per resident in West Hollywood was 5.6 and 5.2 per employee. In the same years, the per capita per day disposal rates per employee in West

Hollywood, measured 6.8 and 6.2, respectively (CalRecycle 2010b). West Hollywood was below both the resident and employee targets set by CalRecycle for both 2007 and 2008.

3.12.2 REGULATORY SETTING

Regulations exist at local, state, and federal levels that guide the development and enforcement of codes to adequately provide public services and facilities to City residents and businesses. These regulations include but are not limited to the following described below.

FEDERAL REGULATIONS

Uniform Fire Code

The Uniform Fire Code (UFC) is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The UFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The UFC and the Uniform Building Code (UBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the UFC employs a permit system based on hazard classification.

National Pollutant Discharge Elimination System

West Hollywood is under the jurisdiction of the Los Angeles RWQCB Region 4, which implements the NPDES permit for the County of Los Angeles. The NPDES permit, a requirement under the Clean Water Act, addresses pollution from urban runoff that impacts water quality of receiving waters (such as streams and lakes). Under the NPDES permit, West Hollywood must implement measures to reduce urban runoff during all phases of development: planning, construction, and existing uses. Requirements include incorporating BMPs to reduce runoff from construction and current uses, reporting any violations to the Los Angeles RWQCB, and education regarding the negative water quality impacts of urban runoff.

STATE REGULATIONS

California Fire Code

The California Fire Code (CFC) and Office of the State Fire Marshall provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The

CFC also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion.

Senate Bill 610 and Senate Bill 221

SB 610 and SB 221, amended into state law effective January 1, 2002, improve the linkage between certain land use decisions made by cities and counties and water supply availability. The statutes require detailed information regarding water availability and reliability with respect to certain developments to be included in the administrative record to serve as evidentiary basis for an approval action by the City or County on such projects.

Under SB 610, a water supply assessment must be furnished to local government for inclusion in any environmental documentation for certain types of projects, as defined in Water Code Section 10912 [a] and subject to CEQA. A fundamental source document for compliance with SB 610 is the UWMP. The UWMP can be used by the water supplier to meet the standard for SB 610.

SB 221 applies to the Subdivision Map Act, conditioning a tentative map on the applicant to verify that the public water supplier has sufficient water available to serve the proposed development.

The General Plan is not subject to either SB 610 or SB 221 because the Plan itself does not grant entitlements; instead, it provides a planning framework for future development in the planning area. However, as individual projects are implemented under the General Plan, they will be reviewed for compliance with the requirements of SB 610 and/or SB 221. Adequate water availability must be demonstrated, as required.

Senate Bill 50

SB 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered "full and complete mitigation" of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional school facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any school impacts.
Urban Water Management Plans

Urban water purveyors are required to prepare and update an UWMP every 5 years. The City of Beverly Hills and LADWP, which provide water service to West Hollywood, updated their UWMPs in 2005. Both agencies are currently in the process of updating their UWMPs for the 2010–2015 period. The UWMPs address water supply, treatment, reclamation, and water conservation, and contain a water shortage contingency plan.

Integrated Waste Management Program

The Integrated Waste Management Act of 1989 (AB 939) was passed because of the increase in the waste stream and the decrease in landfill capacity. As a result, the California Integrated Waste Management Board (CIWMB) (now known as Department of Resources Recycling and Recovery or CalRecycle) was established. A disposal reporting system with CIWMB oversight was established, and facility and program planning was required. AB 939 mandates a reduction of waste disposal. Jurisdictions were required to meet diversion goals of 25% by 1995 and 50% by the year 2000. AB 939 also established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance.

In 2007, the Legislature amended the California Integrated Waste Management Act through SB 1016 to ensure that the measurement system for diversion progress is more accurate and timely. To achieve this, SB 1016 transitions from a diversion-based measurement to a disposal-based measurement system that adjusts for growth using a jurisdiction's annual population figure as reported by DOF.

Each year, jurisdictions are required to submit an annual report to the CIWMB to report diversion progress and program implementation. From this report the CIWMB generates a jurisdiction's diversion rate, using a set of adjustment factors, to determine whether a jurisdiction is maintaining a 50% or greater diversion rate as required by AB 939. SB 1016 does not change the diversion goals of AB 939. Rather, SB 1016 changed the way diversion progress is measured and reported during the annual report process.

SB 1016 uses the CIWMB's disposal reporting system (DRS) and population as reported by DOF as the two factors for determining a jurisdiction's progress in meeting AB 939 diversion mandates. The disposal reporting number used to determine compliance is reported as a per capita disposal rate, where per capita disposal is defined as total annual disposal divided by total population.

SB 1016 establishes each jurisdiction's per capita disposal equivalent by calculating a jurisdiction's per capita disposal had it had been at exactly 50% diversion during the reporting period of 2003 to 2006 (the 'base period' for purposes of SB 1016). An increase in per capita disposal in subsequent years would indicate that a jurisdiction has allowed disposal amounts to increase faster than population. The CIWMB would then begin to examine a jurisdiction's program implementation and recommend that the jurisdiction enhance program development. Each jurisdiction or regional agency will continue to submit their Electronic Annual Report to the CIWMB each year on or around March 1. Under SB 1016, the compliance and enforcement that a jurisdiction could incur is the "compliance order" for failing to maintain the diversion requirement and "civil penalties" for failing to meet the requirements stipulated in the compliance order. If a jurisdiction fails to implement the plan of correction as contained in a compliance order, civil fines could be levied of up to \$10,000.00 per jurisdiction per day.

Department of Resources Recycling and Recovery (CalRecycle)

CalRecycle is the new home of California's recycling and waste reduction efforts. Officially known as the Department of Resources Recycling and Recovery, CalRecycle is a new department within the California Natural Resources Agency and administers programs formerly managed by the State's Integrated Waste Management Board and Division of Recycling.

3.12.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to public services and utilities would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the CEQA Guidelines:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
 - Police Protection
 - Fire Protection
 - Schools
 - Libraries
 - Other Public Facilities

- Exceed wastewater treatment requirements of the applicable RWQCB;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Result in insufficient availability of water supplies to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Generate waste materials that would exceed the permitted capacity of local landfills or fail to comply with federal, state, and local statutes and regulations related to solid waste; or
- ► Violate federal, state, and local statutes and regulations related to solid waste.

Although not included in Appendix G of the CEQA Guidelines, the following would also be considered a significant impact if implementation of the General Plan would:

 Create demand for electricity or natural gas service that would require the construction of facility improvements that could cause significant environmental impacts.

3.12.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

Development of land use 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.

POLICE PROTECTION

Implementation of the proposed General Plan will result in an increase in population and new development in West Hollywood. Additional police 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. In particular, intensification of

development and additional population in the commercial subareas would lead to an increased demand for police services in these areas. This is a **potentially significant** impact.

Even though the City does not use an officer-to-population ratio standard to measure the adequacy of policing levels in the City, the City would need approximately 23 new sworn personnel and approximately 8 civilian personnel to maintain West Hollywood's current sworn officer-to-population ratio of 3.6 sworn personnel for every 1,000 population. This figure is based on the net population increase of approximately 6,834 persons anticipated at buildout of the proposed General Plan. Additionally, the existing West Hollywood Sheriff's Station facility occupies 20,000 square feet and provides 120 parking spaces. Approximately 250 employees, reserves, and volunteers occupy the facility at various times. At the present time, there are no plans for a new station, new equipment, or increased manpower (County of Los Angeles Sheriff's Department 2010).

According to the Federal Bureau of Investigation, the 2004 average full-time law enforcement officer-to-population ratio for cities in the Western United States is 1.7 officers per 1,000 population. For cities with populations of 25,000 to 49,999 population, which is comparable to West Hollywood, the ratio is 1.4 (Department of Justice 2010). As noted, the City of West Hollywood far exceeds these average ratios by providing 3.6 sworn officers per 1,000 population.

The General Plan update proposes policies to provide adequate law enforcement for the protection of the community. Policies proposed in the Safety and Noise Element include the following:

- Continuing to provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.
- Cooperating and collaborating with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services,
- Supporting the County's existing mutual aid and automatic aid agreements for additional fire and police resources needed during an emergency.
- Using urban design features to enhance public safety, to facilitate "eyes on the street" and to create defensible space in project design. To achieve improved public safety in project design, the City should utilize best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape.

- Continuing to utilize community policing to improve public safety and involve the community in working to improve the overall safety of West Hollywood.
- Contracting with Los Angeles County for the provision of police services and remain part of the Consolidated Fire Protection District of the County of Los Angeles for fire/emergency services, and annually review the services regarding responsiveness to community needs, effectiveness, and efficient resource allocation.
- Promoting community-based programs in fire safety and emergency preparedness, including neighborhood-level programs and programs with businesses.
- Establishing a public safety impact fee, for expenditures related to facilities, operations and management.
- Coordinating the provision of law enforcement and fire protection/emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.
- Encouraging, facilitating, and participating in, where appropriate, the establishment of methods of communication among the public safety and social service providers and the West Hollywood community to discuss and resolve issues of responsiveness and sensitivity which may arise.
- ► The City utilizes the Public Safety Commission to facilitate communication among public safety service providers and the West Hollywood community.

With adherence to and implementation of the proposed General Plan policies, and implementation of Mitigation Measures 3.12-1 through 3.12-8, program-level impacts to police protection would be **less than significant**.

Pursuant to Section 15145 of CEQA, analysis of the physical changes in the City that may occur from future construction or expansion of police stations and/or police facilities would be speculative and no further analysis of the impact is required at this time. However, construction of police facilities would be subject to CEQA. If project-level significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

FIRE PROTECTION

Implementation of the proposed General Plan will result in an increase in population and new development in West Hollywood. Additional fire protection personnel and facilities will be

needed over the course of the General Plan buildout because increased development and associated population will place increased demand on the department. In particular, intensification of development and additional population primarily within the five commercial subareas would lead to increased demand for fire protection services in these areas. This is a **potentially significant** impact.

Per the LACFD, development of all proposed projects must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. Specific fire and life safety requirements, including compliance with the fire code standards, would be ensured through the plan check process and fire review phase prior to the issuance of building permits.

The proposed General Plan contains numerous fire protection policies, which include providing adequate fire protection for the community as discussed above in the analysis of Police Protection.

With adherence to and implementation of the proposed General Plan policies and implementation of Mitigation Measures 3.12-1 through 3.12-6, program-level impacts to fire protection would be **less than significant**.

Pursuant to Section 15145 of CEQA, analysis of the physical changes in the City, which may occur from future construction or expansion of fire stations, would be speculative and no further analysis of the impact is required at this time. However, construction of fire stations would be subject to CEQA. If project-level significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

EDUCATION

Development of land use 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 with implementation of the proposed General Plan. The majority of new development would occur as infill and redevelopment in the already developed five commercial subareas. All new development would be multi-family residential units or mixed-use development and would be expected to have lower generation rates for schoolchildren than single-family residential development.

Generation rates used by LAUSD to estimate the impact on district schools resulting from new residential development within its jurisdiction are listed in Table 3.12-5.

Dwelling Unit Type	Proposed Dwelling Units	Education Level	Generation Factor	Students Generated
		Elementary	0.1966	840
Multi-Family 4,	4,274	Middle	0.0935	400
		High	0.1106	522
Total Students Generated from Implementation of General Plan				1,762

Table 3.12-5. Student Generation

Source: LAUSD 2010

Based on LAUSD's student generation rates provided in Table 3.12-5, an estimate of 1,762 new students could be generated in West Hollywood by implementation of the proposed General Plan. 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. As indicated in Table 3.12-2 in Section 3.12.1, all schools serving the City of West Hollywood are below capacity.

Because the schools used by West Hollywood are operated by LAUSD and others, the City does not control school programming or facilities.

With adoption of SB 50 and Proposition 1A in 1998, school districts that meet certain requirements now have the option of adopting alternative school fees, also known as Level 2 Fees and Level 3 Fees (PRC Sections 65995.5, 65995.6, and 65995.7). In general, alternative school fees, which are calculated for each school district, apply solely to residential construction within a school district. Therefore, LAUSD and the City will require developers to provide for adequate educational facilities, to the extent allowed by law. Current developer fees assessed for residential development are \$3.87 per square foot and \$0.47 per square foot for commercial development.

Pursuant to Section 15145 of CEQA, analysis of physical changes in the City that may occur from future construction or expansion of schools would be speculative and no further analysis of the impact is required at this time. The environmental effects of expansion, construction, and operation of additional school facilities would be evaluated under CEQA by LAUSD in its efforts to plan for construction of new schools or expansion of existing facilities, if applicable. LAUSD continually evaluates demand, capacity, and plans for facility needs. If project-level

significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

LIBRARIES

Implementation of the proposed General Plan would add additional population in the City of West Hollywood increasing the demand for library services.

As indicated in Section 3.12.1, a new West Hollywood Library is under construction as part of the redevelopment of West Hollywood Park. The library will replace the existing 5,000-square-foot library. The library itself will be approximately 32,500 square feet (Worland 2010). Project construction began in May 2009 and is anticipated to be completed by September 2012. 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 (City of West Hollywood 2004). Therefore, no additional analysis is required in this EIR.

The City has not adopted service standards for library facilities. However, the Los Angeles County Library system has minimum service requirements for new facilities. Table 3.12-6 compares the Los Angeles County requirements and the service goals set for the new West Hollywood Library.

Library Standards	Los Angeles County Minimum Guidelines	West Hollywood Library (under construction)	2035
Square feet of library space per capita	0.50	0.88	0.74
Technology workstations per 1,000 residents	1.00	1.30	Unknown
Reader seats per 1,000 residents	2.50	5.20	Unknown
Meeting room seats per 1,000 residents	2.00	4.50	Unknown
Volumes per capita	2.75 to 3.00	4.40	Unknown

Table 3.12-6. Library Service Standards

Source: Worland 2010 and AECOM 2010

As indicated in the table, the new West Hollywood Library would exceed the minimum standards set by the County of Los Angeles. Based on the buildout population of the General Plan, the library would continue to exceed minimum requirements for square feet of library space per capita. Technology workstations, reader seats, meeting rooms, and volumes per capita are currently unknown. Upon completion in 2012, the City of West Hollywood Library would be almost six times as large as the existing facility and would exceed the Los Angeles County library guidelines for minimum square feet of library per capita. Additionally, the environmental

impacts of construction of the West Hollywood Library have already been analyzed in the West Hollywood Park Master Plan Mitigated Negative Declaration. Therefore, impacts would be **less than significant**.

WATER

Water Infrastructure Impact

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 could result in an increase in the need for new water infrastructure.

New development and redevelopment pursuant to the General Plan would be primarily located within five commercial subareas of West Hollywood where water infrastructure already exists. Portions of three of the commercial subareas are located within the water service area of the City of Beverly Hills. As indicated in Section 3.12.1, water lines already exist in this service area. In addition, the City of Beverly Hill's CIP allocates ongoing funding to repair and replace water infrastructure in the service area. The 2009–2010 adopted CIP includes funding and programs to replace or rehabilitate undersized, deteriorated, or old water mains.

Both the City of Beverly Hills and LADWP 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.

The proposed General Plan contains policies to ensure adequate water infrastructure is available to serve new development in West Hollywood. Proposed water infrastructure policies include requiring new development to demonstrate sufficient access to necessary infrastructure and services, such as water, provided by outside service providers; requiring new development to pay for the costs of improvements to water infrastructure that it necessitates; and requiring the City to work with service providers to ensure that system capacity keeps up with the potential demand for additional growth in West Hollywood.

Pursuant to section 15145 of CEQA, the specific environmental impact of constructing new water infrastructure in the City of West Hollywood cannot be determined at the General Plan level of analysis because no specific water infrastructure construction projects are proposed as

part of the General Plan program and analysis would be speculative; however, like the development of other land uses allowed under the General Plan, individual development projects would be required to evaluate the potential impacts of the proposed project in accordance with CEQA. In addition, various policies and programs included in the General Plan address the potential impacts associated with the construction of new water infrastructure. Therefore, impacts are **less than significant**.

Water Supply Impact

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.

Water in the City of West Hollywood is supplied by the City of Beverly Hills and LADWP.

City of Beverly Hills

The following water discussion is taken from the 2005 City of Beverly Hills UWMP, except where noted. Water use data from 2006 through 2009 were obtained from the City of Beverly Hills in April 2010.

The Beverly Hills UWMP indicates that water use in the City of Beverly Hills service area depends on land use, population, types of water fixtures, water loss, irrigation, and availability. Changes in water demand are affected by changes in the type and intensity of land uses, household size, population growth, landscape areas, rainfall, and conservation efforts. In making projections regarding future water supply and demand, the Beverly Hills UMWP relies on historic water production patterns in the Beverly Hills water service area.

The projected water demand shown in the UWMP for the water service area was calculated by collecting water use and population data for a 10-year period beginning in 1996 and ending in 2005 and developing a per capita per day water demand rate. The water demand rate was calculated to be 275.5 gallons per capita per day (gpcd) based on this methodology, which includes a safety factor of approximately 2.5%.

According to MWD, per capita water use does not express the amount of water actually used by an individual, because it includes all categories of urban water use, including residential, commercial, industrial, fire fighting, and others. However, per capita water use can be a useful measure of how water use within a particular region is changing over time. In MWD's service area (which includes the City of Beverly Hills) per capita water use fell from a high of 219 gpcd in 1989 to a low of 171 gpcd in 1991, at the time of water-use restrictions. Since that time, per capita use has varied between 176 and 193 gpcd, which is well below the predrought levels (MWD 2005).

As indicated in the City of Beverly Hills UWMP and as discussed above, water demand depends on a variety of factors. The built environment differs in the City of West Hollywood from that of the City of Beverly Hills. Much of the City of West Hollywood area served by Beverly Hills water service contains multi-family buildings with more limited landscape areas. In general, these types of uses need less water than the large-lot single-family homes typically found in Beverly Hills. Furthermore, water use data for the portion of the City of West Hollywood served by Beverly Hills indicate that water use for the City of West Hollywood is considerably lower than 275.5 gpcd. Table 3.12-7 shows the actual water use in that portion of the City of West Hollywood served by Beverly Hills. As indicated, water use from 2006 through 2009 declined from approximately 143 gpcd in 2006 to 129 gpcd in 2009.

	Year			
Water Use	2006	2007	2008	2009
Undefined (hundred gpy)	569	1,691	2,184	2,162
3 units (hundred gpy)	868	935	1,346	2,035
Commercial (hundred gpy)	1,375,069	1,234,061	1,111,328	1,146,539
Industrial (hundred gpy)	85,562	82,346	82,084	63,906
Municipal (hundred gpy)	179,794	194,553	177,146	180,774
Private-fire (hundred gpy)	7,391	7,787	0	0
R-double (hundred gpy)	271,318	282,292	288,045	284,529
R-multi (hundred gpy)	1,548,490	1,504,968	1,441,279	1,456,225
R-single (hundred gpy)	695,673	714,195	677,234	620,674
Total Water Use (hundred gpy)	4,164,734	4,022,828	3,780,646	3,756,844
Total water use (gpd)	1,141,023	1,102,145	1,035,794	1,029,272
gpcd (based on 8,000 people)	142.6	137.8	129.5	128.7
Average gpcd 2006–2009	134.6			

Table 3.12-7. Actual Water Demand 2006 through 2009, Portion ofCity of West Hollywood Served by City of Beverly Hills

gpy = gallons per year; gpd = gallons per day; gpcd = gallons per capita per day Source: City of Beverly Hills 2010 The City of Beverly Hills provided water to approximately 8,000 people in the City of West Hollywood in 2000. According to SCAG, the population of West Hollywood in 2000 was 35,851 people. This indicates that the City of Beverly Hills served approximately 22.3% of the West Hollywood population. The UWMP assumes the same percentage (22.3%) to calculate water demand for future years.

Water demand assumptions are based on SCAG projections of future population. The UWMP assumes that the City of West Hollywood would have approximately 39,609 people in the year 2030 (no projections were done for 2035). The proposed West Hollywood General Plan indicates that the City of West Hollywood would have approximately 44,182 people in 2035. Therefore, a conservative estimate indicates that the UWMP does not account for approximately 1,020 people (44,182 - 39,609 = 4,573 * 22.3% = 1,020). Based on the actual highest water use from 2006 through 2009, at 143 gpcd (to ensure a conservative estimate of demand), approximately 145,450 gallons or 0.45 AF per day, or 163 AFY additional water supply would be needed to serve population growth in West Hollywood that was not anticipated in the Beverly Hills UWMP. Table 3.12-8 indicates the total water supply and demand in the City of Beverly Hills in 5-year increments through the year 2030. Additionally, Table 3.12-8 indicates that, even considering the additional water demand from implementation of the West Hollywood General Plan not anticipated in the Beverly Hills UWMP, there would be a surplus of 53 AFY of water available in 2030.

			Year		
	2010	2015	2020	2025	2030
Local Wells	1,500	1,500	1,500	1,500	1,500
MWD	13,380	13,380	13,380	13,380	13,380
Total Supply	14,880	14,880	14,880	14,880	14,880
Total Demand	13,668	13,927	14,044	14,426	14,661
Difference	1,212	953	836	454	219
Additional water demand for West Hollywood not anticipated in UWMP	-	-	-	-	163
Difference					53

Table 3.12-8. Water Supply and Demand, City of Beverly Hills (AFY)

Source: City of Beverly Hills 2005; AECOM 2010

The City of Beverly Hills currently imports approximately 90% of its water from MWD. The City of Beverly Hills has a preferential right of 1.01% of MWD water. MWD has prepared a UWMP that addresses the reliability of its supplies. The City of Beverly Hills received 100% of its water supply from MWD from 1976 to 2003. In 2003, Beverly Hills supplemented its

imported supply with local groundwater, which now makes up approximately 10% of the City of Beverly Hills' total water supply.

To determine the water supply reliability for the City of Beverly Hills service area from the MWD, existing and projected supplies and demands for MWD water using three different scenarios are compared: multiple dry, single dry, and normal (average) years.

Table 3.12-9 shows a comparison between the supply and demand of MWD water during multiple dry, single dry, and average water years for 2010, 2015, 2020, 2025, and 2030. As shown, the projected supply exceeds the projected demand in all cases.

	Year				
	2010	2015	2020	2025	2030
Multiple Dry Year					
Supply	2,619,000	2,834,000	2,841,000	2,827,000	2,827,000
Demand	2,376,000	2,389,000	2,317,000	2,454,000	2,587,000
Difference	243,000	445,000	524,000	373,000	240,000
Single Dry Year					
Supply	2,842,000	3,101,000	3,102,000	3,078,000	3,078,000
Demand	2,293,000	2,301,000	2,234,000	2,363,000	2,489,000
Difference	549,000	800,000	868,000	715,000	589,000
Average Water Ye	ar				
Supply	2,668,000	2,600,000	2,654,000	2,654,000	2,654,000
Demand	2,040,000	2,053,000	1,989,000	2,115,000	2,249,000
Difference	628,000	547,000	665,000	539,000	405,000

Table 3.12-9. MWD Projected Water Supply and Demand Comparison (AFY)

Source: City of Beverly Hills 2005

As indicated in the LADWP UWMP, MWD has implemented a variety of projects and programs designed to reduce its dependency on imported water during droughts. These have included (1) providing financial incentives for local projects and conservation; (2) increased surface storage via Diamond Valley Lake and use of the SWP terminus reservoirs; (3) groundwater storage programs in Central Valley, Imperial Valley, and Coachella Valley; (4) short- and long-term water transfers; and (5) local groundwater storage programs with participating member agencies. MWD's integrated resource plan (IRP) calls for further expanding all of these alternative supplies. MWD is also planning for the development of a 500,000-AF buffer supply to mitigate for any shortfall in future supply development. Implementation of MWD's IRP will provide sufficient water to its member agencies (which includes the City of Beverly Hills) even during critically dry events from now until at least 2025 (LADWP UWMP 2005).

Based on the information in the City of Beverly Hills UWMP and information from MWD, the City of Beverly Hills water service area appears to have adequate access to water supply.

Additionally, the City of Beverly Hills recently amended its General Plan, which included goals and policies to continue to implement water conservation measures to limit water consumption and meet the current and projected future daily and peak water demands, which are designed to increase reliability. The City of Beverly Hills also has a drought-resistant plant ordinance to further reduce water demand, and, as a member of the California Urban Water Conservation Council, has a demonstrated commitment to efficient water use by integrating urban water conservation BMPs into the planning and management of California's water resources (City of Beverly Hills 2009).

Furthermore, the Beverly Hills water distribution system includes 10 reservoirs that together are capable of delivering up to 46,336 AFY of water into the City of Beverly Hills' system at 80% operation and the expansion of the Coldwater Canyon Reservoir is currently underway. Therefore, as additional water becomes available to serve the City of Beverly Hills, there is ample storage for that water, and no additional facilities would be required (City of Beverly Hills 2009).

However, uncertainty exists for the long-term supply of water to the City of Beverly Hills and for all of California. Uncertain climate change impacts and variable hydrology and environmental issues in the Bay-Delta could reduce the quantity of water that the SWP delivers to MWD, and in turn to the City of Beverly Hills water service area (including the City of West Hollywood), among other issues.

Since the City of Beverly Hills UWMP was adopted in 2005, considerable research, planning, and analysis have been conducted to study the impacts of climate change on California, including water supply. Although the potential effects of climate change are evaluated in this EIR, the Beverly Hills UWMP did not address the potential effects of climate change on water supply.

Additionally, restrictions on Bay-Delta pumping related to the listing of endangered species, hydrology constraints, and several years of drought contribute to long-term uncertainty in water supply. Operational constraints with the SWP will likely continue until a long-term solution to problems in the Bay-Delta is implemented.

Because long-term water supply is uncertain, compliance with the guidance provided by the California Supreme Court's decision in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* requires an explanation of how the long-term demand for adequate water supplies is likely to be met with other water source options. The following description of other water source options, the potential environmental impacts of exploiting those sources, and how those impacts are to be mitigated is required by the Vineyard Case.

City of Beverly Hills Service Area Alternative Water Sources

Recycled Water

All wastewater flows from the City of Beverly Hills water service area (not including stormwater) are collected by the City and delivered to the City of Los Angeles for treatment at that agency's HTP. There are no wastewater recycling plants within the vicinity of Beverly Hills. The closest tertiary treatment plant is located 20 miles from Beverly Hills and the closest pipeline from that plant is 15 miles from Beverly Hills. As of the UWMP date in 2005, no plans exist for a wastewater treatment plant due to engineering and financial issues such as discharge lines and second infrastructure for reclaimed water. Recycled water is an additional source of water that may be a potential supply in future years. There is no identified land within Beverly Hills that could be used to site a wastewater treatment plant, and the cost to install a dual system has been determined economically infeasible at the current time.

Desalinated Water

The City of Beverly Hills is not located adjacent to the ocean and does not have any plans for either a local or regional desalination facility. The City of Beverly Hills could participate in a regional desalination facility that supplied treated water to MWD's distribution system, but MWD does not currently have any plans for such a facility in which Beverly Hills could participate.

As noted in the discussion above, the City of Beverly Hills does not have plans for alternative water supplies as of the 2005 UWMP. However, also as discussed above, MWD, which supplies 90% of the water to the City of Beverly Hills, has implemented a variety of projects and programs designed to reduce its dependency on imported water during droughts, which would be considered alternative supply sources. These alternative sources explored by MWD, as well as potential environmental impacts and mitigation measures, are summarized within the discussion below on LADWP Service Area Alternative Water Source Options because the LADWP contains that discussion.

Los Angeles Department of Water and Power

The following discussion is based on the 2005 LADWP UWMP.

Demographic projections in the Los Angeles UWMP were obtained for the LADWP service area from MWD utilizing a land-use-based planning tool that allocates projected demographic data from SCAG into water service areas for their member agencies. MWD's demographic projections use data reported in SCAG's 2004 Regional Transportation Plan (RTP).

From 1985 through 2004, water use in the LADWP service area peaked in 1989 at 750,000 AFY and reached a low point of 557,000 AFY in 1991. During the same time period, average demand was approximately 644,000 AFY. Because of LADWP's aggressive long-term conservation measures, water use in 2005 is equal to the annual use of about 20 years ago, despite a growth in population of more than 750,000 people.

During the 1980s, per-person use averaged over 180 gpcd. Due to the drought and economic recession, per-person use decreased to about 145 gpcd in the early 1990s. Since 1996, per-person use has been averaging approximately 155 gpcd. The annual water savings of about 15% between today's per-person use and that which occurred during the 1980s is attributed to long-term conservation measures implemented by the City of Los Angeles.

Table 3.12-10 indicates the projected water demand in the LADWP service area through the year 2030, based on SCAG demographic data.

Water Demand	Year				
Condition	2010	2015	2020	2025	2030
Multiple Dry	717,000	739,000	766,000	792,000	813,000
Single Dry	717,000	739,000	766,000	792,000	813,000
Average (Normal)	683,000	705,000	731,000	755,000	776,000

 Table 3.12-10. Projected Water Demand LADWP Water Service Area (AFY)

Source: LADWP 2005

The proposed West Hollywood General Plan indicates that the City of West Hollywood would have approximately 44,182 people in 2035. Because the City of Beverly Hills provides water to approximately 22.3% of the City of West Hollywood, LADWP provides water to 77.7% of West Hollywood. A conservative estimate assumes that the LADWP UWMP does not account for any growth in the City of West Hollywood associated with implementation of the proposed General Plan. Since current (2008) population in the City of West Hollywood is 37,348, the LADWP

UWMP would not account for approximately 6,834 people (44,182 - 37,348 = 6,834 * 77.7% = 5,310).

Therefore, to estimate the additional water supply needed to serve the population growth not anticipated in the LADWP UWMP, a factor of 155 gpcd is used, based on the average water use in the LADWP service area since 1996. At 155 gpcd, approximately 823,050 gallons or 2.5 AF per day, or 922 AFY of additional water supply would be needed to serve population growth in West Hollywood that was not anticipated in the LADWP UWMP.

Water Service Reliability Assessment for 2030

LADWP's surface water supplies from the Los Angeles Aqueduct, MWD's Colorado River Aqueduct, and the SWP vary substantially due to hydrology. To mitigate against the variability of surface supplies, LADWP has made significant investments in groundwater, recycled water, and water conservation. These supplies and demand management provide a "hedge" against droughts and variability of surface water. Table 3.12-11 describes the supply sources for the year 2030.

	Average Year	
Supply	Supplies	Dry Year
Los Angeles Aqueducts	31%	10%
MWD Imported Supply	20-34%	39–54%
Groundwater	12%	14%
Existing and Planned Recycled Water*	3%	3%
Other Planned Supply**	6%	6%
Existing Conservation	14%	13%
Potential Conservation***	6%	7%
Potential Supply	8%	8%
Total 2030 Supply	897,200 AFY	934,200 AFY

Table 3.12-11. LADWP Service Reliability Summary for Year 2030

* For nonpotable municipal and industrial purposes.

** Includes seawater desalination and water transfer.

*** Potential conservation may include smart irrigation and other measures, while potential supplies may include additional recycled water, additional seawater desalination, and beneficial reuse of urban runoff. However if these potential conservation measures and supplies are not developed due to cost, technology, and/or customer acceptance, greater reliance on MWD would be needed. Source: LADWP 2005

To determine the overall service area reliability, LADWP defined three hydrologic conditions: average (or normal weather), single dry year (such as a repeat of the 1976–77 drought), and multiyear drought (such as a repeat of the 1987–92 drought).

Under average weather conditions, approximately 66% of the total supply (estimated to be 897,200 AF) is from existing and planned locally developed supplies, including the Los Angeles Aqueduct and conservation. The potential supplies and additional potential conservation represent 14%. The remaining 20% of supply is imported water from MWD. Should the potential supplies not be developed due to cost, technology, regulatory compliance, and/or customer acceptance issues, then the MWD portion of supply would represent 34%. During a dry year, existing and planned locally developed supplies represent 46% of the total supply (estimated to be 934,200 AF); while 15% is potential supplies and conservation. The remaining 39% is imported water from MWD.

Based on the LADWP UWMP, in 2030 projected water demand would be 813,000 AFY in dry years, while supply available is projected at 934,200 AFY. The difference is a surplus of 121,200 AFY. During an average water year, demand in 2030 is projected at 776,000 AFY, while total supply available is projected at 897,200 AFY. The difference is a surplus and is also 121,200 AFY.

According to the LADWP UWMP, under the hydrologic conditions throughout the 25-year projection period (through 2030), LADWP's supply portfolio is expected to be reliable, with adequate supplies available to meet projected demands in the LADWP water service area.

Based on the information in the LADWP UWMP, LADWP appears to have adequate access to water supply. However, uncertainty exists in the long-term supply of water to LADWP and for all of California. Uncertain climate change impacts and variable hydrology and environmental issues in the Bay-Delta could reduce the quantity of water that the SWP delivers to MWD, and in turn to the LADWP, among other issues.

The LADWP UWMP analyzed the effects of climate change on water supplies and identified strategies and alternative water sources to reduce potential impacts to water supply. Various regional climate models have reached the general conclusion that rises in greenhouse gases will cause temperatures to increase. Temperature increases may (1) reduce snowpack levels, with possibly greater impacts at lower mountain elevations; (2) shift to an earlier period the timing of spring runoff; (3) increase water demands for outdoor watering; and (4) change precipitation falling as rainfall rather than snow, thereby reducing the natural reservoir storage that snowpack provides. This could lead to a reduction in water supply available to LADWP. This could also result in reduction in water supply to West Hollywood, as West Hollywood receives water from LADWP. However, the effect of climate change on long-term water supply is currently not known and contributes to the uncertainty of the long-term supply of water. Additionally,

restrictions on Bay-Delta pumping related to the listing of endangered species, hydrology constraints, and several years of drought contribute to long-term uncertainty in water supply for any areas served by the Bay-Delta. Operational constraints with the SWP will likely continue until a long-term solution to problems in the Bay-Delta is implemented.

LADWP Service Area Alternative Water Source Options

Because long-term water supply is uncertain, compliance with the guidance provided by the California Supreme Court's decision in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* requires an explanation of how the long-term demand for adequate water supplies is likely to be met with other water source options. This discussion describes other water source options that may be available to help address any potential uncertainty of long-term water supply to the southern California region. It is important to note that the following discussion is included in this Program EIR to comply with the guidance provided by the California Supreme Court's decision in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, which requires an explanation of how the long-term demand for adequate water supplies is likely to be met with other water source options.

It is also important to note that the potential impacts of the other water source options identified in the following discussion and the mitigation for those potential impacts do not represent direct impacts of, or necessary mitigation for, the proposed West Hollywood General Plan. Instead they are provided in accordance with guidance under the California Supreme Court decision in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*.

As indicated in the LADWP UMWP, LADWP is actively investigating alternative supply options including water transfers, seawater desalination, and beneficial reuse of urban runoff. Such options, with proper planning, can supplement existing supplies and contribute toward future demand under various conditions. The following potential water source options supplement the potential water supplies shown as a supply source in Table 3.12-11.

Water Transfers

LADWP is planning to acquire water through transfers. LADWP is working with multiple agencies to finalize an agreement for construction of a turnout to deliver water from the California Aqueduct into the LAA.

MWD has consented to the transfer of water into its service territory. LADWP's current goal is to transfer up to 40,000 AFY once the turnout facilities are in place. Regionally, MWD has been

active with water transfers, seeking and implementing agreements and cooperative arrangement opportunities to supplement Southern California's water supply.

Sea Water Desalination

Seawater desalination is the process of removing salts and other impurities from seawater to produce potable water. With increasing demand for water and limited new supply options, the future value of seawater desalination as a part of California's water supply portfolio has become apparent. Within Southern California, up to 133 MGD of seawater desalination production capacity is possible by the year 2015. While this production represents less than 5% of the region's total water supplies, it is considered by water planners as an important part of the region's water supply portfolio.

Enhanced Local Groundwater Basin Production

Three groundwater basins exist near or within LADWP's service area that have additional groundwater potentially available. The Hollywood Basin, La Brea subarea of the Central Basin, and Santa Monica Basin are unadjudicated basins, where water rights have not been legally established.

The Hollywood Basin yields approximately 3,500 AFY. Groundwater extracted from this basin is used by the City of Beverly Hills. With financial assistance from MWD, Beverly Hills commenced operation of a 1,270-gallon-per-minute groundwater treatment facility in 2003 that processed water from the 15-square-mile basin to assist in fulfilling its municipal water needs (LADWP UWMP 2005).

The Santa Monica Basin is composed of the Coastal, Charnock and Crestal subbasins. The Coastal and Charnock subbasins are utilized by the City of Santa Monica for its municipal water supply. Currently, there is no pumping activity at the Crestal subbasin. Although the potential yield of the Crestal subbasin is estimated to be approximately 3,000 AFY, extensive water contamination would require substantial treatment prior to use.

The groundwater in the Hollywood, La Brea, and Santa Monica basins exhibits poor water quality and would require significant treatment prior to distribution. At this time, the relatively high costs involved with developing these supplies make them economically unattractive. LADWP continues to follow the progress of studies relating to these and other basins and will pursue this supplemental source of water supply when economically feasible.

Beneficial Reuse of Urban Runoff

Urban runoff is a relatively untapped alternative water supply for the LADWP water service area. By managing runoff and beneficially reusing it, dependence on imported water can be reduced.

Both dry and wet weather runoff can be beneficially used. Dry weather runoff is any runoff that occurs in the absence of rainfall, while wet weather runoff is any runoff that occurs as a direct result of rainfall. Wet weather runoff represents a significantly larger volume of water than dry weather runoff.

The beneficial use option for dry weather runoff consists of capturing runoff, treating it, then reusing it. For dry weather flow, most of the runoff could potentially be diverted directly to beneficial use, particularly during the summer months when demands for nonpotable water are high (due to the higher irrigation demands in the summertime). The level of treatment of the runoff before being beneficially used would be determined by the ultimate use of the water.

Additionally, a portion of recycled water demand could be supplied by treated runoff. The most common use of the nonpotable water would be for irrigation, which means demand for beneficial reuse water would be the highest during the dry season. The dry weather runoff available for reuse throughout the LADWP water service area is estimated at 97 MGD (approximately 26,000 million gallons per year).

Wet weather beneficial reuse consists of the use of cisterns, treatment and beneficial reuse, neighborhood recharge, and regional recharge. Cisterns are water conservation devices that store diverted runoff from roof areas and other impervious surfaces. This stored runoff can provide a source of chemically untreated water for gardens and compost that is free of most sediment and dissolved salts. Because residential irrigation can account for up to 40% of domestic water consumption, water conservation measures will be utilized to reduce demands, especially during summer months. The effect of installing cisterns at all residences in the City of Los Angeles would result in the potential maximum capture of approximately 440 MG in cisterns for each design storm event of 0.45 inch. This provides a substantial amount of water conservation and reduction in potable water demands.

Treatment and beneficial reuse of wet weather runoff greatly depends on the seasonal storage capacity. Wet weather runoff would need to be stored until the demand exists, which could be done through a regional and/or a localized approach. A regional approach to seasonal storage

could include the use of out-of-service reservoirs. A localized approach would be to construct distributed underground storage facilities, locally located in open spaces, parks, schools, etc. The potential storage volume is 19,000 MG of water.

Neighborhood recharge involves installing recharge facilities in portions of vacant urban lots, abandoned alleys, and parklands, where the soil is highly permeable. The maximum runoff that could potentially be managed by recharge facilities would be 550 MGD.

Regional recharge considers recharge of captured wet weather runoff into the Valley groundwater basin. Based on the assumption to recharge only in the eastern part of the Valley, only flows from the Valley are being considered. The total runoff generated in the Valley from the 0.45 inch storm event is 4,000 AF (1,300 MG) for the watershed, and 2,900 AF (750 MG) for the City of Los Angeles only. This amount could potentially be conserved and used to augment groundwater recharge. These amounts account for the runoff from the 0.45-inch storm only. As this represents approximately 25% of the total annual runoff generated in the City of Los Angeles, there is more runoff available to recharge. Once the capture, storage, and diversion facilities are in place, flows from storms that exceed 0.45 inch could be diverted as well.

Graywater

Graywater is untreated household waste water that has not come into contact with toilet waste. It includes used water from bathtubs, showers, bathroom wash basins, and water from clothes washing machines and laundry tubs. Graywater may be reused for other purposes, especially landscape irrigation.

The Graywater Systems for Single-Family Residences Act of 1992 legally incorporated the use of graywater as part of the California Plumbing Code. In September 1994, the City of Los Angeles approved an ordinance that permitted the installation of graywater systems in residential homes. Unlike recycled water that must comply with regulatory health standards, graywater does not need to comply. The potentially high cost of installation and maintenance and lack of widespread public interest have limited implementation of graywater systems.

Table 3.12-12 summarizes the alternative water supplies being explored by LADWP. Not every option discussed above is quantified and included in the table. Therefore, additional water supplies not summarized below could become available if developed.

Alternative Water Supply	Potential Water Yield (AFY)
Smart Irrigation	25,000
Urban Runoff Plants	5,000
Cisterns ¹	8,000
Neighborhood Recharge ²	12,000
Regional Recharge ³	10,000
Seawater Desalination ⁴	25,000
Water Transfer	40,000

Table 3.12-12.	Alternate	Water Sup	olies Beind	ed by I ADWP
	Alternate	Trater Oup	phes Denig	

¹ Capturing and reusing stormwater on-site for schools and government only.

² Groundwater recharge of stormwater for open spaces, parks, and abandoned alleys on land where the soil is highly permeable.

³ Groundwater recharge of stormwater in the East Valley using existing recharge system.

⁴ Yield shown here is based on LADWP's optimization study. Source: LADWP 2005

MWD Actions

As discussed above, since the City of Los Angeles and the City of Beverly Hills rely on imported water from MWD, the following information is provided. MWD has implemented a variety of projects and programs designed to reduce its dependency on imported water during droughts. These have included (1) providing financial incentives for local projects and conservation; (2) increased surface storage via Diamond Valley Lake and use of the SWP terminus reservoirs; (3) groundwater storage programs in the Central Valley, Imperial Valley, and Coachella Valley; (4) short- and long-term water transfers; and (5) local groundwater storage programs with participating member agencies. MWD's IRP calls for further expanding all of these alternative supplies. To further guard against uncertainty, MWD is planning for the development of a 500,000-AF buffer supply to mitigate for any shortfall in future supply development. Implementation of MWD's IRP will provide sufficient water to its member agencies (which include the City of Los Angeles, Beverly Hills, and West Basin Municipal Water District (discussed below) even during critically dry events from now until at least 2025 (LADWP UWMP 2005).

West Basin Municipal Water District – Alternative West Hollywood Water Source

In the event that LADWP is unable to provide water to West Hollywood in the future, the West Basin Municipal Water District (West Basin) can function as an alternate water source.

The City of West Hollywood is a member agency of West Basin and is within Division IV of West Basin's service area. As explained above, West Hollywood has historically obtained its water from the City of Beverly Hills and LADWP, whose water supplies are both derived in part from MWD. In the event that these municipalities are unable to continue providing water service to West Hollywood for any reason, the City, as a member agency, is entitled to become a West Basin customer and purchase water directly from West Basin. Under that scenario, the agencies would need to contract with LADWP for use of its water pipe infrastructure to bring the water into the City.

West Basin, like LADWP, is a member agency of the MWD. As mentioned above, implementation of MWD's IRP will provide sufficient water to its member agencies, including West Basin. MWD provides the region with imported water and is composed of 27 member agencies: 14 cities; 12 municipal water districts; and one county water authority. As a member agency, West Basin purchases imported water from MWD (approximately 65% of West Basins' water supply) and wholesales the water to cities, mutual water companies, investor-owned utilities and private companies in southwest Los Angeles County. West Basin also obtains approximately 20% of its water from groundwater, 7% from recycled water, and approximately 7% of its water supply is attributed to conservation. The 2005 West Basin Urban Water Management Plan indicates that West Basin's water projections show that water supplies will adequately meet service area demands in normal, single dry, and multiple dry-year scenarios (West Basin 2005). Although West Hollywood is not currently a customer of West Basin, in a meeting between City of West Hollywood staff and West Basin representatives on June 15, 2010, a West Basin representative indicated that West Basin was capable of providing West Hollywood with its water in the event its municipal water suppliers discontinued service. West Basin will submit to the City of West Hollywood written confirmation of West Basin's ability to provide water to the City. Therefore, West Basin is an alternate water source for the City of West Hollywood (City of West Hollywood 2010).

Potential Environmental Impacts

Both construction- and operation-related environmental impacts associated with alternative water sources would be determined by future environmental analysis on a project-by-project basis, and appropriate mitigation measures would also be indentified to reduce any significant environmental impacts at the time the project is proposed. However, in an effort to supply a general overview of the potential environmental impacts associated with the construction and operation of these types of projects, relevant projects in proximity to the LADWP water service area were examined for general environmental impacts as well as typical mitigation for those impacts. Those projects are:

- City of Huntington Beach Final EIR for the Seawater Desalination Project at Huntington Beach dated April 5, 2005;
- Irvine Ranch Water District Final EIR for the Michelson Water Reclamation Plant Phase 2 and 3 Capacity Expansion Project
- Aliso Creek Urban Runoff Recovery, Reuse and Conservation Project Mitigated Negative Declaration dated 2008

These projects serve as reasonable examples for the general types of potential environmental impacts and potential mitigation measures that can be expected for these types of projects in Southern California. The environmental issues surrounding these types of projects have similarities and are therefore summarized in Table 3.12-13. While the information included in Table 3.12-13 has been gathered from the documents mentioned above, this discussion is meant to be general in nature and does not directly apply to any other specific desalination project, reclaimed water expansion project, reuse of urban runoff, or the General Plan.

Environmental Issue Area	Potential Impact	Possible Mitigation
Aesthetic/Visual Impact on	Construction activities	Project applicant shall implement short-term
Landscape	may alter scenic views.	construction equipment staging areas with
	Addition of new visual	appropriate screening; provide a vegetative buffer
	features may block views	around facility; install fencing that is
	and cause additional	complementary with surrounding environment;
	sources of light and glare.	and shield exterior light sources away from
		adjoining uses.
Air Quality	The following may occur:	Project applicant shall comply with applicable
	temporary construction air	federal, state, and local air quality guidelines.
	quality impacts; emission	
	of toxic air contaminants;	
	and conflict with local Air	
	Quality Management Plan.	
Biological Resources	Construction and	Project applicant shall comply with applicable
	operation activities may	federal, state, and local regulatory agencies to
	impact terrestrial and	ensure proper safeguards are in place protecting
	marine biological	all sensitive biological resources before, during,
	resources.	and after construction.

Table 3.12-13. Potential Environmental Impacts Associated with Alternative Water Supply Projects

Environmental Issue Area	Potential Impact	Possible Mitigation
Cultural Resources	Construction and	Project applicant shall perform preconstruction
	operation activities may	surveys; require a professional archaeologist
	potentially disturb	and/or paleontologist on-site during construction;
	undiscovered	flag and monitor Areas of Potential Effects.
	archaeological and	
	The fall and a second s	
Geology and Solis	The following may occur:	for the Uniform Duilding Code (most current
	including earthquakes; and	adition) to assume seismic safety. A detailed site
	geologic related bazards	specific geotechnical study must be prepared
	including landslides and	Compliance with the recommendations set forth
	liquefaction soil and	in site-specific geologic and/or geotechnical
	topsoil erosion and water	studies will be made a condition of the site
	and wind erosion.	development permit for subsequent projects.
Global Climate Change	Project may increase the	Project shall implement and comply with all state
	emission of greenhouse	and local initiatives to reduce the emission of
	gases.	greenhouse gases.
Hazards and Hazardous Materials	Project may create hazards	All hazardous materials shall be handled, and
	due to the storage,	stored, transported, and disposed in accordance
	transportation, and/or	with all applicable federal, state, and local codes
	handling of hazardous	and regulations.
	materials, thereby	
	increasing the risk of	
	exposure to hazards and	
Hudrology on d Water Ouglity	hazardous materials.	Drainet englisent shall have a Water Quality
Hydrology and water Quanty	flooding may occur	Management Plan specifically identifying best
	nooding may occur.	management practices. The project applicant shall
		demonstrate compliance with all applicable
		regulations established by the U.S. Environmental
		Protection Agency as set forth in the National
		Pollutant Discharge Elimination System permit
		requirements for urban runoff and stormwater
		discharge and any regulations adopted by the
		jurisdiction within which construction will take
		place; appropriate hydrology and hydraulic
		analysis shall be performed for the project prior to
		grading or building permits; and appropriate on-
		site drainage systems shall be installed.
Noise	Construction and	Project applicant shall prepare acoustical analysis
	imports to possibly consistive	reports and appropriate construction plans, and all
	receptors	with the appropriate poise standards set by the
	receptors.	iurisdiction in which the project is located
Public Services and Utilities	Increased solid waste	Project must be in compliance with the
i done services and oundes	production may occur	appropriate waste reduction and recycling
	production may occur.	regulations: project must be in compliance with
		Assembly Bill 939.

Environmental Issue Area	Potential Impact	Possible Mitigation
Traffic and Circulation	Short-term project	Prior to improvement plan approval, a traffic
	construction could	control plan will be prepared for approval by each
	potentially impact traffic.	jurisdiction within which the project is proposed
		to be located; the traffic control plan will show all
		signage and striping, and delineate detours,
		flagging operations, and any other devices that
		will be used during construction to guide
		motorists safely through the construction zone
		and allow for adequate access and circulation, to
		the satisfaction of the jurisdiction or agency.

Source: AECOM 2010

The proposed General Plan contains numerous policies regarding water efficiency, conservation, capture, and reuse. Policies proposed in the Infrastructure, Resources, and Conservation Element include the following:

- Not allowing for the construction of new development until it is demonstrated that there
 will be sufficient water to supply the development, as determined by the service provider.
- Requiring new development projects with the water-use equivalent of 10 dwelling units to conduct a long-term water supply analysis as part of the development approval process.
- Regularly updating water conservation regulations to ensure that current best practices are utilized.
- Educating the public regarding water conservation, greywater use, and water storage and capture strategies.
- ► Taking steps to reduce water use from municipal operations, which may include:
 - Low-flow fixtures in all public buildings
 - Where feasible, reductions of grass and turf in medians and planting strips in favor of water-efficient landscaping
 - A centralized irrigation control system within public rights-of-way and on Cityowned properties
 - Water recapture systems in new buildings and major renovations
 - Rain water retention and reuse systems

- Requiring new construction and major renovations of all residential and non-residential developments to meet the following standards:
 - Achieve a reduction of water use to be 40% less than baseline for buildings as calculated by the Energy Policy Act of 1992. Single-family homes are exempted from this requirement but must still meet the other standards of the Green Building Ordinance.
 - Reduce water consumption for outdoor landscape irrigation, consistent with the most recent City policy.
 - Comply with all prevailing state laws and City regulations regarding indoor and outdoor water conservation and efficiency in new construction.
- Encouraging existing residential and non-residential buildings to pursue strategies for water conservation, including:
 - Drought-tolerant landscaping
 - Drip irrigation systems for landscaping where appropriate
 - Low-flow fixtures in bathrooms and kitchens

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 3.12-9 through 3.12-13 would also reduce water consumption in 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.

WASTEWATER

The increased population resulting from implementation of the proposed General Plan will generate additional demand for increased wastewater collection and treatment facilities. As indicated in Table 3.12-14, implementation of the proposed General Plan would increase

wastewater flow by approximately 1.2 MGD. As no specific development is proposed, wastewater generation is based on the estimation of probable future land uses.

		Existing Conditions		General Plan Buildout 2035		Difference	
Land Use	Wastewater Generation Rate	Units or SF	Wastewater Generated (gpd)	Units or SF	Wastewater Generated (gpd)	Units or SF	Wastewater Generated (gpd)
Residential	156 gpd per unit ¹	24,573	3,833,388	28,847	4,500,132	4,274	666,744
Commercial/Retail	0.20 gpd per sf ¹	4,729,616	945,923	5,594,770	1,118,954	865,154	173,031
Hotel	130 gpd per room ^{2,3}	1,506,422	391,670	2,257,673	586,995	751,251	195,325
Office	0.15 gpd sf ³	3,691,031	553,655	4,573,105	685,966	882,074	132,311
Industrial	0.15 gpd sf ³	104,300	15,645	102,635	15,395	-1,665	(250)
Public/Institutional/ Civic	0.15 gpd sf^3	1,305,362	195,804	1,421,677	213,252	116,314	17,447
Total			5,936,085		7,120,694		1,184,609

Table 3.12-14. Estimated Wastewater Generation

Source: ¹ Melrose Triangle Draft EIR and AECOM 2010 ² Calculation based on average size of a hotel room of 500 square feet (sf).

³ Beverly Hills General Plan Update EIR 2008

Capacity of the HTP is 450 MGD for dry weather capacity and 850 MGD for wet weather capacity. The current flow is 340 MGD. As noted, wastewater generation attributed to buildout of the General Plan would increase to approximately 1.2 MGD.

As indicated in the environmental setting section, West Hollywood does not have a specific wastewater discharge entitlement with the HTP. There is no theoretical limit on how much flow an agency (such as Sanitation District No. 4) can discharge. Per the Sanitation Districts of Los Angeles County, the City's projected wastewater increase from approximately 5.9 MGD to 7.2 MGD with implementation of the proposed General Plan, in terms of the overall capacity of the HTP system, is small and there would be no impact on the facilities and no cause for a restriction to be placed on the ability of Sanitation District No. 4 to discharge (Sanitation Districts of Los Angeles County 2010c).

The HTP 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.

The proposed General Plan contains numerous policies regarding the wastewater system. In particular, the Infrastructure, Resources, and Conservation Element contains the following policies:

- Regularly inspecting, maintaining and rehabilitating the City's sewer system.
- Requiring new development to pay for its share of wastewater system improvements necessitated by that development.
- Requiring developers of residential, commercial or mixed use projects with a net increase of sewage flow equivalent of 10 dwelling units to prepare a sewer capacity analysis to demonstrate available capacity.
- Considering local options for wastewater treatment and participating in regional wastewater recycling and utilization efforts.
- Maintaining an updated Sewer Master Plan.
- Educating the public about the ecological damage caused by disposing of chemicals such as paints, lubricants, pharmaceuticals, fertilizers, and other petrochemicals and volatile organic compounds into the sewer system.

With adherence to and implementation of the proposed General Plan policies, program-level impacts to the City's wastewater system would be **less than significant**.

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. Incorporation of stormwater management facilities, such as retention basins, swales, or vegetation planted for evapotranspiration, would reduce drainage loads through the stormwater system. Additionally, on an annual basis, the City performs maintenance to clean catch basins (storm drain inlets), stencil no-dumping logos, and install debris excluder devices to prevent entry of trash into the storm drains.

The proposed General Plan contains numerous stormwater policies. In particular, the Infrastructure, Resources, and Conservation Element contains the following policies:

- Working with Los Angeles County Flood Control District for maintenance and operation of the regional stormwater system that serves the City, sharing information about service needs and growth projections.
- ► Maintaining, funding, and regularly monitoring stormwater infrastructure.
- ► Maximizing local actions to reduce, capture and treat urban runoff, as feasible.
- Collaborating with other government agencies and the Santa Monica Bay Watershed to reduce and remove contaminants in urban runoff.
- Pursuing programs that reduce the amount and improve the quality of stormwater runoff in a manner the meets or exceeds all regional, state and federal stormwater programs.
- Reducing the amount and improve the quality of stormwater that leaves the City through best management practices, including stormwater reuse and the use of vegetation and permeable surfaces to capture and filter stormwater.
- Managing all stormwater on-site for new development projects in accordance with the City approved Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.
- Exploring innovative ways of capturing and reusing stormwater for non-drinking water purposes to reduce the use of potable water.
- Continuing to prohibit activities that negatively impact the stormwater system.
- Requiring that new development pay for the cost of stormwater system improvements necessitated by that development.

See Section 3.7 for an analysis of hydrology and water quality impacts, including stormwater runoff.

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**.

ENERGY

Electricity and Natural Gas

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.

SCE provides capacity to meet the electricity load and demand of the City of West Hollywood. SCE works with the City to provide and meet the demand for electricity and electricity infrastructure as growth is proposed (SCE 2010).

In 2035, with implementation of the General Plan consumption of electricity is estimated to be 400,934,955 kWh, which is an increase of approximately 19.5% over existing conditions (AECOM 2010).

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 (SoCalGas 2010).

In 2035, with implementation of the General Plan, consumption of natural gas is estimated to be 18,125,749 therms, which is an increase of approximately 7% over existing conditions (AECOM 2010).

Pursuant to Section 15145 of CEQA, analysis of physical changes in the City that may occur from future electrical and gas infrastructure would be speculative and no further analysis of the impact is required at this time. The environmental effects of expansion, construction, and operation of additional electrical and gas infrastructure would be evaluated under CEQA by SCE and SoCalGas in their efforts to plan for construction of new electrical and gas infrastructure or expansion of existing facilities, if applicable. SCE and SoCalGas continually evaluate demand, capacity, and plans for facility needs. If project-level significant impacts are identified, specific mitigation measures will be required.

The Infrastructure, Resources, and Conservation Element contains goals and policies to reduce the total and per capita amount of energy used in the City. Specific policies include:

- Promoting building energy efficiency improvements through strategies that may include the following:
 - Retrofits of existing buildings with energy efficient technology, through efforts such as a point-of-sale residential and commercial energy conservation ordinance to require energy improvements at time of title transfer

- Expanded public outreach in partnership with Southern California Edison on energy efficiency upgrades
- A voluntary energy audit program for residents and businesses
- Diverse incentives for energy efficiency
- Maximizing the use of renewable energy in the City through strategies that may include the following:
 - A comprehensive renewable energy program that provides incentives, outreach, financing, and similar forms of assistance to residents and businesses in the City
 - Incentives to existing residents to purchase solar water heaters
 - Incentives to encourage commercial properties to develop solar energy production systems on private property and sell the energy to the public utility system
- Coordinating with available energy efficiency and conservation programs—such as those administered by Southern California Edison, the United States Department of Energy, or other organizations—to reduce energy use.
- Updating the green building regulations regularly and continuing to administer a green building program and/or enforcing green building requirements within the City.
- Showcasing residential and commercial green building techniques at City Hall and sponsoring workshops demonstrating their success, educating the community about the feasibility of various green building techniques.
- Offering incentives for buildings to exceed the minimum green building requirements.
- Training City staff on an ongoing basis to implement the Green Building Program and to provide advice and expertise about green building to the public.

The specific environmental impact of construction of new electrical and gas infrastructure in the planning area cannot be determined at the General Plan level of analysis because no specific electrical and gas construction projects are proposed; however, like the development of other land uses allowed under the General Plan, individual development projects would be required to evaluate the potential impacts of the proposed project in accordance with CEQA. Mitigation measures would be required to reduce impacts to a less-than-significant level, as necessary. In Furthermore, implementation of the policies above, in addition to the mandatory Green Building Ordinance adopted in 2007 (Zoning Ordinance; Section 19.20.060) and the continued

coordination with local energy providers, would reduce impacts related to energy infrastructure to **less than significant**.,

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. As indicated in Table 3.12-15, implementation of the General Plan will increase solid waste generated by approximately 36,988 pounds per day or 6,750 tons per year.

		Existing Conditions (2008)		General Plan Buildout 2035		Difference	
Land Use	Generation Factor	Units or SF	Solid Waste Generated (per day)	Units or SF	Solid Waste Generated (per day)	Units or SF	Solid Waste Generated (per day)
Residential	5.31 lb/du/day	24,573	130,483	28,847	153,178	4,274	17,096
Commercial/Retail	0.006 lb/sf/day	4,729,616	28,378	5,594,770	33,569	865,154	5,191
Hotel	2 lb/room/day	1,506,422	6,026	2,257,673	9,031	751,251	3,005
Office	0.006 lb/sf/day	3,691,031	22,146	4,573,105	27,439	882,074	5,292
Industrial	0.006 lb/sf/day	104,300	626	102,635	616	-1,665	(10)
Public/Institutional Civic	0.007 lb/sf/day	1,305,362	9,138	1,421,677	9,952	116,314	814
Total			196,797 lb/day 35,915 tons/year		233,785 lb/day 42,665 tons/year		36,988 lb/day 6,750 tons/year

Table 3.12-15. Estimated Solid Waste Generation

Source: CalRecycle 2010c

As indicated in the environmental setting section, the Puente Hills Landfill, which is the City's primary waste disposal site, has a remaining capacity of 35.2 (48%) million cubic yards. The Puente Hills Landfill is scheduled to close in 2013, after which time the waste will be transferred by rail from Puente Hills to the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The Mesquite Regional Landfill is located on 4,245 acres of land in Imperial County. The landfill will provide capacity for approximately 600 million tons of residual municipal solid waste (approximately 100 years of capacity).

The Eagle Mountain Landfill has a total capacity of 708 million tons and is currently permitted to accept up to 460 million tons. The eventual operation of the Eagle Mountain Landfill is contingent upon successful resolution of pending federal legislation (Sanitation Districts of Los Angeles County 2010a).

Adequate capacity exists in the Mesquite Regional Landfill and Eagle Mountain Landfill to dispose of the City of West Hollywood's solid waste.

Policies in the Infrastructure, Resources, and Conservation Element of the General Plan update propose a variety of policies related to solid waste including the following:

- Aggressively seeking to reduce its rate of waste disposal per capita.
- Providing services for recycling and composting and expanding these services over time, where appropriate.
- Encouraging all construction projects (regardless of size) to divert 80% of the construction waste debris away from landfills.
- Providing ongoing education to residents and businesses about waste reduction, composting, and recycling.
- Supporting or sponsoring regular e-waste and hazardous materials disposal events by the City.
- Providing streetside recycling containers alongside public trash receptacles, where feasible.
- Encouraging the use of recycled building materials in public and private development projects.
- Supporting legislation to reduce the creation of waste, including advocating for manufacturer responsibility for product waste, and banning problem materials.
- Requiring the use of recycled paper and other recycled materials in all City operations.
- ► Collaborating with other government agencies to promote waste reduction.

With adherence to and implementation of the proposed General Plan policies, program-level impacts to solid waste impacts would be **less than significant**.

3.12.5 MITIGATION MEASURES

Implementation of the following programmatic mitigation measures, derived from the proposed General Plan Implementation Programs, will reduce potential impacts to police services and fire protection services to **less than significant** at this Program EIR level of analysis. Mitigation measures for water supply would reduce the water supply impact due to implementation of the

proposed General Plan but not to a less-than-significant level. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

POLICE AND FIRE

- 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.
- 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.

WATER SUPPLY

- 3.12-9 Create an enforcement plan to support the water conservation ordinance.
- 3.12-10 Create a master plan for retrofitting municipal facilities and public rights-of-way with fixtures and materials that reduce water consumption.
- 3.12-11 Update ordinances to achieve more stringent water reduction strategies.
- 3.12-12 Work with water providers to continue education efforts on water conservation.
- 3.12-13 Amend the Green Building Ordinance to promote reuse of sump pump water.

3.12.6 SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed General Plan would have a less-than-significant impact on the City's storm drain system, schools, the library, electricity and natural gas, water infrastructure, wastewater, and solid waste.

With adherence to and implementation of the proposed General Plan policies and mitigation measures, the potential impacts to police and fire protection will be reduced to a less-than-significant level at the General Plan program level.

With adherence to and implementation of General Plan policies and mitigation measures, impacts to water supply would be reduced. However, uncertainty exists in long-term water supply to the City of West Hollywood and impacts would remain potentially significant and unavoidable.

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

3.13 RECREATION

This section describes and evaluates the potential impacts to parks, recreational resources, and facilities associated with the proposed General Plan update. Existing parks and facilities are described, and potential environmental impacts associated with implementation of the proposed General Plan, and mitigation measures where appropriate, are included. This section is based on review of the 2009 West Hollywood General Plan Parks and Open Space Background Report (City of West Hollywood 2009).

3.13.1 EXISTING ENVIRONMENTAL SETTING

West Hollywood has six developed parks for recreational use in the City, amounting to 15.31 acres of parkland. The City has three different classifications for the City's parks as discussed below.

POCKET PARK

These parks are generally 0.25 to 0.5 acre in size and typically occupy "in-fill" parcels. These parks are used to address limited recreation needs and offer few amenities. Havenhurst and Formosa pocket parks are examples of this category.

NEIGHBORHOOD PARK

These parks are the basic unit of the City's park system and are approximately 0.5 to 1 acre in size. Neighborhood parks generally accommodate spaces for passive activities and active recreation. Kings Road Park and William S. Hart Park are neighborhood parks.

COMMUNITY PARKS

Community Parks serve a broader purpose than neighborhood parks. Community parks meet the City's recreation needs through more formal and highly programmed activities. Amenities currently include basketball and tennis courts, playgrounds, and community meeting facilities. Community parks in West Hollywood include Plummer Park and West Hollywood Park.

Table 3.13-1 provides a description of each park, including name, location, acreage, and facilities and amenities available at each park. Figure 3.13-1 shows the locations of the parks in West Hollywood.

Name (date	Addross	Agroago	Facilities			
uevelopeu)	Address	Acreage	Plummer Park Community Center			
Plummer Park (1937)	7377 Santa Monica Boulevard	8.5	 Fiesta Hall Great Hall and Long Hall Meeting spaces 1 dance studio 1 child care center 1 half basketball court, and 1 basketball court 7 lighted tennis courts 2 parking lots 1 playground and exercise equipment Benches and tables 			
West Hollywood Park (1960s)	647 San Vicente Boulevard	5.3	 I auditorium 1 swimming pool and pool house 1 softball field 1 half (youth) basketball court 2 full basketball courts 2 lighted tennis courts 2 playgrounds 1 picnic area (handicapped accessible) 1 library 1 restroom building 2 parking lots 1 tiny tot building Benches and tables 			
William S. Hart Park (1989)	8341 De Longpre Avenue	0.75	 Hart House Off-leash dog area Picnic tables Parking lot AIDS Memorial Theater Restrooms Benches 			
Kings Road Park (1996)	1000 Kings Road	0.50	 Picnic tables Community building Playground 2 water features Benches and restrooms 			
Havenhurst Pocket Park (2009)	1351 Havenhurst Drive	0.15	 Boardwalk paths 3 thematic gardens 2 water features Benches Drought-tolerant plantings 			
Formosa Pocket Park (2009)	1140 Formosa Street	0.11	 Circulation paths Shade structure 1 water feature Benches Drought-tolerant plantings 			
Total Park Acrea	ige	15.31				

Table 3.	13-1.	West	Hollyw	ood Parks
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Note: This table does not include or reflect the City's green open space areas. Source: City of West Hollywood GIS December 2007; Existing Land Use Survey January 2008





Figure 3.13-1 Parks

PARK FACILITY NEEDS

Table 3.13-2 identifies the City's park acreage, population, and the ratio of park acres per 1,000 residents, as documented for 2008. The total park acreage does not include any parks outside the City and does not include open spaces or community gardens within the City that provide recreation opportunities for City residents.

Park Needs	Measures
Existing Park Acreage	15.31
2008 Population	37,348
Existing Park Ratio (Acres/1,000 Residents)	0.41

Based on the population of West Hollywood in 2008 of 37,348, the current park acreage equates to 0.41 acre of parkland per 1,000 persons (acreage of open space or green space is not included because it is not City of West Hollywood dedicated parkland). The City does not have an adopted park standard in terms of park acreage per resident.

The State Quimby Act recommends, but does not require, a park acreage of 3 acres per 1,000 population.

RECREATION LANDS

In addition to developed parkland, West Hollywood contains several facilities and amenities that provide the City's residents with recreational opportunities, as described in the subsequent sections.

Open Space

The City's open spaces include Sal Guarriello Veterans Memorial along Santa Monica Boulevard, the Santa Monica Boulevard medians, and Crescent Heights Triangle. Santa Monica Boulevard features wide landscaped medians, walking paths, public art, and shade trees. Crescent Heights Triangle offers benches, drought-tolerant planting, and the Matthew Shepard Memorial.

Community Gardens

In addition to providing valuable green visual space, community gardens can enhance nutrition and physical activity and promote the role of public health in improving quality of life. West Hollywood currently has one community garden, but it is threatened with closure and conversion to an alternate use. The City is actively seeking additional locations for community gardens.

Plazas

The West Hollywood Gateway Project at Santa Monica Boulevard and La Brea Avenue features a large outdoor plaza that functions as a civic square through the use of outdoor dining areas, fountains, public art, retail kiosks, and lush landscaping.

The Pacific Design Center contains a 2-acre outdoor area with garden landscaping and fountains. Daytime festivals and parties, and evening events and concerts take place at this facility.

Private Recreation

A large number of private recreational facilities are located throughout the City, particularly private health clubs and gyms. These facilities range in size from small, personal service facilities to large chain operations. In addition to the exercise benefits, health clubs and gyms also provide a social networking location within West Hollywood.

JOINT USE AGREEMENTS

Five Los Angeles Unified School District (LAUSD) schools are located in or adjacent to West Hollywood: West Hollywood Elementary School, West Hollywood Community Day School, Rosewood Avenue Elementary School, Laurel Elementary School, and Fairfax High School. LAUSD encourages joint use of their facilities for community needs and has adopted guidelines for such endeavors. However, the City would need to work with LAUSD to create an agreement to guarantee LAUSD facilities are properly maintained while open for public use. Additionally, the City would be required to create an agreement with LAUSD for the City to accept liability while the facility is open to the public. The City does not currently have any adopted joint use agreements with LAUSD.

Poinsettia Park, located in the City of Los Angeles, abuts the southeastern border of West Hollywood. The City is currently pursuing an arrangement with the City of Los Angeles to develop joint programming at Poinsettia Park while construction activities occur at Plummer Park.

NEIGHBORING PARK FACILITIES

In addition to the parks inside West Hollywood, other parks in the surrounding area include Poinsettia Park and Runyon Canyon Park in the City of Los Angeles, and La Cienega Park and Beverly Gardens Park in the City of Beverly Hills. Poinsettia Park and La Cienega Park are community parks, offering playgrounds, baseball diamonds, soccer fields, tennis courts, barbecue grills and picnic tables, and community centers. Poinsettia Park is located just outside the City's southern boundary on Poinsettia Place. La Cienega Park is located approximately 0.25 mile from West Hollywood.

Runyon Canyon Park is a 160-acre wilderness park, located approximately 0.75 mile north of West Hollywood. Wilderness parks are primarily unimproved open space areas with hiking and equestrian trails, with the primary park purpose of protecting and preserving natural resources. Runyon Canyon Park includes multiple trails. Additionally, dogs are allowed off the leash in 90 of the 160 acres of the park.

Beverly Gardens Park is a 1.9-mile-long linear park, containing approximately 16.3 acres, that includes jogging and walking paths, arbors, and fountains. Beverly Gardens Park is located on the western edge of the City of West Hollywood.

3.13.2 REGULATORY SETTING

FEDERAL REGULATIONS

There are no federal plans, policies, regulations, or laws related to recreation that apply to the proposed General Plan.

STATE REGULATIONS

Quimby Act

The 1975 Quimby Act (California Government Code Section 66477) authorizes cities and counties to pass ordinances requiring that a condition be placed on all subdivision applications requiring dedication of land for public park use or payment of fees for land acquisition or improvement of recreational facilities within neighborhood or community parks. The Act further specifies that the dedication of land or fee amount be proportionate to the amount necessary to provide 3 acres of park area for every 1,000 persons residing within the city or county adopting the park ordinance. "Recreational community gardening" is specifically included as a use for which park fees can be expended.

LOCAL PLANS AND POLICIES

City of West Hollywood Municipal Code

The City of West Hollywood does not specifically adopt the Quimby Act or other park acreage standards. However, Section 19.64.020 of the West Hollywood Municipal Code requires applicants for new development within the City to pay Quimby Act/Public Open Space fees for residential and nonresidential development in the amounts set by the City's Fee Resolution.

West Hollywood Park Master Plan

In 2004, West Hollywood revised and updated the West Hollywood Park Master Plan. The Master Plan envisions the park as an oasis of green within a dynamic city. The West Hollywood Park Master Plan was approved by City Council in 2004 and is included as part of the City's 25th Anniversary Capital Campaign. While providing active and passive recreation at its core, the park is also a crossroads where the community comes together, formally and informally. The redevelopment of West Hollywood Park is currently underway and includes the construction of a new West Hollywood Library.

Plummer Park Master Plan

On July 6, 1993, the City of West Hollywood entered into an agreement to prepare a master plan for the renovation of Plummer Park. The Design Development Report (DDR) that was produced as a result of this agreement documents the master plan and describes in detail the design intent, proposed improvements, their function, and recommended construction materials. The DDR evaluated environmental impacts, mitigation measures, an estimate of development costs, and suggested methods of implementation. The DDR is clear in underlining that a key goal of the plan was flexibility and the ability to adapt to the changing needs and future opportunities afforded by the dynamics of the City of West Hollywood.

In April of 2002, the City Council approved an agreement to revisit and reevaluate the 1994 Adopted Master Plan. In 2004, the City revisited the Plummer Park Master Plan and proposed plan revisions to increase the amount of land available for active park space. The realization of Phase 1 of the Plummer Park Master Plan is part of the City's 25th Anniversary Capital Campaign. The program includes improvements to and expansion of park space and facilities, including constructing an underground parking structure to allow for additional park surface.

Greening West Hollywood Plan

In 2006, the Greening West Hollywood Plan was developed by the City. This plan includes preliminary strategies to green the City and promote a high quality of life for residents. One main focus of this plan included the greening of the City's 312 acres of public right-of-way.

3.13.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to recreations would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the CEQA Guidelines:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- ► Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment.

3.13.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

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 is a **potentially significant** impact.

The City assesses public open space/Quimby Act project fees for residential and nonresidential development projects in the City. These fees will be used to acquire parkland as sufficient funding and land become available, and/or to expand and maintain existing recreational facilities. Implementation of the General Plan would contribute additional funding to the open space/Quimby Act fees as new development occurs and open space/Quimby Act fees are paid. It is likely that additional parkland would be developed in the coming years as the General Plan is implemented. However, no specifically located new park acreage is currently proposed.

As described in the existing conditions section, besides developed parkland, the City contains open space, community gardens, plazas, and private recreation space that provide recreational space, facilities, and programs for the residents of West Hollywood. In addition, numerous parks are located in proximity to the City.

The proposed General Plan contains numerous policies to increase the supply of parks and open space in the City; to provide diverse recreational programs and facilities; and to provide well-maintained park, open space, and recreation facilities in the City. Specific policies in the Parks and Communities Facilities Element include:

- Developing methods to increase the supply of parks and open space.
- Creating new parks and open spaces should be a high priority for public funding.
- ► Continuing to enhance existing parks and recreational facilities.
- Maintaining a diversity of park spaces throughout the City, including recreation areas, hardscaped plazas, children's play areas, and open fields.
- Improving and updating Plummer Park and West Hollywood Park according to the applicable Master Plans.
- ► Purchasing parcels adjacent to existing parks to create larger parks as opportunities arise.
- ► Considering incentives or modifying development standards to encourage new development to create on- or off-site open space.
- Ensuring appropriate lighting and visibility in all park facilities.
- Ensuring residences adjacent to parks should not be adversely affected by nighttime park activities.
- Promoting increased access to parks and open spaces, pedestrian and bike-oriented routes to parks and open space, greening of public right-of-ways, and a variety of active and passive uses of parks and open space, to promote physical activity.
- Working with local schools (public and private) to provide park and recreational space to the public through joint use of school grounds.
- Requiring that new residential and non-residential development contribute fees for expanded park space, including public open space, green streets, and pocket-parks, when open space is not provided on-site, consistent with State law.

- Using master plans to guide the increase, expansion or improvement of park space.
- Promoting environmental sustainability and conservation when designing new parks or renovating, operating, and maintaining existing parks.
- Working with the adjacent jurisdictions of Los Angeles and Beverly Hills to increase access to open spaces for West Hollywood residents.
- Conducting needs assessments and evaluating recreational programs on a regular basis to gather information regarding community needs and priorities.
- Continuing to offer recreational programs to meet the needs of the population, including seniors, LGBT, Russian-speaking persons, youth, families and persons with disabilities.
- Accommodating unique social and cultural needs, including a variety of seating areas, passive and active use facilities, open and semi-sheltered open spaces, artwork, and programmed events, when designing and programming parks.
- Continuing to provide recreational opportunities and access, particularly for youth and seniors, through its recreation programs, parks, and open spaces.
- Continuing to regularly notify residents of the types of recreation and programs available and encouraging their participation.
- Continuing to produce or provide support for community-related special events.
- Encouraging, permitting, and supporting special events organized by businesses and nonprofit agencies located within the City.
- Maintaining high-quality parks, open space, and recreation facilities in a reliable, safe, and efficient way.
- Utilizing progressive techniques in the delivery of maintenance services related to parks, open space and recreation facilities.
- Prioritizing physical improvements to parks, open space, and recreation facilities based on regular monitoring and evaluation of their condition and the needs of the community.
- Seeking to implement best management practices for energy and water conservation when managing parks and recreation programs and facilities, as feasible.

With adherence to and implementation of proposed General Plan policies and regulations, and implementation of Mitigation Measures 3.13-1 through 3.13-7, program-level impacts to

increased use and physical deterioration of existing recreational facilities would be reduced to a **less-than-significant** level. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

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. Future development of park and recreational facilities could potentially result in significant impacts in such areas as aesthetics, noise, traffic, geology, hazards and hazardous materials, and water quality. However, existing City programs for project design and approval as well as the CEQA environmental review process require that such potential impacts be analyzed prior to construction of new facilities. Therefore, impacts would be **less than significant** and no further analysis at this Program EIR level is required.

The actual impacts of new or expanded park facilities would depend upon the precise type and location of such facilities and would therefore be required to undergo project-specific environmental review. Mitigation measures would be identified to reduce any potentially significant environmental impacts, as necessary.

3.13.5 MITIGATION MEASURES

Implementation of the following programmatic mitigation measures, derived from the proposed General Plan Implementation Programs, will reduce potential impacts to parks and recreational facilities from increased use and physical deterioration. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

- 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.

3.13.6 SIGNIFICANCE AFTER MITIGATION

With adherence to and implementation of the proposed General Plan policies along with the above mitigation measures, the potential impacts from increased use and physical deterioration of existing recreational facilities would be reduced to a less-than-significant level. The significance of impacts to construction or expansion of existing park and recreational facilities at the General Plan Program level of analysis would be less than significant. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.14 TRANSPORTATION AND TRAFFIC

This section describes transportation and traffic conditions in the City of West Hollywood and analyzes the changes that would occur as a result of implementation of the proposed General Plan. Information presented in the discussion and subsequent analysis was drawn from a technical memorandum, *Travel Forecasts and Traffic Impact Report for the West Hollywood General Plan Update* (Fehr & Peers 2010), which is included as Appendix F of this EIR.

3.14.1 EXISTING ENVIRONMENTAL SETTING

AUTOMOBILE CIRCULATION

The City of West Hollywood General Plan Mobility Element defines the functional classification of major roadways inside the City boundaries. Traditionally, functional classification has been applied to automobile traffic and describes the extent to which a given roadway segment fulfills its general purposes of mobility and access. The City of West Hollywood defines three classes of roadways (arterial, collector, and local. This limited classification is reasonable in West Hollywood, a geographically small city with few different types of roadways. Figure 3.14-1 illustrates the City's current roadway functional classification system.

Major east-west arterials within the City include Santa Monica Boulevard, Beverly Boulevard, and Sunset Boulevard. These arterials serve not only local trips but a significant number of regional trips. In the north-south direction, major arterials La Brea Avenue, Fairfax Avenue, San Vicente Boulevard, and La Cienega Boulevard serve regional as well as local trips. Due to West Hollywood's regional location and major east-west roadways, cut-through traffic—or trips with neither a beginning nor an end in the City—accounts for a sizeable portion of vehicle trips in the City.

The nearest freeway connections servicing the City include the San Diego Freeway (Interstate 405 [I-405]), the Hollywood Freeway (U.S. 101), and the Santa Monica Freeway (Interstate 10 [I-10]). I-405 is the major north-south link between the San Fernando Valley in the north and San Diego in the south, is located approximately 5 miles west of West Hollywood, and is accessed by Sunset Boulevard and Santa Monica Boulevard. Sunset Boulevard and Santa Monica Boulevard also provide access to U.S. 101 about 2 miles east of West Hollywood. About 5 miles to the south of West Hollywood lies I-10, which is accessed by La Cienega Boulevard and La Brea Boulevard.

Level of Service

Traffic congestion is typically described in terms of "level of service" (LOS). LOS rankings range from A to F depending on the levels of congestion. The City of West Hollywood applies LOS standards based on seconds of delay at intersections. Table 3.14-1 presents LOS standards for signalized intersections in the City of West Hollywood, and Table 3.14-2 presents LOS standards for stop-controlled intersections.

	Average Approach Delay in	
Level of Service	Seconds	Definition
А	<u><</u> 10	EXCELLENT. No Vehicle waits longer than one red light and no approach phase is fully used.
В	> 10-20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 20-35	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 35-55	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 55-80	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 80	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Table 3.14-1. Level of Service Definitions for Signalized Intersections

	Table 3.14-2. Level	of Service Definition	ons for Stop-controlle	d Intersections
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	Average Total Delay
Level of Service	(seconds per vehicle)
А	<u><</u> 10.0
В	$> 10.0 \text{ and } \le 15.0$
С	$> 15.0 \text{ and } \le 25.0$
D	$> 25.0 \text{ and } \le 35.0$
Е	$> 35.0 \text{ and } \le 50.0$
F	> 50.0

Source: Highway Capacity Manual, Transportation Research Board, 2000



Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-1 Roadway Functional Classification

The Los Angeles County Metropolitan Transportation Authority's (Metro's) Congestion Management Plan (CMP) designates certain roadways and intersections as CMP facilities. Two intersections on Santa Monica Boulevard within the City of West Hollywood are designated CMP arterial monitoring locations; the intersection with Doheny Drive, and the intersection with La Cienega Boulevard. The CMP calls for LOS E for CMP intersection monitoring locations. Table 3.14-3 presents LOS and volume to capacity (V/C) at these intersections.

Street Names	AM Peak Hour V/C	AM Peak Hour LOS	PM Peak Hour V/C	PM Peak Hour LOS
Doheny Drive & Santa Monica Boulevard	1.053	F	0.984	Е
La Cienega Boulevard & Santa Monica Boulevard	0.989	Е	0.799	С

Table	3.14-3.	Congestion	Management	Plan LOS

Source: Fehr & Peers 2010

TRAFFIC CONGESTION AND CIRCULATION SYSTEM METRICS

West Hollywood has limited roadway and intersection capacity, and there is high demand throughout the day for automobile travel within, to, and through the City. Additionally, many operational conditions contribute to traffic friction, including a large number of closely spaced traffic signals, commercial land uses including entertainment and night-life destinations, and onstreet parking lining most major corridors. The result is congestion experienced in West Hollywood not just during the traditional a.m. and p.m. peak periods, but for long periods throughout the day.

Traffic-carrying capacity along most major and minor streets, especially Sunset and Santa Monica boulevards, is limited by commercial uses along each corridor with on-street parking and large numbers of traffic signal installations. Table 3.14-4 and Figure 3.14-2 present existing LOS at intersections in the City. Table 3.14-5 presents daily segment volumes, while Figures 3.14-3 and 3.14-4 present existing daily and peak hour roadway segment volumes, respectively.

The capacity, efficiency, and function of the City's circulation system can be measured using various methods. LOS is the most common measure to evaluate the circulation system, but other measures include vehicle miles traveled (VMT), vehicle hours of travel (VHT), vehicle trip generation (VT), and average trip length. Compared to LOS, which solely measures traffic congestion, the other measures can be more directly related to air quality, greenhouse gas emission, or sustainability goals.

			AM PN			
Int	North/South Street	East/West Street	Delay ¹	LOS	Delay ¹	LOS
1	Doheny Rd/Cory Av	Sunset Bl	23	С	28	С
2	Doheny Dr	Sunset Bl	52	D	60	Е
4	San Vicente Bl	Sunset Bl	33	С	36	D
5	Larrabee St	Sunset Bl	7	Α	10	В
6	Sunset Plaza Dr	Sunset Bl	9	Α	14	В
7	La Cienega Bl / Miller Dr	Sunset Bl	19	В	59	Е
9	Crescent Heights Bl	Sunset Bl	58	Е	60	Е
11	La Cienega Bl	Fountain Av	54	D	192	F
12	Olive Dr	Fountain Av	6	Α	4	Α
14	Sweetzer Av	Fountain Av	9	А	12	В
15	Crescent Heights Bl	Fountain Av	98	F	49	D
17	Fairfax Av	Fountain Av	66	Е	58	Е
18	Spaulding Av	Fountain Av	5	А	5	Α
20	Gardner St	Fountain Av	56	Е	190	F
24	La Brea Av	Fountain Av	64	Е	50	D
26	Holloway Dr/Horn Av	Sunset Bl	40	D	54	D
27	La Cienega Bl	Holloway Dr	30	С	58	Е
28	Doheny Dr	Cynthia St ²	21	С	52	F
29	San Vicente Bl	Cynthia St	15	В	20	С
20	Doheny Dr	Santa Monica Bl (WB) ³	98	F	39	D
30	Doheny Dr	Melrose Av/SM Bl $(EB)^3$	65	Е	191	F
32	Robertson Bl	Santa Monica Bl	35	С	33	С
33	San Vicente Bl	Santa Monica Bl	42	D	61	Е
34	Westbourne Dr	Santa Monica Bl	16	В	18	В
35	La Cienega Bl	Santa Monica Bl	83	F	77	Е
36	Croft Av/Holloway Dr	Santa Monica Bl	15	В	32	С
39	Sweetzer Av	Santa Monica Bl	14	В	18	В
41	Crescent Heights Bl	Santa Monica Bl	54	D	111	F
42	Laurel Av	Santa Monica Bl	10	Α	11	В
43	Fairfax Av	Santa Monica Bl	60	Е	82	F
46	Gardner St	Santa Monica Bl	19	В	25	С
47	Martel Av	Santa Monica Bl	8	Α	15	В
49	Formosa Av	Santa Monica Bl	10	Α	36	D
50	La Brea Av	Santa Monica Bl	59	Е	71	Е
54	Robertson Bl	Melrose Av	15	В	13	В
55	San Vicente Bl	Melrose Av	34	С	23	С
56	Huntley Dr	Melrose Av	26	С	7	А
57	La Cienega Bl	Melrose Av	60	Е	40	D
61	Doheny Dr	Beverly Bl	45	D	48	D
63	Robertson Bl	Beverly Bl	61	Е	34	С
65	San Vicente Bl	Beverly Bl	40	D	39	D
66	La Cienega	Beverly Bl	64	Е	84	F
72	La Brea Av	Romaine St	11	В	51	D

Table 3.14-4. Existing Levels of Service City of West Hollywood General Plan Update Study Intersections

¹ Beyond a certain point intersection delay can no longer be accurately calculated. The intersection is said to be overflowing (OVFL).

² Intersection is controlled by stop signs on the minor approach only and delay is reported for the worst-case movement.

³ Intersection is controlled by two signals on one controller. Delay and LOS are reported for each signal.

Notes: For signalized intersections, average delay beyond 200 seconds is reported as OVFL.

For unsignalized intersections, worst-case approach delay beyond 50 seconds is reported as OVFL.

At some intersections, field-collected traffic count data may represent only the number of vehicles that proceed through the intersection, rather than including the actual demand, which can be in queue upstream. Any traffic counts conducted under these conditions may under-represent the true demand for the intersection, and the actual LOS may be worse than represented above.



Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-2 Existing (Year 2008) Intersection Levels Of Service

		E	Existing (Year 2008)		Future (Y	Future (Year 2035) Proposed Project			Future (Year 2035) No Project		
Roadway	Segment	ADT	AM	PM	ADT	AM	PM	ADT	AM	PM	
Beverly Boulevard	W/O Doheny	25,679	2,271	2,058	27,010	2,380	2,240	27,010	2,460	2,350	
Beverly Boulevard	E/O La Cienega Boulevard	34,361	2,070	2,508	37,960	2,320	2,770	37,960	2,360	2,870	
Crescent Heights Boulevard	S/O Santa Monica Boulevard	23,089	1,700	1,652	23,640	1,730	1,720	23,640	1,790	1,660	
Crescent Heights Boulevard	S/O Sunset Boulevard	33,538	2,192	2,257	36,860	2,270	2,350	36,860	2,300	2,270	
Doheny Drive	S/O Santa Monica Boulevard	14,545	974	1,063	16,490	1,100	1,180	16,490	1,100	1,190	
Doheny Drive	S/O Beverly	18,552	1,177	1,249	22,120	1,330	1,450	22,120	1,410	1,480	
Doheny Drive	S/O Sunset Boulevard	9,619	507	613	11,560	550	680	11,560	610	720	
Fairfax Avenue	S/O Santa Monica Boulevard	30,457	1,917	2,160	33,330	2,410	2,660	33,330	2,180	2,470	
Fairfax Avenue	S/O Sunset Boulevard	31,318	1,948	2,260	34,770	2,270	2,550	34,770	2,080	2,580	
Fountain Avenue	E/O La Cienega Boulevard	28,364	1,951	1,987	31,580	2,070	2,180	31,580	2,060	2,000	
Fountain Avenue	@ Crescent Heights	34,890	2,413	2,017	41,050	2,600	2,200	41,050	2,820	2,180	
Fountain Avenue	@ Fuller Av	35,627	2,072	2,275	41,040	2,330	2,520	41,040	2,260	2,420	
La Brea Avenue	S/O Santa Monica Boulevard	39,173	2,394	2,547	42,100	2,610	2,730	42,100	2,760	2,880	
La Brea Avenue	S/O Sunset Boulevard	38,020	2,336	2,500	40,310	2,510	2,660	40,310	2,450	2,620	
La Cienega Boulevard	S/O Santa Monica Boulevard	35,501	1,972	2,254	38,990	2,130	2,490	38,990	2,250	2,530	
La Cienega Boulevard	S/O Sunset Boulevard	36,112	2,140	2,209	36,420	2,150	2,220	36,420	2,200	2,490	
Melrose Avenue	E/O Robertson Bl	21,203	1,117	1,484	23,070	1,300	1,640	23,070	1,290	1,610	
Melrose Avenue	E/O La Cienega Boulevard	33,983	2,321	2,437	38,830	2,510	2,620	38,830	2,550	2,810	
Robertson Boulevard	S/O Beverly	18,840	1,104	1,256	21,500	1,230	1,410	21,500	1,260	1,510	
Robertson Boulevard	S/O Santa Monica Boulevard	11,235	550	725	12,490	590	760	12,490	560	740	
San Vicente Boulevard	S/O Santa Monica Boulevard	21,220	1,322	1,527	23,230	1,480	1,700	23,230	1,460	1,690	
San Vicente Boulevard	S/O Sunset Boulevard	12,830	850	991	15,260	1,000	1,160	15,260	900	1,060	
Santa Monica Boulevard	W/O Doheny	40,423	2,229	2,160	45,050	2,430	2,380	45,050	2,410	2,240	
Santa Monica Boulevard	E/O La Cienega Boulevard	45,313	2,520	2,771	50,800	2,810	3,080	50,800	3,120	3,460	
Santa Monica Boulevard	@ Westbourne Dr	53,388	2,979	3,015	59,600	3,220	3,330	59,600	3,280	3,300	
Santa Monica Boulevard	@Crescent Heights Bl	46,468	2,216	2,779	51,550	2,460	2,960	51,550	2,770	3,190	
Santa Monica Boulevard	@Formosa Av	45,489	2,389	2,933	52,090	2,570	3,190	52,090	2,870	3,430	
Sunset Boulevard	E/O Crescent Heights Bl	56,525	2,995	2,940	60,980	3,210	3,080	60,980	3,220	2,990	
Sunset Boulevard	@ Sunset Plaza	51,462	2,124	2,621	56,680	2,320	2,850	56,680	2,560	3,130	
Sunset Boulevard	E/O La Cienega Boulevard	52,231	3,097	3,090	55,360	3,220	3,230	55,360	3,330	3,640	

Table 3.14-5. No Project Scenario and Proposed Project Scenario Forecast Roadway Segment Volumes – City of West Hollywood General Plan Update Study Segments



Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-3 Daily Segment Volumes - Existing



Source: FEHR & PEERS Transportation Consultants 2010



Vehicle Miles Traveled

VMT measures the miles traveled in and to the City of West Hollywood. For VMT calculations, 100% of the mileage is counted for trips that begin and end in the City. For trips to or from the City to or from other areas, 50% of the mileage is counted. Cut-through trips, which neither begin nor end in West Hollywood, are not counted in VMT calculations. Current daily VMT for the City is 1,503,700 miles per day.

Vehicle Hours Traveled

VHT measures the total time spent traveling into and out of the City of West Hollywood. This metric is affected by factors including length of trips, number of trips taken by car, and congestion levels. Current daily VHT for the City is 44,500 hours per day.

Vehicle Trips

VT measures the total number of vehicle trips made in the City of West Hollywood (including trips into and out of the City, but excluding cut-through trips). Existing VT in the City is 355,000 trips per day.

Average Trip Length

Average trip length is calculated by dividing the total VMT by the total number of vehicle trips. Note that while VMT only includes half of mileage for trips that begin or end outside the City (the other half being attributed to the other jurisdiction), the average trip length includes the full trip length. The current average trip length in the City is 7 miles.

TRANSIT

West Hollywood is part of a diverse public transit network. The primary transit carrier is Metro, which provides local and rapid bus lines throughout the City. The primary transit streets are Santa Monica Boulevard, Sunset Boulevard, La Brea, La Cienega, and Fairfax. Given the size of the City, most residents are within a 0.25-mile walk of regional bus routes. West Hollywood's CityLine shuttle service and dial-a-ride provide transportation services for seniors and the disabled, a significant and growing population in the City. Finally, Access Services, Inc. provides Americans with Disability Act (ADA) paratransit services for the City as part of the coordinated paratransit plan for Los Angeles County.

PEDESTRIAN AND BICYCLE FACILITIES

The City has an extensive pedestrian network, including approximately 87 miles of sidewalks. Many streets have wide sidewalks, street trees, and, in commercial areas, other amenities that enhance the pedestrian experience.

The City has a limited bicycle network. There are only 5.5 miles of existing bike lanes in the City, on 43.69 miles of roadway, although a number of low-traffic residential streets also accommodate bicycle travel and connect portions of the bike lane network.

TRUCK ROUTES

There are no officially designated truck routes in the City of West Hollywood. In adjacent Beverly Hills, "heavy vehicle" designated streets that continue through West Hollywood are Santa Monica, La Cienega, and Beverly boulevards. In the City of Los Angeles, all highways classified as "major" or "secondary" are truck routes unless specifically restricted by the posting of weight limit signs. Because of the classifications in neighboring jurisdictions, all east-west and north-south arterial streets in the City of West Hollywood are implied truck routes.

EMERGENCY RESPONSE ROUTES

The City of West Hollywood designates all arterials, collectors, and locals in the City as emergency response or evacuation routes. The designated emergency evacuation route in the event of an emergency depends on where the incident is located.

3.14.2 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to transportation and traffic would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the CEQA Guidelines:

Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersection, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;

- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Although CEQA does not identify a threshold for analyzing the adequacy of parking supply, this section includes a discussion of parking capacity and demand.

The City of West Hollywood has adopted traffic impact thresholds of significance. These thresholds were designed to address the unique traffic situation in West Hollywood and provide members of the public and decision makers with accurate information in Traffic Impact Studies (TIS) prepared for development projects in the City.

The West Hollywood traffic impact criteria are highly detailed by necessity to address the City's complex traffic situation. The criteria are as follows:

Commercial Corridor Signalized Intersections: If the intersection is formed by two commercial corridors, an impact is considered significant if the following criteria are met:

- ► The addition of project traffic results in LOS D and an increase in delay of 12 seconds or greater.
- The addition of project traffic results in LOS E or F and an increase in delay of 8 seconds or greater.

For purposes of development review the following are considered commercial corridors:

- Sunset Boulevard
- ► Santa Monica Boulevard
- Melrose Avenue
- Beverly Boulevard
- Doheny Drive
- Robertson Boulevard
- ► San Vicente Boulevard (at and/or South of Santa Monica Boulevard)
- ► La Cienega Boulevard
- Fairfax Avenue
- ► La Brea Avenue

Other Signalized and/or 4-way Stop Intersections: Significant impacts will occur if the following criteria are met:

- The addition of project traffic results in LOS D and an increase in delay of 8 seconds or greater.
- The addition of project traffic results in LOS E or F and an increase in delay of 5 seconds or greater.

Unsignalized Intersections (and/or 1-way or 2-way stops): Significant impacts will occur if the following criteria are met:

► The addition of project traffic results in LOS D, E, or F and an increase in delay of 5 seconds or greater.

The Los Angeles CMP defines a significant impact to a CMP arterial monitoring location if the proposed project would:

• Increase traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02), causing LOS F (V/C ≥ 1.00); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02).

3.14.3 ANALYSIS OF ENVIRONMENTAL IMPACTS

Impact analysis in this section used the West Hollywood Traffic Demand Model. The methodology for the modeling is presented in more detail in the *Travel Forecasts and Traffic Impact Report for the West Hollywood General Plan Update* (Fehr & Peers 2010), which is included as Appendix F of this EIR.

PEAK HOUR INTERSECTION LEVEL OF SERVICE

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. Table 3.14-6 presents a comparison of existing and future LOS and delay at study intersections in the cities of West Hollywood, Los Angeles, and Beverly Hills and Figure 3.14-5 illustrates intersection LOS in 2035 under the proposed plan. For 15 of these intersections, the changes that would result from implementation of the proposed General Plan would result in **significant** impacts at the remaining intersections during the morning peak hour, the afternoon peak hour, or both morning and afternoon peaks. Figure 3.14-6 illustrates the location of intersections with significant impacts related to intersection LOS in 2035. The intersections with significant impacts are discussed in more detail below:

Doheny Drive & Sunset Boulevard: This intersection is projected to degrade one service level during both the a.m. and p.m. peak hours with buildout of the proposed General Plan. During the a.m. peak hour, the intersection would worsen from LOS D under existing conditions to LOS E with the General Plan with an increase in average delay of 22 seconds. Increases in traffic volumes along Sunset Boulevard and Doheny Drive would result in increase delay for westbound and northbound drivers. During the p.m. peak hour, the increase in average delay would be approximately 20 seconds due to traffic volume increases and additional delay for vehicles traveling north and south on Doheny Drive and westbound on Sunset Boulevard. Increasing the green time for vehicles traveling on Doheny Drive would reduce delays for northbound and southbound traffic but would further delay eastbound and westbound vehicles traveling on Sunset Boulevard. Operations at this intersection could be improved by providing an exclusive westbound right-turn lane. However, the bus stop located at this corner in addition

to limited right-of-way makes this improvement infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- San Vicente Boulevard & Sunset Boulevard: This intersection is projected to ► degrade from LOS D under existing conditions to LOS E with buildout of the proposed General Plan and experience an increase in average delay of 25 seconds during the p.m. peak hour. The increase in delay is primarily due to additional vehicles making the northbound right-turn movement from San Vicente Boulevard onto Sunset Boulevard during the p.m. peak hour. This intersection already provides an exclusive northbound right-turn lane plus a shared northbound left/through/right-turn lane, and right-of-way is not available to provide additional northbound capacity. Increasing the amount of green time for the northbound approach would improve the average delay at the intersection; however, the intersection would continue to operate at LOS E during the p.m. peak hour. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- La Cienega Boulevard/Miller Drive & Sunset Boulevard: This intersection is projected to degrade from LOS E under existing p.m. peak hour conditions to LOS F with buildout of the proposed General Plan (average delay increase of 31 seconds). The high level of delay at the intersection is primarily caused by heavy eastbound and westbound traffic volumes along Sunset Boulevard and for the westbound left-turn movement from Sunset Boulevard onto La Cienega Boulevard. The westbound left-turn movement currently operates under protected-permissive phasing, and extending the green time would reduce delays for these vehicles. However, an increase in green time for the westbound left-turn movement would result in decreased green time for eastbound through vehicles, which already experience substantial delays during peak travel hours. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- Crescent Heights Boulevard & Sunset Boulevard: This intersection currently operates at LOS E during both the a.m. and the p.m. peak hours and would

							Future (2	035)	Future (2035)	AM		PM	
			Existing (20	008) AM	Existing (2	008) PM	Proposed Pro	ject AM	Proposed Pr	oject PM	Impact Ana	alysis	Impact Anal	ysis
Int	North/South Street	East/West Street	Delay ¹	LOS	Change in Delay	Impact?	Change in Delay	Impact?						
1	Doheny Rd/Cory Av	Sunset Bl	23	С	28	С	26	С	34	С	4	No	7	No
2	Doheny Dr	Sunset Bl	52	D	60	Е	73	Е	80	Е	22	Yes	20	Yes
4	San Vicente Bl	Sunset Bl	33	С	36	D	42	D	61	Е	9	No	25	Yes
5	Larrabee St	Sunset Bl	7	А	10	В	9	Α	11	В	2	No	1	No
6	Sunset Plaza Dr	Sunset Bl	9	А	14	В	11	В	22	С	2	No	8	No
7	La Cienega Bl/Miller Dr	Sunset Bl	19	В	59	Е	25	С	90	F	7	No	31	Yes
9	Crescent Heights Bl	Sunset Bl	58	Е	60	Е	69	Е	74	Е	10	Yes	14	Yes
11	La Cienega Bl	Fountain Av	54	D	192	F	63	Е	240	F	9	Yes	48	Yes
12	Olive Dr	Fountain Av	6	А	4	А	9	А	6	А	2	No	2	No
14	Sweetzer Av	Fountain Av	9	А	12	В	12	В	14	В	2	No	1	No
15	Crescent Heights Bl	Fountain Av	98	F	49	D	113	F	71	Е	15	Yes	22	Yes
17	Fairfax Av	Fountain Av	66	Е	58	Е	96	F	101	F	30	Yes	44	Yes
18	Spaulding Av	Fountain Av	5	А	5	А	6	А	6	А	1	No	1	No
20	Gardner St	Fountain Av	56	Е	190	F	87	F	289	F	31	Yes	100	Yes
24	La Brea Av	Fountain Av	64	Е	50	D	80	Е	64	Е	16	Yes	14	Yes
26	Holloway Dr/Horn Av	Sunset Bl	40	D	54	D	57	Е	69	Е	17	Yes	15	Yes
27	La Cienega Bl	Holloway Dr	30	С	58	Е	42	D	70	Е	13	Yes	12	Yes
28	Doheny Dr	Cynthia St^2	21	C	52	F	38	Е	110	F	17	Yes	59	Yes
29	San Vicente Bl	Cynthia St	15	B	20	C	17	B	28	C	1	No	8	No
	Doheny Dr	Santa Monica Bl $(WB)^3$	98	F	39	D	114	F	41	D	16	Yes	2	No
30	Doheny Dr	$\frac{\text{Summer Difference Br}(HB)^3}{\text{Melrose Av/SM Bl}(EB)^3}$	65	E	191	F	247	F	208	F	182	Yes	17	Yes
32	Robertson Bl	Santa Monica Bl	35	C	33	C	57	E	56	E	22	Yes	24	Yes
33	San Vicente Bl	Santa Monica Bl	42	D	61	Ē	63	E	102	F	20	Yes	40	Yes
34	Westbourne Dr	Santa Monica Bl	16	B	18	B	20	B	31	C	4	No	13	No
35	La Cienega Bl	Santa Monica Bl	83	F	77	Е	103	F	100	F	20	Yes	23	Yes
36	Croft Av/Holloway Dr	Santa Monica Bl	15	В	32	С	18	В	51	D	3	No	19	Yes
39	Sweetzer Av	Santa Monica Bl	14	В	18	В	17	В	21	С	2	No	3	No
41	Crescent Heights Bl	Santa Monica Bl	54	D	111	F	74	Е	135	F	20	Yes	24	Yes
42	Laurel Av	Santa Monica Bl	10	А	11	В	11	В	11	В	1	No	1	No
43	Fairfax Av	Santa Monica Bl	60	Е	82	F	79	Е	155	F	20	Yes	73	Yes
46	Gardner St	Santa Monica Bl	19	B	25	C	21	C	37	D	2	No	12	Yes
47	Martel Av	Santa Monica Bl	8	А	15	В	9	A	17	В	1	No	2	No
49	Formosa Av	Santa Monica Bl	10	А	36	D	14	В	59	Е	4	No	23	Yes
50	La Brea Av	Santa Monica Bl	59	Е	71	Е	80	Е	101	F	21	Yes	30	Yes
54	Robertson Bl	Melrose Av	15	B	13	B	17	B	15	B	2	No	2	No
55	San Vicente Bl	Melrose Av	34	C	23	C	42	D	32	C	8	No	9	No
56	Huntley Dr	Melrose Av	26	C	7	A	35	C	8	A	9	No	1	No
57	La Cienega Bl	Melrose Av	60	Ē	40	D	72	E	53	D	12	Yes	13	Yes
61	Doheny Dr	Beverly Bl	45	D	48	D	71	E	72	E	26	Yes	24	Yes
63	Robertson Bl	Beverly Bl	61	E	34	C	75	Ē	50	D	14	Yes	16	Yes
65	San Vicente Bl	Beverly Bl	40	D	39	D	44	D	59	E	4	No	20	Yes
66	La Cienega	Beverly Bl	64	E	84	F	85	F	107	F	21	Yes	23	Yes
72	La Brea Av	Romaine St	11	R	51	D	14	R	46		21	No	-5	No
14		Romanic Di	11	Ы	51		17		U		5	110	-5	110

Table 3.14-6. General Plan Levels of Service – City of West Hollywood General Plan Update Study Intersect

¹ Beyond a certain point intersection delay can no longer be accurately calculated. The intersection is said to be overflowing (OVFL).
 ² Intersection is controlled by stop signs and delay is reported for the worst-case movement.
 ³ Intersection is controlled by two signals on one controller. Delay and LOS are reported for each signal.

Notes: For signalized intersections, average delay beyond 200 seconds is reported as OVFL. For unsignalized intersections, worst-case approach delay beyond 50 seconds is reported as OVFL.

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Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-5 Proposed General Plan (Year 2035) Intersection Levels Of Service

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Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-6 Proposed General Plan Intersection Impacts

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continue to operate at LOS E with buildout of the General Plan (10-second increase in average delay during the a.m. peak hour and 14-second increase in average delay during the p.m. peak hour). LOS E operations are caused by high traffic volumes along Sunset Boulevard and on southbound Crescent Heights Boulevard under existing and future conditions. The increase in delay at this intersection is primarily due to traffic volume increases along Sunset Boulevard in both the eastbound and westbound directions during the peak hours. Limited right-of-way makes improvements to this intersection infeasible. This intersection is located outside the jurisdiction of West Hollywood, within the City of Los Angeles.

- La Cienega Boulevard & Fountain Avenue: This intersection operates at LOS D and LOS F under existing conditions during the a.m. and p.m. peak hours, respectively, and is projected to degrade to LOS E during the a.m. peak hour and continue to operate at LOS F during the p.m. peak hour with buildout of the proposed General Plan. The increase in average delay is expected to be 9 seconds during the a.m. peak hour, the additional delay is caused by increased volumes and congestion for vehicles traveling westbound on Fountain Avenue and turning onto southbound La Cienega Boulevard. Increases in p.m. peak hour delay are primarily due to vehicles traveling northbound on La Cienega Boulevard and turning onto Fountain Avenue. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- Crescent Heights Boulevard & Fountain Avenue: This intersection operates at LOS F under existing conditions during the a.m. peak hour and is projected to continue to operate at LOS F with buildout of the proposed General Plan with an increase in average delay of 15 seconds. During the p.m. peak hour, this intersection currently operates at LOS D and would degrade to LOS E with an increase in delay of 22 seconds with the proposed General Plan. During the a.m. peak hour, the poor LOS is due to high traffic volumes on westbound Fountain Avenue and southbound Crescent Heights Boulevard. Conversely, during the p.m. peak hour the intersection experiences high traffic volumes on eastbound Fountain Avenue and northbound Crescent Heights Boulevard. This intersection could be improved by providing exclusive right-turn lanes on Fountain Avenue

for vehicles turning onto Crescent Heights Boulevard. The width of the curb lane currently allows some vehicles to make a right turn on red even if a vehicle traveling through the intersection is stopped. While striping the right-turn pockets would provide reduced delay for vehicles turning onto Crescent Heights Boulevard, the intersection would continue to operate at LOS F during the a.m. peak hour and LOS E during the p.m. peak hour. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- Fountain Avenue & Fairfax Avenue: This intersection currently operates at LOS ► E during both peak hours and is projected to degrade to LOS F during the a.m. and p.m. peak hours with buildout of the proposed General Plan (average delay increase of 30 seconds during the a.m. peak hour and 44 seconds during the p.m. peak hour). Poor operations are partially caused by heavy left-turn movements from Fountain Avenue onto Fairfax Avenue with peak volumes exceeding 200 vehicles per hour in both the eastbound and westbound directions. Modifying the existing permissive left-turn phasing to protected permissive would improve the delay for left-turning vehicles. An additional improvement at this location is the striping of a right-turn lane on southbound Fairfax Avenue for vehicles turning onto Fountain Avenue. During the a.m. peak hour, nearly 300 vehicles make this turning movement and additional demand would occur with the proposed General Plan. The width of the southbound curb lane currently allows some vehicles to make a right turn on red even if a vehicle traveling through the intersection is stopped. While providing protected-permissive left-turn phasing on Fountain Avenue and striping the southbound right-turn pocket on Fairfax Avenue would provide reduced delay for applicable movements, the intersection would continue to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour (see Mitigation Measure 3.14-1).
- Gardner Street & Fountain Avenue: This intersection currently operates at LOS E during the a.m. peak hour and is expected to degrade to LOS F with buildout of the proposed General Plan (average delay increase of 31 seconds). During the p.m. peak hour, the intersection currently operates at LOS F and would continue to operate at LOS F with an increase in average delay of 100 seconds with the proposed General Plan. The poor operations at this intersection are due to high traffic volumes along Gardner Avenue. Limited right-of-way makes

improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- La Brea Avenue & Fountain Avenue: This intersection currently operates at LOS E during the a.m. peak hour and is expected to continue to operate at LOS E with buildout of the proposed General Plan while experiencing a 16-second increase in average delay. During the p.m. peak hour, the intersection is expected to degrade from LOS D operations under existing conditions to LOS E with the proposed General Plan with an average delay increase of 14 seconds. The poor operations at this intersection are primarily due to high delays for eastbound and westbound vehicles traveling on Fountain Avenue. Increasing the green time for these vehicles, including providing permissive protected left-turn phasing, worsens the overall average intersection delay by degrading operations for north-south traffic on La Brea Avenue. Limited right-of-way makes improvements to this intersection infeasible. This intersection is located outside the jurisdiction of West Hollywood, within the City of Los Angeles.
- Holloway Drive/Horn Avenue & Sunset Boulevard: This intersection currently operates at LOS D during the a.m. and p.m. peak hours and is expected to degrade to LOS E with buildout of the proposed General Plan. The increase in average delay with the General Plan exceeds the City's threshold for significant impacts with an increase of 17 seconds during the a.m. peak hour and 15 seconds during the p.m. peak hour. The approaches with the highest delay at this intersection are northbound Holloway Drive and southbound Horn Avenue. Increasing green times for the north-south movements would improve delay for these vehicles; however, the high traffic volumes on Sunset Boulevard would result in poor eastwest operations and worsen overall intersection operations. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- La Cienega Boulevard & Holloway Drive: This intersection currently operates at LOS C during the a.m. peak hour and LOS E during the p.m. peak hour. With buildout of the proposed General Plan, this intersection would degrade to LOS D during the a.m. peak hour and experience an increase in average delay of 13 seconds. During the p.m. peak hour, the intersection would continue to operate at

LOS E with an increase in average delay of 12 seconds. LOS D operations during the a.m. peak hour are primarily due to high southbound traffic volumes along La Cienega Boulevard including the southbound right-turn movement volume of over 600 vehicles (under both existing and proposed General Plan conditions). LOS E conditions during the p.m. peak hour are caused by high traffic volumes along northbound La Cienega Boulevard in addition to a high demand for the eastbound left-turn movement from Holloway Drive to La Cienega Boulevard (over 500 vehicles under both existing and proposed General Plan conditions). An exclusive southbound right-turn lane is already provided at this intersection and the eastbound left-turn movement already operates with protected-permissive signal phasing. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- Doheny Drive & Cynthia Street: This is a shared intersection between the City of ► West Hollywood and the City of Beverly Hills. This intersection is unsignalized with stop signs on Cynthia Street and free-flow traffic along Doheny Drive. The poor operations at this location, LOS C in the a.m. peak hour and LOS F in the p.m. peak hour, are due to 90 vehicles traveling through the intersection along Cynthia Street in the westbound direction during the a.m. peak hour and 50 vehicles traveling in the eastbound direction during the p.m. peak hour. Vehicles turning left from westbound Cynthia Street to southbound Doheny Drive are prohibited during the peak hours. The reported increase in delay with the proposed General Plan is reflecting the worst-case movement at the intersection (the east-west through movements). If the delay for all vehicles traveling through the intersection is considered, this location currently operates at LOS B or better during the peak hours and is expected to continue to operate at LOS B during the peak hours with buildout of the Proposed General Plan. The traffic volumes at this location do not warrant the installation of a traffic signal.
- Doheny Drive & Santa Monica Boulevard & Melrose Avenue: This 5-legged intersection serves as the western gateway to the City of West Hollywood and experiences substantial congestion during both the a.m. and p.m. peak hours with LOS F conditions for the majority of vehicles traveling through the intersection during peak hours. High traffic volumes along Santa Monica Boulevard cause delays for north-south traffic along Doheny Drive. Traffic volumes are

particularly high in the westbound direction in the a.m. peak hour and in the eastbound direction during the p.m. peak hour along Santa Monica Boulevard. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- Robertson Boulevard & Santa Monica Boulevard: This intersection currently operates at LOS C during the a.m. and p.m. peak hours. With buildout of the proposed General Plan, operations are expected to degrade by two service levels during both peak hours resulting in LOS E conditions during the a.m. peak hour (22-second increase in average delay) and LOS E during the p.m. peak hour (24-second increase in average delay). The degraded LOS at this intersection is primarily due to high traffic volumes along Santa Monica in both the eastbound and westbound directions. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- San Vicente & Santa Monica Boulevard: This intersection currently operates at LOS D during the a.m. peak hour and LOS E during the p.m. peak hour. Traffic operations are projected to degrade by one service level with buildout of the proposed General Plan to LOS E during the a.m. peak hour (20-second increase in average delay) and LOS F during the p.m. peak hour (40-second increase in average delay). The increase in delay with the General Plan is caused by additional vehicles traveling on Santa Monica Boulevard during both peak hours. Traffic volume increases on San Vicente Boulevard also worsen delay for north-south vehicles during the p.m. peak hour. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- ► La Cienega Boulevard & Santa Monica Boulevard: This intersection currently operates at LOS F during the a.m. peak hour and is expected to worsen with buildout of the proposed General Plan with an increase in average delay of 20 seconds. During the p.m. peak hour, this intersection operates at LOS E and is expected to degrade to LOS F with an increase in average delay of 23 seconds.

Additional delay during the a.m. peak hour is caused primarily by increases in traffic volumes on westbound Santa Monica Boulevard and on southbound La Cienega Boulevard. During the p.m. peak hour, operations worsen at each approach to the intersection as a result of increased traffic volumes. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- Croft Avenue/Holloway Drive & Santa Monica Boulevard: This intersection currently operates at LOS C during the p.m. peak hour and is expected to degrade to LOS D with buildout of the proposed General Plan with an increased in average delay of 19 seconds. The increase in delay is primarily due to additional congestion at the intersection of Croft Avenue/Santa Monica Boulevard and Holloway Drive. These movements could be improved by increasing the amount of green time provided. However, the high traffic volumes along Santa Monica Boulevard would be adversely affected by this change. A westbound right-turn lane is already provided for vehicles traveling on Santa Monica Boulevard to Holloway Drive (over 200 vehicles during the p.m. peak hour). Additional turn lanes are not feasible due to right-of-way constraints. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- Crescent Heights Boulevard & Santa Monica Boulevard: This intersection ► currently operates at LOS D during the a.m. peak hour and LOS F during the p.m. peak hour. With buildout of the proposed General Plan, operations are expected to degrade to LOS E during the a.m. peak hour with an increase in average delay of 20 seconds and stay at LOS F during the p.m. peak hour with an increase in average delay of 24 seconds. Poor LOS at this intersection is due to high volumes along Santa Monica Boulevard during both peak hours, on southbound Crescent Heights Boulevard during the a.m. peak hour, and on northbound Crescent Heights Boulevard during the p.m. peak hour. The northbound left-turn movement from Crescent Heights Boulevard to Santa Monica Boulevard is currently prohibited during the p.m. peak hour (3:00-7:00 p.m.). Exclusive rightturn lanes are provided for the westbound and southbound right-turn movements. Additional turn lanes are not feasible due to right-of-way constraints. There is no feasible mitigation for this intersection LOS impact within the existing right-ofway, and taking additional right-of-way for vehicular traffic would be infeasible.

- Fairfax Avenue & Santa Monica Boulevard: This intersection currently operates at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. With buildout of the proposed General Plan, the intersection is expected to continue to operate at LOS E and LOS F during the a.m. and p.m. peak hours, respectively, with an increase in average delay of 20 seconds during the a.m. peak hour and 73 seconds during the p.m. peak hour. This intersection could be improved by providing an exclusive right-turn lane on southbound Fairfax Avenue for vehicles turning onto Santa Monica Boulevard. The width of the curb lane currently allows some vehicles to make a right turn on red even if a vehicle traveling through the intersection is stopped. While striping the right-turn pocket would reduce delay for vehicles turning onto Santa Monica Boulevard, the intersection would continue to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour (see Mitigation Measure 3.14-1).
- Gardner Street & Santa Monica Boulevard: This intersection currently operates at LOS C during the p.m. peak hour and is expected to degrade to LOS D with buildout of the General Plan with an increase in average delay of 12 seconds. The increase in delay is primarily due to high traffic volumes along Santa Monica Boulevard. In addition, the eastbound left-turn movement from Santa Monica Boulevard onto Gardner Street has a volume ranging from 160 to 170 vehicles (under existing conditions and with the General Plan) during the p.m. peak hour. Providing protected-permissive phasing for the eastbound left-turn movement during the p.m. peak hour would improve delay for these vehicles. However, overall intersection operations would remain at LOS D during the p.m. peak hour with the proposed General Plan (see Mitigation Measure 3.14-1).
- Formosa Avenue & Santa Monica Boulevard: This intersection currently operates at LOS D and is expected to degrade to LOS E with an increase in average delay of 23 seconds with buildout of the General Plan during the p.m. peak hour. The increase in delay is primarily due to heavy traffic volumes on Santa Monica Boulevard. Limited right-of-way and potential loss of parking along Formosa Avenue make improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.
- ► La Brea Avenue & Santa Monica Boulevard: This intersection currently operates at LOS E during the a.m. and p.m. peak hours. With buildout of the proposed

General Plan, operations would remain at LOS E during the a.m. peak hour (average delay increase of 21 seconds) and worsen to LOS F during the p.m. peak hour (average delay increase of 30 seconds). The additional delay during both peak hours is due to heavy traffic volumes along Santa Monica Boulevard and La Brea Avenue. During peak hours, parking along La Brea is restricted to provide three northbound and southbound travel lanes. In addition, protected-permissive phasing is provided for each left-turn movement at this intersection. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-ofway, and taking additional right-of-way for vehicular traffic would be infeasible. La Cienega Boulevard & Melrose Avenue: This intersection currently operates at LOS E during the a.m. peak hour and is expected to continue to operate at LOS E with buildout of the proposed General Plan (average delay increase of 9 seconds). Poor operations are due to high traffic volumes along southbound La Cienega Boulevard during the a.m. peak hour along with a high demand for the westbound left-turn movement from Melrose Avenue onto La Cienega Boulevard (over 300 vehicles under both existing and proposed General Plan conditions). The westbound left-turn movement already operates with protected signal phasing. Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing rightof-way, and taking additional right-of-way for vehicular traffic would be infeasible.

Doheny Drive & Beverly Boulevard: This intersection currently operates at LOS D during the a.m. and p.m. peak hours. With buildout of the proposed General Plan, operations are expected to degrade by one service level during both peak hours to LOS E with an increase in average delay of 26 seconds during the a.m. peak hour and 24 seconds during the p.m. peak hour. The worsened LOS is primarily due to heavy traffic volumes along Beverly Boulevard and increased delay on Doheny Drive with buildout of the proposed General Plan. A protected left-turn phase is currently provided for vehicles traveling on westbound Beverly Boulevard and turning left onto Doheny Drive (approximately 250 vehicles during the a.m. peak hour and 150 vehicles during the p.m. peak hour). Limited right-of-way makes improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible.

- ► San Vicente Boulevard & Beverly Boulevard: This is a shared intersection between the City of West Hollywood and the City of Los Angeles. This intersection currently operates at LOS D during the p.m. peak hour and is expected to degrade to LOS E with buildout of the proposed General Plan with an increase in average delay of 20 seconds. LOS E operations are primarily due to high left-turn volumes for vehicles traveling on San Vicente Boulevard, both northbound (over 230 vehicles) and southbound (over 160 vehicles), and making a left-turn onto Beverly Boulevard. Delay could be reduced by provided protected-permissive phasing for these left-turn movements during the p.m. peak hour; however, the intersection would continue to operate at LOS E with the proposed General Plan (see Mitigation Measure 3.14-1).
- La Cienega Boulevard & Beverly Boulevard: This intersection currently operates ► at LOS E during the a.m. peak hour and is expected to degrade to LOS F with buildout of the proposed General Plan with an increase in average delay of 21 seconds. During the p.m. peak hour, the intersection currently operates at LOS F and would continue to operate at LOS F with an increase in average delay of 23 seconds with the proposed General Plan. Poor operations at this intersection are due to high peak hour traffic volumes along westbound Beverly Drive and southbound La Cienega Boulevard during the a.m. peak hour and on eastbound Beverly Drive and northbound La Cienega Boulevard during the p.m. peak hour. An exclusive northbound right-turn lane is already provided along with a rightturn overlap phase to serve the high p.m. peak hour demand for this movement (approximately 400 vehicles under existing and proposed General Plan conditions). A protected left-turn phase is provided for vehicles traveling on eastbound Beverly Boulevard to northbound La Cienega Boulevard (over 250 vehicles under existing and General Plan conditions during the p.m. peak hour). Limited right-of-way makes improvements to this intersection infeasible. This intersection is located outside the jurisdiction of West Hollywood, within the City of Los Angeles.

Policies in the proposed General Plan include a variety of actions aimed at maintaining the City's transportation system, including roadway service. The Mobility Element, in particular, contains policies specifically written to address transportation impacts. Policies and programs related to transportation include:

- Continuing to encourage the expansion of local and regional transit systems, including the Red Line extension, which serve or have alignments and stops within the City.
- Working with transit providers to improve the quality of transit stations, transit stops, and transfer points by enhancing the following passenger amenities, among others, as appropriate:
 - Way-finding and clear signage
 - Bus shelters and shade structures
 - Clean and comfortable waiting areas
 - Attractive landscaping, art, and paving materials
 - User-friendly system and route maps
 - Updated and current schedules
 - Real-time arrival times via GPS updates (i.e., "NextBus"),
 - Adequate seating areas based on passenger volumes and typical wait times
 - Adequate pedestrian walkways
 - Convenient pay stations
 - Bicycle storage
 - Public restrooms
- Ensuring public transit amenities and incentive programs are considered for inclusion in development projects.
- Considering the expansion of locally-provided transit services and working with regional transit providers to increase frequency, including extending frequent bus service into the evenings and on weekends.
- Working with regional transit providers to improve access to local and regional transit services, particularly for the following populations:
 - Senior and persons with disabilities
 - Persons with low and moderate income

- Students
- The temporarily disabled
- Transit-dependent populations
- Seeking to maximize the target audience and the operating efficiency of the existing City internal transit system, including dial-a-ride, taxi coupon, bus pass, and CityLine programs.
- Seeing to create incentives for discretionary transit riders, such as visitors to cultural and entertainment destinations and others.
- Engaging in outreach and education to publicize transit options to City residents.
- Seeking to optimize traffic infrastructure and working with transit agencies to make bus travel times more competitive with automobile travel times.
- Participating in regional discussions, planning efforts, and advocacy to improve regional transportation solutions and to improve the efficiency, reliability, accessibility, quality, and frequency of transit service to and within the City.
- Continuing to advocate for and cooperating with regional partners including Metro, the Westside Cities Council of Governments (WSCOG), and the Southern California Association of Governments (SCAG) to create an environmentally and financially sustainable, complete, and comprehensive regional transportation network connecting West Hollywood to other destinations.
- Working with adjacent jurisdictions, regional transportation agencies, and others to pursue common interests relating to the City's transportation system and the mobility of West Hollywood's residents and visitors. The efforts that should be coordinated include, but are not limited to:
 - Intersection signal timing along the City's boundaries
 - Transit levels of service, including the Red Line Subway extension and rail feeder services
 - Transportation demand management programs
 - Bus stop locations
 - Transit center or rail stop locations

- Working with regional transportation agencies to establish Transportation Systems Management (TSM) and Transportation Demand Management (TDM) programs to improve regional transportation and reduce through travel within the City.
- ► Implementing improvements identified in the adopted SCAG Regional Transportation Plan as funding becomes available.
- Pursuing multi-jurisdictional car-sharing and bike-sharing programs with regional partners including the Westside Cities and SCAG.
- Encouraging and providing incentives and programs for people to walk more and drive less.
- Prioritizing space for pedestrians and bicycles in the design and improvement of public rights of way.
- Implementing improvements identified in the adopted Bicycle and Pedestrian Mobility Plan and ADA Transition Plan as funding becomes available.
- Providing the following pedestrian amenities throughout the street network, among others:
 - Wider sidewalks
 - Street trees and landscaping
 - Bulb-outs
 - Seating areas
 - Pedestrian-oriented lighting
- Working with businesses and business groups to improve walkability on major corridors and supports private investment into pedestrian-oriented amenities.
- Limiting the quantity and width of new curb cuts for vehicle access in order to improve the pedestrian network.
- Seeking to minimize the negative impacts of parking for the pedestrian realm and accommodating bicycles, carpool and carshare vehicles, and other modes of transit wherever possible in the design of public parking.

- Providing for the construction of pedestrian rights of way to allow convenient and unimpeded circulation to, through, and within new commercial development.
- Requiring design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.
- ► Enhancing pedestrian accessibility by providing bulb-outs where appropriate in order to minimize pedestrian crossing distances and improve visibility.
- Implementing improvements identified in the adopted Bicycle and Pedestrian Mobility Plan (2003) as funding becomes available.
- Ensuring that new development of commercial and multi-family residential uses enhance the City's bicycle network and facilities.
- Considering the installation of bicycle amenities including parking, storage, dedicated bicycle lanes, and bicycle way-finding/signage along planned bicycle routes, throughout commercial areas, and at all public facilities.
- Exploring the development of bicycle stations throughout the City and at major transit stops. The bicycle stations should consider amenities such as the following:
 - Lockers
 - Showers
 - Bicycle repair
 - Bicycle sharing facilities
- Requiring major employers to provide covered and secure bicycle parking and shower and locker facilities for their bicycle commuters, or to assist in funding bicycle-transit centers in nearby locations.
- Utilizing outreach and public education activities to increase bicycling for recreation, commuting, and shopping. This may include City-sponsored bike festivals, maintenance classes, and route maps, among others.
- Maintaining a current Streetscape Master Plan that balances the needs of pedestrians, bikes, public transit, passenger vehicles, and commercial vehicles.
- Prioritizing property access to promote transit, walking, and bicycling over auto access.

- Optimizing roadway and signal systems with appropriate technologies to support access and multi-modal travel.
- Continuing to secure street dedication for pedestrian and bicycle facilities and/or streetscape improvements.
- Considering the collection of fees from developers to undertake the following infrastructure projects to support new development:
 - Sidewalk improvements
 - Aesthetic repaving and landscaping
 - Bicycle infrastructure
 - Traffic calming devices
 - Traffic signals
 - Other street improvements that maintain the pedestrian-oriented character of the community
- Requiring new development to pay for their share of transportation improvements necessitated by that development.
- Investigating and utilizing state-of-the-art transportation system management technology and industry practices to address recurring and non-recurring traffic events (i.e., special events, incident/emergency management). Technologies may include traffic cameras, synchronization of signals, photo enforcement and other intelligent transportation system improvements.
- Maintaining and periodically updating a Transportation Demand Management (TDM) Ordinance to reduce auto trips associated with new development.
- Considering the implementation of implementing multimodal performance measures for analyzing the impacts of new development.
- Considering the requirement for new residential and commercial development to provide a partial transit subsidy for employees and/or residents.
- Continuing to study the community's travel characteristics to identify actions and techniques for reducing travel demand.

- Continuing to support carpool, rideshare, and telecommuting programs in partnership with the City's business community, and striving for increased participation rates.
- ► Implementing car-sharing and bike-sharing programs for City employees.
- Responding to changes in demand by replacing auto infrastructure with other types of transportation infrastructure. For example, the City may replace auto parking with bicycle parking as bicycle use grows, or designate auto lanes for public transit only.

With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of Mitigation Measure 3.14-1, program-level impacts to intersection LOS would be reduced, but not to a less-than-significant level. This impact would remain **significant and unavoidable**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

DAILY AND PEAK HOUR ROADWAY SEGMENT VOLUMES

Existing daily and peak hour traffic volumes are compared to future conditions under the proposed General Plan in Table 3.14-5 and Figures 3.14-7 and 3.14-8. In general, development under the proposed General Plan will not substantially alter the overall pattern of traffic on West Hollywood streets, though all study segments will see some increase in vehicular traffic. Some segments with relatively lower existing volumes, such as Doheny Drive or San Vicente Boulevard south of Sunset Boulevard, will see a greater percentage increase in volumes. However, the absolute gain in traffic volume will usually be lower than the larger streets. Similarly, streets with greater existing volumes tend to see a lower percentage increase, but a greater absolute gain in volumes.

Policies in the proposed General Plan include a variety of actions aimed at maintaining the City's transportation system, including vehicle roadway capacity. The Mobility Element, in particular, contains policies specifically written to address transportation impacts, as discussed in the analysis of peak hour intersection LOS.

The City of West Hollywood has not established a threshold of significance for daily or peak hour roadway segment volumes for arterials and collectors. For this reason, **no significance**

conclusion is presented for this issue area, but modeling results are provided for information purposes.

TRANSPORTATION PERFORMANCE MEASURES

In addition to LOS and traffic volume information, there are several alternative metrics that can provide additional information about the performance of the City's transportation system. The proposed General Plan focuses on transportation system management, public transit, and pedestrian and bicycle transportation, and comparison to metrics such as vehicle miles traveled, (VMT), vehicle hours of travel (VHT), and vehicle trip generation (VT), and average trip length provides useful information about the overall performance of these policies and programs, and the City's transportation system as a whole.

Traffic modeling conducted for the proposed General Plan assumes that the population will increase by 18.3% over existing, and that the total employment will increase by 25.3%. Existing and proposed 2035 VMT, VHT, VT, and average trip length information are presented in Table 3.14-7.

Secondring	X7N//T	VIIT	VT	Average Trip
Scenarios	V IVI I	VHI	V I	Length
Existing Conditions	1,503,718	44,557	354,967	7.02
Proposed General Plan (2035)	1,726,427	56,004	409,341	6.99
Percentage Change from Existing	14.8%	25.7%	15.3%	-0.1%

 Table 3.14-7. Daily Performance Measures

Source: Fehr & Peers 2010

VMT and VT are forecast to increase, but the increase would be relatively smaller than the projected population and employment increase, indicating that per capita VMT and VT would decrease modestly. VHT would increase more than 25%, indicating a per capita increase. The average trip length would decline slightly.

Policies in the proposed General Plan include a variety of actions aimed at maintaining the City's transportation system, including vehicle roadway capacity. The Mobility Element, in particular, contains policies specifically written to address transportation impacts, as discussed in the analysis of peak hour intersection LOS.

The City of West Hollywood has not established thresholds of significance for these alternative metrics, including VMT, VHT, VT, and average trip length. For this reason, **no significance**





Figure 3.14-7 Daily Segment Volumes - Proposed General Plan

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Source: FEHR & PEERS Transportation Consultants 2010



Figure 3.14-8 Peak Hour Segment Volumes - Proposed General Plan

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conclusion is presented for this issue area, but modeling results are provided for information purposes.

CONGESTION MANAGEMENT PROGRAM INTERSECTION LEVEL OF SERVICE

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. Table 3.14-8 presents a comparison of existing and future LOS and V/C ratio at designated CMP intersections in the City of West Hollywood. Implementation of the proposed General Plan would exceed LOS standards established by a County CMP, resulting in a **significant** impact at Doheny Drive and Santa Monica Boulevard.

		Peak	Scenario		Change	Significant
Scenario	Street Names	Hour	V/C	LOS	in V/C	Impact?
Existing Conditions	Doheny Drive & Santa Monica	AM	1.053	F	N/A	N/A
	Boulevard	PM	0.984	Е	N/A	N/A
	La Cienega Boulevard & Santa	AM	0.989	Е	N/A	N/A
	Monica Boulevard	PM	0.799	С	N/A	N/A
Proposed General Plan	Doheny Drive & Santa Monica	AM	1.111	F	0.058	Yes
	Boulevard	PM	1.019	F	0.035	Yes
	La Cienega Boulevard & Santa	AM	1.058	F	0.069	Yes
	Monica Boulevard	PM	0.889	D	0.090	No
No Project	Doheny Drive & Santa Monica	AM	1.144	F	0.091	Yes
	Boulevard	PM	1.057	F	0.073	Yes
	La Cienega Boulevard & Santa	AM	1.119	F	0.130	Yes
	Monica Boulevard	PM	0.918	Е	0.119	No
Growth Constrained to Transit Overlay Areas Only	Doheny Drive & Santa Monica	AM	1.101	F	0.048	Yes
	Boulevard	PM	1.013	F	0.029	Yes
	La Cienega Boulevard & Santa	AM	1.028	F	0.039	Yes
	Monica Boulevard	PM	0.856	D	0.057	No
Extensive TDM Alternative	Doheny Drive & Santa Monica	AM	1.074	F	0.021	Yes
	Boulevard	PM	1.014	F	0.030	Yes
	La Cienega Boulevard & Santa	AM	1.016	F	0.027	Yes
	Monica Boulevard	PM	0.826	D	0.027	No

Table 3.14-8. Intersection Levels of Service for CMP Impact Analysis

Policies in the proposed General Plan include a variety of actions aimed at maintaining the City's transportation system, including roadway service. The Mobility Element, in particular, contains policies specifically written to address transportation impacts, as discussed in the analysis of peak hour intersection LOS.

With adherence to and implementation of the proposed General Plan policies and regulations, program-level impacts to intersection LOS would be reduced, but not to a less-than-significant level. 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**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

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.

AIR TRAFFIC PATTERNS

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. The proposed General Plan would allow mid- to high-rise buildings reaching eight stories within the Commercial-Regional Center land use designation. Future development in the City of West Hollywood would occur through infill and redevelopment activities primarily in five commercial subareas, including Melrose/Beverly District, Santa Monica Boulevard West, the Santa Monica/Fairfax Transit District, the La Brea/Santa Monica Transit District, and the Sunset Strip. Some of these areas already have mid- to high-rise buildings. 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. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

EMERGENCY ACCESS

The intersection LOS impacts summarized in Table 3.14-6 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. The Safety and Noise Element, in particular, contains policies specifically written to address impacts related to emergency preparedness, which include the following:

- Maintaining the West Hollywood Emergency Plan, including plans for police and fire services, vulnerable populations, and sensitive facilities, as well as plans for the continuity of the community and important networks following a significant disaster.
- Using the latest technologies to inform the community regarding potential hazards, locations of potential sources of hazards, and actions to take in case of emergency, ensuring that emergency preparedness is the mutual responsibility of the City, residents, and the business community.
- Coordinating the provision of law enforcement and fire protection/emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.
- Encouraging, facilitating, and participating in, where appropriate, the establishment of methods of communication among the public safety and social service providers and the West Hollywood community to discuss and resolve issues of responsiveness and sensitivity which may arise.
- Utilizing the Public Safety Commission to facilitate communication among public safety service providers and the West Hollywood community.

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. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

PUBLIC TRANSIT, BICYCLE, AND PEDESTRIAN FACILITIES

Future development in the City of West Hollywood under the proposed General Plan would occur through infill and redevelopment activities primarily in five commercial subareas. 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.

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. The Mobility Element, in particular, contains policies specifically written to address transportation impacts, as discussed in the analysis of peak hour intersection LOS.

With adherence to and implementation of the proposed General Plan policies and regulations, program-level impacts to alternative transportation would be **less than significant**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval

PARKING

Future development in the City of West Hollywood under the proposed General Plan would occur through infill and redevelopment activities primarily in five commercial subareas. Changes in the number of residential units, number of employees, and number of visitors that would affect parking needs would occur primarily in these areas.

Parking occupancy studies were conducted in two commercial areas of the City (Civic Enterprises 2010). These studies focused on the Sunset Strip and the area bounded by Santa Monica Boulevard, Melrose Avenue, and San Vicente Boulevard.

The parking occupancy studies included metered street parking, off-street private facilities, and off-street municipal facilities, and presented hourly occupancy data for weekend days, and week days. Occupancy rates above 85% indicate a shortage of available parking. Metered street parking and off-street municipal facilities had occupancy rates above 85% during some periods of weekday and/or weekend days. However, private parking facilities, which represent the

largest share of parking spaces in both commercial areas, were less than 50% occupied during these busy periods.

The parking occupancy study results indicate that the number of spaces available in the study areas generally exceeds the demand. However, the current allocation of these spaces, including private ownership of some parking facilities, may not currently 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. The Mobility Element, in particular, contains policies specifically written to address parking impacts, which include the following:

- ► Utilizing existing parking resources both public and privately owned as effectively and efficiently as possible.
- Utilizing the most current technology to aid in parking management.
- Encouraging, promoting, and allowing shared and off-site parking arrangements in all commercial areas.
- Pursuing strategies to reduce circling for parking by visitors, including the following:
 - User-friendly informational and wayfinding signage to direct motorists to parking facilities;
 - A shared valet program with standardized uniforms and signage;
 - Technology to provide real-time parking occupancy information to motorists before they begin their trip, en route, and once they arrive at a parking facility;
 - Standardized price information displayed at all public and private parking facilities, including meters.
- Increasing the availability of on-street parking and where feasible, consider dedicating existing roadway travel lanes to parking during non-peak travel hours, and dedicating parking areas for small vehicles, including bicycles.
- Pursuing potential joint use of private parking facilities for public parking.

- Encouraging shared parking and creating a program to pool shared public and private parking spaces in key commercial districts to help create "park once" environments.
- Considering new commercial developments to place their parking spaces in shared parking pools.
- Providing adequate parking whether on-site, off-site, though shared parking or park-once strategies, or other methods.
- Considering the allowance of reductions in minimum parking requirements along commercial corridors, in TOD zones, or for projects that provide dedicated parking spaces for car sharing programs.
- Requiring all new multifamily residential and commercial development located along commercial corridors and in TOD zones to unbundle parking.
- Considering the unbundling of parking requirements for new residential uses.
- Considering the allowance of reductions in parking standards and/or unbundling of parking to encourage the construction of affordable housing, senior housing, special needs housing and housing near high-frequency regional transit services.
- Maintaining demand-responsive pricing of all public on- and off-street parking in commercial corridors.
- Encouraging private parking operators in commercial areas to post information about parking prices, time restrictions, and availability in a consistent manner for all commercial parking.
- Encouraging building owners and/or managers in new multi-family and commercial buildings to make parking spaces available to qualified car-share operators, and to allow public access to the car-share vehicles.
- Consider maintaining and reviewing residential preferential parking districts where appropriate.

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 Draft General Plan would improve access to parking through more efficient use of existing facilities. Although implementation of the proposed General Plan would result in additional residents, employees, and visitors in the City, new development projects would be required to comply with the City's parking requirements. Furthermore, transportation policies of the proposed plan would encourage use of transportation alternatives to the automobile, reducing per capita automobile travel and parking demand. 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**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.14.4 MITIGATION MEASURES

Implementation of the following programmatic mitigation measures, derived from the proposed General Plan Implementation Programs, will reduce potential impacts at this Program EIR level of analysis, but not to a less-than-significant level. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

- 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.

3.14.5 SIGNIFICANCE AFTER MITIGATION

With the implementation of Mitigation Measure 3.14-1, which requires intersection improvements, delays at these intersections would be reduced. However, the LOS at these intersections would still be a **significant and unavoidable** impact at the General Plan program level. No feasible mitigation would reduce LOS at CMP intersections to a less-than-significant level; this impact would also remain **significant and unavoidable**. The significance of impacts to transportation resulting from individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.15 GLOBAL CLIMATE CHANGE

This section presents a discussion of existing climate conditions, the current state of climate change science, and greenhouse gas (GHG) emissions sources in California and in the City of West Hollywood, as well as a summary of applicable regulations and a description of potential impacts of the proposed General Plan related to climate change.

3.15.1 EXISTING ENVIRONMENTAL SETTING

GENERAL DESCRIPTION OF GLOBAL CLIMATE CHANGE

Climate change consists of persistent, recorded changes in the average weather of the earth, measured by variables such as wind patterns, storms, precipitation, and temperatures that evolve over a long period of time (e.g., decades or centuries). Scientific research on climate change indicates with very high confidence (i.e., at least 90 percent) that the current rate and magnitude of global temperature increases are primarily anthropogenic (i.e., human-caused) and will lead to adverse effects around the globe (IPCC 2007). It is extremely unlikely that global climate change of the past 50 years can be explained without the contribution from human activities (IPCC 2007).

Attributing Climate Change—The Physical Scientific Basis

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back toward space. The radiation absorbed by the earth is re-radiated, not as high-frequency solar radiation, but as lower frequency infrared radiation.³ Most solar radiation passes through GHGs; however, infrared radiation is selectively absorbed by GHGs. As a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on the earth. Without the greenhouse effect, the earth would not be able to support life as we know it.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), chlorofluorocarbons (CFCs), and sulfur hexafluoride (SF₆). Anthropogenic emissions of these GHGs leading to atmospheric levels in

³ The frequencies at which bodies emit radiation are proportional to temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency (longer wavelength) radiation.

excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth's atmosphere and oceans, with corresponding effects on global circulation patterns and climate (IPCC 2007). CO₂ emissions associated with fossil fuel combustion are the primary contributors to human-induced climate change (EPA 2010d). Following CO₂, CH₄ and N₂O emissions associated with human activities are the next largest contributors to climate change (IPCC 2007; EPA 2010e).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, it is understood that more CO_2 is currently emitted into the atmosphere than is sequestered. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively. These are two of the most common processes of CO_2 sequestration. Of the total annual human-caused CO_2 emissions, approximately 54% is sequestered through ocean uptake, northern hemisphere forest regrowth, and other terrestrial sinks within a year, whereas the remaining 46% of human-caused CO_2 emissions remain stored in the atmosphere (Seinfeld and Pandis 1998).

Similarly, impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, the quantity is enormous, and no single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro-climate.

Climate change could affect environmental conditions in California through a variety of mechanisms. One effect of climate change is sea level rise. Sea levels along the California coast rose approximately 7 inches during the last century (CEC 2006a), and are predicted to rise an additional 7–22 inches by 2100, depending on the future levels of GHG emissions (IPCC 2007). However, the Governor-appointed Delta Vision Blue Ribbon Task Force has recommended that the state plan for a scenario of 16 inches of sea level rise by 2050 and 55 inches by 2100 (California Natural Resources Agency 2008). Resultant effects of sea level rise could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento–San Joaquin River Delta, where pumps delivering potable water could be threatened), and disruption of wetlands (CEC 2006a). Some low-lying populated areas

throughout the Central Valley and Sacramento–San Joaquin River Delta inundated by sea level rise could experience population displacement and economic disruption.

As the existing climate throughout California changes over time, the ranges of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the state if suitable conditions are no longer available. Additional concerns associated with climate change are a reduction in the snowpack, leading to less overall water storage in the mountains, the largest "reservoir" in the state, and increased risk of wildfire caused by changes in rainfall patterns and plant communities.

Attributing Climate Change—Greenhouse Gas Emission Sources

State Greenhouse Gas Emissions Inventory

Emissions of CO_2 are byproducts of fossil-fuel combustion and are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors (CEC 2006b). In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (CEC 2006b) (see Figure 3.15-1).

GHGs with lower emissions rates than CO_2 may still contribute significantly to climate change because they are more effective at absorbing outgoing infrared radiation than CO_2 . The concept of CO_2 -equivalency (CO_2e) is used to account for the fact that different GHGs have different potentials to absorb infrared radiation. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Emissions of CH_4 and N_2O are generally two to four orders of magnitude lower than those of CO_2 and are associated with anaerobic microbial activity resulting from agricultural practices, flooded soils, and landfills. CH_4 and N_2O have approximately 23 and 296 times the GWP of CO_2 , respectively.

 CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively, and are two of the most common types of CO_2 sequestration.




Notes: GWP = global warming potential; MMT = million metric tons Source: ARB 2008b

California is the 12th to 16th largest emitter of CO_2 in the world and is responsible for approximately 2 percent of the world's CO_2 emissions (CEC 2006b). California produced 484 million metric tons (MMT) of CO_2e in 2004.

City of West Hollywood

AECOM has developed a GHG emissions inventory (inventory) for community-wide GHG emission sources for the 2008 base year in the City of West Hollywood. This inventory will be used to establish an emissions baseline for the Climate Action Plan (CAP).

The inventory was compiled for the following emission sectors: residential and nonresidential (i.e. commercial and industrial) electricity and natural gas use (i.e., energy use), transportation, solid waste, water use, and wastewater treatment. Government-related GHG emission sources, which include government buildings, vehicle fleets, solid waste, streetlights, and other

government-owned/operated facilities, can be considered a subset of the community-wide emissions inventory.

AECOM also prepared community-wide GHG emissions projections for 2020 and 2035 under a business-as-usual scenario (i.e., a scenario without the GHG reduction measures that will become part of the CAP). In some cases, GHG reductions are anticipated to occur (despite a growing population) due to programs and regulations applied at the federal and state levels (e.g., low carbon fuel standards and renewable energy portfolio requirements). Quantitative reductions attributable to federal and state actions are currently unknown and are not accounted for in the 2020 and 2035 projections.

Community-wide and municipal 2008 GHG emissions were calculated using a "bottom-up" approach, which involves multiplication of an emission factor for a given process by a consumption rate for that process. Table 3.15-1 and Figure 3.15-2 summarize the magnitude and relative contribution of community-wide baseline emissions from each sector.

	2008 Inventory Emissions		2020 Inventory Emissions		2035 Inventory	
Community Sector	MT CO ₂ e	Percent	MT CO ₂ e	Percent	MT CO ₂ e	Percent
Residential Electricity Use	29,086	5%	31,243	5%	34,256	5%
Commercial Electricity Use	39,451	7%	42,977	7%	49,831	7%
Industrial Electricity Use	27,908	5%	28,071	4%	31,210	4%
Residential Natural Gas Use	41,292	7%	46,276	7%	49,825	7%
Nonresidential Natural Gas Use	48,838	8%	44,980	7%	46,612	7%
On-road Mobile-Sources	361,350	62%	412,450	64%	456,600	64%
Solid Waste	8,543	1%	9,267	1%	10,172	1%
Wastewater Treatment	20,981	4%	22,768	4%	24,974	4%
Water Use	5,764	1%	8,200	1%	8,971	1%
Total	583,213	100%	646,232	100%	712,451	100%
Per Capita (MT/person) ¹	15.62		16.00		16.1	

Table 3.15-1. West Hollywood 2008, 2020, and 2035 Business-as-Usual Community-wide GHG Emissions

¹ Based on 2008 and 2020 populations of 37,348 and 44,182; the 2020 population was linearly interpolated from the 2008 and 2020 population data.

Notes: $CO_2e =$ carbon dioxide equivalent; MT= metric tons

Source: Data compiled by AECOM 2010

Total community-wide GHG emissions are anticipated to grow by approximately 11% and 21% between 2008 and 2020, and 2008 and 2035, respectively, under a business-as-usual scenario, due largely to projected growth.



Figure 3.15-2. West Hollywood Communitywide GHG Inventory by Sector 2008, 2020, and 2035

West Hollywood Communitywide GHG Inventory by Sector: 2020 Total GHG Emissions ~ 646,000 MTCO₂e







The largest sources of GHG emissions for 2008, 2020, and 2035 are the following, in descending order:

- 1. On-road mobile sources (~62%)
- 2. Nonresidential (commercial and industrial) electricity consumption (~12%)
- 3. Nonresidential natural gas consumption (~8%)
- 4. Residential natural gas consumption (~7%)
- 5. Residential electricity consumption (~5%)
- 6. Wastewater generation (~4%)

On-road mobile source emissions are the largest contributor to community-wide GHG emissions. Climate conditions in the southern California region can result in a smaller relative contribution of energy-related emissions due to less intense need for space heating/cooling as compared to other locations such as northern California.

The remaining sources are similar in magnitude (~1% of the total GHG emissions in 2008, 2020, and 2035):

- 1. Solid waste
- 2. Water consumption

The magnitude of GHG emissions increases from 2008 to 2020 and 2035, due primarily to anticipated future population growth (and related consumption) in West Hollywood. The relative percentage of emissions in each sector remains relatively insensitive to change during the projection period. Per capita emissions are predicted to remain relatively similar during the projection period.

Government-Related (Municipal) Emissions

Government-related (municipal) GHG emission sources, which include government buildings, vehicle fleets, solid waste, streetlights, and other government-owned/operated facilities, can be considered a subset of the community-wide emissions inventory. Table 3.15-2 summarizes the magnitude of municipal baseline emissions from sectors for which data are available. Emissions from the municipal vehicle fleet, solid waste, and water/wastewater are not reported since data for these sectors were not available at the time of this writing.

	2008 Inventory Emissions		
Municipal Sector	MT CO ₂ e		
Buildings and Facilities Electricity Use ¹	670		
Buildings and Facilities Natural Gas Use ²	52		
Street Lights ³	2,211		
Traffic Control ³	69		

Table 3.15-2. West Hollywood 2008 Municipal GHG Emissions

¹ Based on City municipal accounts data from Southern California Edison (SCE).

² Based on City municipal accounts data from Southern California Gas Company (SCG).

³ From *Electricity Use Report for City of West Hollywood*, prepared by SCE

Notes: $CO_2e = carbon dioxide equivalent; MT= metric tons.$

Source: Data compiled by AECOM 2010.

3.15.2 REGULATORY SETTING

Emissions of GHGs have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. The proper context for addressing this issue in an EIR is at the cumulative level, because although it is unlikely that a single project will contribute significantly to climate change, cumulative emissions from many projects could impact global GHG concentrations and the climate system. In turn, global climate change has the potential to result in sea level rise (resulting in flooding of low-lying areas), to affect rainfall and snowfall (leading to changes in water supply), to affect temperatures and habitats (impacting biological resources), and to result in many other adverse effects.

Cumulative impacts are the collective impacts of one or more past, present, and future projects that, when combined, result in adverse changes to the environment. In determining the significance of a proposed project's contribution to anticipated adverse future conditions, a lead agency should generally undertake a two-step analysis. The first question is whether the *combined* effects from *both* the proposed project *and* other projects would be cumulatively significant. If the agency answers this inquiry in the affirmative, the second question is whether "the proposed project's *incremental* effects are cumulatively considerable" and thus significant in and of themselves.

Legislation and executive orders on the subject of climate change in California have established a statewide context and process for developing an enforceable cap on GHG emissions. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs, even relatively small additions, on a global basis. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially significant.

REGULATORY FRAMEWORK FOR CLIMATE CHANGE

Numerous federal, state, regional, and local laws, rules, regulations, plans, and policies define the framework that regulates and will potentially regulate climate change. The following discussion focuses on climate change requirements applicable to the project.

Federal Greenhouse Gas Programs

Supreme Court Ruling

EPA is the federal agency responsible for implementing the Clean Air Act (CAA). The Supreme Court of the United States ruled on April 2, 2007, that CO_2 is an air pollutant as defined under the CAA, and that EPA has the authority to regulate emissions of GHGs. However, as of the date of publication of this EIR, there are no adopted federal regulations or policies regarding GHG emissions applicable to the proposed project.

EPA Actions

In response to the mounting issue of climate change, EPA has taken actions to regulate, monitor, and potentially reduce GHG emissions.

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, EPA issued a final rule for mandatory reporting of GHGs from large GHG emissions sources in the United States. In general, this national reporting requirement will provide EPA with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons (MT) or more of CO_2 equivalent per year (CO_2e/yr). This publically available data will allow the reporters to track their own emissions, compare them to similar facilities, and aid in identifying cost-effective opportunities to reduce emissions in the future. Reporting is at the facility level, except that certain suppliers of fossil fuels and industrial GHGs along with vehicle and engine manufacturers will report at the corporate level. An estimated 85% of the total U.S. GHG emissions, from approximately 10,000 facilities, are covered by this final rule.

National Program to Cut Greenhouse Gas Emissions and Improve Fuel Economy for Cars and Trucks

On September 15, 2009, EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) proposed a new national program that would reduce GHG emissions and improve fuel economy for all new cars and trucks sold in the United States. EPA proposed the first-ever national GHG emissions standards under the CAA, and NHTSA proposed

Corporate Average Fuel Economy standards under the Energy Policy and Conservation Act. This proposed national program would allow automobile manufacturers to build a single light-duty national fleet that satisfies all requirements under both federal programs and the standards of California and other states.

Endangerment and Cause or Contribute Findings

On December 7, 2009, EPA adopted its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA based on Section 202(a) of the CAA, which states that the EPA administrator should regulate and develop standards for "emission[s] of air pollution from any class or classes of new motor vehicles or new motor vehicle engines, which in [its] judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare." The rule addresses Section 202(a) in two distinct findings. The first finding addresses whether the concentrations of the six key GHGs (i.e., CO₂, CH₄, N₂O, HFCs, CFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations. The second finding addresses whether the combined emissions of GHGs from new motor vehicles and motor vehicle engines contribute to atmospheric concentrations of GHGs and therefore the threat of climate change.

The EPA administrator found that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA. The evidence supporting this finding consists of human activity resulting in "high atmospheric levels" of GHG emissions, which are very likely responsible for increases in average temperatures and other climatic changes. Furthermore, the observed and projected results of climate change (e.g., higher likelihood of heat waves, wild fires, droughts, sea level rise, higher intensity storms) are a threat to the public health and welfare. Therefore, GHGs were found to endanger the public health and welfare of current and future generations.

The EPA administrator also found that GHG emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHGs fit within the CAA definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements but rather allow EPA to finalize the GHG standards proposed earlier in 2009 for new light-duty vehicles as part of the joint rulemaking with USDOT

State Plans, Policies, Regulations, and Laws

ARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA), which was adopted in 1988. Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is occurring, and a real potential exists for severe adverse environmental, social, and economic effects in the long term. Because every nation emits GHGs and therefore makes an incremental cumulative contribution to global climate change, cooperation on a global scale will be required to reduce the rate of GHG emissions to a level that can help slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 1493

In 2002, then-Governor Gray Davis signed AB 1493 (Statutes 2002, Chapter 200) (amending Health & Safety Code, Section 42823 and adding Health & Safety Code, Section 43018.5). AB 1493 (also known as the Pavley Bill) requires that ARB develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of GHG emitted by passenger vehicles and light-duty trucks and other vehicles determined by ARB to be vehicles whose primary use is noncommercial personal transportation in the State."

To meet the requirements of AB 1493, ARB approved amendments to the CCR in 2004 by adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 and adoption of 13 CCR Section 1961.1 require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty weight classes for passenger vehicles (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily to transport people), beginning with the 2009 model year. Emissions limits are reduced further in each model year through 2016. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Executive Order S-3-05

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures

could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the executive order established targets for total GHG emissions. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050.

The executive order directed the Secretary of Cal/EPA to coordinate a multiagency effort to reduce GHG emissions to the target levels. The Secretary will also submit biannual reports to the governor and state legislature describing progress made toward reaching the emission targets, impacts of global warming on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the Secretary of Cal/EPA created the California Climate Action Team made up of members from various state agencies and commissions. The California Climate Action Team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, the local government, and the community and through state incentive and regulatory programs.

Assembly Bill 32, California Global Warming Solutions Act of 2006

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Global Warming Solutions Act of 2006. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs ARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then ARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that ARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves the reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

Assembly Bill 32 Climate Change Scoping Plan

In December 2008, ARB adopted its *Climate Change Scoping Plan* (Scoping Plan), which contains the main strategies California will implement to achieve reduction of approximately 169 MMT of CO₂e, or approximately 30% from the state's projected 2020 emission level of 596 MMT of CO₂e under a business-as-usual scenario (this is a reduction of 42 MMT CO₂e, or almost 10%, from 2002–2004 average emissions) (ARB 2008b). The Scoping Plan also includes ARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards (ARB 2008b):

- improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO₂e),
- energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO₂e),
- ► a renewable portfolio standard for electricity production (21.3 MMT CO₂e), and
- ▶ the Low-Carbon Fuel Standard (15.0 MMT CO₂e).

ARB has not yet determined what amount of GHG reductions it recommends from local government operations. The Scoping Plan states that the ultimate GHG reduction assignment to local government operations is to be determined (ARB 2008b). However, the Scoping Plan does state that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. With regard to land use planning, the Scoping Plan reports that approximately 5.0 MMT CO₂e will be achieved by implementation of SB 375, which is discussed further below (ARB 2008b). ARB is also developing an additional protocol for community emissions.

Executive Order S-1-07

Executive Order S-1-07, which was signed by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, at over 40% of statewide emissions. The executive order establishes a Low Carbon Fuel Standard that says that

the carbon intensity of transportation fuels sold in California should be reduced by a minimum of 10% by 2020. This order also directed ARB to determine whether this standard could be adopted as a discrete early action measure after meeting the mandates in AB 32. ARB adopted the standard on April 23, 2009.

Senate Bill 97

SB 97, signed August 2007, acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. This bill directed the California Office of Planning and Research (OPR) to prepare, develop, and transmit guidelines to the California Natural Resources Agency for the feasible mitigation of GHG emissions, or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The California Natural Resources Agency adopted those guidelines on December 30, 2009, which became effective March 18, 2010.

Senate Bill 375

SB 375, signed September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy or alternative planning strategy, which will prescribe land use allocation in that MPO's regional transportation plan. ARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years, but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's sustainable communities strategy or alternative planning strategy for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects would not be eligible for funding programmed after January 1, 2012.

Addressing Climate Change at the Project Level: California Attorney General's Office

In January, 2010, the California Attorney General's Office released a document to assist local agencies with addressing climate change and sustainability at the project level under CEQA. The document provides examples of various measures that may reduce the impacts related to climate change at the individual project level. As appropriate, the measures will be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees).

Regional and Local Plans, Policies, Regulations, and Ordinances

There are currently no regional or local policies, regulations, or laws specifically pertaining to GHG emissions. The existing General Plan for the City contains numerous goals, policies, and implementation programs pertaining to Land Use and Urban Design, Circulation, Air Quality, and Energy and Water Conservation that also serve to reduce GHG emissions.

Additionally, on October 1, 2007, West Hollywood adopted a Green Building Program. The City's Green Building Program establishes development standards that apply to all development, including all new residential and commercial projects, as well as remodels and tenant improvements. A key component of West Hollywood's Green Building Program is the Green Building Point System for new construction, which offers incentives for projects that achieve exemplary status across a range of sustainable indicators.

EFFECTS OF CLIMATE CHANGE ON THE CITY OF WEST HOLLYWOOD

As discussed previously in this section, human-induced increases in GHG concentrations in the atmosphere have led to increased global average temperatures (global warming) through the intensification of the greenhouse effect, and associated changes in local, regional, and global average climatic conditions.

Although there is a strong scientific consensus that global climate change is occurring and is influenced by human activity, there is less certainty as to the timing, severity, and potential consequences of the climate phenomena. Scientists have identified several ways in which global climate change could alter the physical environment in California (IPCC 2007; CEC 2006a). These include:

- increased average temperatures;
- ▶ modifications to the timing, amount, and form of precipitation (rain vs. snow);
- ► changes in the timing and amount of runoff; and
- ► reduced water supply.

The changes listed above may translate into a variety of issues and concerns that may affect the City, including but not limited to:

- increased energy demand associated with increased temperatures;
- ▶ increased air pollution and related effects on human health;
- decreased water supply, reliability, and quality;
- increased risk of flooding and landslides associated with changes to precipitation patterns; and
- increased frequency and intensity of wildfire as result of changing precipitation patterns and temperatures.

All the above-mentioned effects will have monetary and intangible costs associated with them, such as increased costs of energy, health and other insurance, water, and public service costs and associated tax increases. Loss of landscaping and visual aesthetics are two examples of intangible costs that may affect the City.

Although the proposed General Plan could increase the City's exposure to such risks and hardships, the Plan also includes a variety of policies and programs that would assist the City in avoiding and adapting to the impacts of climate change.

3.15.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

ARB and SCAQMD have not adopted a significance threshold for analyzing GHG emissions associated with land use development projects such as the proposed project, or a methodology for analyzing impacts related to GHG emissions or global climate change. The City acknowledges that, by adoption of AB 32 and SB 97, the State of California has identified GHG emission reduction goals and that the effect of GHG emissions as they relate to global climate change is inherently an adverse environmental impact. While the emissions of one single project will not cause global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change.

To meet AB 32 goals, California would need to generate less GHG emissions than current levels. It is recognized, however, that for most projects there is no simple metric available to determine if a single project would substantially increase or decrease overall GHG emission levels.

Although the text of AB 32 applies to stationary sources of GHG emissions, this mandate demonstrates California's commitment to reducing the rate of GHG emissions and the state's associated contribution to climate change, without intent to limit population or economic growth

within the state. Thus, to achieve the goals of AB 32, which are tied to GHG emission rates of a specific benchmark year (i.e., 1990), California would have to achieve a lower rate of emissions per unit of population than its current rate. Further, to accommodate *future* population and economic growth, the state would have to achieve an even lower rate of emissions per unit than was achieved in 1990. (The goal to achieve 1990 quantities of GHG emissions by 2020 means that this will need to be accomplished in the face of 30 years of population and economic growth beyond 1990.) Thus, future planning efforts that would not encourage reductions in GHG emissions or not enable land uses to operate in a GHG-efficient manner would conflict with the policy decisions contained in the spirit of AB 32, thus impeding California's ability to comply with the mandate.

Thus, if a statewide context for addressing GHG emissions is applied, any net increase in GHG emissions within state boundaries would be considered "new" emissions. For example, a land development project, such as the proposed General Plan, does not create "new" emitters of GHGs but would theoretically accommodate a greater number of residents in the state. Some of the residents that move to West Hollywood could already be residents in California, while others may be from out of state (or would "take the place" of in-state residents who "vacate" their current residences to move to the new project). The out-of-state residents would be contributing new emissions in a statewide context but would not necessarily be generating new emissions in a global context. Given the statewide context established by AB 32, the project would need to accommodate an increase in population in a manner that would not inhibit the state's ability to achieve the goals of lower emissions overall.

However, the State of California has established GHG emission reduction targets and has determined that GHG emissions as they relate to global climate change are a source of adverse environmental impacts in California that should be addressed under CEQA. Although AB 32 did not amend CEQA, it identifies the myriad of environmental problems in California caused by global warming (California Health and Safety Code, Section 38501[a]). SB 97, however, did amend CEQA by directing OPR to prepare revisions to the State CEQA Guidelines addressing the mitigation of GHGs or their consequences. As an interim step toward development of required guidelines, in June 2008, OPR published a technical advisory, entitled *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review* (OPR 2008). In this technical advisory, OPR recommends that the lead agencies under CEQA make a good-faith effort, based on available information, to estimate the quantity of GHG emissions that would be generated by a proposed project, including the emissions associated with vehicular traffic, energy consumption, water usage, and construction activities, to

determine whether the impacts have the potential to result in a project or cumulative impact and to mitigate the impacts where feasible mitigation is available.

The OPR's technical advisory also acknowledges that "perhaps the most difficult part of the climate change analysis will be the determination of significance," and noted that "OPR has asked ARB technical staff to recommend a method for setting thresholds which will encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state." ARB has not yet completed this task at the time of writing this EIR.

OPR provided amendments to the state *CEQA Guidelines*, including Appendix G, to address impacts of GHG emissions, as directed by SB 97 (2007). These amendments were approved by the California Natural Resources Agency on December 30, 2009, and were codified in the CCR on March 18, 2010. The thresholds for determining the significance of the impact of projected GHG emissions generated by the project for this analysis are based on OPR's additions to Appendix G of the State CEQA Guidelines. Adoption and implementation of the proposed General Plan would result in a significant adverse impact related to GHG emissions if the goals, policies, objectives, or regulations established by the proposed documents, or if anticipated subsequent development in accordance with those documents, would:

- Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment
- Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG

For the purposes of this EIR, the net change in GHG emissions associated with the proposed project are quantified and used as a criterion to determine whether the associated emissions would substantially help or hinder the state's ability to attain the goals identified in AB 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020). The analysis of GHG emissions in this EIR recognizes that the impact that GHG emissions have on global climate change does not depend on whether they are generated by stationary, mobile, or area sources, or whether they are generated in one region or another. As stated above, the mandate of AB 32 demonstrates California's commitment to reducing GHG emissions and the state's associated contribution to climate change, without intending to limit population or economic growth within the state. Thus, to achieve the goals of AB 32, which are tied to mass GHG emission levels of a specific benchmark year (i.e., 1990), California would have to achieve a lower rate of emissions per unit of population (per person) and/or per level of economic activity (e.g., per job) than its current

rate. Furthermore, to accommodate future population and economic growth, the state would have to achieve an even lower rate of emissions per unit than it achieved in 1990. (The goal-to achieve 1990 quantities of GHG emissions by 2020-will need to be accomplished despite 30 years of population and economic growth beyond 1990.) For this reason, land uses need to be GHG "efficient" to attain AB 32 goals while accommodating population and job growth. Thus, the program-level analysis of GHGs for this EIR focuses on the annual operational GHG emissions per service population (SP), or annual GHG/SP, where SP is the number of residents accommodated by the proposed project plus the number of jobs supported by the proposed project. The Bay Area Air Quality Management District (BAAQMD) estimates the benchmark for this metric to be approximately 6.6 MT CO_2e/SP /year. The benchmark for this metric was derived from the emission rates at the state level that would accommodate projected population and employment growth under trend forecast conditions, and the emission rates needed to accommodate growth while allowing for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020). BAAQMD has proposed this threshold to be used to determine the significance of proposed plans for GHGs (BAAQMD 2009). SCAQMD has also proposed 6.6 MT CO₂e per SP for a plan level significance threshold (all sectors) (SCAQMD 2009).

Additionally, the application of an efficiency-based metric in this analysis is consistent with the discussion in ARB's Scoping Plan of the importance of GHG efficiency in land use planning that must be achieved to attain the mandated reductions in mass annual GHG emission levels (ARB 2008b, page ES-12). However, although the Scoping Plan discusses efficiency in terms of tons per person, it does not explicitly discuss ways to account for projected growth in the state's population or projected growth in the state's economy. Moreover, the metric of mass GHG emissions per capita would not be useful for understanding the efficiency of nonresidential land uses (e.g., commercial, industrial, educational).

Because the $CO_2e/SP/year$ metric accounts for future population growth, future economic growth, and mass emission targets, future land use development projects that would not be more GHG efficient than "business as usual" would conflict with the spirit of AB 32 policy.

Nonetheless, one of the primary challenges to establishing a reasonable threshold and determining impacts (and mitigation) relates to enactment of AB 32 and other GHG emission-reduction legislations. As previously described, much of this legislation requires ARB and others to establish standards that relate to energy efficiency, carbon levels in fuels, smokestack emissions, and regional transportation planning (i.e., SB 375). These standards are in the development process but may be a few to several years away from implementation. The project, however, would also be in development for multiple decades (~25 years), and during its lifetime

would be subject to these as-yet undeveloped thresholds. There is a lag time between enactment of these legislative fixes and the regulations that will implement them. As a consequence, local governmental agencies are left to struggle with trying to discern the extent to which their decisions can and will influence GHG emissions, versus what still-to-be-developed regulations will achieve. For instance, a local lead agency can base a threshold on generation of emissions below some business-as-usual target, but it is difficult to ascertain whether these regulations will largely result in substantial reductions that hit the target, or whether local agencies will need to impose additional measures. This challenge is discussed in more detail in Section 3.15.4 below.

3.15.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

ANALYSIS METHODOLOGY

At the time of writing this EIR, neither ARB nor any air district in California (including SCAQMD) has formally adopted a recommended methodology for evaluating GHG emissions associated with new development. Pursuant to full disclosure and according to OPR's CEQA Guidelines that state, "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project," the construction and operational emissions associated with the proposed project have been quantified using methods described below.

Construction-related GHG emissions were estimated using the URBEMIS 2007 Version 9.2.4 model that estimates CO_2 emissions associated with construction-related GHG sources such as off-road construction equipment, material delivery trucks, soil haul trucks, and construction worker vehicles (Rimpo and Associates 2008).

Operational emissions of GHGs, including GHGs generated by direct and indirect sources, are estimated according to the recommended methodologies from ARB and the California Climate Action Registry (CCAR). Direct sources include emissions such as vehicle trips, natural gas consumption, and landscape maintenance. Indirect sources include off-site emissions occurring as a result of implementation of the proposed General Plan such as electricity and water consumption. Direct emissions associated with area and mobile sources were estimated using URBEMIS (Rimpo and Associates 2008). Modeling was based on project-specific data (e.g., size and type of proposed uses) and vehicle trip information from the traffic analysis prepared for this project (Fehr & Peers 2010). Indirect emissions associated with residential and nonresidential energy consumption were estimated using electricity consumption rates from the California Energy Commission's (CEC's) California Energy Demand 2000-2010 report and CCAR's

General Reporting Protocol Version 3.1 (CCAR 2009), respectively. GHG emission factors associated with electricity production were obtained from the CCAR General Reporting Protocol (CCAR 2009). Indirect GHG emissions associated with the consumption of water were calculated based on the estimated level of electricity required to convey, treat, and distribute the project's estimated water usage and the aforementioned emission factors for electricity production from CCAR. Water demand of the proposed land uses was obtained from Section 3.12, "Public Services and Utilities" of this EIR, and the electricity consumption associated with water consumption was estimated using an electricity consumption rate from the CEC report entitled *Refining Estimates of Water-Related Energy Use in California* (CEC 2007).

It is important to note that all CO₂ emissions from operational activities may not necessarily be considered "new" emissions, given that a project itself does not create "new" emitters (people) of GHGs, at least not in the traditional sense. In other words, the GHG emissions for a residential project are not necessarily all new GHG emissions in the local area, state, or world; to a large degree, a new residential development accommodates household relocations. In this sense, residential development projects can be seen as reacting to increased demand from the growing population and economy, and are not in themselves creators of economic or population growth. Emissions of GHGs are, however, influenced by the location and design of projects, to the extent that they can influence travel to and from the projects, and to the degree the projects are designed to maximize energy efficiency and GHG efficiency.

The methodology used in this EIR to analyze the project's contribution to global climate change includes a calculation of GHG emissions and a discussion about the context in which they can be evaluated. The City's purpose of calculating the project's GHG emissions is for informational and comparison purposes, as neither ARB nor SCAQMD has adopted a quantifiable threshold for evaluating whether project-generated GHGs would be considered a significant impact.

GENERATION OF GHG EMISSIONS

Construction-Related GHG Emissions

Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed project would result in exhaust emissions of GHGs. Exact project-specific data (e.g., construction equipment types and number requirements) were not available at the time of this analysis.

GHG emissions generated by construction would be primarily in the form of CO_2 . Although emissions of other GHGs, such as CH_4 and N_2O , are important with respect to global climate

change, the emission levels of these other GHGs from on- and off-road vehicles used during construction are relatively small compared with CO_2 emissions, even when factoring in the relatively larger GWP of CH_4 and N_2O .

Accordingly, total construction emissions for the 25-year buildout period associated with implementation of the proposed project were estimated using URBEMIS (Rimpo and Associates 2008). URBEMIS is designed to model construction emissions for land use development projects based on building size, land use and type, and disturbed acreage and allows for the input of project-specific information. Construction-generated GHG emissions were modeled based on general information provided in Chapter 2, "Project Description," and default SCAQMD-recommended settings and parameters attributable to the proposed land use types and site location.

Development associated with the proposed General Plan would occur over a very large area and large portions of the planning area could undergo construction at a given time. However, a detailed schedule describing the timing and location of construction activities under the proposed project is not available at the time of writing this EIR. Construction activities are anticipated to commence as early as 2011 and last until approximately 2035. Given that exhaust emission rates of the construction equipment fleet in California are expected to decrease over time due to efforts led by ARB and SCAQMD, annual construction emissions were estimated using the earliest calendar year when construction would begin (i.e., 2011) in order to generate conservative estimates. It is anticipated, however, that in later years, advancements in engine technology, retrofits, and turnover in the equipment fleet would result in increased fuel efficiency, potentially more alternatively fueled equipment, and lower levels of GHG emissions. Also, the URBEMIS model does not account for reductions in CO₂ emission rates that would affect future construction activity due to the regulatory environment that is expected to evolve under AB 32. For instance, ARB's Scoping Plan identifies the need to expand efficiency strategies and low carbon fuels for heavy-duty and off-road vehicles (ARB 2008b).

A summary of the GHG emissions generated during buildout of the proposed project is presented in Table 3.15-3. Refer to Appendix G for a detailed summary of the modeling assumptions, inputs, and outputs.

Table 3.15-3. Summary of Modeled Greenhouse Gas Emissions (CO ₂ e) from	
Implementation of the Proposed Project	

Source	CO ₂ e Emissions ¹				
Construction Emissions over Buildout Period (2011–2035) (metric tons)	15,470				
Operational Emissions at Buildout (Year 2035) (metric tons/year)					
Area Sources	15,355				
Mobile Sources	92,197				
Electricity Consumption	15,478				
Water Consumption	1,764				
Total Operational Emissions	124,793				
Operational GHG Efficiency Metrics					
Additional Residential Population Accommodated by Plan	6,834				
Additional Employment Accommodated by Plan	5,764				
Additional Service Population (SP) Supported by Plan	12,598				
Annual CO ₂ e/SP (metric tons/year)	9.9				
GHG Efficiency Benchmark - Annual MT CO ₂ e/SP benchmark that reflects statewide target for Year 2020 (metric tons/year)	6.6				

¹ The values presented do not include the full life cycle of GHG emissions that would occur over the production/transport of materials used during the construction of development envisioned under the Plan or used during the operational life of the project, solid waste that would be generated over the life of the project, and the end of life for the materials and processes that would occur as an indirect result of the project. Estimating the GHG emissions associated with these processes would be too speculative for meaningful consideration and would require analysis beyond the current state of the art in impact assessment, and may lead to a false or misleading level of precision in reporting operational GHG emissions. Furthermore, indirect emissions associated with in-state energy production and generation of solid waste would be regulated under AB 32 directly at the source or facility that would handle these processes. The emissions associated with off-site facilities in California would be closely controlled, reported, capped, and traded under AB 32 and California ARB programs, as recommended by ARB's Scoping Plan (ARB 2008b). Therefore, it is assumed that GHG emissions associated with these life-cycle stages would be consistent with AB 32 requirements.

Notes: $CO_2e =$ carbon dioxide equivalent

Source: Modeling performed by AECOM in 2010.

As shown in Table 3.15-3, estimated GHG emissions from construction during the 25-year buildout of the proposed project would be approximately 15,470 MT of CO₂. This value accounts only for exhaust emissions of GHGs that would be generated by heavy-duty equipment, haul trucks, and vehicle trips, however. Additional GHG emissions would also be "embodied" in the materials selected for construction and the level of embodied GHG emission can vary substantially according to which materials are selected. This is particularly the case for construction of buildings and infrastructure that involves high quantities of cement, which is a key ingredient of concrete, given that ARB has identified cement production as an energy-intensive, GHG-intensive industry (ARB 2008b). In fact, ARB has included cement plants as a separate emissions sector in its demand-based GHG inventory for the state (ARB 2008b). Construction-generated exhaust emissions would be temporary and short term in that they would only occur during the buildout period, and they would not continue on an ongoing basis year

after year throughout the operational life of the development, as is the case with large stationarysource facilities or the operation of most land use developments. In addition, the regulatory environment that continues to evolve under the mandate of AB 32 is expected to reduce some of the GHG emissions from construction activity. ARB's Scoping Plan does not directly discuss GHG emissions generated by construction activity; however, it does recommend measures for improving the efficiency of medium- and heavy-duty on-road vehicles (1.4 MMT CO₂e) and expended efficiency strategies for off-road vehicles (e.g., forklifts, bulldozers). In addition, existing programs for air quality improvement in California, including the *Diesel Risk Reduction Plan* and the 2007 State Implementation Plan, will result in the accelerated phase-in of cleaner technology for virtually all of California's diesel engine fleets, including construction equipment (ARB 2008b). Measures implemented under these plans are likely to result in future fleets of construction equipment that are more GHG efficient than existing fleets. For these reasons, levels of GHG emissions associated with construction activity are expected to decrease over time as new regulations are developed under the mandate of AB 32.

Nonetheless, due to the intensity and duration of construction activities under development envisioned under the proposed General Plan, 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.

Policies in the proposed General Plan include a variety of actions aimed at avoiding and adapting to the impacts of climate change. In particular, the Infrastructure, Resources, and Conservation Element of the General Plan contains the following climate change policies:

- Proactively consulting with the State and appropriate agencies to effectively implement climate change legislation, including the California Global Warming Solutions Act (AB32) and California Senate Bill 375.
- Leading by example in reducing municipal greenhouse gas emissions.
- Maintaining and regularly updating its greenhouse gas emissions inventory, greenhouse gas emissions reduction target, and Climate Action Plan to track reduction of greenhouse gas emissions from the community and from municipal operations.

- Rationally relating greenhouse gas emissions reduction strategies to the sources of emissions identified in the inventory.
- Developing adaptation strategies to address the impacts of climate change upon the West Hollywood community and the Los Angeles Metropolitan Region.
- Expanding the tree canopy citywide to provide relief from rising temperatures and the heat island effect, and to sequester atmospheric carbon and help purify the air from emissions related to smog formation.
- Implementing heat island reduction strategies, including but not limited to strategies to increase permeable surfaces in the streetscape and buildings, increased vegetation and shade, and the use of reflective materials in the streetscape and buildings.
- Implementing policies in the Land Use and Urban Form Chapter of this General Plan that reduce building- and transportation-related greenhouse gas emissions.
- Implementing policies in the Mobility Chapter of this General Plan that encourage a shift in travel from single-occupant autos to walking, biking, public transit and ride-sharing, with a focus on policies that promote the following:
 - Increasing walking and biking within the City.
 - Increasing transit use and reducing barriers to transit ridership.
 - Increasing ride sharing.
 - Promoting alternatives to automobile ownership.
- Implementing policies in this Infrastructure, Resources, and Conservation Chapter that reduce greenhouse gas emissions related to water and wastewater, energy, green building, recycling and solid waste, and facilities for city operations, including policies that accomplish the following:
 - Reducing energy associated with the use, treatment and conveyance of water and wastewater.
 - Improving energy efficiency in existing buildings.
 - Ensuring high levels of energy performance in new construction.
 - Maximizing the use of renewable energy.
 - Reducing the amount of waste sent to landfills.

- Improving energy efficiency and increasing energy conservation within city facilities.
- Implementing policies in the Parks and Recreation and Land Use and Urban Form Chapters of this General Plan that increase green spaces throughout the City and provide carbon capture through trees, vegetation, and open space.

Additionally, the City is adopting a CAP that includes measures intended to reduce GHG emissions within City operations and the community at large. 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. Implementation of the CAP as proposed would reduce GHG emissions from construction thereby helping to achieve AB 32 goals. 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 nonstandard 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 construction-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. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If projectspecific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

Operations-Related GHG Emissions

GHG emissions would be generated throughout the operational life of the proposed project. Operational emissions would be generated by area, mobile, and stationary sources. Area-source emissions would be associated with activities such as combustion of natural gas for space and water heating, maintenance of landscaping and grounds, waste disposal, and other sources. Mobile-source emissions of GHGs would include project-generated vehicle trips for residents, employees, and visitors. In addition, increases in stationary-source emissions could occur at off-

site utility providers from electricity generation that would supply power to the proposed land uses. Thus, the GHGs associated with the consumption of electricity by the proposed land uses are considered an indirect source. On-site consumption of water would also result in indirect GHG emissions because of the electricity consumption associated with the off-site conveyance, distribution, and treatment of that water.

GHG emissions generated by operation of the proposed land uses under the General Plan would be primarily in the form of CO₂. Although emissions of other GHGs, such as CH₄ and N₂O, are important with respect to global climate change, the emissions levels of these other GHGs from the sources considered for this project are relatively small compared with CO₂ emissions, even when factoring in the relatively larger global warming potential of CH₄ and N₂O.

Direct operational CO₂ emissions were calculated using URBEMIS (Rimpo and Associates 2008). Indirect operational emissions associated with electricity consumption were estimated according to methodologies of the CCAR's *General Reporting Protocol* (CCAR 2009). Indirect operational emissions associated with water consumption were estimated using information provided by CEC (CEC 2007) as well as CCAR's *General Reporting Protocol* (CCAR 2009).

It should be noted that the GHG inventory and projections discussed in the "Existing Environmental Setting" section were prepared for community-wide emissions in the City. GHG emissions reported in Table 3.15-3 reflect the increase in GHG emissions that is anticipated to occur from the land use development anticipated to occur under the proposed General Plan. The inventory and projections were quantified for the purposes of the CAP to identify the contribution of each sector and define strategies and reduction measures that achieve the largest and most cost-effective GHG reductions in the City. In contrast, the focus of this EIR analysis is to evaluate the increase in GHG emissions that would occur with implementation of the proposed General Plan and identify potential impacts to climate change.

Operational GHG emissions were estimated for buildout of the proposed General Plan, in the Year 2035 and are presented in Table 3.15-3. 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. However, for many operational GHG emission sources, GHG emission rates for future years are not yet developed, partly because regulations continue to evolve under the mandate of AB 32. The URBEMIS model, as well as other GHG estimation protocols, does not yet account for the impact reductions of the future regulatory environment and future technological improvements that will result in GHG efficiencies. Thus,

this analysis uses the emissions estimates modeled for buildout as a proxy for evaluating GHG emissions associated with implementation of the proposed General Plan.

As shown in Table 3.15-3, estimated GHG emissions associated with operation of the land uses proposed under the General Plan would total approximately 125,000 MT annually. At buildout the increase in residential population accommodated by the Plan would be approximately 6,834 residents; and the increase in number of jobs associated with implementation of the proposed General Plan would be approximately 5,764. When estimated CO_2e emissions are normalized with respect to service population (combined increase in residential population and jobs), the average annual efficiency rate of operations under buildout of the proposed project would be 9.9 MT $CO_2e/SP/year$.

The circulation system in the City includes a multimodal system of sidewalks, bike lanes, transit services, alleys, and roadways. The City is served by major bus lines operated by the Metropolitan Transit Authority of Los Angeles County. The City also operates its own bus system, the Cityline bus system. Future development within the City will primarily take the form of redevelopment and infill development focused in the five commercial subareas discussed in Chapter 2, "Project Description." The proposed General Plan places a strong emphasis on multimodal circulation, transit-oriented development, and Travel Demand Management, which are measures intended to provide additional transportation choices and reduce VMT. In addition, the emissions rates used to estimate mobile-source GHG emissions do not account for GHG reductions that would result from the Low Carbon Fuel Standard, which was adopted as a discrete early-action measure of AB 32, or the CAA waiver that California received from EPA allowing the state to adopt more stringent fuel efficiency standards for passenger vehicles and light trucks (AB 1493, which is discussed in the "Regulatory Setting" section above).

With regard to the other largest category of operational GHG emissions shown in Table 3.15-3, indirect GHG emissions related to the consumption of fossil fuel-based electricity, these estimated emissions do not account for reductions that will result from future regulatory changes under AB 32. The estimate of these emissions is not discounted to reflect the alternative-energy mandate of SB 107, which requires Southern California Edison (SCE) and other electric utilities to provide at least 20% of its electricity supply from renewable sources by 2010 and 30% by 2020; this mandate would be fully implemented before buildout of the proposed General Plan. In addition, SB 1368 requires more stringent emissions performance standards for new power plants, both in state and out of state, that will supply electricity to California consumers. Thus, implementation of SB 1368 will also reduce GHG emissions associated with electricity consumption. Rates of energy consumption will be further reduced with implementation of the

2010 Green Building Regulations, which will replace Title 24 building standards with more stringent, energy-efficiency requirements.

Further reductions are also expected from other regulatory measures that will be developed under the mandate of AB 32, as identified and recommended in ARB's Scoping Plan (ARB 2008b). In general, the Scoping Plan focuses on achieving the state's GHG reduction goals with regulations that improve the efficiency of motor vehicles and the production (and consumption) of electricity. Thus, even with the implementation of no project-specific mitigation, the rate of GHG emissions from development under the proposed project is projected to decrease in subsequent years as the regulatory environment progresses under AB 32. Additionally, new technology improvements may become available or the feasibility of existing technologies may improve. Nonetheless, a complete picture of the future regulatory environment is unknown at this time. GHG reduction measures promulgated under the AB 32 mandate may not be sufficient to cause future development to achieve ARB's recommended 30% reduction from business-asusual emissions levels projected for 2020 (as discussed in the Scoping Plan) or the $CO_2e/SP/year$ goal discussed above.

Also worth consideration is that, for the moment, the total annual GHG emissions level associated with operation of the proposed project would exceed 25,000 MT of CO_2 per year throughout their operational life, which is the mandatory reporting level for stationary sources as part of implementation of AB 32. In comparison to this reporting level, the amount of operational GHG emissions of the proposed project would be considered substantial.

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.

As indicated in the analysis on construction-related GHGs, the proposed General Plan contains a variety of actions aimed at avoiding and adapting to the impacts of climate change.

Additionally, the City is adopting a CAP that includes measures intended to reduce GHG emissions within City operations and the community at large. 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. 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 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. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION

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. This impact is considered **potentially significant**.

As indicated in the analysis on operations-related GHGs, the proposed General Plan contains a variety of actions aimed at avoiding and adapting to the impacts of climate change.

Additionally, the City is adopting a CAP that includes measures intended to reduce GHG emissions within City operations and the community at large. 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. 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 regarding conflicts with applicable plans, policies, or regulations 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 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, this impact would remain **significant and unavoidable**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.15.5 MITIGATION MEASURES

Implementation of mitigation measures identified in Chapter 3.2, "Air Quality," will serve to reduce GHG emissions associated with the proposed General Plan to some extent. In addition, the City shall implement the following programmatic mitigation measures to further reduce potential impacts at this Program EIR level of analysis. Certain measures could already be considered components of the proposed General Plan or the CAP but are provided here for purposes of completeness. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

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).

- Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power.
- Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment. (emissions of oxides of nitrogen [NO_X] from the use of low carbon fuel must 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.

3.15.6 SIGNIFICANCE AFTER MITIGATION

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," that reduce construction and operational criteria air pollutant emissions would also reduce GHG emissions to some extent. Even with these measures, implementation of the proposed General Plan would continue to contribute to global climate change. Therefore, 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**.

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CHAPTER 4.0 ANALYSIS OF LONG-TERM EFFECTS

4.1 MAXIMUM THEORETICAL BUILDOUT SCENARIO

The theoretical buildout scenario is included in the Draft General Plan EIR to provide the reader with the ability to understand the worst-case scenario of full, but theoretical development of the General Plan. The theoretical buildout scenario demonstrates residential and nonresidential development levels that could theoretically be achieved by the proposed General Plan.

Unlike a forecast, the theoretical buildout scenario does not have a time horizon, such as 2035, nor does it include transportation, demographic, existing land use, or economic assumptions typically used by a forecasted model to provide more realistic land use planning data. Therefore, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units and nonresidential building square feet to allow the buildout estimates presented in Table 4-1.

The calculations in Table 4-1 assume that all Single-Family and Two-Family Residential designations would build out at a density of 1 unit per 3,500 square feet of lot area, and all Low Density Residential would build out at 1 unit per 2,000 square feet of lot area. The actual number of units permitted in these designations would vary depending on the size of individual parcels, and these conservative ratios were selected for ease of calculation. Residential unit totals assume that the maximum possible density bonus of 35% would be granted for all applicable lands based on meeting the affordability thresholds identified in Government Code Section 65915. Commercial square footage totals assume that a 0.5 floor area ratio (FAR) bonus would be granted for all commercial development based on meeting the City's mixed-use or creative office bonus criteria. Based on the existing household size (1.6 residents per household), the City's population under the maximum buildout scenario would be 53,118.

		Maximum	Maximum
	Maximum	Residential	Nonresidential
Land Use Designation	Density/Intensity	Units	Square Feet
Residential Designations			
Single-Family and Two-Family Residential R1A	1 unit/3,500 SF lot area	70	
Single-Family and Two-Family Residential R1B	1 unit/3,500 SF lot area	1,483	
Single-Family and Two-Family Residential R1C	1 unit/3,500 SF lot area	9	
Low Density Residential R2	1 unit/2,000 SF lot area	1,793	
Medium Density Residential R3A	36 du/acre*	1,226	
Medium Density Residential R3B	36 du/acre*	5,824	
Medium Density Residential R3C	36 du/acre*	1,319	
Medium Density Residential R3C-C	36 du/acre*	75	67,082
High Density Residential R4A	50 du/acre*	5,930	
High Density Residential R4B	50 du/acre*	10,536	
High Density Residential R4B-C	50 du/acre*	139	89,734
Commercial Designations			
Commercial Neighborhood CN1	FAR 1.0*	116	387,140
Commercial Neighborhood CN2	FAR 1.0*	229	762,028
Community Commercial CC1	FAR 1.5*	1,585	4,695,332
Community Commercial CC2	FAR 2.0*	907	2,518,857
Commercial Arterial CA	FAR 2.5*	302	805,642
Commercial Regional Center CR	FAR 3.0*	1,027	2,661,952
Other Designations			
Movietown Specific Plan	NA	370	32,300
Pacific Design Center Specific Plan	NA		1,573,400
Sunset Specific Plan	NA	259	1,180,000
Public Facilities	NA		1,027,415
Grand Total		33,199	15,800,882

Table 4-1. Daily Performance Measures

*A bonus is possible. Residential bonus includes a maximum 35% bonus for affordable housing. Commercial bonus includes a 0.5 FAR bonus for either Creative Office or Mixed Use.

Notes: Commercial designations are assumed to build out with 75% of the FAR in commercial and 25% in residential, plus bonuses.

Source: Raimi 2010, adapted by AECOM

Theoretical buildout assumes full development of all land in the City, pursuant to the maximum density and/or intensity specified in the Land Use and Urban Form Element of the proposed General Plan. Such development would represent a substantial change in the level of residential and nonresidential development described for existing conditions. There are 24,573 existing residential units and 11,336,731 square feet of existing nonresidential uses in the City. The 2008 population is 37,348. Under the theoretical buildout scenario, when compared to existing conditions, there would be a 35% increase in total housing units, a 39% increase in nonresidential (commercial, industrial and public) building square feet, and a 42% increase in population.

Given the generalized, highly theoretical nature of this buildout analysis, the analysis did not account for variations due to the implementation of additional regulations or site-specific conditions that could affect attainment of density. For example, parking requirements, slope and other land suitability characteristics, and implementation of environmental regulations may make attainment of maximum densities and/or intensities infeasible, and site-specific easements may restrict development of certain properties to levels below what is permitted by the zoning. Another variable is that decision makers have the authority to approve, deny, or modify discretionary projects based on numerous site-specific factors.

4.1.1 AESTHETICS AND VISUAL RESOURCES

Under the General Plan buildout scenario, the basic neighborhood character and aesthetic quality of the environment would remain the same, with some alteration of specific sites, primarily in commercial corridors, as redevelopment occurs. Under the theoretical buildout scenario, neighborhoods that are below maximum buildout could be subject to redevelopment to achieve buildout. As such, the neighborhood character and the aesthetic quality of many areas could be dramatically altered. Areas currently occupied by single-family homes in areas that allow multifamily uses would be redeveloped with the allowed additional density. Development in commercial areas would also be enlarged to meet maximum buildout potential, which would be strikingly different from the current environment. View corridors would be substantially altered if not blocked completely in some areas based on the construction of higher new buildings compared to existing structures. Due to the magnitude of change in intensity of development under the theoretical buildout scenario and the lack of information on specific development projects and associated project-level mitigation, the impacts to aesthetics and visual resources would be significant and unavoidable under the maximum development scenario.

4.1.2 AIR QUALITY

Under theoretical buildout conditions, the increased development capacity and density would add a substantial number of automobile or transit trips and stationary source emissions, which could potentially affect West Hollywood's ability to meet regional, state, and federal clean air standards, including the RAQS or SIP.

This increase in development could also create air emissions that could substantially degrade ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations. The construction needed to create this increase in density would be a considerable source of NO_X , CO_2 , and ROG from the diesel fuel used to operate construction
equipment. In addition, construction activities associated with the theoretical buildout scenario would generate additional vehicle trips by construction workers traveling to and from construction sites. Therefore, implementation of the theoretical buildout scenario would result in localized short-term air quality impacts. Although the proposed General Plan includes policies and implementation programs that would lessen impacts, the magnitude of change in the level of residential and nonresidential development under the theoretical buildout scenario would result in substantial numbers of new residents, visitors, and workers in the City. Increasing the density of development in the City could potentially increase the share of trips completed by alternative modes, including pedestrian, bike, and transit trips, and result in lower per capita energy use compared to existing conditions or the anticipated development under the proposed General Plan. However, the volume of emissions would still be expected to increase and would result in impacts to air quality that could not be mitigated without major advancements in technology or restrictions on travel. It is also infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less-than-significant level since no specific development projects are known. Therefore, impacts would be significant and unavoidable.

4.1.3 BIOLOGICAL RESOURCES

The urban environment in the City of West Hollywood does not support sensitive species, migration corridors, riparian habitat or other sensitive natural communities, or wetlands; there would be no impact in these issue areas under the maximum theoretical buildout. Similarly, there are no habitat conservation plans or natural community conservation plans that apply to the City. Construction activities and new development that could occur under the theoretical buildout scenario would still be required to comply with existing federal, state, and local laws and regulations, and impacts related to regulatory compliance would not be different from the proposed project.

4.1.4 CULTURAL RESOURCES

As part of the development required to achieve the theoretical buildout scenario, extensive ground disturbance would occur during redevelopment of most of the City. The area of ground disturbance would be much larger than would be anticipated under the preferred General Plan scenario. Because the majority of these projects would be infill and redevelopment, this grading would occur on previously graded surfaces. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots, and lots containing surface parking; etc.). Previously excavated areas are generally considered to have a low potential for archaeological or historic resources, since the

soil containing such resources has been removed. However, projects required to create the theoretical buildout scenario likely would involve underground parking areas, underground tanks, new pipelines, or replacement of pipelines, all at a lower depth than the previous development.

Although the General Plan includes policies and implementation programs that would lessen impacts, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less-than-significant level since no specific development projects are proposed. Due to the magnitude of ground disturbance that would be required to support the infill and redevelopment of residential and nonresidential densities under the theoretical buildout scenario and the lack of mitigation available for historic resources, the potential for adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites; or impacts to existing archeological resources or the disturbance of any human remains, including those interred outside formal cemeteries, would be significant and unavoidable.

4.1.5 GEOLOGY, SOILS, AND MINERAL RESOURCES

Although the General Plan may allow for a theoretical increase in density, the City is already built out at urban densities. Although buildout of the maximum development scenario would result in larger numbers of people and structures potentially exposed to seismic and soil hazards, new buildings and utilities would be constructed according to state and local regulations to minimize geologic hazards. Impacts related to geology, soils, and mineral resources would be less than significant for the maximum buildout scenario, similar to the proposed General Plan.

There are no known mineral resources located within the planning area, and only marginal extraction is occurring from oil fields in the City. As with the proposed General Plan, no significant impact to mineral resources would occur under the theoretical buildout scenario.

4.1.6 HAZARDS AND HAZARDOUS MATERIALS

During redevelopment at the maximum permitted density, construction could occur on contaminated sites located throughout the City. This increased development could also lead to an increase in the use, transport, and disposal of hazardous materials, including the number of underground storage tanks, and thus potentially more leaking underground storage tanks. All of these conditions would create a much more substantial risk of exposure to people or sensitive

receptors (including schools) to potential health hazards over the General Plan scenario because of the amount of development that would occur to create theoretical buildout conditions.

There would also be a considerable growth in population associated with the increased density under the theoretical buildout conditions. As such, more people and structures would be at risk of significant loss, injury, or death from wildland fires, flooding, mudflows, or underground gas hazards because there would be more people, structures, and construction activities in the plan area community. The policies and programs of the General Plan, along with implementation of the City's existing Hazard Mitigation Plan and SEMS/NIMS procedures would avoid conflict with adopted emergency plans for the maximum buildout scenario.

Although the General Plan includes policies and implementation programs that would lessen impacts, the magnitude of change in the level of residential and nonresidential development under the theoretical buildout scenario and associated growth would be significant. Since no specific development projects are proposed, it is infeasible at this Program EIR level to provide specific mitigation measures that would reduce impacts to a less-than-significant level. Therefore, impacts associated with hazards and hazardous materials would be significant and unavoidable.

4.1.7 HYDROLOGY AND WATER QUALITY

Although the theoretical buildout scenario would result in development and redevelopment throughout the City, West Hollywood is already built out at urban densities. No new areas of impermeable surface would be created; there would be no substantial change in absorption rates, drainage patterns, groundwater infiltration, or the rate of surface runoff. New construction would be required to comply with federal, state, and local regulations governing water quality and pollution prevention; water quality impacts would be less than significant, as with the proposed project. Some areas of the City are subject to dam inundation or flood hazards, and more residents and structures would be exposed to these hazards under the maximum development scenario than the proposed plan. However, implementation of policies and programs of the General Plan, along with required mitigation from this EIR, would reduce these risks to a less-than-significant level.

4.1.8 LAND USE AND PLANNING

The extensive redevelopment required to achieve the theoretical buildout scenario could create substantial incompatibilities such as bulk, shading, and noise between adjacent land uses as

existing buildings are removed and replaced with more dense or intense development. Although the General Plan contains policies and implementation programs that would reduce impacts, it is infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less-than-significant level, since specific development projects are not known. Due to the magnitude of growth under the theoretical buildout scenario and the lack of specific development projects and associated project-level mitigation, impacts related to land use and planning would be significant and unavoidable under the theoretical buildout scenario.

4.1.9 NOISE

The existing General Plan, Noise Ordinance, and applicable standards of other agencies were not written in anticipation of future development that would necessitate the theoretical buildout condition. Almost all noise planning documents addressing noise in the region rely on SCAG forecasts. No forecast analysis produced by SCAG has projected the population and level of development within the City similar to that of the theoretical buildout scenario. As such, the increase of noise from the construction related to the redevelopment required for this theoretical condition, as well as noise generated by the increased number of automobile or transit trips from the associated population increase, would cause exposure of sensitive receptors to future noise levels that would exceed established standards. Increased noise related to construction activities and population growth would also cause a substantial increase in the existing ambient noise levels and would create land use incompatibilities associated with increased noise.

Although the General Plan includes policies and implementation programs that would lessen impacts, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less-than-significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and nonresidential development under the theoretical buildout scenario and the lack of specific development projects and associated project-level mitigation, all impacts to noise would be significant and unavoidable under the theoretical buildout scenario.

4.1.10 PALEONTOLOGICAL RESOURCES

As part of the development required to achieve the theoretical buildout scenario, extensive ground disturbance would occur during redevelopment of most of the City. The area of ground disturbance would be much larger than would be anticipated under the preferred General Plan scenario. The majority of these projects would be infill and redevelopment, and would occur on previously graded surfaces. The likelihood of encountering paleontological resources is greatest

on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots, and lots containing surface parking; etc.). Previously excavated areas would have lower potential for paleontological resources, since the soil containing such resources has been removed. However, projects required to create the theoretical buildout scenario likely would involve underground parking areas, underground tanks, new pipelines, or replacement of pipelines, all at a lower depth than the previous development.

Although the General Plan includes policies and implementation programs that would lessen impacts, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less-than-significant level since no specific development projects are proposed. Due to the magnitude of ground disturbance that would be required to support the infill and redevelopment of residential and nonresidential densities under the theoretical buildout scenario and the lack of mitigation available for paleontological resources, the potential for adverse effects to paleontological resources would be significant and unavoidable.

4.1.11 POPULATION AND HOUSING

To achieve the theoretical buildout scenario, there would be major changes in the overall level of development Citywide, much more than projected under the General Plan scenario. This conversion would lead to substantial displacement of residents as older existing residential units are replaced. Although the General Plan contains implementation programs that would seek to reduce displacement impacts, it is infeasible at this Program EIR level to provide mitigation that can reduce such impacts to a less-than-significant level, since specific development projects are not known. For this reason and due to the magnitude of change in the level of residential and nonresidential development under the theoretical buildout scenario, the impact from the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing, would be significant and unavoidable.

4.1.12 PUBLIC SERVICES AND UTILITIES

Buildout of the City at the theoretical maximum would lead to considerably larger populations of residents and employees within the City, well beyond anticipated growth scenarios for West Hollywood developed by SCAG. This growth in population would require an increase of public services, which would in turn necessitate the construction of additional or improved public facilities. These new and upgraded facilities could cause significant environmental impacts in order to construct the facilities and services necessary to maintain service ratios, response times, or other performance objectives.

Additionally, all public utility planning has not been written in anticipation of the growth that would occur with the theoretical buildout condition. Almost all utility planning documents in the region rely heavily on population growth and development projection data provided by SCAG. No population growth analysis produced by SCAG has projected the population within the planning area similar to that of the theoretical buildout scenario. As such, excessive amounts of water beyond projected available supplies and excessive amounts of electrical power, fuel, or other forms of energy would result. In addition, with increased population and development, there would be more demand for utilities under the theoretical buildout scenario and the construction of new or physically altered utilities could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives. Due to the magnitude of change in the level of residential and nonresidential development under the theoretical buildout scenario and the lack of specific development projects and associated project-level mitigation, impacts to public services and utilities would be significant and unavoidable under the theoretical buildout scenario.

4.1.13 RECREATION

The considerable population growth and increase in development associated with the theoretical buildout scenario can be expected to create impacts associated with construction of additional or improved park and recreational facilities and a substantial increase in the use of park and recreation facilities. For these reasons, these impacts would be significant and unavoidable.

4.1.14 TRAFFIC AND TRANSPORTATION

The City's transportation system already operates beyond its design capacity, and the population increase and employment growth associated with the theoretical buildout scenario would further affect roadway volumes and intersection LOS. It is likely that there would be substantial increases of the number of average daily trips and percent of daily vehicle miles traveled at LOS E or F on the City's roadways. Although the increased density of the maximum buildout scenario would likely increase the variety of uses present within the City, mixed-use development and increased bicycle and pedestrian options within the City would have a minimal effect on the pass-through traffic to and from other parts of the region. New residential and nonresidential uses would be required to provide parking in compliance with the City's parking standards, so parking impacts of the maximum buildout scenario would be less than significant. It is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less-than-significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and nonresidential development under the

theoretical buildout scenario and the lack of specific development projects and associated project-level mitigation, impacts related to transportation and circulation would be significant and unavoidable.

4.1.15 GLOBAL CLIMATE CHANGE

Buildout of the City at the theoretical maximum would lead to considerably larger populations of residents and employees and major changes in the overall level of development Citywide, which is much more than projected under the General Plan scenario.

Construction-generated emissions would be temporary and short term; 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. However, given the information available today, GHG emissions associated with construction of the theoretical buildout scenario would result in a cumulatively considerable incremental contribution to the significant cumulative impact of climate change.

The total GHG emissions associated with project operations under the theoretical buildout scenario would be considered substantial because of greater population and overall development levels and, due to the uncertainty about whether the future regulations developed through implementation of AB 32 would cause operational emissions to be 30% lower than business-as-usual emission levels or achieve the CO2e/SP/year goal, the maximum theoretical buildout scenario would result in an even greater cumulatively considerable contribution to a significant cumulative impact related to long-term operational generation of GHGs than the proposed General Plan. Adherence to state regulations and proposed General Plan regulations and policies, and implementation of mitigation measures would reduce construction- and operation-related incremental GHG emissions associated with the maximum buildout scenario. Even with these measures, implementation of the maximum buildout scenario would result in a cumulatively considerable contribution to a significant cumulative impact.

4.2 CUMULATIVE IMPACTS

CEQA requires the discussion of the cumulative impacts, growth-inducing impacts, and long term impacts of proposed projects. The following sections address these issues as they relate to implementation of the West Hollywood General Plan.

The CEQA Guidelines define cumulative effects as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." The CEQA Guidelines further state that the individual effects can be the various changes related to a single project or the changes involved in a number of other closely related past, present, and reasonably foreseeable future projects (Section 15335). The CEQA Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List Method A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- Regional Growth Projections Method A summary of projects contained in an adopted general plan or related planning document or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact (Section 15130).

The proposed General Plan establishes policy to guide future development within the City and implementation that is long term in nature. The Regional Growth Projections Method is appropriate in evaluating cumulative impacts because it provides general growth projections for the region and considers long-term growth.

SCAG, composed of Los Angeles, Orange, Riverside San Bernardino, Ventura, and Imperial counties, has adopted growth forecasts for each county within the SCAG region, through the year 2035. The following cumulative impact analysis utilizes the regional growth projections contained in the May 2008 Regional Transportation Plan Population, Housing, and Employment forecasts.

As shown in Table 4-2, the adopted SCAG Growth Forecasts for Los Angeles County project a 2035 total population of 12,338,620 for Los Angeles County and 4,003,501 households.

Implementation of the General Plan would add population growth of 6,834 and 4,274 housing units to West Hollywood, leading to buildout projections of 44,182 population and 28,847 housing units in 2035. The population growth rate from 2008 to 2035 is approximately 18% for West Hollywood and 19% for the County of Los Angeles.

	City of West	Hollywood ¹	County of Los Angeles ²		
	2008	2035	2008	2035	
Population	37,348	44,182	10,301,658	12,338,620	
Housing	24,573	28,847	3,403,577	4,003,501	

Table 4-2 City	of West Holly	wood and Los) salanna s	County Growt	h Forecast
1 able 4-2. City		ywuuu anu Lus	S Allyeles C	Soundy Grown	III UIECasi

¹ For 2008, population is Department of Finance (DOF) data and housing is based on Raimi and Associates projections. For 2035, total population growth is based on 2008 population of 37,348 from DOF plus 4,274 housing units at 1.6 persons per household. Housing is projected housing units.

² 2008 data are DOF data. 2035 data are based on SCAG projections. For 2035, housing is households projected by SCAG, not housing units.

It should be noted that forecasts such as the one prepared for the 2008 Regional Transportation Plan Growth Forecast Report are prepared as planning tools and do not predict the course of future events. SCAG's forecasts, which are based on adopted general plan land use policies for jurisdictions, among other factors, are used primarily to prepare the Regional Transportation Plan (RTP) and to provide inputs into air quality management plans. Experience shows that these forecasts are most reliable at the regional and county levels and less so for smaller areas like cities and census tracts.

SCAG's current projections for the City of West Hollywood reflect the current (1988) General Plan, not the proposed General Plan. The population capacity of the proposed General Plan is higher than SCAG's 2035 estimate. It is likely that West Hollywood's growth projections would be revised upward in future SCAG planning documents to reflect proposed General Plan projections.

The geographic area that could be affected by the General Plan varies depending on the type of environmental resource being considered. The general geographic area associated with different environmental effects of the General Plan defines the boundaries of the area considered in the cumulative impact analysis. Each section of this Program EIR considers the specific geographic segment of this growth that is directly related to the individual topic addressed within that section. For example, the analysis of air quality, noise, and transportation and circulation impacts is based on growth on a regional level because these impacts are regional in nature, whereas an aesthetic impact, given its localized impact area, only considers related projects in the vicinity of the project site. Table 4-3 presents the general geographic areas associated with the different resources addressed in this Program EIR analysis.

Resource Issue	Geographic Area
Aesthetics	Local (City and adjacent communities)
Air Quality	Regional and Local
Biological Resources	Regional and Local
Cultural Resources	Local
Geology, Soils, and Mineral Resources	Local
Hazards and Hazardous Materials	Local
Hydrology and Water Quality	Regional
Land Use and Planning	Local
Noise	Regional and Local
Paleontological Resources	Local
Population and Housing	Regional and Local
Public Services and Utilities	Regional
Recreation	Regional and Local
Transportation and Traffic	Regional and Local
Global Climate Change	Global, Statewide, and Local

Table 4-3. Geographic Scope of Cumulative Impacts

4.2.1 AESTHETICS

Cumulative impact of future development within the City of West Hollywood pursuant to General Plan land use and urban form policy will not disrupt public or private scenic vistas of resources such as the Hollywood Hills and the Los Angeles Basin. The City's scenic view preservation policies, as implemented through the SSP, will avoid cumulative impacts to scenic vistas within the City. With regard to the adjacent communities of Los Angeles and Beverly Hills with hillside areas, these jurisdictions also have policies in place to protect hillside and scenic resources. Future development in the City will not contribute to any cumulative adverse aesthetic impact relative to scenic vistas.

Future development associated with the proposed General Plan and future development in surrounding communities may increase the amount of light and glare in the area. Given that the area is entirely urban, light is considered part of the existing environment and is important for public safety. Through the development review process, the City also regulates outdoor lighting and building materials to avoid adverse light and glare effects. Current City practices sensitively address light and glare concerns. Thus, local contribution to any regional increase in light levels will not be significant.

4.2.2 AIR QUALITY

The South Coast Air Basin (Basin) is in nonattainment for ozone and particulate matter (both PM_{10} and $PM_{2.5}$). Future urban development would add to this air quality problem by adding

vehicle trips and accommodating construction, and through other means, resulting in a significant cumulative impact. The proposed General Plan would make a cumulatively considerable contribution to this significant cumulative impact.

Given that compliance with applicable rules and regulations would be required for the control of stationary-source emissions of toxic air contaminants (TACs), both on-site and off-site, the contribution of the proposed General Plan to long-term cumulative increases in stationary-source TAC concentrations would be less than cumulatively considerable. No major nonpermitted sources of TAC emissions are proposed as part of the General Plan. Exposure to TAC emissions from mobile sources, specifically diesel exhaust PM, is of growing concern within the Basin, and no restrictions on where sensitive receptors will be located relative to major roadways are currently in place. For this reason, this would be a significant cumulative impact. The proposed General Plan would make a cumulatively considerable contribution to this significant cumulative impact.

Implementation of the proposed General Plan would not result in significant air quality impacts related to carbon monoxide emissions from local mobile sources. Because the model used in the traffic analysis is a regional transportation model that includes development forecasted in the City through 2035, this is representative of the cumulative condition. Thus, this would be a less than significant cumulative impact.

4.2.3 BIOLOGICAL RESOURCES

Future growth within the City of West Hollywood and surrounding areas within the Cities of Los Angeles and Beverly Hills generally will have a less-than-significant impact to biological resources. As a built-out urban environment, West Hollywood does not support sensitive vegetation or wildlife habitat. The City of Beverly Hills, which borders West Hollywood to the west, has few relatively undisturbed areas within the City located near the foothills of the Santa Monica Mountains and in open space areas located in the portion of the City north of Sunset Boulevard (City of Beverly Hills 2008). The community of Hollywood in the City of Los Angeles contains highly concentrated open space in one area of the Hollywood Hills community area (City of Los Angeles 2009). As built urban environments, these communities largely do not support sensitive vegetation or wildlife habitat. However, future development will impact biological resources with the removal and replacement of street trees.

In addition to the regulations on the treatment of street trees and trees on public lands in the City's Municipal Code, as well as the requirements under the Heritage Tree Program, policies in

the proposed General Plan require new development projects to install street trees consistent with the City's street tree specifications along public sidewalks adjacent to the project site where such street trees do not currently exist or where replacement is needed. Policies also encourage the planting of native species.

Future development projects within the City and its vicinity would be subject to all applicable federal, state, regional, and local policies and regulations related to the protection and conservation of biological resources, including, but not limited to, FESA, MBTA, CESA, California Fish and Game Code, and CEQA. Therefore, the proposed General Plan would not result in a cumulatively considerable contribution to a cumulative impact. Impacts would be less than significant.

4.2.4 CULTURAL RESOURCES

Development pursuant to the proposed General Plan will have the potential to impact historical and archaeological resources, and human remains. Historic resources could be impacted due to development activities. Actions that could directly affect historical structures include demolition, seismic retrofitting, and accidents or vibration caused by nearby construction activities. There is also potential for unknown and previously undisturbed archaeological resources, and human remains to be found within West Hollywood as redevelopment activities occur through earthmoving, excavation, or similar activities. However, implementation of regulations, standards, and General Plan policies identified in Section 3.4 of this EIR will reduce impacts related to cultural resources to a less-than-significant level. Future development projects will be reviewed by the City per CEQA to identify potential impacts to cultural resources on a project-by-project basis. If project-level impacts are identified, specific mitigation measures will be required. Thus, future development according to the proposed General Plan will not result in cumulatively significant impacts to cultural resources.

4.2.5 GEOLOGY, SOILS, AND MINERAL RESOURCES

Future development allowed under the proposed General Plan would expose additional people and structures to ground shaking, fault rupture, liquefaction, and earthquake-induced landslides as development occurs in hazard areas throughout the City. Future development may also be constrained by unstable soils, including expansive, collapsible, or unstable soils; landsliding; and debris flows. However, implementation of state, federal, and local laws and regulations, along with programs and policies of the proposed General Plan, will reduce impacts related to soils, geology, and mineral resources to a level less than significant. Geology and soil hazards are related to conditions and circumstances at specific, individual sites. Although cumulative development in the region may include numerous projects with geologic and soil impacts, these impacts would affect each individual project, rather than result in an additive cumulative effect. Therefore, development of related projects and other development in the region are not considered to result in a cumulatively significant impact related to geology and soil hazards. In the absence of a cumulatively significant impact, the project would not result in a cumulatively considerable contribution to a significant cumulative impact related to geology and soil hazards. Because the proposed project would not result in a change in the availability of mineral resources, there would be no cumulative impact to the availability of mineral resources.

4.2.6 HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials impacts are geographically localized; local hazards impacts in Beverly Hills or surrounding areas of Los Angeles would generally not have an additive or cumulative effect when combined with local hazard impacts in the City of West Hollywood. Future infill development and redevelopment allowed by the proposed General Plan would increase the number of people exposed to hazards related to hazardous materials and wildland fires. Additional development or redevelopment has the potential to place new or additional residents in proximity to existing commercial areas, or create new commercial areas in proximity to existing residents. However, implementation of existing federal, state, and local regulations, along with policies and programs of the proposed General Plan, would reduce public health hazards to a less-than-significant level. The proposed project would not contribute to a significant cumulative impact.

4.2.7 HYDROLOGY AND WATER QUALITY

Future development within the City of West Hollywood and surrounding areas of the Los Angeles region has the potential to increase the amount of pollutants, runoff, and impervious surfaces within the region. 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. Erosion and sedimentation may occur during construction activities, which may impact surface water bodies as well. Future development and redevelopment activities in the City are not expected to substantially increase the amount of existing impervious surfaces and, in fact, site redevelopment may provide opportunities to create new permeable surfaces through new landscaping and use of porous pavements, potentially reducing the amount of runoff and associated pollutants. Development associated with the proposed General Plan is

not expected to alter existing drainage or contribute to flood risks by creating additional stormwater. Implementation of General Plan policies and programs, along with mitigation measures identified in Section 3.7.5 of this EIR and implementation of BMPs in accordance with the NPDES permit, will reduce impacts related to hydrology and water quality to a less-than-significant level. Because implementation of the proposed General Plan would not create substantial new pollutant sources or increase stormwater flows (and in fact would potentially reduce these flows), implementation would not result in a significant cumulative hydrology and water quality impact.

4.2.8 LAND USE AND PLANNING

SCAG is the regional organization that provides guidance for planning for the region. Development activities in accordance with proposed General Plan policies will be implemented according to the recommended distribution and intensity identified in the Urban Form Land Use Element. Future development will comply with adopted land use standards, policies, and ordinances and will be compatible with surrounding land uses consistent with the policies in the Land Use and Urban Form Element, and Noise Element. The proposed General Plan is consistent with the SCAG RCP and Guide, the RTP, and the Compass Growth Vision Principles because the proposed General Plan incorporates policies that call for more infill and mixed-use development in primarily commercial subareas that would reduce vehicular trips through enhanced walking, biking, and transit infrastructure and services. The commercial subareas are adjacent to existing employment and transit services and are adjacent to or within walking distance of commercial services. The proposed General Plan policies to guide growth and development would not allow development activities and circulation improvements at a scale that would physically divide established communities either within the City or surrounding areas. Therefore, implementation of the proposed General Plan will not contribute to a significant cumulative land use and planning impact.

4.2.9 NOISE

The assumptions in the noise analysis for the proposed General Plan include traffic and other noise sources from all other potential areawide development pursuant to policies in the proposed General Plan. As such, the analysis of potential noise impacts addresses cumulative noise impacts as well.

Implementation of the proposed General Plan will result in additional development within the City, primarily in the commercial subareas, which will generate noise and potentially vibration

during construction activity. If construction activities occur during more noise-sensitive hours or if construction equipment is not properly equipped with noise control devices, construction noise and vibration could exceed applicable standards. A substantial temporary increase in the ambient noise environment at nearby noise-sensitive receptors could also occur.

Development pursuant to the proposed General Plan will also increase traffic volumes and associated noise levels. Significant noise levels already occur along many of the City's transportation corridors.

Point source noise levels associated with commercial land uses could potentially exceed the City of West Hollywood noise standards at nearby existing and future noise-sensitive receptors, particularly mixed-use development in the commercial subareas.

Implementing local noise ordinances, constructing buildings according to state acoustical standards, proper land use planning, and implementation of the mitigation measures and proposed General Plan policies identified in Section 3.9 of this EIR will reduce cumulative impacts to new noise-sensitive land uses to a less-than-significant level. Thus, future development according to the proposed General Plan will not result in cumulatively significant noise impacts.

4.2.10 PALEONTOLOGICAL RESOURCES

Fossil discoveries resulting from excavation and earth-moving activities associated with development are occurring with increasing frequency throughout the state. The value or importance of different fossil groups varies depending on the age and depositional environment of the rock unit that contains the fossils, their rarity, the extent to which they have already been identified and documented, and the ability to recover similar materials under more controlled conditions (such as for a research project). Unique, scientifically important fossil discoveries are relatively rare, and the likelihood of encountering them is site specific and based on the type of specific geologic rock formations found underground. These geologic formations vary from location to location.

The General Plan update would result in a less-than-significant impact to paleontological resources, because implementation of Mitigation Measure 3.10-1 would require that construction workers be alerted to the possibility of encountering paleontological resources, and in the event that resources were encountered, that fossil specimens be recovered and recorded and undergo appropriate curation. When unique, scientifically important fossils are encountered by

construction activities, the subsequent opportunities for data collection and study generally provide a benefit to the scientific community. Therefore, because of the site-specific nature of unique paleontological resources; the low probability that any individual project would encounter unique, scientifically important fossils; and the benefits that would occur from recovery and further study of those fossils if encountered, development of related projects and other development in the region are not considered to result in a cumulatively considerable impact related to paleontological resources. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative impact related to paleontological resources.

4.2.11 **POPULATION AND HOUSING**

New development pursuant to proposed General Plan land use policy will result in approximately 4,274 new dwelling units and an additional 2.6 million square feet of nonresidential building floor area at buildout. A net population increase of approximately 6,504 persons is anticipated, as is a net increase of approximately 4,551 jobs. The population increase is intended in part to meet regional housing needs over the long term and to respond to the housing needs of West Hollywood's diverse demographic.

Even though the proposed General Plan does not propose new development, the development capacity allowed by the proposed General Plan could result in an increase in population (18.3%) and housing units (17.4%) over 2008 levels. 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. Additionally, proposed General Plan policies require improvements to the City's infrastructure and public facilities to be made incrementally to support anticipated growth. The increase in population and housing unit growth would not contribute to a cumulatively significant population and housing impact.

4.2.12 PUBLIC SERVICES AND UTILITIES

The geographic scope of cumulative public services impacts is generally limited to the jurisdiction under analysis. However, shortages of certain public services in one jurisdiction can lead to unanticipated demand for public services from nearby and regional service providers. The analysis in Section 3.12 of this Program EIR assesses the cumulative, long-term impacts of growth within the City of West Hollywood on police protection, fire protection, the library, schools, water service, sewer service, gas and electricity services, and solid waste services. As concluded for each of these issue areas, with the exception of water supply, impacts will be less

than significant. Impacts related to police protection and fire protection will be reduced to a lessthan-significant level with mitigation.

Future growth within the City of West Hollywood will increase demand for these services. To meet this increased demand, service providers will continue to evaluate their levels of service available and the funding sources available to meet increases in demand. Although the ability of local service providers to provide specific levels of services varies throughout the region, sound local planning to accommodate future growth, and adherence to policies and programs in the General Plan, along with implementation of the mitigation measures contained in this Program EIR, would reduce cumulative impacts associated with the provision of services and utilities to a less-than-significant level, with the exception of water supply.

Due to uncertainty in the long-term provision of adequate water supply, the proposed General Plan in combination with other future cumulative projects that increase demand for water supply could result in decreases in imported water from MWD. The issue is statewide, however, and would result from the cumulative nature of projects within and beyond the region. Therefore, implementation of the proposed General Plan would contribute to a potentially cumulatively considerable, significant and unavoidable water supply impact.

4.2.13 RECREATION

Future growth within the City of West Hollywood and surrounding areas within Los Angeles and Beverly Hills will increase demand for parks and recreation facilities. To meet this increased demand, the City of West Hollywood and other local jurisdictions will continue to evaluate both the amount of recreational facilities available and the funding sources available to meet increases in regional demand.

The proposed General Plan contains numerous policies to encourage the acquisition of additional parkland and open space by prioritizing funding for parkland, purchasing parcels adjacent to existing parks if available, pursuing joint use agreements, continuing the assessment of park and open space development fees, and creating a master park expansion/improvement plan. However, the City's size and absence of vacant, undeveloped properties for the development of new park space, as well as the high land values in West Hollywood, make it unlikely for the City to expand park property.

The City of Beverly Hills General Plan, and the Hollywood and Wilshire Community Plans, which comprise a portion of the City of Los Angeles General Plan, contain policies and programs to maintain and improve parks.

Even though implementation of the General Plan will increase the demand for local and regional parks, the Cities of West Hollywood, Beverly Hills, and Los Angeles have policies and programs in place to maintain and enhance existing parks. Therefore, the potential for physical deterioration of parks in West Hollywood and adjacent jurisdictions is a less-than-significant impact.

4.2.14 TRANSPORTATION AND TRAFFIC

Traffic and roadway impacts discussed in Section 3.14, "Transportation and Traffic," include the cumulative impact contribution expected from growth and changes to transportation infrastructure in the City and its surrounding region. As discussed in Section 3.14, impacts related to intersection LOS are significant, including significant impacts related to intersections included in the County CMP. For most intersections, no feasible mitigation is available, and implementation of mitigation at several intersections would not reduce impacts to a less-than-significant level. The proposed General Plan would not result in impacts related to roadway design changes, so no contribution to any cumulative impact related to design components would occur. Similarly, less-than-significant impacts of the project on air traffic patterns and emergency access would not contribute to significant cumulative impacts because the scale of any such effects would be local. Impacts related to alternative transportation would be beneficial; the plan proposes numerous policies and programs that would improve and expand alternatives to automobile transportation in the City of West Hollywood.

4.2.15 GLOBAL CLIMATE CHANGE

As discussed in Section 3.15, the proper context for addressing this issue in an EIR is as a discussion of cumulative impacts, because although the emissions of one single project will not cause global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. Implementation of the proposed project would lead to incremental construction- and operations-related GHG emissions that are cumulatively considerable and significant and unavoidable.

4.3 GROWTH-INDUCING IMPACTS

Section 15126 of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing. Direct growth-inducing impacts are generally associated with the provision of urban services and the extension of infrastructure to an undeveloped area. The extension of services and facilities to an individual site can reduce development constraints for other nearby areas and can serve to induce further development in the vicinity. Indirect or secondary growth-inducing impacts consist of growth induced in the region by the additional demands for housing, employment, and goods and services associated with population increase caused by, or attracted to, new development.

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.

Table 4-4 shows the change in development capacity between existing conditions and proposed General Plan buildout. 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.

	Existing 2008	General Plan Buildout 2035	Net Change	Percentage Change
Dwelling units	24,573	28,847	4,274	17.4%
Population	37,348	44,182	6,834	18.3%
Nonresidential development, square feet	11,336,731	13,949,860	2,613,129	23.1%

Table 4-4. City of West Hollywood Development Changes

Source: AECOM and Raimi and Associates 2010

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.

4.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(f) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be involved in the proposed action should it be implemented.

Development in accordance with the General Plan land use policy would result in the consumption of nonrenewable resources. This use will have an irreversible effect on such resources. The irreversible commitment of limited resources is inherent in any development project, or in the case of the General Plan, cumulative development projects. Resources anticipated to be irreversibly committed over the life of the General Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water.

Buildout of the General Plan represents a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating, and cooling of residences and buildings, and transportation to and from the planning area.

The commitment to resources would be a long-term obligation because once land is developed it is highly infeasible to revert such land uses to a less urban use or open space.

4.5 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL IMPACTS

According to Sections 15126.2(a) and 15126.2(b) of the CEQA Guidelines, an EIR shall identify and focus on the significant environmental effects of the proposed project, including effects that cannot be avoided if the proposed project is implemented.

This section describes significant environmental impacts, including impacts that are mitigated but would not be reduced to a less-than-significant level. With implementation of the proposed General Plan, significant effects related to air quality, transportation, public services and utilities water supply, and climate change cannot be avoided. Individual impacts are discussed below.

4.5.1 AIR QUALITY

Implementation of mitigation measures would reduce short-term, construction-related emissions, but not to a less-than-significant level. While individual development projects will be required to comply with applicable SCAQMD rules and employ construction approaches that minimize pollutant emissions, the City lies in a nonattainment air basin and growth associated with General Plan implementation will continue to contribute pollutant emissions in that nonattainment context. Construction-related emissions of criteria area 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, and/or expose sensitive receptors to substantial pollutant concentrations, resulting in a significant and unavoidable project-level and cumulative impact.

Compliance with policies outlined in the General Plan and implementation of mitigation measures would reduce operational emissions of criteria area pollutants and precursors from mobile- and area-sources, but not to a less-than-significant level. Operational emissions could violate or contribute substantially to an existing or projected air quality violation, and/or expose sensitive receptors to substantial pollutant concentrations. This impact would is significant and unavoidable at the project and cumulative levels of analysis.

Implementation of mitigation measures would reduce the potential for exposure of sensitive receptors to TACs from mobile sources. However, no feasible mitigation is available to reduce the impact to a less-than-significant level. The City will coordinate with SCAQMD as

implementation of the proposed General Plan occurs to assess situations in which toxic risk from diesel PM may occur and to review methodologies that may become available to estimate the risk. However, this impact would remain significant and unavoidable at the project and cumulative impact level of analysis.

4.5.2 TRANSPORTATION AND CIRCULATION

Implementation of the proposed General Plan would result in impacts to LOS in 2035 at numerous intersections throughout West Hollywood during the morning peak hour, the afternoon peak hour, or both morning and afternoon peak hours. With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of mitigation measures, program-level impacts to intersection LOS would be reduced, but not to a less-than-significant level. Impacts would be significant and unavoidable at the project and cumulative level.

4.5.3 PUBLIC SERVICES AND UTILITIES

Implementation of the proposed General Plan would have a potentially significant and unavoidable project-level and cumulative water supply 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 would also reduce water consumption in 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 the LADWP is uncertain given potential climate change impacts and variable hydrology and environmental issues in Bay-Delta, among other factors.

4.5.4 CLIMATE CHANGE

Although construction-generated emissions associated with implementation of the proposed General Plan 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 a significant cumulative global climate change impact.

Additionally, the total GHG emissions associated with project operations under the proposed General Plan 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 by 2020 or achieve the $CO_{2}e$ per service population per year goal, the proposed project would result in a cumulatively considerable contribution to a significant global climate change cumulative impact related to long-term operational generation of GHGs. Global climate change impacts would be significant and unavoidable at the cumulative level.

4.6 EFFECTS NOT FOUND TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires a statement indicating the reason why various possible significant effects are determined not to be significant and therefore are not discussed in the EIR.

The City of West Hollywood is completely built out and is located in an urbanized area of Los Angeles County. The City has been completely developed with structures, parking lots, and rights-of-way. Designated farmland or zoned agricultural lands do not exist in West Hollywood. Therefore, the environmental issue area of Agricultural Resources was not analyzed in this EIR.

CHAPTER 5.0 ALTERNATIVES

5.1 CEQA REQUIREMENTS AND APPROACH FOR ALTERNATIVES ANALYSIS

According to Section 15126.6 of the CEQA Guidelines, the purpose of the analysis of alternatives is "... focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Thus, project alternatives are intended to reduce or eliminate the potentially significant adverse environmental effects of the proposed General Plan, while attempting to meet most of the basic project objectives, as stated in Chapter 2.0, "Project Description."

CEQA requires the consideration of alternative development scenarios and the analysis of impacts associated with the alternatives. Through comparison of these alternatives to the proposed project, the advantages of each can be weighed and analyzed. Section 15126.6 of the CEQA Guidelines requires that an EIR, "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

Additionally, the CEQA Guidelines state:

- ► The specific alternative of "no project" shall also be evaluated along with its impact. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. [Section 15126.6(e)(1)(2)]
- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly discuss the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were

rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts. [Section 15126.6(a) and (c)]

 "Feasible" means capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. [Section 15364]

5.1.1 **PROJECT OBJECTIVES**

As described in Chapter 2.0, "Project Description," the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts. The objectives for the West Hollywood General Plan include:

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.

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.

5.2 ALTERNATIVES CONSIDERED BUT REJECTED

ALTERNATIVE LOCATION

Although CEQA Guidelines recommend considering an alternative location to reduce potential impacts of a proposed project, none of the alternatives involve an alternate location because the regulatory authority and goals and policies of the General Plan and CAP are specific to the geographic context of the City of West Hollywood. Buildout pursuant to goals and policies contained in the proposed General Plan at an alternate location would not achieve the City of West Hollywood's goals.

STRAIGHT LINE GROWTH APPLIED TO TRAFFIC ANALYSIS ZONES

This alternative would have assumed a specific growth rate applied equally throughout the City. However, it was determined that this would not represent realistic future conditions in the City. Additionally, this alternative would not achieve the City of West Hollywood's quality of life, housing, neighborhood character, environment, traffic and parking, and other goals for the proposed General Plan.

SCAG GROWTH PROJECTIONS ALTERNATIVE

This alternative would have applied existing SCAG growth projections to traffic analysis zones. This alternative was rejected because it would not represent realistic future conditions in the City and would not enable the City to meet goals related to focused redevelopment of commercial corridors.

5.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED ANALYSIS

In addition to focusing on alternatives capable of either eliminating any significant environmental effects of the project or reducing them to a less-than-significant level, the following analysis examines variations of the proposed project that were considered during preparation of the General Plan and that may be considered further during the public hearing process. The following project alternatives are examined:

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

The alternatives analyzed in the EIR are general in nature, as is the proposed project. The degree of specificity used in the alternatives analysis is related to the programmatic approach used in the analysis of impacts associated with implementation of the General Plan.

Pursuant to the CEQA Guidelines, a range of alternatives to the proposed project is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The analysis in this section provides:

- 1. A description of alternatives considered;
- 2. An analysis of whether each alternative meets most of the basic objectives of the proposed project as described in the Chapter 2.0 of this EIR and above; and
- 3. A comparative analysis of the alternatives under consideration and the proposed project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the project to a less-than-significant level.

Table 5-1 provides a summary of general buildout projections determined by the three land use alternatives, including the proposed General Plan. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon but rather provide a likely development scenario that would only occur if all of the areas of the City were to develop the probable capacity yielded by the land use designations.

	Proposed General Plan	No Project/ Existing General Plan		Two Transit Overlay Areas Only		Extensive TDM	
	Projection	Projection	Comparison to Proposed Project	Projection	Comparison to Proposed Project	Projection	Comparison to Proposed Project
Dwelling Units	28,847	28,619	-228 (-0.8%)	27,781	-1,066 (-3.7%)	28,847	± 0 (0%)
Nonresidential development, square feet	13,949,860	13,759,254	-190,606 (-1.4%)	13,293,572	-656,288 (-4.7%)	13,949,860	± 0 (0%)
Population	44,182	43,821	-361 (0.8%)	42,482	-1,700 (-3.8%)	44,182	± 0 (0%)

 Table 5-1. City of West Hollywood Development Changes Comparison

Source: California Department of Finance 2009; Raimi and Associates 2010

The No Project/Existing General Plan column shows the realistic growth projections that would occur under the existing General Plan if the proposed General Plan was not adopted. The estimates are based on 2008 calculations of proposed pipeline projects and parcel-by-parcel analysis of development potential using density and intensity assumptions for existing General Plan land use designations.

The Two Transit Overlay Areas Only, and Extensive TDM columns indicate the growth projections for these alternatives. The methodology for these alternatives is consistent with the approach used for the proposed project.

As discussed in subsequent sections, each of the three alternatives contain a range of different TDM features. Table 5-2 compares the TDM features for each alternative. Table 5-3 provides a summary of the detailed alternatives analysis found in the following sections.

	Proposed Project		Two Transit Ov	erlay Areas Only	Extensive TDM		
		Commercial		Commercial		Commercial	
	Residential	Corridors/	Residential	Corridors/	Residential	Corridors/	
TDM Measure	Areas	TOD Nodes	Areas	TOD Nodes	Areas	TOD Nodes	
Reduced or	No change from	Phase in tailored	- Eliminate minir	num parking	No change from	- Eliminate minimum	
Eliminated Auto	existing policy	reductions in minimum	requirements		existing policy	parking requirements for	
Parking		parking requirements	- Set low maximu	ım parking		TOD projects.	
Requirements			requirements			- Phase in tailored	
						reductions in minimum	
						parking requirements for	
						TOD projects	
Unbundled Auto	No change from	All new multi-family	- All new multi-f	amily residential	No change from	- All new multi-family	
Parking	existing policy	residential and commercial	and commercial	development will	existing policy	residential and	
		development will be	be required to u	nbundle parking		commercial development	
		required to unbundle	- Explore creating	g a Zoning Parking		will be required to	
		parking.	Credit program			unbundle parking	
						- Explore creating a Zoning	
D'' (D 11)						Parking Credit program	
Pricing of Public	No change from	Demand responsive	- Demand respon	sive pricing of all	No change from	- Demand responsive	
Auto Parking	existing policy	pricing of all public on-	public on- and c	off-street parking in	existing policy	pricing of all public on-	
		and off-street parking in	all areas			and off-street parking in	
		commercial corridors	- Phased increase	s to price of on-		all areas	
D'1 C (T 1 4'		street residentia	parking permits	T 1 4		
Bike System	Implement improveme	Not it is play as for dive	- Expedite fundin	ig of improvements	Implement improve	ments identified in the	
Improvements	Bicycle and Pedestriar	n Mobility Plan as funding	Identified in the	adopted Bicycle	adopted Bicycle and	a Pedestrian Mobility Plan as	
	becomes available		and Pedestrian Mobility Plan as		international decomes av	han a a a a a a a TOD	
			tunding becomes available, with		mprovements to en	mance access to TOD	
			ragional/throws	ients to ennance	projects		
			ioba advantiona	l institutions and			
			jobs, educationa	n msututions, and			
			services				

Table 5-2. Comparison of Transportation Demand Management Features per Alternative

	Propo	sed Project	Two Transit Ov	erlay Areas Only	Ext	ensive TDM
		Commercial		Commercial		Commercial
	Residential	Corridors/	Residential	Corridors/	Residential	Corridors/
TDM Measure	Areas	TOD Nodes	Areas	TOD Nodes	Areas	TOD Nodes
Pedestrian System Improvements	 Implement improven adopted Bicycle and Plan/ADA Transition available. Continue to pursue S funding for public sc cooperation with the additional funding op 	tion Plan as funding becomes and Pedestrian Mobility Plan as funding becomes available, with target improvements to enhance regional/through connectivity to jobs, educational institutions, and services - Continue to pursue Safe Routes to School funding for public schools and work to improve cooperation with the LAUSD to be eligible for additional funding opportunities - Coordinate with private schools located within the City and adjacent cities to develop Safe Routes to School programs/projects and apply for funding. - Advocate for expedited funding o		 Expedite funding of improvements identified in the adopted Bicycle and Pedestrian Mobility Plan as funding becomes available, with target improvements to enhance regional/through connectivity to jobs, educational institutions, and services Continue to pursue Safe Routes to School funding for public schools and work to improve cooperation with the LAUSD to be eligible for additional funding opportunities Coordinate with private schools located within the City and adjacent cities to develop Safe Routes to School programs/projects and apply for 		vements identified in the nd Pedestrian Mobility Plan es available, with targeted enhance access to TOD e Safe Routes to School schools and work to on with the LAUSD to be onal funding opportunities.
Transit System Improvements	 Implement improven adopted regional Sho funding becomes ava Assume subway-to-th West Hollywood 	nents identified in the rt-Range Transit Plan as ilable he-sea alignment through	 Advocate for eximprovements in adopted regional Transit Plan as a available, with the improvements the regional/through jobs, educational services. Assume subway alignment through Hollywood 	spedited funding of dentified in the l Short-Range funding becomes argeted o enhance h connectivity to al institutions, and y-to-the-sea gh West	 Advocate for experimprovements ider regional Short-Ran becomes available to enhance access Assume subway-to West Hollywood 	edited funding of ntified in the adopted nge Transit Plan as funding , with targeted improvements to TOD projects o-the-sea alignment through

	Proposed Project		Two Transit Ov	verlay Areas Only	Ext	ensive TDM
		Commercial		Commercial		Commercial
	Residential	Corridors/	Residential	Corridors/	Residential	Corridors/
TDM Measure	Areas	TOD Nodes	Areas	TOD Nodes	Areas	TOD Nodes
Subsidized Transit Passes	- In all new residential development; the dev management will be transit subsidy for all lifetime of the buildin	or commercial veloper and/or property required to provide a 50% employees/residents for the ng	 In all new resid commercial dev developer and/c management wi provide a 100% all employees/ra lifetime of the b With facilitation and/or TMAs w to provide a sim subsidy to group the requirement construction Require develop financial contril transit capital an funds to expand transportation set 	ential or relopment; the or property Il be required to transit subsidy for esidents for the building n by the City, BIDs fill be encouraged and transit pass ps not covered by s for new opment to provide butions to the nd/or operational l existing City ervices.	No change from existing policy	 In all new residential or commercial development, the developer and/or property management will be required to provide a 100% transit subsidy for all employees/ residents for the lifetime of the building With facilitation by the City, BIDs and/or TMAs will be encouraged to provide a similar transit pass subsidy to groups within 0.5 mile of TOD nodes but that are not covered by the requirements of new construction Require development to provide financial contributions to the transit capital and/or operational funds to expand existing City transportation services.
Zone	No change from existi	ng policy	No change from	existing policy	of West Hollywoo originating within	of so that all transit trips City boundaries are fare-

	Propo	sed Project	Two Transit Ov	verlay Areas Only	Ext	ensive TDM
TDM Measure	Residential Areas	Commercial Corridors/ TOD Nodes	Residential Areas	Commercial Corridors/ TOD Nodes	Residential Areas	Commercial Corridors/ TOD Nodes
Auto Parking Cash-Out	N/A to residential development (see unbundled parking)	No change from existing policy.	N/A to residential development (see unbundled parking)	 Expand existing parking cash-out requirement to all businesses (i.e., regardless of number of employees or SF of business) if the employer subsidizes or provides free parking for employees 	N/A to residential development (see unbundled parking	 Expand existing parking cash-out requirement to all businesses in TOD projects (i.e., regardless of number of employees or SF of business) if the employer subsidizes or provides free parking for employees
Car Sharing	 Implement a small-sective employees. Pursue multijurisdict with regional partner Angeles, Westside C 	cale carsharing program for ional car sharing program s including City of Los ities, and SCAG	 Require develop implement on-s program or pay incentivize a bil to implement a in the near term Pursue multijur sharing progran partners includi Angeles, Wests SCAG 	Require development projects to implement on-site car sharing program or pay into a fund to incentivize a bike sharing operator to implement a Citywide program in the near term - Pursue multijurisdictional car sharing program with regional partners including City of Los Angeles, Westside Cities, and SCAG		elopment projects to car sharing program or pay ntivize a bike sharing nent a Citywide program in fictional car sharing program ners including City of Los cities, and SCAG

	Propo	sed Project	Two Transit Ov	verlay Areas Only	Extensive TDM		
		Commercial		Commercial		Commercial	
	Residential	Corridors/	Residential	Corridors/	Residential	Corridors/	
TDM Measure	Areas	TOD Nodes	Areas	TOD Nodes	Areas	TOD Nodes	
Bike Sharing	 Implement a small-sc for City employees. Pursue multijurisdict with regional partners Angeles, Westside Ci 	cale bike sharing program ional bike sharing program s including City of Los ities, and SCAG	 Require develog implement on-s program or pay incentivize a bil to implement a in the near term Pursue multijur sharing progran partners includi Angeles, Wests SCAG 	pment projects to ite bike sharing into a fund to ke sharing operator Citywide program isdictional bike n with regional ng City of Los ide Cities, and	 Require TOD devimplement on-site into a fund to ince operator to implement on-site into a fund to ince operator to implement of Los Angeles, W 	elopment projects to bike sharing program or pay ntivize a bike sharing nent a Citywide program in lictional bike sharing onal partners including City /estside Cities, and SCAG	
Carpooling/ Vanpooling	Target small to modera participation rates in ca additional promotional	ate increase in employee arpools and vanpools due to l efforts by the City	SCAG Target moderate to high increase in employee participation rates in carpools and vanpools due to additional promotional efforts by the City, mode split performance targets for new development, and		Target moderate to participation rates in TOD projects due to efforts by the City, targets for new deve private subsidies	high increase in employee n carpools and vanpools at o additional promotional mode split performance elopment, and public or	
Telecommuting Alternative Work Schedules	Target small to moderate increase in employee participation rates in telecommuting and alternative work schedules due to additional promotional efforts by the City		Target moderate to high increase in employee participation rates in telecommuting and alternative work schedules for employees due to additional promotional efforts by the City, mode split performance targets for new development, and public or private subsidies		Target moderate to participation rates in alternative work scl TOD projects due to efforts by the City, targets for new deve private subsidies	high increase in employee n telecommuting and nedules for employees at o additional promotional mode split performance elopment, and public or	

	_		Al	e	
	Propose	d Project	P	roposed Projec	t
Issue Area	Without Mitigation	With Mitigation	No Project	Two Transit Overlay Areas Only	Extensive TDM
3.1 Aesthetics					
Scenic Vistas	LS	LS	—	_	—
Scenic Highways	LS	LS	—	_	—
Visual Character	LS	LS	—	—	—
Light and Glare	LS	LS	—	—	
3.2 Air Quality					
SCAQMD Air Quality Management Plan	PS	SU	—	_	_
Violation of Air Quality Standards – Short-Term Impacts	PS	SU	—	▼	—
Violation of Air Quality Standards – Long-Term Impacts	PS	SU		▼	▼
Increase in Criteria Air Pollutants	PS	SU	A	▼	▼
Toxic Air Contaminants – Construction-Related Emissions	LS	LS	—	▼	_
Toxic Air Contaminants – Operational Emissions – Stationary Sources	LS	LS	—	▼	—
Toxic Air Contaminants – Operational Emissions – On-Road Mobile Sources	LS	LS	A	▼	▼
Local CO Hotspots	LS	LS	—	—	—
Odors	LS	LS	—	—	
3.3 Biological Resources					
Sensitive Species	NI	NI	—	—	—
Riparian Habitat or Other Sensitive Habitat	NI	NI	—	—	—
Wetlands	NI	NI	—	—	—
Movement of Wildlife Species	NI	NI	—	—	—
Conflict with Polices or Ordinances Protection Species	LS	LS	—	—	—
Habitat Conservation Plan/Natural Community Conservation Plan	NI	NI	—	—	_
3.4 Cultural Resources					
Historical Resources	LS	LS	—	-	—
Archaeological Resources and Human Remains	LS	LS	—	—	—

Table 5-3. Comparison of Impacts of Alternatives to the Proposed Project

	Propose	d Project	Alternatives to the Proposed Project		
Issue Area	Without Mitigation	With Mitigation	No Project	Two Transit Overlay Areas Only	Extensive TDM
3.5 Geology, Soils, and Mineral Resources					
Fault Rupture	LS	LS	—	—	—
Ground Shaking	LS	LS	—	—	—
Liquefaction and Ground Failure	LS	LS	—	▼	—
Earthquake-Induced Landslides	LS	LS	—	—	—
Soil Erosion or Loss of Topsoil	LS	LS	—	—	—
Soil Hazards: Landslides, Subsidence, Lateral Spreading, Expansive Soils	LS	LS	—	—	—
Mineral Resources	LS	LS	—	—	—
3.6 Hazards and Hazardous Materials					
Routine Use, Transportation, Disposal, and Release of Hazardous Materials	LS	LS	—	—	—
Interference with an Adopted Emergency Plan	LS	LS	—	▼	▼
Development on a Known Hazardous Materials Site	LS	LS	—	—	—
Fire Hazards	LS	LS	—	—	—
Underground Gas Hazards	LS	LS	—	_	—
Hazardous Materials within 0.25 mile of Schools	LS	LS	—	—	—
3.7 Hydrology and Water Quality					
Violation of Water Quality Standards	LS	LS	—	—	—
Groundwater Resources	LS	LS	A	—	—
Surface Hydrology and Drainage	LS	LS	—	—	—
Flooding and Dam Inundation	LS	LS	—	—	—
Mudflows	LS	LS	—	—	—
3.8 Land Use and Planning					
Divide an Established Community	LS	LS	<u> </u>	_	—
Conflict with an Adopted Land Use Plan	LS	LS	▼	_	—
Conflict with an Applicable Habitat Conservation Plan	LS	LS	—	_	—

	Propose	d Project	Alternatives to the Proposed Project				
Issue Area	Without Mitigation	With Mitigation	No Project	Two Transit Overlay Areas Only	Extensive TDM		
3.9 Noise							
Construction Noise	PS	LS	—	—	—		
Transportation Noise	LS	LS	—	▼	—		
Stationary and Area- Source Noise Levels – Changes in Land Use	PS	LS	—	▼	—		
Stationary and Area- Source Noise Levels – Other Noise Sources	PS	LS	—	▼	—		
Aircraft Noise	LS	LS	—	—	—		
Construction-Induced Vibration	PS	LS	—	—	—		
Vehicular Traffic-Induced Vibration	LS	LS	—	▼	—		
Industrial and Commercial Operations Vibration	LS	LS	—	▼	—		
3.10 Paleontological Resources							
Paleontological Resources	PS	LS	A	▼	—		
3.11 Population and Housing							
Induce Substantial Population Growth	LS	LS	—	▼	—		
Displace Substantial Numbers of Existing Housing or People	LS	LS	—	▼	—		
3.12 Public Services and Utilities							
Police Protection	PS	LS	—	▼	—		
Fire Protection	PS	LS	—	▼	—		
Education	LS	LS	—	▼	—		
Libraries	LS	LS	—	▼	—		
Water – Water Infrastructure	LS	LS	—	▼	—		
Water – Water Supply	PS	SU	A	▼	—		
Wastewater	LS	LS	—	▼	—		
Storm Drain System	LS	LS	—	▼	—		
Electricity and Natural Gas	LS	LS	—	▼	—		
Solid Waste	LS	LS		▼	—		
	Propose	d Project	Alternatives to the Proposed Project				
--	-----------------------	--------------------	---	--------------------------------------	------------------	--	--
Issue Area	Without Mitigation	With Mitigation	No Project	Two Transit Overlay Areas Only	Extensive TDM		
3.13 Recreation							
Increased use and physical deterioration of existing recreational facilities	LS	LS	—	▼	—		
Construction or Expansion of Existing Facilities	LS	LS	—	▼	—		
3.14 Transportation and Circulation							
Peak Hour Intersection Level of Service	PS	SU		▼	▼		
Congestion Management Program Level of Service	PS	SU		▼	▼		
Design Hazards	LS	LS	—	_	—		
Air Traffic Hazards	LS	LS	—	_	—		
Emergency Access	LS	LS		_	—		
Public Transit, Bicycle, and Pedestrian Facilities	LS	LS	—	_	—		
Parking	LS	LS		_	—		
3.15 Global Climate Change							
Construction-Related GHG Emissions	PS	SU		▼	▼		
Operations-Related GHG Emissions	PS	SU		▼	▼		
Conflict with an Applicable Plan, Policy, or Regulation	PS	SU		▼	▼		

Alternative is likely to result in greater impacts to issue when compared to proposed project

- Alternative is likely to result in similar impacts to issue when compared to proposed project

▼ Alternative is likely to result in less impacts to issue when compared to proposed project; however, impacts would still be significant before mitigation

PS Potentially significant impact

LS Less-than-significant impact

SU Potentially significant and unavoidable

NI No impact

5.3.1 ALTERNATIVE 1: NO PROJECT/EXISTING GENERAL PLAN

This alternative is analyzed within this EIR as it is required under CEQA Guidelines Section 15126.6(e). According to Section 15126.6(e)(2) of the CEQA Guidelines, the "no project" analysis shall discuss, "what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." This alternative 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 according to the existing General Plan goals and policies.

COMPARISON OF ENVIRONMENTAL IMPACTS TO PROPOSED PROJECT

Aesthetics

All aesthetics impacts would be less than significant for both the proposed project and Alternative 1. Future development under the proposed project could result in slightly taller structures in limited areas of the City than would be permitted under Alternative 1, potentially affecting scenic vistas. However, SSP and 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.

There are no designated scenic highways in West Hollywood, so there would be no impact under either the proposed project or this alternative.

Future development under the proposed project and this alternative would include infill and redevelopment projects, which would have the potential to impact the visual character of existing neighborhoods, adding new sources of light and glare, and shade or shadow. Future development projects would be subject to subsequent environmental and design review, which would include analysis of visual impacts. Both the proposed project and Alternative 1 include policies regarding aesthetic improvements such as landscaping, pedestrian amenities, and design standards for architecture and lighting. Future development would also be subject to existing building and development standards specified in the City's Zoning Code. Because of requirements for aesthetic improvements under the proposed project and Alternative 1, as well as implementation

of existing Zoning Code requirements and SSP requirements, aesthetics impacts would be similar for the proposed project and Alternative 1.

Air Quality

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%. Because the level of development would be similar under Alternative 1; construction-related air quality impacts would be similar and would remain significant. The majority of development under the proposed project would occur within five commercial subareas of the City as a result of redevelopment. New development in the commercial subareas, which could include residential development, has the potential to expose more sensitive receptors to new and existing sources of air pollution. Although potentially fewer receptors would be exposed under Alternative 1, this impact would remain significant. However, intensification of the commercial subareas could provide a wider range of services and uses, potentially reducing or shortening vehicle trips. Additionally the Mobility Element of the proposed General Plan emphasizes alternative transportation, including pedestrian walkways, and bicycle paths throughout the City that could also reduce vehicle trips, as well as vehicle miles traveled. The proposed General Plan includes green building policies, potentially reducing emissions from existing and future buildings. This alternative would have greater traffic volumes on most roadway segments, and would have more intersections that operate at an unacceptable level of service (LOS) compared to the proposed project. This alternative would be similar to the proposed project with respect to implementation of the SCAQMD Air Quality Plan.

Implementation of this alternative would result in generally similar impacts associated with construction sources, and similar impacts associated with stationary sources, but increased impacts associated with mobile sources. No significant air quality impacts for the proposed project would be reduced to a less-than-significant level under this alternative. Because mobile sources are the largest contributor to air quality impacts, Alternative 1 is considered to have greater air quality impacts compared to the proposed project.

Biological Resources

There would be no significant biological resources impacts for the proposed project. The urban environment in the City of West Hollywood does not support sensitive species, migration corridors, riparian habitat or other sensitive natural communities, or wetlands. There would be no impact to these resources under either the proposed project or Alternative 1. Similarly, there are

no habitat conservation plans or natural community conservation plans that apply to the City, so there would be no impact under the proposed project or this alternative.

Future development under both the proposed project and Alternative 1 would be subject to all applicable state, federal, and local ordinances protecting biological resources. Implementation of either the proposed project or Alternative 1 would result in a less-than-significant impact related to conflict with these plans, regulations, and ordinances. Impacts to biological resources would be similar under the proposed General Plan and Alternative 1.

Cultural Resources

All cultural resources impacts would be less than significant under both the proposed project and Alternative 1. Under both Alternative 1 and the proposed project, the City would continue to preserve historic resources through preservation policy, design standards, and environmental review. With respect to archaeological resources and burial sites, policies in both Alternative 1 and the proposed project require evaluation and oversight by a qualified archaeologist if resources are identified during construction activities.

Because future development under both Alternative 1 and the proposed project would be required to comply with policies and ordinances protecting historical and cultural resources, Alternative 1 would result in similar impacts to cultural resources compared to the proposed project.

Geology, Soils, and Mineral Resources

All geology, soils, and mineral resource impacts would be less than significant for the proposed project. The majority of development under the proposed project would occur as infill or redevelopment within five commercial subareas. The City is currently built out, and under Alternative 1, any changes would similarly represent infill or redevelopment.

The Hollywood Fault runs through the City. A seismic event on this fault or a smaller nearby fault could result in surface fault rupture. Therefore, infill development or redevelopment under either the proposed project or this alternative within proximity to these faults would have the potential to expose additional people and/or structures to hazards in the event of fault rupture.

Because the City is located within a seismically active region of Southern California near large regional faults capable of generating strong earthquakes with high intensity ground shaking, the

entire City is at risk for damage caused by ground shaking under either Alternative 1 or the proposed General Plan.

Approximately half of the City has been designated as a liquefaction hazard area. Some or all of the Sunset Strip, Santa Monica Boulevard West, and Melrose/Beverly District commercial subareas proposed within the Draft General Plan are located within this hazard area. Thus, development under the proposed General Plan may expose more people and property to liquefaction hazards than under Alternative 1. However, this impact would be less than significant for the proposed project, so this alternative would not reduce or avoid a significant impact related to liquefaction hazards.

A small area along the northern edge of the City has been designated as susceptible to earthquake-induced landslides. No land use changes are proposed in this area under either Alternative 1 or the proposed project, so the potential for redevelopment or infill activities that would subject buildings, roadways, utilities, and persons to severe damage or injury in the event of an earthquake-induced landslide would be similar under both alternatives.

Sites undergoing development or redevelopment could be susceptible to erosion from wind and storm water runoff associated with construction activities. New development under either Alternative 1 or the proposed project has the potential to increase soil erosion if undertaken without erosion control.

Soil hazards, including land sliding, debris flows, expansive soils, and collapsible soils, are present in the City. Future development permitted under either the proposed project or Alternative 1 would expose additional people and structures to soil hazards.

There are no designated mineral resources zones in the City, and neither the proposed project nor this alternative would result in the loss of availability of mineral resources. Wastewater conveyance and treatment are available throughout the City, so neither the proposed project nor Alternative 1 would result in impacts related to suitability of soils for septic systems.

Like the proposed General Plan, several programs and regulations are implemented under Alternative 1 to protect people and property from geologic and seismic hazards. All new development would be subject to state and federal regulations, including the California Building Code seismic safety standards for construction. Safety policies and protections under both the proposed and existing General Plans are similar. All geology, soils, and mineral resource impacts of the proposed project would be less than significant. However, based on the fact that all or part of three of the five commercial subareas identified for development and redevelopment in the proposed project lie in areas subject to liquefaction hazards, Alternative 1 would result in lesser impacts to geology, soils, and mineral resources compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would not result in any significant impacts related to hazards and hazardous materials. 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%. The majority of development under the proposed project would occur within five commercial subareas of the City as a result of redevelopment. Some of these areas include commercial lands that may use, store, or release hazardous materials. Under both the existing and proposed General Plans, future commercial land uses would remain within currently designated areas.

Increased population and commercial square footage under both the proposed project and Alternative 1 would result in increased use, storage, and/or disposal of hazardous materials during routine operations, and increased transportation of hazardous materials to and through the City. However, compliance with regulations governing hazardous materials transportation, handling and disposal, including handling of materials within 0.25 mile of existing or proposed schools, would be required under both the proposed General Plan and Alternative 1.

The level of development associated with the proposed General Plan would result in relatively lower levels of congestion at intersections and along roadways identified as evacuation routes compared to buildout of Alternative 1. However, implementation of either the proposed project or Alternative 1 would require periodic updating of, and compliance with, adopted emergency plans.

Several Cortese-listed sites are present in the City, and development or redevelopment of these sites or other parcels with known hazardous materials or hazardous waste could occur under either the proposed project or this alternative. However, compliance with existing state, federal, and local hazardous waste site cleanup standards would be required under both the proposed project and this alternative.

No change will occur to land use designations in the portion of the City designated as a wildfire hazard severity zone under either Alternative 1 or the proposed General Plan. Underground gas

hazards are present in some areas of the City, and redevelopment or infill development under either the existing or the proposed General Plan could expose additional people to underground gas hazards.

Development pursuant to either Alternative 1 or the proposed General Plan would be subject to the same local, state, and federal regulations regarding hazards and hazardous materials. The level of development that would occur under either the proposed General Plan or Alternative 1 would be similar, and therefore the increased presence of hazardous materials within the commercial subareas would be similar. Future development in proximity to these uses could be exposed to hazardous materials related to the use, disposal, and transport of hazardous materials. The proposed project would not result in any significant impacts related to hazards and hazardous materials, and implementation of Alternative 1 would not reduce or avoid any significant hazards or hazardous materials impacts of to the proposed project. Implementation of Alternative 1 would result in similar impacts with respect to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

The proposed project would not result in any significant impacts related to hydrology and water quality. 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%. The majority of development under the proposed project would occur through redevelopment within five commercial subareas. However, because most new development would occur in the form of infill, redevelopment, or adaptive reuse in existing urbanized areas, it would not result in substantial changes to absorption rates, drainage patterns, and the rate of surface runoff. Site redevelopment will likely improve the quality of urban runoff contributing to groundwater infiltration and recharge due to enforcement of NPDES permit requirements. The proposed General Plan could lead to a net reduction in Citywide impervious surface and landscaping occurring through retrofitting of previously developed sites, particularly in the commercial areas of the City, thus improving absorption and surface runoff rates.

Neither the proposed project nor Alternative 1 would result in the alteration of existing streams, rivers, or drainage channels. Future infill development in the City's existing urban areas would not substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of storm water runoff.

Under either the proposed project or Alternative 1, future development would occur in urbanized areas; new land would not be converted to urban uses, and substantial new areas of impervious surfaces would not be created. In fact, site redevelopment may provide opportunities to create new pervious surfaces through new landscaping and use of porous pavements, increasing groundwater recharge.

Two areas of the City are located within the 0.2% AEP boundary for floods (500-year floodplain). However, there are no areas of West Hollywood that are located within the 1% AEP boundary (100-year floodplain). Neither the proposed project nor Alternative 1 would expose people or structures to hazards related to a 100-year flood. Portions of West Hollywood are susceptible to flood events related to dam failure. The West Franklin Dam and the Mulholland Dam are located in the Hollywood Hills above West Hollywood. Areas below the dams, including portions of the City, have the potential to be inundated in the unlikely event of catastrophic dam failure. The projected increases in population, housing, and nonresidential development would be similar in the proposed project and Alternative 1, and the potential exposure of persons and property to flooding and dam inundation would be similar under the proposed project and Alternative 1.

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 steeply graded slopes, including following construction activities or after wildfires. Infill development or redevelopment could occur in this area under either Alternative 1 or the proposed General Plan.

Development under this alternative and the proposed General Plan would be subject to local, regional, state, and federal standards for water quality. Additionally, in comparison to Alternative 1, the proposed General Plan's Infrastructure, Resources, and Conservation Element contains updated goals, policies, and programs related to groundwater, water supply, hydrology, and water quality responsive to recent changes in federal and state regulation. Due to the updated policies and programs, implementation of Alternative 1 would result in greater impacts to hydrology and water quality compared to the proposed project.

Land Use and Planning

The proposed project would not result in any significant impacts related to land use and planning. 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%. The majority of development under the proposed project would occur through redevelopment within five commercial subareas.

Due to the urbanized character of the City, development pursuant to either Alternative 1 or the proposed General Plan would not physically divide established communities, as all new development would occur in the form of site redevelopment.

The proposed project and Alternative 1 are consistent with the goals of the Regional Comprehensive Plan and Guide, including the Compass Growth Visioning Principles. However, the Zoning Code, existing specific plans, and West Hollywood Redevelopment Plan, all of which are consistent with the existing General Plan, would have to be reviewed and/or updated as needed to conform to the proposed General Plan.

There are no adopted habitat conservation plans or natural community conservation plans in the City.

Although not considered a significant physical land use and planning impact, because other plans and ordinances of the City that are consistent with Alternative 1 would have to be reviewed and/or updated as needed to conform with the proposed project, implementation of Alternative 1 would result in lesser impacts to land use and planning than the proposed project.

Noise

The majority of development under the proposed project would occur as a mix of uses within five commercial subareas, all of which are located adjacent to roadways with high traffic volumes. Additional residents would be exposed to elevated traffic-related noise levels under the proposed project. These increases could exceed noise significance thresholds and have the potential to affect noise-sensitive receptors and uses located adjacent to arterials. However, the proposed General Plan also includes policies aimed at reducing noise related to vehicular traffic that are not found in the existing General Plan.

Construction activities associated with either Alternative 1 or the proposed General Plan would generate elevated noise from construction and have the potential to impact noise-sensitive land uses.

The proposed project would result in the development of more residences and nonresidential development than Alternative 1. West Hollywood is an urbanized area, with a variety of existing stationary noise sources, including both daytime and nighttime activities.

West Hollywood is located more than 8 miles from the nearest airport (Burbank-Glendale-Pasadena Airport), and noise from aircraft would be an intermittent occurrence under both the proposed project and Alternative 1.

Vibration from sources, including construction activities, and ongoing commercial and industrial activities, would affect a similar number of people under the proposed project and Alternative 1, based on the similar level of construction and development.

Because the increases in population and nonresidential square footage would be similar under Alternative 1 and the proposed project, impacts related to stationary noise sources, traffic noise, and vibration would be similar under Alternative 1 compared to the proposed project. Because Alternative 1 would result in similar increases in similar new noise sources, and similar number of receptors exposed to noise, implementation of Alternative 1 would not reduce any significant noise impacts of the proposed project below the level of significance.

Paleontological Resources

The majority of development under the proposed project would occur as infill or redevelopment within five commercial subareas. The City is currently built out, and under Alternative 1, any changes would similarly represent infill or redevelopment. Most areas of the City (excluding only the Hollywood Hills) are located on paleontologically sensitive alluvial fan deposits similar to rock formations where large numbers of fossils have been recovered. As under the proposed project, development under Alternative 1 would have the potential to affect paleontological resources, but implementation of the existing General Plan under Alternative 1 would not be subject to the requirement for construction worker training and evaluation by a qualified paleontologist if resources were identified during construction. The proposed project requires this training and evaluation, reducing the impact to a less-than-significant level. Impacts would thus be greater under Alternative 1 than the proposed project.

Population and Housing

The proposed project would not result in any significant impacts related to population and housing. 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%. Although both Alternative 1 and the proposed project would result in more growth than forecast by SCAG, Alternative 1 would have a slightly lesser population increase.

While it is likely that the creation of housing units associated with the proposed General Plan could provide additional housing opportunities and the replacement of substandard housing with newer housing units relative to Alternative 1, it is also possible that residents of older housing units could be displaced as a result of the demolition and replacement of older housing units with newer housing units. Policies in both the existing and proposed General Plans address, facilitate, and promote development of a variety of rental and ownership housing types in the planning area aimed at all income levels to meet the needs of the projected population.

No significant population and housing impacts were identified for the proposed project, and although the change in the number of residential units and the quantity of nonresidential square footage is projected to be slightly smaller compared to the proposed project, these differences are less than 1%, and population and housing impacts would be similar for Alternative 1 compared to the proposed project. Alternative 1 would not reduce any population and housing impacts below a level of significance.

Public Services and Utilities

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%. The levels of development and population projected under Alternative 1 are similar to the proposed project, and would generate a similar number of calls associated with criminal activity, medical emergencies, fires, and accidents, as well as a similar need for expanded public education efforts related to crime and fire prevention. With the similar increase in population and new development under Alternative 1, a similar increase in police and fire personnel, equipment, and facilities would be required to ensure adequate emergency service capabilities and short response times.

Given the similar increase in the number of dwelling units and associated school-age population under Alternative 1 compared to the proposed project, demands on school facilities and staff would be similar relative to the proposed project. Also, the similar increase in residential population under Alternative 1 would create a similar increase in demand for additional library services. Nevertheless, a new West Hollywood Library is currently under construction as part of the redevelopment of West Hollywood Park. The impacts of library construction have been previously evaluated in environmental documentation external to this EIR. The similar increase in population and development resulting from Alternative 1 would create a similar increase in demand for additional water infrastructure as well as replacement and upgrading of water facilities relative to the proposed project.

Future water supply for the proposed project is a significant and unavoidable impact based on future uncertainties related to the consistent availability of water from the San Francisco Bay/Sacramento River Delta region. The proposed project includes a variety of policies and programs aimed at reducing per capita water use, and because the increases in population, and commercial square footage would be similar under the proposed project and Alternative 1, increased water demand would be potentially greater under Alternative 1 compared to the proposed project.

Implementation of Alternative 1 would result in a similar increase in population relative to the proposed project, creating similar demand for wastewater collection and treatment facilities. The population growth associated with Alternative 1 would also create similar new demand for electricity and natural gas. Because the proposed project includes policies to reduce waste that are not present in the existing General Plan, implementation of Alternative 1 would result in greater increases in demand for solid waste collection and disposal capacity relative to the proposed project.

Overall, implementation of Alternative 1 would allow a similar amount of new development and redevelopment in the City to what would occur under implementation of the proposed project. Because of the similar population and employment forecast, demand for police, fire, school, and library services and infrastructure capacity would be similar for this alternative compared to the proposed project. Because the proposed project includes water conservation and waste reduction policies not present in the existing General Plan, implementation of Alternative 1 would result in greater impacts to public services and utilities compared to the proposed project.

Recreation

The proposed project would not result in any significant impacts related to recreation. Implementation of either the proposed project or Alternative 1 would result in an increase in the City's population, and neither the proposed project nor Alternative 1 identifies new or expanded park facilities. Buildout under Alternative 1 would result in a similar number of dwelling units, and residents as would be forecast under the proposed project. Because the increase in

population would be similar, impacts related to recreation would be similar under Alternative 1 compared to the proposed project.

Transportation and Traffic

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%. However, the proposed project includes new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management. These policies and programs are not present in the existing General Plan. Table 5-3 presents a comparison of the TDM policies that would be implemented under each alternative.

Implementation of the proposed project would result in 22 intersections with significant LOS impacts during the a.m. peak hour, with 26 intersections having significant impacts during the p.m. peak hour. Buildout of Alternative 1, which lacks the proposed project's emphasis on management of the transportation system, would result in 24 intersections with significant impacts during the a.m. peak hour, and 29 intersections during the p.m. peak hour. Table 5-4 presents future intersection LOS for Alternative 1. Most roadway segments would have similar or greater volumes under Alternative 1 compared to the proposed project; Table 5-5 presents future roadway segment volumes for the proposed project and Alternative 1.

Because of the policies and programs of the proposed project that serve to reduce the number and distance of automobile trips, vehicle miles traveled (VMT), vehicle hours traveled (VHT), vehicle trips generated (VT), and average trip length would all be lower for the proposed project compared to Alternative 1. Table 5-6 presents daily performance measures for the proposed project and the alternatives.

Because of the proposed project's emphasis on alternative transportation and reduced demand for automobile travel, impacts on county CMP intersections would be less under the proposed project compared to this alternative. Table 5-7 presents CMP Impact information for the proposed project and the three alternatives.

Neither the proposed project nor Alternative 1 would increase hazards due to design features or incompatible uses; no new roadways are planned for the City, and any proposed expansions or alterations would be subject to existing City design standards.

Future (2035) Future (2035) Existing (2008) AM Existing (2008) PM No Project AM No Project PM North/South Street East/West Street Delay¹ LOS **Delay**¹ LOS **Delay**¹ LOS **Delay**¹ Ch Int LOS Doheny Road/Cory Avenue Sunset Boulevard 23 29 37 D 1 С 28 С С 52 60 82 84 Doheny Drive D 2 Sunset Boulevard Е F F San Vicente Boulevard 33 49 4 Sunset Boulevard С 36 D D 76 Е 5 Larrabee Street Sunset Boulevard 10 В 10 12 В 7 А А 14 С 6 Sunset Plaza Drive Sunset Boulevard 9 А В 11 В 26 7 La Cienega Boulevard/Miller Drive 19 В 59 Е 28 С 110 F Sunset Boulevard 9 Crescent Heights Boulevard 58 60 81 Sunset Boulevard Е Е 80 F F 11 La Cienega Boulevard Fountain Avenue 54 D 192 F 73 Е 276 F 12 Olive Drive Fountain Avenue 4 10 6 А А А 6 А 14 Sweetzer Avenue 12 В 12 В 14 В Fountain Avenue 9 А 15 Crescent Heights Boulevard 49 123 Fountain Avenue 98 F D F 81 F 17 Fairfax Avenue 66 Е 58 Е 112 F 124 F Fountain Avenue 18 Spaulding Avenue Fountain Avenue 5 А 5 А А 7 А 6 20 Gardner Street 56 Е 190 F 88 F 300 F Fountain Avenue 24 La Brea Avenue 64 Е 50 D 90 68 F Е Fountain Avenue 54 26 Holloway Drive/Horn Avenue Sunset Boulevard 40 D D 61 Е 76 Е 27 La Cienega Boulevard Holloway Drive 58 47 72 30 С Е D Е 28 Doheny Drive Cynthia Street² 21 52 60 176 С F F F 29 San Vicente Boulevard 20 17 28 Cynthia Street 15 В C В С Doheny Drive Santa Monica Boulevard (WB)³ 98 F 39 D 119 F 42 D 30 Doheny Drive Melrose Avenue/Santa Monica Boulevard (EB)³ 65 Е 191 F 228 F 211 F 32 Robertson Boulevard Santa Monica Boulevard 35 С 33 C 63 Е 71 Е 33 San Vicente Boulevard Santa Monica Boulevard 42 D 61 Е 79 Е 119 F 22 34 Westbourne Drive Santa Monica Boulevard 18 В 40 D 16 В С 35 La Cienega Boulevard Santa Monica Boulevard 83 77 Е 123 112 F F F Santa Monica Boulevard 36 Croft Avenue/Holloway Drive 15 В 32 19 В 53 D С 39 Sweetzer Avenue Santa Monica Boulevard В 19 23 14 В 18 В С 41 Crescent Heights Boulevard Santa Monica Boulevard 54 D 111 F 82 F 143 F 42 Laurel Avenue Santa Monica Boulevard 10 А 11 В 11 В 12 В 43 Fairfax Avenue Santa Monica Boulevard 60 Е 82 F 104 F 166 F Gardner Street Santa Monica Boulevard 19 В 25 С 21 43 46 С D 47 Santa Monica Boulevard 15 17 Martel Avenue В 8 А 9 Α В Santa Monica Boulevard 49 Formosa Avenue 10 36 D 15 В 68 А Е Santa Monica Boulevard 50 La Brea Avenue 59 Е 71 Е 89 115 F F 13 54 Robertson Boulevard Melrose Avenue 15 В 18 В В В 17 55 San Vicente Boulevard 23 43 35 Melrose Avenue 34 С С D D 56 Huntley Drive Melrose Avenue 26 С 7 53 D А Α 8 57 La Cienega Boulevard 40 D 77 61 Melrose Avenue 60 Е Е Е 61 Doheny Drive Beverly Boulevard 45 D 48 D 81 F 83 F 63 Robertson Boulevard 61 Е 34 78 52 D Beverly Boulevard С Е 39 72 65 San Vicente Boulevard Beverly Boulevard 40 D D 46 D Е 66 La Cienega Boulevard Beverly Boulevard 84 112 64 Е F 94 F F 72 La Brea Avenue Romaine Street 51 D 14 В D 11 В 46

Table 5-4. Future No Project Level of Service

¹ Beyond a certain point, intersection delay can no longer be accurately calculated. The intersection is said to be overflowing.

² Intersection (Int) is controlled by stop signs and delay is reported for the worst-case movement.

³ Intersection is controlled by two signals on one controller. Delay and LOS are reported for each signal.

Notes: AM and PM represent AM and PM Peak Hour.

Change in delay is in seconds.

For signalized intersections, average delay beyond 200 seconds is reported as overflowing.

For unsignalized intersections, worst-case approach delay beyond 50 seconds is reported as overflowing.

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AM		PM						
Impact Anal	ysis	Impact Anal	ysis					
ange in Delay	Impact?	Change in Delay	Impact?					
7	No	9	No					
30	Yes	25	Yes					
15	Yes	39	Yes					
2	No	2	No					
2	No	12	No					
10	No	51	Yes					
22	Yes	20	Yes					
19	Yes	84	Yes					
4	No	2	No					
3	No	2	No					
25	Yes	32	Yes					
46	Yes	67	Yes					
1	No	1	No					
33	Yes	111	Yes					
26	Yes	18	Yes					
21	Yes	22	Yes					
18	Yes	14	Yes					
39	Yes	124	Yes					
2	No	8	No					
22	Yes	3	No					
163	Yes	21	Yes					
28	Yes	38	Yes					
36	Yes	58	Yes					
6	No	22	Yes					
40	Yes	35	Yes					
4	No	21	Yes					
4	No	5	No					
28	Yes	32	Yes					
2	No	1	No					
45	Yes	84	Yes					
3	No	17	Yes					
1	No	2	No					
5	No	32	Yes					
30	Yes	44	Yes					
3	No	4	No					
9	No	12	Yes					
27	Yes	2	No					
17	Yes	21	Yes					
36	Yes	35	Yes					
17	Yes	18	Yes					
6	No	33	Yes					
30	Yes	29	Yes					
3	No	-5	No					

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		Ex	kisting (Year 20	08)	Future (Year 2035) Proposed Project		Future (Year 2035) No Project			
Roadway	Segment	ADT	AM	PM	ADT	AM	PM	ADT	AM	PM
Beverly Boulevard	W/O Doheny	25,679	2,271	2,058	27,010	2,380	2,240	27,010	2,460	2,350
Beverly Boulevard	E/O La Cienega Boulevard	34,361	2,070	2,508	37,960	2,320	2,770	37,960	2,360	2,870
Crescent Heights Boulevard	S/O Santa Monica Boulevard	23,089	1,700	1,652	23,640	1,730	1,720	23,640	1,790	1,660
Crescent Heights Boulevard	S/O Sunset Boulevard	33,538	2,192	2,257	36,860	2,270	2,350	36,860	2,300	2,270
Doheny Drive	S/O Santa Monica Boulevard	14,545	974	1,063	16,490	1,100	1,180	16,490	1,100	1,190
Doheny Drive	S/O Beverly	18,552	1,177	1,249	22,120	1,330	1,450	22,120	1,410	1,480
Doheny Drive	S/O Sunset Boulevard	9,619	507	613	11,560	550	680	11,560	610	720
Fairfax Avenue	S/O Santa Monica Boulevard	30,457	1,917	2,160	33,330	2,410	2,660	33,330	2,180	2,470
Fairfax Avenue	S/O Sunset Boulevard	31,318	1,948	2,260	34,770	2,270	2,550	34,770	2,080	2,580
Fountain Avenue	E/O La Cienega Boulevard	28,364	1,951	1,987	31,580	2,070	2,180	31,580	2,060	2,000
Fountain Avenue	@ Crescent Heights	34,890	2,413	2,017	41,050	2,600	2,200	41,050	2,820	2,180
Fountain Avenue	@ Fuller Av	35,627	2,072	2,275	41,040	2,330	2,520	41,040	2,260	2,420
La Brea Avenue	S/O Santa Monica Boulevard	39,173	2,394	2,547	42,100	2,610	2,730	42,100	2,760	2,880
La Brea Avenue	S/O Sunset Boulevard	38,020	2,336	2,500	40,310	2,510	2,660	40,310	2,450	2,620
La Cienega Boulevard	S/O Santa Monica Boulevard	35,501	1,972	2,254	38,990	2,130	2,490	38,990	2,250	2,530
La Cienega Boulevard	S/O Sunset Boulevard	36,112	2,140	2,209	36,420	2,150	2,220	36,420	2,200	2,490
Melrose Avenue	E/O Robertson Bl	21,203	1,117	1,484	23,070	1,300	1,640	23,070	1,290	1,610
Melrose Avenue	E/O La Cienega Boulevard	33,983	2,321	2,437	38,830	2,510	2,620	38,830	2,550	2,810
Robertson Boulevard	S/O Beverly	18,840	1,104	1,256	21,500	1,230	1,410	21,500	1,260	1,510
Robertson Boulevard	S/O Santa Monica Boulevard	11,235	550	725	12,490	590	760	12,490	560	740
San Vicente Boulevard	S/O Santa Monica Boulevard	21,220	1,322	1,527	23,230	1,480	1,700	23,230	1,460	1,690
San Vicente Boulevard	S/O Sunset Boulevard	12,830	850	991	15,260	1,000	1,160	15,260	900	1,060
Santa Monica Boulevard	W/O Doheny	40,423	2,229	2,160	45,050	2,430	2,380	45,050	2,410	2,240
Santa Monica Boulevard	E/O La Cienega Boulevard	45,313	2,520	2,771	50,800	2,810	3,080	50,800	3,120	3,460
Santa Monica Boulevard	@ Westbourne Dr	53,388	2,979	3,015	59,600	3,220	3,330	59,600	3,280	3,300
Santa Monica Boulevard	@Crescent Heights Bl	46,468	2,216	2,779	51,550	2,460	2,960	51,550	2,770	3,190
Santa Monica Boulevard	@Formosa Av	45,489	2,389	2,933	52,090	2,570	3,190	52,090	2,870	3,430
Sunset Boulevard	E/O Crescent Heights Bl	56,525	2,995	2,940	60,980	3,210	3,080	60,980	3,220	2,990
Sunset Boulevard	@ Sunset Plaza	51,462	2,124	2,621	56,680	2,320	2,850	56,680	2,560	3,130
Sunset Boulevard	E/O La Cienega Boulevard	52,231	3,097	3,090	55,360	3,220	3,230	55,360	3,330	3,640

Table 5-5. Future (Year 2035) No Project Scenario and Proposed Project Scenario Forecast Roadway Segment Volumes – City of West Hollywood General Plan Update Study Segments

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	Per Capita				Average Trip
Alternative Scenario	VMT	VMT	VHT	VT	Length
Existing Conditions (2008)	24.62	1,503,718	44,557	354,967	7.02
Proposed Project	27.55	1,726,427	56,004	409,341	6.99
No Project/Existing General Plan	27.73	1,737,545	56,440	411,077	7.00
Two Transit Overlay Areas Only Alternative	23.91	1,651,080	53,005	393,311	6.95
Extensive TDM Alternative	23.55	1,691,569	54,597	402,052	6.97

Note: Per capita VMT calculation includes both population and employment. Source: Fehr & Peers 2010

		Peak	Scen	ario	Change	Significant
Scenario	Street Names	Hour	V/C	LOS	in V/C	Impact?
	Doheny Drive & Santa Monica	AM	1.053	F	N/A	N/A
Existing	Boulevard	PM	0.984	Е	N/A	N/A
Conditions	La Cienega Boulevard & Santa	AM	0.989	Е	N/A	N/A
	Monica Boulevard	PM	0.799	С	N/A	N/A
	Doheny Drive & Santa Monica	AM	1.111	F	0.058	Yes
Proposed	Boulevard	PM	1.019	F	0.035	Yes
General Plan	La Cienega Boulevard & Santa	AM	1.058	F	0.069	Yes
	Monica Boulevard	PM	0.889	D	0.090	No
No Project	Doheny Drive & Santa Monica	AM	1.144	F	0.091	Yes
	Boulevard	PM	1.057	F	0.073	Yes
	La Cienega Boulevard & Santa	AM	1.119	F	0.130	Yes
	Monica Boulevard	PM	0.918	Е	0.119	No
Two Trongit	Doheny Drive & Santa Monica	AM	1.101	F	0.048	Yes
Two Transit	Boulevard	PM	1.013	F	0.029	Yes
Only Alternative	La Cienega Boulevard & Santa	AM	1.028	F	0.039	Yes
Only Alternative	Monica Boulevard	PM	0.856	D	0.057	No
	Doheny Drive & Santa Monica	AM	1.074	F	0.021	Yes
Extensive TDM	Boulevard	PM	1.014	F	0.030	Yes
Alternative	La Cienega Boulevard & Santa	AM	1.016	F	0.027	Yes
	Monica Boulevard	PM	0.826	D	0.027	No

Table 5-7. Intersection Levels of Service for CMP Impact Analysis

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 the areas with existing and proposed mid- to high-rise buildings, would not be considerably altered with implementation of either the existing or the proposed General Plan.

The intersection LOS impacts and roadway segment volumes of Alternative 1 would be greater than those of the proposed project, resulting in increased effects related to emergency access.

Neither the existing nor the proposed General Plan would conflict with policies supporting alternative modes of transportation, or result in further extension of roadways into areas that are not serviced by bus or rail services necessitating the use of automobiles by residents beyond those currently planned. Additional policies in the proposed General Plan include actions aimed at encouraging alternative transportation modes such as walking, biking, and using public transportation, relative to Alternative 1.

On-street parking and off-street municipal parking operate above 85% capacity during peak hours in commercial areas within the City. Although sufficient spaces are available in private parking facilities to meet the existing and likely future demand in these areas, the existing General Plan does not include policies or programs to support the better management and utilization of existing parking facilities. Parking impacts would be greater under Alternative 1 compared to the proposed project.

More intersections would operate at unacceptable LOS under Alternative 1 compared to the proposed project; similarly, Alternative 1 would have higher (less desirable) numbers under alternative metrics such as VMT, VHT, VT, and average trip length. Because the existing General Plan lacks the proposed project's emphasis on support for transportation demand management, public transportation, bicycle and pedestrian transportation, and parking management, transportation and traffic impacts would be greater under Alternative 1 compared to the proposed project. Implementation of Alternative 1 would result in additional significant LOS impacts at intersections with less-than-significant impacts under the proposed project.

Global Climate Change

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%. The proposed project includes new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management. The proposed project includes the preparation of a Climate Action Plan (CAP) to reduce communitywide greenhouse gas (GHG) emissions 20 to 25% over 2008 levels by 2035. The CAP is an Implementation Program of the Infrastructure, Resources, and Conservation Element of the proposed General Plan. These policies and programs are not present in the existing General Plan. In the absence of these policies and programs, Alternative 1 would have higher per-capita VMT, VHT, more trips generated, and longer average trip length compared to the proposed project. Given the potential

increase in VMT and GHG emissions, and the lack of climate change policies and programs within the existing General Plan, this alternative would result in greater cumulative impacts compared to the proposed project. These impacts would be significant and unavoidable under both alternatives. All impacts related to global climate change would be significant and unavoidable for both the proposed project and Alternative 1.

CONCLUSION

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.

Alternative 1 would not implement the proposed General Plan. As such, Alternative 1 would not achieve most of the objectives of the proposed General Plan, such as reducing dependence on the automobile, increasing other options for movement, and meeting GHG reduction targets.

5.3.2 ALTERNATIVE 2: GROWTH CONSTRAINED TO TWO TRANSIT OVERLAY AREAS ONLY

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. The three transit overlay zones include La Brea Avenue and Santa Monica Boulevard, Santa Monica Boulevard West, and Fairfax Avenue and Santa Monica Boulevard. 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. The two transit overlay areas where growth could occur include La Brea Avenue and Santa Monica Boulevard, and Fairfax Avenue and Santa Monica Boulevard. Growth would not be allowed in the Santa Monica Boulevard West transit overlay area. 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 the vicinity of La Brea Avenue and Santa Monica Boulevard, and Fairfax Avenue and Santa Monica Boulevard. 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.

COMPARISON OF ENVIRONMENTAL IMPACTS TO PROPOSED PROJECT

Aesthetics

All aesthetics impacts would be less than significant under the proposed project. Future development under both the proposed project and Alternative 2 could result in taller structures limited to a small number of parcels in the transit zones than would be permitted in the existing General Plan, potentially affecting scenic vistas. However, SSP and 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.

There are no designated scenic highways in West Hollywood, so there would be no impact under either the proposed project or this alternative.

Future development under the proposed project would include infill and redevelopment projects, which would have the potential to impact the visual character of existing neighborhoods, adding new sources of light and glare, and shade or shadow. Similarly, development under Alternative 2 would occur through infill and redevelopment projects, but the number of such projects would be limited based on the focus of redevelopment at two transit nodes and policies discouraging additional development elsewhere in the City. Future development projects would be subject to subsequent environmental and design review, which would include analysis of visual impacts. Under both the proposed project and Alternative 2, the General Plan would include policies regarding aesthetic improvements such as landscaping, pedestrian amenities, and design standards for architecture and lighting. Future development would also be subject to existing building and development standards specified in the City's Zoning Code. Because of requirements for aesthetic improvements under the proposed project and this alternative, as well

as implementation of existing Zoning Code requirements and SSP requirements, aesthetics impacts would be similar for the proposed project and Alternative 2.

Air Quality

Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. Because the level of development would be less under Alternative 2, construction-related air quality impacts would be reduced. However, this alternative still represents substantial growth and construction compared to existing conditions, and these impacts would also be significant for Alternative 2. The majority of development under the proposed project would occur within five commercial subareas of the City as a result of redevelopment. New development in the commercial subareas, which could include residential development, has the potential to expose more sensitive receptors to new and existing sources of air pollution. Similarly, in Alternative 2, new development would be constrained only to two transit-oriented development (TOD) nodes at the intersections of Santa Monica Boulevard and La Brea and Fairfax avenues, exposing more sensitive receptors to air pollution. However, the focus on mixed-use and TOD under both the proposed project and this alternative could provide a wider range of services and uses near residents, potentially reducing or shortening vehicle trips. Alternative 2 would have lower traffic volumes on most roadway segments and would have fewer intersections that operate at an unacceptable LOS compared to the proposed project. Although mobile source air emissions would be relatively smaller under this alternative, the increased mobile source emissions compared to existing conditions would still result in a significant impact under Alternative 2. Impacts related to implementation of the SCAQMD Air Quality Plan would be similar under the proposed project and Alternative 2.

Implementation of this alternative would result in generally smaller impacts associated with construction sources, smaller impacts associated with mobile sources, and similar impacts associated with stationary sources. Because mobile sources are the largest contributor to air quality impacts, Alternative 2 is considered to have lesser air quality impacts compared to the proposed project. However, this alternative would not reduce any significant air quality impacts of the proposed project to a less-than-significant level.

Biological Resources

Biological resources impacts of the proposed project would be less than significant. The urban environment in the City of West Hollywood does not support sensitive species, migration

corridors, riparian habitat or other sensitive natural communities, or wetlands. There would be no impact to these resources under either the proposed project or Alternative 2. Similarly, there are no habitat conservation plans or natural community conservation plans that apply to the City, so there would be no impact under the proposed project or this alternative.

Future development under both the proposed project and Alternative 2 would be subject to all applicable state, federal, and local ordinances protecting biological resources. Implementation of either the proposed project or Alternative 2 would result in a less-than-significant impact related to conflict with these plans, regulations, and ordinances. Impacts to biological resources would be similar under the proposed General Plan and Alternative 2.

Cultural Resources

Cultural resources impacts of the proposed project would be less than significant. Under both Alternative 2 and the proposed project, the City would continue to preserve historic resources through preservation policy, design standards, and environmental review. With respect to archaeological resources and burial sites, existing policies and policies of the proposed project require evaluation and oversight by a qualified archaeologist if resources are identified during construction activities.

Because future development under both Alternative 2 and the proposed project would be required to comply with policies and ordinances protecting historical and cultural resources, Alternative 2 would result in similar impacts to cultural resources compared to the proposed project.

Geology, Soils, and Mineral Resources

Geology, soils, and mineral resources impacts of the proposed project would be less than significant. The majority of development under the proposed project would occur as infill or redevelopment within five commercial subareas. The City is currently built out, and under Alternative 2, any changes would similarly represent infill or redevelopment. However, for Alternative 2, the redevelopment would be focused on transit nodes at the intersections of Santa Monica Boulevard with La Brea and Fairfax avenues.

The Hollywood Fault runs through the City. A seismic event on this fault or smaller nearby faults could result in surface fault rupture. Therefore, infill development or redevelopment under either the proposed project or this alternative within proximity to these faults would have the potential to expose additional people and/or structures to hazards in the event of fault rupture.

Because West Hollywood is located within a seismically active region of southern California near large regional faults capable of generating strong earthquakes with high intensity ground shaking, the entire City is at risk for damage caused by ground shaking under either the proposed General Plan or Alternative 2.

Approximately half of the City has been designated as a liquefaction hazard area. Some or all of the Sunset Strip, Santa Monica Boulevard West, and Melrose/Beverly District commercial subareas proposed within the Draft General Plan are located within this hazard area. These commercial subareas are not proposed for intensified development in Alternative 2; development under the proposed General Plan may expose more people and property to liquefaction hazards than Alternative 2. However, this impact would be less than significant for both the proposed project and Alternative 2.

A small area along the northern edge of the City has been designated as susceptible to earthquake-induced landslides. No land use changes are proposed in this area under either the proposed project or Alternative 2, so the potential for redevelopment or infill activities that would subject buildings, roadways, utilities, and persons to severe damage or injury in the event of an earthquake-induced landslide would be similar for both.

Sites undergoing development or redevelopment could be susceptible to erosion from wind and stormwater runoff associated with construction activities. New development under either the proposed project or Alternative 2 has the potential to increase soil erosion if undertaken without erosion control.

Soil hazards, including land-sliding, debris flows, expansive soils, and collapsible soils, are present in the City. Future development permitted under either the proposed project or Alternative 2 would expose additional people and structures to soil hazards.

There are no designated mineral resources zones in the City, and neither the proposed project nor this alternative would result in the loss of availability of mineral resources. Wastewater conveyance and treatment are available throughout the City, so neither the proposed project nor Alternative 2 would result in impacts related to suitability of soils for septic systems.

Like the proposed General Plan, several programs and regulations would be implemented under Alternative 2 to protect people and property from geologic and seismic hazards. All new development would be subject to state and federal regulations, including the California Building Code seismic safety standards for construction. All geology, soils, and mineral resources impacts would be less than significant under either the proposed project or Alternative 2. However, based on the slightly higher forecasts for population and new commercial development under the proposed General Plan compared to Alternative 2, and the fact that all or part of three of the five commercial subareas identified for development and redevelopment in the proposed project lie in areas subject to liquefaction hazards, Alternative 2 would result in lesser impacts to geology, soils, and mineral resources compared to the proposed project.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts of the proposed project would be less than significant. Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. The majority of development under the proposed project would occur within five commercial subareas of the City as a result of redevelopment. Some of these areas include commercial lands that may use, store, or release hazardous materials. Under both the proposed project and Alternative 2, future commercial land uses would remain within currently designated areas. However, for Alternative 2, the redevelopment would be focused on transit nodes at the intersections of Santa Monica Boulevard with La Brea and Fairfax avenues.

An increase over the existing population and commercial square footage under both the proposed project and Alternative 2 would result in increased use, storage, and/or disposal of hazardous materials during routine operations, and increased transportation of hazardous materials to and through the City. However, compliance with regulations governing hazardous materials transportation, handling and disposal, including handling of materials within 0.25 mile of existing or proposed schools, would be required under both the proposed General Plan and Alternative 2.

Similarly, the level of development associated with the proposed General Plan would result in greater levels of congestion at intersections and along roadways identified as evacuation routes than under Alternative 2. However, implementation of either the proposed project or Alternative 2 would require periodic updating of, and compliance with, adopted emergency plans. Impacts related to evacuation routes and compliance with emergency plans would be less than significant for both the proposed project and Alternative 2.

Several Cortese-listed sites are present in the City, and development or redevelopment of these sites or other parcels with known hazardous materials or hazardous waste could occur under

either the proposed project or this alternative. However, compliance with existing state, federal, and local hazardous waste site cleanup standards would be required under both the proposed project and Alternative 2.

No change will occur to land use designations in the portion of the City designated as a wildfire hazard severity zone under either the proposed General Plan or Alternative 2. Underground gas hazards are present in some areas of the City, and redevelopment or infill development under either proposed project or Alternative 2 could expose additional people to underground gas hazards.

Development pursuant to either the proposed General Plan or Alternative 2 would be subject to the same local, state, and federal regulations regarding hazards and hazardous materials. The proposed project would not result in any significant hazards or hazardous materials impacts, and thus Alternative 2 would not reduce or avoid any significant hazards impacts of the proposed project. However, the increased level of development under the proposed General Plan would potentially result in an increased presence of hazardous materials within commercial and industrial focus areas compared to Alternative 2. Future development in proximity to these uses could be exposed to hazardous materials related to the use, disposal, and transport of hazardous materials. Thus, implementation of Alternative 2 would result in lesser impacts with respect to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

Hydrology and water quality impacts of the proposed project would be less than significant. Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. The majority of development under the proposed project would occur through redevelopment within five commercial subareas. For Alternative 2, the redevelopment would be focused on transit nodes at the intersections of Santa Monica Boulevard with La Brea and Fairfax avenues. However, because most new development would occur in the form of infill, redevelopment, or adaptive reuse in existing urbanized areas, it would not result in substantial changes to absorption rates, drainage patterns, and the rate of surface runoff. Site redevelopment will likely improve the quality of urban runoff contributing to groundwater infiltration and recharge due to enforcement of NPDES permit requirements. The proposed General Plan and Alternative 2 could both lead to a net reduction in Citywide impervious surface in the environment when compared to existing conditions, due to the addition of pervious surface and landscaping occurring through retrofitting of previously developed sites, particularly in the commercial areas of the City, thus improving absorption and surface runoff rates. The proposed General Plan and Alternative 2 both include goals and policies intended to further improve water quality, manage stormwater, and reduce runoff.

Neither the proposed project nor Alternative 2 would result in the alteration of existing streams, rivers, or drainage channels. Future infill development in the City's existing urban areas would not substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of storm water runoff.

Under either the proposed project or Alternative 2, future development would occur in urbanized areas; new land would not be converted to urban uses, and substantial new areas of impervious surfaces would not be created. In fact, site redevelopment may provide opportunities to create new pervious surfaces through new landscaping and use of porous pavements, increasing groundwater recharge.

Two areas of the City are located within the 0.2% AEP boundary for floods (500-year floodplain). However, there are no areas of the City that are located within the 1% AEP boundary (100-year floodplain). Neither the proposed project nor Alternative 2 would expose people or structures to hazards related to a 100-year flood. Portions of West Hollywood are susceptible to flood events related to dam failure. The West Franklin Dam and the Mulholland Dam are located in the Hollywood Hills above West Hollywood. Areas below the dams, including the Santa Monica Boulevard-La Brea Avenue Transit node, have the potential to be inundated in the unlikely event of catastrophic dam failure. Given proposed increases in population, housing, and nonresidential development in both the proposed project and Alternative 2, exposure of persons and property to flooding and dam inundation would be similar.

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 steeply graded slopes, including following construction activities or after wildfires. No infill development or redevelopment is proposed in this area under either the proposed project or Alternative 2.

Development under this alternative and the proposed General Plan would be subject to local, regional, state, and federal standards for water quality. Additionally, the proposed General Plan's Infrastructure, Resources, and Conservation Element contains updated goals, policies and

programs related to groundwater, water supply, hydrology, and water quality responsive to recent changes in federal and state regulation. Due to these updated policies and programs in both the proposed project and Alternative 2, implementation of Alternative 2 would result in similar impacts to hydrology and water quality compared to the proposed project.

Land Use and Planning

Land use and planning impacts of the proposed project would be less than significant. Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. The majority of development under the proposed project would occur through redevelopment within five commercial subareas. For Alternative 2, the redevelopment would be focused on transit nodes at the intersections of Santa Monica Boulevard with La Brea and Fairfax avenues. Due to the urbanized character of the City, development pursuant to either the proposed General Plan or Alternative 2 would not physically divide established communities, as all new development would occur in the form of site redevelopment.

Both the proposed project and Alternative 2 are consistent with the goals of the Regional Comprehensive Plan and Guide, including the Compass Growth Visioning Principles. However, the Zoning Code, existing specific plans, and West Hollywood Redevelopment Plan, all of which are consistent with the existing General Plan, would have to be updated to conform to either the proposed General Plan or Alternative 2.

There are no adopted habitat conservation plans or natural community conservation plans in the City.

Because neither the proposed project nor Alternative 2 would divide existing communities, both would be consistent with the Regional Comprehensive Plan and Guide, and both would require updating of other plans and ordinances of the City, land use impacts would be similar under the proposed project and Alternative 2.

Noise

The majority of development under the proposed project would occur as a mix of uses within five commercial subareas, all of which are located adjacent to roadways with high traffic volumes. Alternative 2 would include development primarily in transit nodes at two locations along Santa Monica Boulevard. However, Alternative 2 would include lesser increases in

population and residents along high-traffic roadways. Fewer residents would be exposed to elevated traffic-related noise levels than under the proposed project. However, under either the proposed project or Alternative 2, these increases could exceed noise significance thresholds and have the potential to affect noise-sensitive receptors and uses located adjacent to arterials.

Construction activities associated with either the proposed project or Alternative 2 would generate elevated noise from construction and have the potential to impact noise-sensitive land uses.

West Hollywood is located more than 8 miles from the nearest airport (Burbank-Glendale-Pasadena Airport), and noise from aircraft would be an intermittent occurrence under both the proposed project and Alternative 2.

Vibration from sources including construction activities, and ongoing commercial and industrial activities would affect fewer people under Alternative 2 based on the increased level of construction and development.

Because of the smaller increases in population and nonresidential square footage, impacts related to stationary noise sources, traffic noise, and vibration would be lesser under Alternative 2 compared to the proposed project. Although the increased population and development under Alternative 2 would result in slightly reduced noise impacts compared to the proposed project, Alternative 2 would still represent a substantial change from existing conditions, and no noise impacts of the proposed project would be reduced below the level of significance in this alternative. Furthermore, after implementation of mitigation measures, all noise impacts of the proposed project would be less than significant. Alternative 2 would not avoid any significant noise impacts of the proposed project.

Paleontological Resources

The majority of development under the proposed project would occur as infill or redevelopment within five commercial subareas. The City is currently built out, and under Alternative 2, any changes would represent infill or redevelopment, primarily of areas around the intersections of Santa Monica Boulevard with La Brea and Fairfax avenues. Most areas of the City (excluding only the Hollywood Hills) are located on paleontologically sensitive alluvial fan deposits similar to rock formations where large numbers of fossils have been recovered. As under the proposed project, development under Alternative 2 would have the potential to affect paleontological resources, but fewer areas are proposed for development or redevelopment under Alternative 2.

Impacts would thus be lesser under Alternative 2 than the proposed project, although the construction that could occur under Alternative 2 would still result in a potentially significant paleontological resources impact. Both the proposed project's paleontological resource impacts and the impacts of Alternative 2 would be reduced to a less-than-significant level following mitigation.

Population and Housing

Population and housing impacts of the proposed project would be less than significant. Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. Although both Alternative 2 and the proposed project would result in more growth than forecast by SCAG, Alternative 2 would have a lesser population increase. This impact would be less than significant for both the proposed project and Alternative 2.

While it is likely that the creation of housing units associated with the proposed General Plan could provide for additional housing opportunities and the replacement of substandard housing with newer housing units relative to Alternative 2, it is also possible that residents of older housing units could be displaced as a result of the demolition and replacement of older housing units with newer housing units. General Plan policies under both Alternative 2 and the proposed project address, facilitate, and promote development of a variety of rental and ownership housing types in the planning area aimed at all income levels to meet the needs of the projected population.

Although no significant population and housing impacts were identified for the proposed project, because of the smaller change in the number of residential units and the quantity of nonresidential square footage compared to the proposed project, population and housing impacts would be lesser for Alternative 2. No significant impacts related to population and housing would be avoided by implementation of Alternative 2.

Public Services and Utilities

Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. The lower levels of development and population under Alternative 2 would generate fewer calls associated with criminal activity, medical emergencies, fires, and accidents, as well as a reduced need for

expanded public education efforts related to crime and fire prevention. With the smaller increase in population and new development under Alternative 2, a lesser increase in police and fire personnel, equipment, and facilities would be required to ensure adequate emergency service capabilities and short response times. However, the incrementally smaller increases in population and development under Alternative 2 compared to the proposed project would not reduce significant police and fire service-level impacts below the level of significance, and implementation of the proposed mitigation measures would reduce impacts to a less-than-significant level for both the proposed project and Alternative 2.

Given the smaller increase in the number of dwelling units and associated school age population under Alternative 2 compared to the proposed project, demands on school facilities and staff would be lower relative to the proposed project. Similarly, the smaller increase in residential population under Alternative 2 would create a lesser increase in demand for additional library services requiring expansion of existing libraries and/or construction of new libraries relative to the proposed project. These impacts would be less than significant for both the proposed project and Alternative 2.

The smaller increase in population and development resulting from Alternative 2 would create a smaller increase in demand for additional water infrastructure as well as replacement and upgrading of water facilities relative to the proposed project. This impact would be less than significant for both the proposed project and Alternative 2.

Future water supply for the proposed project is a significant and unavoidable impact based on future uncertainties related to the consistent availability of water from the San Francisco Bay/Sacramento River Delta region. Both the proposed project and Alternative 2 include a variety of policies and programs aimed at reducing per capita water use. The increases in population, commercial square footage, and therefore also water demand would be relatively smaller under Alternative 2 compared to the proposed project; however, the impact would remain significant and unavoidable for Alternative 2.

Implementation of Alternative 2 would result in a smaller increase in population relative to the proposed project, creating less new demand for wastewater collection and treatment facilities. This impact would be less than significant for both the proposed project and Alternative 2.

The smaller increase in population associated with Alternative 2 would also create less new demand for electricity and natural gas. Lower levels of development and population growth with implementation of Alternative 2 would result in smaller increases in demand for solid waste

collection and disposal capacity relative to the proposed project. These impacts would be less than significant for both the proposed project and Alternative 2.

Overall, implementation of Alternative 2 would allow slightly less new development and redevelopment in the City than would occur under implementation of the proposed General Plan. Because of the smaller population and employment forecast, demand for police, fire, school, and library services and infrastructure capacity would be lower for this alternative than for the proposed project. Implementation of Alternative 2 would therefore result in lesser impacts to public services and utilities compared to the proposed project. However, implementation of Alternative 2 would not reduce any significant impacts of the proposed project to a less-than-significant level.

Recreation

Recreation impacts of the proposed project would be less than significant. Implementation of either the proposed project or Alternative 2 would result in an increase in the City's population, and neither the proposed project nor Alternative 2 identifies new or expanded park facilities. Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. Because the increase in population would be smaller, impacts related to recreation would be less under Alternative 2 compared to the proposed project. However, implementation of Alternative 2 would not reduce or avoid any significant recreation impacts that were identified for the proposed project.

Transportation and Traffic

Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. Both the proposed project and Alternative 2 include new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management. Table 5-2 presents a comparison of the TDM policies, which would be implemented under each alternative.

Implementation of the proposed project would result in 22 intersections with significant LOS impacts during the a.m. peak hour, with 26 intersections having significant impacts during the p.m. peak hour. Buildout of Alternative 2 would result in 21 intersections with significant impacts during the a.m. peak hour, and 23 intersections during the p.m. peak hour. Table 5-8

presents future intersection LOS for Alternative 1. Most roadway segments would have similar or greater volumes under the proposed project compared to Alternative 2; Table 5-9 presents future roadway segment volumes for Alternative 2 and Alternative 3.

Because of the smaller increase in population compared to the proposed project and the focus on development and redevelopment only in areas with access to public transportation, VMT, VHT, VT, and average trip length would all be lower for Alternative 2 compared to the proposed project. Table 5-6 presents daily performance measures for the proposed project and the alternatives.

Significant impacts on County CMP intersections would still result under Alternative 2, but V/C ratios would be lower at each intersection compared to those forecast for the proposed project. Table 5-7 presents CMP impact information for the proposed project and the three alternatives.

Neither the proposed project nor Alternative 2 would increase hazards due to design features or incompatible uses; no new roadways are planned for the City, and any proposed expansions or alterations would be subject to existing City design standards. This impact would be less than significant for both the proposed project and Alternative 2.

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 or Alternative 2. Current patterns utilized by helicopters accessing facilities within the City and surrounding area, including the areas with existing and proposed mid- to high-rise buildings would not be considerably altered with implementation of either the proposed General Plan or Alternative 2. This impact would be less than significant for both the proposed project and Alternative 2.

The intersection LOS impacts and roadway segment volumes of Alternative 2 would be lesser than those of the proposed project, resulting in relatively smaller effects related to emergency access. This impact would be less than significant for both the proposed project and Alternative 2.

Neither the proposed General Plan nor this alternative would conflict with policies supporting alternative modes of transportation, or result in further extension of roadways into areas that are not serviced by bus or rail services necessitating the use of automobiles by residents beyond those currently planned. Additional policies in both the proposed General Plan and Alternative 2 include actions aimed at encouraging alternative transportation modes such as walking, biking, and using public transportation. This impact would be less than significant for both the proposed project and Alternative 2.

							Future (2035)		Future (2035)		AM		PM	
			Existing (20	08) AM	Existing (20	08) PM	TOD Al	t AM	TOD AI	t PM	Impact Anal	ysis	Impact Anal	lysis
Int	North/South Street	East/West Street	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Change in Delay	Impact?	Change in Delay	Impact?
1	Doheny Road/Cory Avenue	Sunset Boulevard	23	С	28	С	26	С	34	С	4	No	7	No
2	Doheny Drive	Sunset Boulevard	52	D	60	Е	73	Е	81	F	21	Yes	22	Yes
4	San Vicente Boulevard	Sunset Boulevard	33	С	36	D	42	D	56	Е	8	No	19	Yes
5	Larrabee Street	Sunset Boulevard	7	А	10	В	9	Α	11	В	2	No	1	No
6	Sunset Plaza Drive	Sunset Boulevard	9	А	14	В	11	В	20	В	2	No	6	No
7	La Cienega Boulevard/Miller Drive	Sunset Boulevard	19	В	59	Е	25	С	81	F	7	No	22	Yes
9	Crescent Heights Boulevard	Sunset Boulevard	58	Е	60	Е	65	Е	72	Е	7	Yes	12	Yes
11	La Cienega Boulevard	Fountain Avenue	54	D	192	F	57	Е	213	F	2	No	21	Yes
12	Olive Drive	Fountain Avenue	6	А	4	А	8	Α	6	А	1	No	2	No
14	Sweetzer Avenue	Fountain Avenue	9	А	12	В	11	В	13	В	2	No	1	No
15	Crescent Heights Boulevard	Fountain Avenue	98	F	49	D	107	F	67	Е	9	Yes	18	Yes
17	Fairfax Avenue	Fountain Avenue	66	Е	58	Е	86	F	93	F	20	Yes	35	Yes
18	Spaulding Avenue	Fountain Avenue	5	А	5	А	6	Α	6	А	1	No	1	No
20	Gardner Street	Fountain Avenue	56	Е	190	F	84	F	258	F	28	Yes	69	Yes
24	La Brea Avenue	Fountain Avenue	64	Е	50	D	75	Е	62	Е	11	Yes	13	Yes
26	Holloway Drive/Horn Avenue	Sunset Boulevard	40	D	54	D	53	D	57	Е	13	Yes	3	No
27	La Cienega Boulevard	Holloway Drive	30	C	58	Е	39	D	63	Е	9	Yes	5	Yes
28	Doheny Drive	Cynthia Street ²	21	С	52	F	33	D	102	F	12	Yes	50	Yes
29	San Vicente Boulevard	Cynthia Street	15	В	20	С	17	В	27	С	1	No	7	No
20	Doheny Drive	Santa Monica Boulevard (WB) ³	98	F	39	D	112	F	41	D	14	Yes	2	No
30	Doheny Drive	Melrose Avenue/SM Boulevard (EB) ³	65	Е	191	F	224	F	233	F	159	Yes	42	Yes
32	Robertson Boulevard	Santa Monica Boulevard	35	С	33	С	51	D	50	D	16	Yes	17	Yes
33	San Vicente Boulevard	Santa Monica Boulevard	42	D	61	Е	57	Е	88	F	15	Yes	27	Yes
34	Westbourne Drive	Santa Monica Boulevard	16	В	18	В	19	В	26	С	3	No	8	No
35	La Cienega Boulevard	Santa Monica Boulevard	83	F	77	Е	93	F	92	F	10	Yes	15	Yes
36	Croft Avenue/Holloway Drive	Santa Monica Boulevard	15	В	32	С	17	В	44	D	2	No	12	Yes
39	Sweetzer Avenue	Santa Monica Boulevard	14	В	18	В	16	В	21	С	1	No	3	No
41	Crescent Heights Boulevard	Santa Monica Boulevard	54	D	111	F	71	Е	131	F	18	Yes	20	Yes
42	Laurel Avenue	Santa Monica Boulevard	10	Α	11	В	10	В	11	В	1	No	0	No
43	Fairfax Avenue	Santa Monica Boulevard	60	Е	82	F	73	Е	150	F	13	Yes	68	Yes
46	Gardner Street	Santa Monica Boulevard	19	В	25	С	20	С	33	С	2	No	8	No
47	Martel Avenue	Santa Monica Boulevard	8	А	15	В	9	Α	17	В	1	No	2	No
49	Formosa Avenue	Santa Monica Boulevard	10	А	36	D	14	В	52	D	4	No	16	Yes
50	La Brea Avenue	Santa Monica Boulevard	59	Е	71	Е	77	Е	92	F	18	Yes	21	Yes
54	Robertson Boulevard	Melrose Avenue	15	В	13	В	17	В	15	В	2	No	2	No
55	San Vicente Boulevard	Melrose Avenue	34	С	23	С	41	D	29	С	7	No	6	No
56	Huntley Drive	Melrose Avenue	26	С	7	А	32	С	8	А	6	No	1	No
57	La Cienega Boulevard	Melrose Avenue	60	Е	40	D	68	Е	47	D	8	Yes	6	No
61	Doheny Drive	Beverly Boulevard	45	D	48	D	73	Е	70	E	28	Yes	22	Yes
63	Robertson Boulevard	Beverly Boulevard	61	Е	34	С	75	Е	47	D	15	Yes	14	Yes
65	San Vicente Boulevard	Beverly Boulevard	40	D	39	D	45	D	50	D	5	No	11	No
66	La Cienega Boulevard	Beverly Boulevard	64	Е	84	F	80	Е	100	F	16	Yes	16	Yes
72	La Brea Avenue	Romaine Street	11	В	51	D	14	В	45	D	3	No	-6	No

Table 5-8. Future TOD Focus Alternative Levels of Service

¹ Beyond a certain point, intersection delay can no longer be accurately calculated. The intersection is said to be overflowing.
 ² Intersection (Int) is controlled by stop signs and delay is reported for the worst-case movement.

³ Intersection is controlled by two signals on one controller. Delay and LOS are reported for each signal.

Notes: AM and PM represent AM and PM Peak Hour.

Change in delay is in seconds.

For signalized intersections, average delay beyond 200 seconds is reported as overflowing. For unsignalized intersections, worst-case approach delay beyond 50 seconds is reported as overflowing.

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		Existing (Year 2008)			F	uture (Year 203 TOD Alternativ	5) e	Future (Year 2035) TDM Alternative			
Roadway	Segment	ADT	AM	PM	ADT	AM	PM	ADT	AM	PM	
Beverly Boulevard	W/O Doheny Drive	25,679	2,271	2,058	27,020	2,390	2,230	26,990	2,390	2,220	
Beverly Boulevard	E/O La Cienega Boulevard	34,361	2,070	2,508	37,040	2,230	2,670	37,520	2,180	2,620	
Crescent Heights Boulevard	S/O Santa Monica Boulevard	23,089	1,700	1,652	23,660	1,720	1,700	23,630	1,720	1,680	
Crescent Heights Boulevard	S/O Sunset Boulevard	33,538	2,192	2,257	36,390	2,240	2,320	36,630	2,220	2,300	
Doheny Drive	S/O Santa Monica Boulevard	14,545	974	1,063	16,360	1,070	1,140	16,420	1,050	1,110	
Doheny Drive	S/O Beverly Boulevard	18,552	1,177	1,249	21,960	1,320	1,410	22,070	1,300	1,380	
Doheny Drive	S/O Sunset Boulevard	9,619	507	613	11,080	550	670	11,230	540	650	
Fairfax Avenue	S/O Santa Monica Boulevard	30,457	1,917	2,160	32,930	2,260	2,580	33,090	2,120	2,500	
Fairfax Avenue	S/O Sunset Boulevard	31,318	1,948	2,260	34,180	2,170	2,490	34,540	2,120	2,450	
Fountain Avenue	E/O La Cienega Boulevard	28,364	1,951	1,987	30,820	1,990	2,070	31,180	1,960	2,000	
Fountain Avenue	@ Crescent Heights Boulevard	34,890	2,413	2,017	40,120	2,510	2,130	40,420	2,420	2,070	
Fountain Avenue	@ Fuller Avenue	35,627	2,072	2,275	40,110	2,240	2,450	40,650	2,180	2,390	
La Brea Avenue	S/O Santa Monica Boulevard	39,173	2,394	2,547	42,020	2,580	2,690	42,050	2,560	2,680	
La Brea Avenue	S/O Sunset Boulevard	38,020	2,336	2,500	40,680	2,500	2,620	40,470	2,480	2,600	
La Cienega Boulevard	S/O Santa Monica Boulevard	35,501	1,972	2,254	37,970	2,050	2,410	38,170	2,020	2,340	
La Cienega Boulevard	S/O Sunset Boulevard	36,112	2,140	2,209	36,370	2,150	2,220	36,560	2,150	2,220	
Melrose Avenue	E/O Robertson Boulevard	21,203	1,117	1,484	22,890	1,230	1,600	23,080	1,210	1,580	
Melrose Avenue	E/O La Cienega Boulevard	33,983	2,321	2,437	37,530	2,400	2,510	38,150	2,330	2,450	
Robertson Boulevard	S/O Beverly Boulevard	18,840	1,104	1,256	21,510	1,220	1,420	21,440	1,200	1,390	
Robertson Boulevard	S/O Santa Monica Boulevard	11,235	550	725	12,510	580	750	12,510	570	740	
San Vicente Boulevard	S/O Santa Monica Boulevard	21,220	1,322	1,527	22,660	1,410	1,610	23,090	1,350	1,540	
San Vicente Boulevard	S/O Sunset Boulevard	12,830	850	991	15,180	950	1,110	15,350	940	1,090	
Santa Monica Boulevard	W/O Doheny Drive	40,423	2,229	2,160	44,510	2,370	2,360	44,800	2,310	2,290	
Santa Monica Boulevard	E/O La Cienega Boulevard	45,313	2,520	2,771	49,910	2,670	2,980	50,350	2,610	2,910	
Santa Monica Boulevard	@ Westbourne Drive	53,388	2,979	3,015	58,550	3,180	3,250	59,060	3,130	3,180	
Santa Monica Boulevard	@ Crescent Heights Boulevard	46,468	2,216	2,779	50,450	2,350	2,900	50,930	2,280	2,860	
Santa Monica Boulevard	@ Formosa Avenue	45,489	2,389	2,933	51,090	2,450	3,070	51,580	2,420	3,030	
Sunset Boulevard	E/O Crescent Heights Boulevard	56,525	2,995	2,940	60,120	3,130	3,030	60,520	3,060	2,990	
Sunset Boulevard	@ Sunset Plaza	51,462	2,124	2,621	55,750	2,210	2,740	56,250	2,130	2,660	
Sunset Boulevard	E/O La Cienega Boulevard	52,231	3,097	3,090	54,510	3,150	3,150	54,960	3,110	3,100	

Table 5-9. Future (Year 2035) TOD Focus Alternative and Extensive TDM Alternative Forecast Roadway Segment Volumes – City of West Hollywood General Plan Update Study Segments

TDM = Traffic Demand Management; TOD = transit oriented development
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On-street parking and off-street municipal parking operate above 85% capacity during peak hours in commercial areas within the City. Sufficient spaces are available in private parking facilities to meet the existing and likely future demand in these areas, and both the existing General Plan and Alternative 2 include policies or programs to support the better management and utilization of existing parking facilities. Parking impacts would be similar under Alternative 2 compared to the proposed project. This impact would be less than significant for both the proposed project and Alternative 2.

Fewer intersections would operate at unacceptable LOS under Alternative 2 compared to the proposed project; Alternative 2 would avoid significant intersection impacts that would occur under the proposed project. Similarly, Alternative 2 would have lower (more desirable) numbers under alternative metrics such as VMT, VHT, VT, and average trip length, although no significance conclusion was offered for these metrics for either the proposed project or Alternative 2. Because a smaller amount of new development and redevelopment compared to the proposed project would be focused exclusively in areas with access to public transportation, traffic and transportation impacts would be lesser under Alternative 2 compared to the proposed project.

Global Climate Change

Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. Both the proposed project and Alternative 2 include new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management. Based on the reduced development and focus on transit, Alternative 2 would have lower per-capita VMT and VHT, fewer trips generated, and shorter average trip length compared to the proposed project. Given the potential decrease in VMT and smaller increase in GHG emissions, this alternative may result in reduced direct GHG emissions impacts with respect to climate change compared to the proposed project. These impacts would be significant and unavoidable under both alternatives.

CONCLUSION

Buildout under Alternative 2 would result in approximately 1,066 fewer dwelling units, approximately 656,288 fewer square feet of nonresidential development, and approximately 1,700 fewer people than would be forecast under the proposed project. This alternative 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.

Because Alternative 2 would restrict additional development in most areas of the City, 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.

5.3.3 ALTERNATIVE 3: EXTENSIVE TRANSPORTATION DEMAND MANAGEMENT PROGRAM

This alternative uses the same basic land use and policy assumptions as the project but includes more aggressive TDM policies as shown in Table 5-3. 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 subsides, 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.

COMPARISON OF ENVIRONMENTAL IMPACTS TO PROPOSED PROJECT

Aesthetics

Aesthetics impacts of the proposed project would be less than significant. Future development under both the proposed project and Alternative 3 could result in taller structures than would be permitted under the existing General Plan, potentially affecting scenic vistas. However, SSP and 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.

There are no designated scenic highways in West Hollywood, so there would be no impact under either the proposed project or this alternative.

Future development under both the proposed project and Alternative 3 would include infill and redevelopment projects, which would have the potential to impact the visual character of existing neighborhoods, adding new sources of light and glare, and shade or shadow. Future development projects would be subject to subsequent environmental and design review, which would include analysis of visual impacts. Under both the proposed project and Alternative 3, the General Plan would include policies regarding aesthetic improvements such as landscaping, pedestrian amenities, and design standards for architecture and lighting. Future development would also be subject to existing building and development standards specified in the City's Zoning Code. Because of requirements for aesthetic improvements under the proposed project and this alternative, as well as implementation of existing Zoning Code requirements and SSP requirements, aesthetics impacts would be similar for the proposed project and Alternative 3.

Air Quality

Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. Because the level of development would be equivalent under Alternative 3, construction-related air quality impacts would be similar. The majority of development under the proposed project and Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. New development in the commercial subareas, which could include residential development, has the potential to expose more sensitive receptors to new and existing sources of air pollution. However, intensification of the commercial subareas could provide a wider range of services and uses, potentially reducing or shortening vehicle trips. Additionally the Mobility Element of the proposed General Plan emphasizes alternative transportation, including pedestrian walkways, and bicycle paths throughout the City that could also reduce vehicle trips, as well as VMT. The proposed General Plan includes green building policies, potentially reducing emissions from existing and future buildings. Alternative 3 would have lower traffic volumes on most roadway segments, and would have fewer intersections that operate at an unacceptable LOS compared to the proposed project. Impacts related to implementation of the SCAQMD Air Quality Plan would be similar under this alternative and the proposed project.

Implementation of this alternative would result in generally similar impacts associated with construction sources, lesser impacts associated with mobile sources, and similar impacts associated with stationary sources. Because mobile sources are the largest contributor to air quality impacts, Alternative 3 is considered to have lesser air quality impacts compared to the proposed project. However, air quality impacts related to mobile sources would still be significant for Alternative 3 based on the increase over existing conditions. Implementation of Alternative 3 would not avoid any significant air quality impacts of the proposed project.

Biological Resources

Biological resources impacts of the proposed project would be less than significant. The urban environment in the City of West Hollywood does not support sensitive species, migration corridors, riparian habitat or other sensitive natural communities, or wetlands. There would be no impact to these resources under either the proposed project or Alternative 3. Similarly, there are no habitat conservation plans or natural community conservation plans that apply to the City, so there would be no impact under the proposed project or this alternative.

Future development under both the proposed project and Alternative 3 would be subject to all applicable state, federal, and local ordinances protecting biological resources. Implementation of either the proposed project or Alternative 3 would result in a less-than-significant impact related to conflict with these plans, regulations, and ordinances. Impacts to biological resources would be similar under the proposed General Plan and Alternative 3.

Cultural Resources

Cultural resources impacts of the proposed project would be less than significant. Under both Alternative 3 and the proposed project, the City would continue to preserve historic resources through preservation policy, design standards, and environmental review. With respect to archaeological resources and burial sites, policies of the proposed project or Alternative 3 would require evaluation and oversight by a qualified archaeologist if resources are identified during construction activities.

Because future development under both Alternative 3 and the proposed project would be required to comply with policies and ordinances protecting historical and cultural resources, Alternative 3 would result in similar impacts to cultural resources compared to the proposed project.

Geology, Soils, and Mineral Resources

Geology, soils, and mineral resources impacts of the proposed project would be less than significant. The majority of development under both the proposed project and Alternative 3 would occur as infill or redevelopment within five commercial subareas. The Hollywood Fault runs through the City. A seismic event on this fault or smaller nearby faults could result in surface fault rupture. Therefore, infill development or redevelopment under either the proposed project or this alternative within proximity to these faults would have the potential to expose additional people and/or structures to hazards in the event of fault rupture.

Because the City is located within a seismically active region of southern California near large regional faults capable of generating strong earthquakes with high intensity ground shaking, the entire City is at risk for damage caused by ground shaking under either the proposed General Plan or Alternative 3.

Approximately half of the City has been designated as a liquefaction hazard area. Some or all of the Sunset Strip, Santa Monica Boulevard West, and Melrose/Beverly District commercial subareas proposed within the Draft General Plan are located within this hazard area. These commercial subareas are also proposed for intensified development in Alternative 3; development under the proposed General Plan may expose a similar number of people to liquefaction hazards relative to Alternative 3.

A small area along the northern edge of the City has been designated as susceptible to earthquake-induced landslides. No land use changes are proposed in this area under either the proposed project or Alternative 3, so the potential for redevelopment or infill activities that would subject buildings, roadways, utilities, and persons to severe damage or injury in the event of an earthquake-induced landslide would be similar for both.

Sites undergoing development or redevelopment could be susceptible to erosion from wind and stormwater runoff associated with construction activities. New development under either the proposed project or Alternative 3 has the potential to increase soil erosion if undertaken without erosion control.

Soil hazards, including land-sliding, debris flows, expansive soils, and collapsible soils, would are present in the City. Future development permitted under either the proposed project or Alternative 3 would expose additional people and structures to soil hazards.

There are no designated mineral resources zones in the City, and neither the proposed project nor this alternative would result in the loss of availability of mineral resources. Wastewater conveyance and treatment are available throughout the City, so neither the proposed project nor Alternative 3 would result in impacts related to suitability of soils for septic systems.

Like the proposed General Plan, several programs and regulations would be implemented under Alternative 3 to protect people and property from geologic and seismic hazards. All new development would be subject to state and federal regulations, including the California Building Code seismic safety standards for construction. Based on the identical forecasts for population and new commercial development under the proposed General Plan compared to Alternative 3, Alternative 3 would result in similar impacts to geology, soils, and mineral resources compared to the proposed project.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts of the proposed project would be less than significant. Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. The majority of development under either the proposed project or Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. Some of these areas include commercial lands that may use, store, or release hazardous materials. Under both the proposed project and Alternative 3, future commercial land uses would remain within currently designated areas.

An increase over the existing population and commercial square footage under both the proposed project and Alternative 3 would result in increased use, storage, and/or disposal of hazardous materials during routine operations, and increased transportation of hazardous materials to and through the City. However, compliance with regulations governing hazardous materials transportation, handling, and disposal, including handling of materials within 0.25 mile of existing or proposed schools, would be required under both the proposed General Plan and Alternative 3.

Similarly, the level of development associated with the proposed General Plan would result in greater levels of congestion at intersections and along roadways identified as evacuation routes than under Alternative 3. However, implementation of either the proposed project or Alternative 3 would require periodic updating of, and compliance with, adopted emergency plans.

Several Cortese-listed sites are present in the City, and development or redevelopment of these sites or other parcels with known hazardous materials or hazardous waste could occur under either the proposed project or this alternative. However, compliance with existing state, federal, and local hazardous waste site cleanup standards would be required under both the proposed project and Alternative 3.

No change will occur to land use designations in the portion of the City designated as a wildfire hazard severity zone under either the proposed General Plan or Alternative 3. Underground gas hazards are present in some areas of the City, and redevelopment or infill development under either the proposed project or Alternative 3 could expose additional people to underground gas hazards.

Development pursuant to either the proposed General Plan or Alternative 3 would be subject to the same local, state, and federal regulations regarding hazards and hazardous materials. The similar levels of future development under the proposed General Plan and Alternative 3 result in similar use of hazardous materials within commercial and industrial focus areas. Future development in proximity to these uses could be exposed to hazardous materials during the use, disposal, and transport of these materials. Thus, implementation of Alternative 3 would result in similar impacts with respect to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

Hydrology and water quality impacts of the proposed project would be less than significant. Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. The majority of development under either the proposed project or Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. However, because most new development would occur in the form of infill, redevelopment, or adaptive reuse in existing urbanized areas, it would not result in substantial changes to absorption rates, drainage patterns, and the rate of surface runoff. Site redevelopment will likely improve the quality of urban runoff contributing to groundwater infiltration and recharge due to enforcement of NPDES permit requirements. The proposed General Plan and Alternative 3 could both lead to a net reduction in Citywide impervious surface in the environment when compared to existing conditions, due to the addition of pervious surface and landscaping occurring through retrofitting of previously developed sites, particularly in the commercial areas of the City, thus improving absorption and surface runoff rates.

Neither the proposed project nor Alternative 3 would result in the alteration of existing streams, rivers, or drainage channels. Future infill development in the City's existing urban areas would not substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of storm water runoff.

Under either the proposed project or Alternative 3, future development would occur in urbanized areas; new land would not be converted to urban uses, and substantial new areas of impervious surfaces would not be created. In fact, site redevelopment may provide opportunities to create new pervious surfaces through new landscaping and use of porous pavements, increasing groundwater recharge.

Two areas of the City are located within the 0.2% AEP boundary for floods (500-year floodplain). However, there are no areas of the City that are located within the 1% AEP boundary (100-year floodplain). Neither the proposed project nor Alternative 3 would expose people or structures to hazards related to a 100-year flood. Portions of West Hollywood are susceptible to flood events related to dam failure. The West Franklin Dam and the Mulholland Dam are located in the Hollywood Hills above West Hollywood. Areas below the dams, including portions of the City, have the potential to be inundated in the unlikely event of catastrophic dam failure. Given potential increases in population, housing, and nonresidential development in both the proposed project and Alternative 3, exposure of persons and property to flooding and dam inundation would be similar.

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. No infill development or redevelopment is proposed in this area under either the proposed project or Alternative 3.

Development under this alternative and the proposed General Plan would be subject to local, regional, state, and federal standards for water quality. Additionally, the Infrastructure, Resources, and Conservation Element of the proposed General Plan contains updated goals, policies, and programs related to groundwater, water supply, hydrology, and water quality responsive to recent changes in federal and state regulation, which would affect future development under both the proposed project and Alternative 3. Because of the similar land use designations and policies, implementation of Alternative 3 would result in similar impacts to hydrology and water quality compared to the proposed project.

Land Use and Planning

Land use and planning impacts of the proposed project would be less than significant. Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. The majority of development under either the proposed project or Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. Due to the urbanized character of the City, development pursuant to either the proposed General Plan or Alternative 3 would not physically divide established communities, as all new development would occur in the form of site redevelopment.

Both the proposed project and Alternative 3 are consistent with the goals of the Regional Comprehensive Plan and Guide, including the Compass Growth Visioning Principles. However, the Zoning Code, existing specific plans, and West Hollywood Redevelopment Plan, all of which are consistent with the existing General Plan, would have to be updated to conform to either the proposed General Plan or Alternative 3.

There are no adopted habitat conservation plans or natural community conservation plans in the City.

Because neither the proposed project nor the TDM alternative would divide existing communities, both would be consistent with the Regional Comprehensive Plan and Guide, and both would require updating of other plans and ordinances of the City, land use impacts would be similar under the proposed project and Alternative 3.

Noise

The majority of development under both the proposed project and Alternative 3 would occur as a mix of uses within five commercial subareas, all of which are located adjacent to roadways with high traffic volumes. A similar number of residents would be exposed to elevated traffic-related noise levels under the proposed project and Alternative 3.

Construction activities associated with either the proposed project or Alternative 3 would generate elevated noise from construction and have the potential to impact noise sensitive land uses.

The proposed project would result in the development of an equivalent number of residences and amount of nonresidential development as compared to Alternative 3. West Hollywood is an

urbanized area, with a variety of existing stationary noise sources, including both daytime and nighttime activities, and a similar number of residents would be exposed to more noise sources under the proposed project and Alternative 3.

West Hollywood is located more than 8 miles from the nearest airport (Burbank-Glendale-Pasadena Airport), and noise from aircraft would be an intermittent occurrence under both the proposed project and Alternative 3.

Vibration from sources including construction activities, and ongoing commercial and industrial activities would affect a similar number of people under the proposed project and Alternative 3 based on the equivalent level of construction and development.

Because of the equivalent increases in population and nonresidential square footage, impacts related to stationary noise sources, traffic noise, and vibration would be similar under Alternative 3 compared to the proposed project.

Paleontological Resources

The majority of development under either the proposed project or Alternative 3 would occur as infill or redevelopment within five commercial subareas. Most areas of the City (excluding only the Hollywood Hills) are located on paleontologically sensitive alluvial fan deposits similar to rock formations where large numbers of fossils have been recovered. As under the proposed project, development under Alternative 3 would have the potential to affect paleontological resources, and similar policies and mitigation measures would be imposed. Impacts would thus be similar under Alternative 3 compared to the proposed project.

Population and Housing

Population and housing impacts of the proposed project would be less than significant. Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. Both Alternative 3 and the proposed project would result in more growth than forecast by SCAG.

While it is likely that the creation of housing units associated with the both the proposed project and Alternative 3 could provide for additional housing opportunities and the replacement of substandard housing with newer housing units, it is also possible that residents of older housing units could be displaced as a result of the demolition and replacement of older housing units with newer housing units. General Plan policies under both Alternative 3 and the proposed project address, facilitate, and promote development of a variety of rental and ownership housing types in the planning area aimed at all income levels to meet the needs of the projected population.

Because of the equivalent change in the number of residential units and the quantity of nonresidential square footage compared to the proposed project, population and housing impacts would be similar for Alternative 3.

Public Services and Utilities

Alternative 3 includes the same General Plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. The majority of development under either the proposed project or Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. Because development and population would be similar under Alternative 3 compared to the proposed project, this alternative would generate a similar number of calls associated with criminal activity, medical emergencies, fires, and accidents, as well as a similar need for expanded public education efforts related to crime and fire prevention. With the similar increase in population and new development under Alternative 3, a similar increase in police and fire personnel, equipment, and facilities would be required to ensure adequate emergency service capabilities and short response times.

Given the similar increase in the number of dwelling units and associated school-age population under Alternative 3 compared to the proposed project, demands on school facilities and staff would be similar. Similarly, the similar increase in residential population under Alternative 3 would create an equivalent increase in demand for additional library services requiring expansion of existing libraries and/or construction of new libraries.

The equivalent increase in population and development resulting from Alternative 3 would create a similar increase in demand for additional water infrastructure as well as replacement and upgrading of water facilities relative to the proposed project.

Future water supply for the proposed project is a significant and unavoidable impact based on future uncertainties related to the consistent availability of water from the San Francisco Bay/Sacramento River Delta region. Both the proposed project and Alternative 3 include a variety of policies and programs aimed at reducing per capita water use, and the increases in population, commercial square footage, and therefore also water demand would be similar.

Implementation of Alternative 3 would result in an equivalent increase in population relative to the proposed project, creating similar new demand for wastewater collection and treatment facilities. The similar increase in population associated with Alternative 3 would also create similar new demand for electricity and natural gas. The comparable levels of development and population growth with implementation of Alternative 3 would result in similar increases in demand for solid waste collection and disposal capacity relative to the proposed project.

Overall, implementation of Alternative 3 would allow equivalent new development and redevelopment in the City to the proposed General Plan. Because of the similar population and employment forecast, demand for police, fire, school, and library services and infrastructure capacity would be similar for this alternative to the proposed project. Implementation of Alternative 3 would therefore result in similar impacts to public services and utilities compared to the proposed project.

Recreation

Recreation impacts of the proposed project would be less than significant. Implementation of either the proposed project or Alternative 3 would result in an increase in the City's population, and neither the proposed project nor the existing General Plan identifies new or expanded park facilities. Alternative 3 applies the same land use designations and population assumptions as the proposed project. Because the increase in population would be equivalent, impacts related to recreation would be similar under Alternative 3 compared to the proposed project.

Transportation and Traffic

Alternative 3 includes the same general plan land use designations as the proposed project, and buildout would result in a similar number of residential units and square feet of nonresidential use, and a similar increase in population. The majority of development under either the proposed project or Alternative 3 would occur within five commercial subareas of the City as a result of redevelopment. The proposed project includes new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management. However, Alternative 3 includes more and stronger policies related to transportation demand. Table 5-2 presents a comparison the transportation policies that would be implemented under each alternative.

Implementation of the proposed project would result in 22 intersections with significant LOS impacts during the a.m. peak hour, with 26 intersections having significant impacts during the p.m. peak hour. Buildout of Alternative 3 would result in 17 intersections with significant

impacts during the a.m. peak hour, and 21 intersections during the p.m. peak hour. Implementation of Alternative 3 would avoid significant intersection LOS impacts of the proposed project. Table 5-10 presents future intersection LOS for Alternative 3. Most roadway segments would have similar or greater volumes under the existing General Plan compared to the proposed project; Table 5-9 presents future roadway segment volumes for Alternative 2 and Alternative 3.

Because of the greater emphasis on policies supporting public transportation, bicycle and pedestrian transportation in this alternative, VMT, VHT, VT, and average trip length would all be lower for Alternative 3 compared to the proposed project. Table 5-6 presents daily performance measures for the proposed project and the alternatives.

Significant impacts on County CMP intersections would still result under Alternative 3, but V/C ratios would be lower at each intersection compared to those forecast for the proposed project. Table 5-7 presents CMP Impact information for the proposed project and the three alternatives.

Neither the proposed project nor Alternative 3 would increase hazards due to design features or incompatible uses; no new roadways are planned for the City, and any proposed expansions or alterations would be subject to existing City design standards.

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 or Alternative 3. Current patterns utilized by helicopters accessing facilities within the City and surrounding area, including the areas with existing and proposed mid- to high-rise buildings, would not be considerably altered with implementation of either the proposed General Plan or Alternative 3.

The intersection LOS impacts and roadway segment volumes of Alternative 3 would be lesser than those of the proposed project, resulting in relatively smaller effects related to emergency access.

Neither the proposed General Plan nor this alternative would conflict with policies supporting alternative modes of transportation, or result in further extension of roadways into areas that are not serviced by bus or rail services necessitating the use of automobiles by residents beyond those currently planned. Additional policies in both the proposed General Plan and Alternative 3 include actions aimed at encouraging alternative transportation modes such as walking, biking, and using public transportation. Alternative 3 adds more (and more restrictive) policies encouraging the use of alternative transportation, and discouraging automobile use.

On-street parking and off-street municipal parking operate above 85% capacity during peak hours in commercial areas within the City. Sufficient spaces are available in private parking facilities to meet the existing and likely future demand in these areas, and both the existing General Plan and Alternative 3 include policies or programs to support the better management and utilization of existing parking facilities. Parking impacts would be similar under Alternative 3 compared to the proposed project.

Fewer intersections would operate at unacceptable LOS under Alternative 3 compared to the proposed project; implementation of Alternative 3 would avoid significant intersection LOS impacts of the proposed project. Similarly, Alternative 3 would have lower (more desirable) numbers under alternative metrics such as VMT, VHT, VT, and average trip length. Because more stringent policies would be imposed to mitigate transportation impacts in Alternative 3 compared to the proposed project, traffic and transportation impacts would be lesser under Alternative 3 compared to the proposed project.

Global Climate Change

Buildout under Alternative 3 would result in an equivalent amount of new development with what is forecast under the proposed project. Both the proposed project and Alternative 3 include new policies and programs aimed at reducing demand for automobile travel, supporting improved access to transit, improving pedestrian and bicycle infrastructure, and supporting transportation system management, but Alternative 3 includes more, and more stringent, policies. Through enforcement of these policies, Alternative 3 would have lower per-capita VMT and VHT, fewer trips generated, and shorter average trip length compared to the proposed project. Given the potential decrease in VMT and smaller increase in GHG emissions, this alternative may result in reduced direct GHG emissions impacts with respect to climate change than the proposed General Plan, and cumulative impacts would also be less than those of the proposed project. These impacts would be significant and unavoidable under both alternatives.

CONCLUSION

Buildout under Alternative 3 would result in an equivalent amount of new development compared to the proposed project. 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, 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

					Future (2035)		(2035)	Future (2035)		AM		PM		
			Existing (20	08) AM	Existing (20	08) PM	TDM A	lt AM	TDM Al	t PM	Impact Anal	<u>ysis</u>	Impact Anal	lysis
Int	North/South Street	East/West Street	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Change in Delay	Impact?	Change in Delay	Impact?
1	Doheny Road/Cory Avenue	Sunset Boulevard	23	С	28	С	26	С	31	С	3	No	3	No
2	Doheny Drive	Sunset Boulevard	52	D	60	E	72	Е	82	F	20	Yes	22	Yes
4	San Vicente Boulevard	Sunset Boulevard	33	С	36	D	39	D	58	Е	6	No	22	Yes
5	Larrabee Street	Sunset Boulevard	7	Α	10	В	9	Α	11	В	1	No	1	No
6	Sunset Plaza Drive	Sunset Boulevard	9	Α	14	В	11	В	17	В	2	No	3	No
7	La Cienega Boulevard/Miller Drive	Sunset Boulevard	19	В	59	E	24	С	67	E	6	No	8	Yes
9	Crescent Heights Boulevard	Sunset Boulevard	58	Е	60	E	63	Е	68	E	4	No	8	Yes
11	La Cienega Boulevard	Fountain Avenue	54	D	192	F	56	Е	192	F	1	No	0	No
12	Olive Drive	Fountain Avenue	6	Α	4	A	8	Α	5	Α	2	No	1	No
14	Sweetzer Avenue	Fountain Avenue	9	Α	12	В	11	В	13	В	2	No	1	No
15	Crescent Heights Boulevard	Fountain Avenue	98	F	49	D	103	F	60	E	5	Yes	11	Yes
17	Fairfax Avenue	Fountain Avenue	66	Е	58	Е	77	E	84	F	12	Yes	27	Yes
18	Spaulding Avenue	Fountain Avenue	5	Α	5	А	6	А	6	Α	0	No	1	No
20	Gardner Street	Fountain Avenue	56	Е	190	F	85	F	261	F	29	Yes	72	Yes
24	La Brea Avenue	Fountain Avenue	64	Е	50	D	72	Е	59	Е	8	Yes	9	Yes
26	Holloway Drive/Horn Avenue	Sunset Boulevard	40	D	54	D	55	D	66	Е	14	Yes	12	Yes
27	La Cienega Boulevard	Holloway Drive	30	С	58	Е	38	D	62	Е	8	Yes	4	No
28	Doheny Drive	Cynthia Street ²	21	С	52	F	31	D	119	F	10	Yes	67	Yes
29	San Vicente Boulevard	Cynthia Street	15	В	20	С	17	В	28	С	1	No	8	No
20	Doheny Drive	Santa Monica Boulevard (WB) ³	98	F	39	D	108	F	40	D	10	Yes	1	No
30	Doheny Drive	Melrose Avenue/SM Boulevard (EB) ³	65	Е	191	F	223	F	223	F	158	Yes	32	Yes
32	Robertson Boulevard	Santa Monica Boulevard	35	С	33	С	49	D	49	D	14	Yes	17	Yes
33	San Vicente Boulevard	Santa Monica Boulevard	42	D	61	Е	51	D	80	Е	9	No	19	Yes
34	Westbourne Drive	Santa Monica Boulevard	16	В	18	В	18	В	25	С	3	No	7	No
35	La Cienega Boulevard	Santa Monica Boulevard	83	F	77	Е	88	F	87	F	5	No	10	Yes
36	Croft Avenue/Holloway Drive	Santa Monica Boulevard	15	В	32	С	17	В	44	D	2	No	12	Yes
39	Sweetzer Avenue	Santa Monica Boulevard	14	В	18	В	15	В	21	С	1	No	3	No
41	Crescent Heights Boulevard	Santa Monica Boulevard	54	D	111	F	68	E	117	F	14	Yes	6	Yes
42	Laurel Avenue	Santa Monica Boulevard	10	Α	11	В	10	А	11	В	0	No	0	No
43	Fairfax Avenue	Santa Monica Boulevard	60	Е	82	F	70	Е	144	F	11	Yes	61	Yes
46	Gardner Street	Santa Monica Boulevard	19	В	25	С	20	В	33	С	1	No	7	No
47	Martel Avenue	Santa Monica Boulevard	8	Α	15	В	9	А	17	В	1	No	2	No
49	Formosa Avenue	Santa Monica Boulevard	10	Α	36	D	13	В	51	D	3	No	15	Yes
50	La Brea Avenue	Santa Monica Boulevard	59	Е	71	Е	73	Е	88	F	14	Yes	17	Yes
54	Robertson Boulevard	Melrose Avenue	15	В	13	В	16	В	15	В	2	No	2	No
55	San Vicente Boulevard	Melrose Avenue	34	С	23	С	40	D	27	С	6	No	4	No
56	Huntley Drive	Melrose Avenue	26	С	7	А	30	С	8	А	4	No	1	No
57	La Cienega Boulevard	Melrose Avenue	60	E	40	D	66	Е	45	D	6	No	5	No
61	Doheny Drive	Beverly Boulevard	45	D	48	D	70	Е	68	Е	25	Yes	20	Yes
63	Robertson Boulevard	Beverly Boulevard	61	Е	34	С	73	Е	44	D	12	Yes	11	No
65	San Vicente Boulevard	Beverly Boulevard	40	D	39	D	45	D	46	D	5	No	7	No
66	La Cienega Boulevard	Beverly Boulevard	64	Е	84	F	78	E	94	F	14	Yes	11	Yes
72	La Brea Avenue	Romaine Street	11	В	51	D	14	В	45	D	3	No	-6	No

Table 5-10. Future Extensive TDM Alternative Levels of Service – City of West Hollywood General Plan Update Study Intersections

¹ Beyond a certain point, intersection delay can no longer be accurately calculated. The intersection is said to be overflowing.

 2 Intersection (Int) is controlled by stop signs and delay is reported for the worst-case movement.

³ Intersection is controlled by two signals on one controller. Delay and LOS are reported for each signal.

Notes: AM and PM represent AM and PM Peak Hour.

Change in delay is in seconds.

For signalized intersections, average delay beyond 200 seconds is reported as overflowing.

For unsignalized intersections, worst-case approach delay beyond 50 seconds is reported as overflowing.

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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.

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, potentially reducing the ability to meet the City's housing and economic development objectives.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No-Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified.

Table 5-1 summarizes the impacts of each of the alternatives relative to the proposed General Plan. Alternative 2, the Two Transit Overlay Areas Only Alternative, has the potential to reduce impacts related to transportation, global climate change, air quality, geology and soils, hazards and hazardous materials, paleontological resources, noise, population and housing, public services and utilities, and recreation. Alternative 2 would avoid significant traffic impacts of the project; fewer intersections would operate at an unacceptable LOS. This alternative would also achieve most, but not all, of the objectives of the proposed General Plan, as explained above in Section 5.1.1. Therefore, this alternative is the environmentally superior alternative. Alternative 3 also results in lesser impacts than the proposed project, including avoiding significant traffic impacts.

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CHAPTER 6.0 CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft EIR in response to the comments received during the public review period. These changes constitute the Final EIR to be presented to the City decision-makers for certification and project approval. None of the changes to the Draft EIR would require recirculation of the EIR. Revisions made to the EIR have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the EIR is not warranted.

The changes to the Draft EIR are identified by section, page number and paragraph number if applicable. Text which has been removed is shown with a strikethrough line, while text that has been added is shown as underlined. All of the changes described in this section have also been made in the corresponding Final EIR sections. It should be noted that minor grammatical, punctuation, and formatting corrections are not included in the summary below. Please refer to Section 7.0, Response to Comments, for referenced comment letters and corresponding responses.

SECTION 0.0 EXECUTIVE SUMMARY

- Page <u>Clarification/Revision</u>
- ES-4 The following language was added to the first bullet point under the heading *Potential Impacts Identified as Less Than Significant*:
 - Aesthetics scenic vistas; scenic resources within a state scenic highway; visual character; light, and glare, and signage; shade or shadow
- ES-31 Mitigation Measure 3.12-7 was deleted from the executive summary and Public Services and Utilities Section 3.12.5 on page 3.12-59. See below:
 - **3.12-7** Reinstate the "Beat Program" to enhance neighborhood safety and livability. This program will assign personnel direct responsibility for specific areas (beats) throughout the City and help foster Sheriff Departments vision of "Public Trust Policing."

The subsequent Mitigation Measures were renumbered accordingly.

CHAPTER 1.0 INTRODUCTION

No changes or revisions have been made to this chapter.

CHAPTER 2.0 PROJECT DESCRIPTION

Page Clarification/Revision

2-4 The word "cars" was removed from the fifth paragraph on page 2-4. This paragraph now reads:

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.

2-12 A portion of Table 2-2: Proposed Residential Land Use Designations, included below, was modified as follows:

				Dwelling	Per Lot Area
Land Use Designation	ation	Stories	Height (ft)	Units	(sf)
Residential,	R1A	2	25	1	
Single-Family or	D1D	2	25	2	<8,499
Two-Unit Low	KID	<u>2</u>	<u>25</u>	<u>3</u>	<u>8,500-11,999</u>
Density	R1C	1	15	1	

ft = feet; sf = square feet

* Denotes proposed new General Plan designation

As reflected in the table, under the land use designation R1B, an additional row was added for lots between 8,500 and 11,999 square feet, allowing 2 stories, 25 feet in height, and 3 dwelling units.

CHAPTER 3.0 ENVIRONMENTAL SETTINGS, IMPACTS, AND MITIGATION

No changes or revisions were made to Chapter 3.0. Changes made to the subsections of Chapter 3 are included below.

SECTION 3.1 AESTHETICS

- Page <u>Clarification/Revision</u>
- 3-1.10 The text in the second paragraph under the heading *Light*, *Glare*, *and Signage* was revised as follows:

However, the proposed General Plan does not propose an increase in the size location or amount of signage allowed compared with existing conditions. <u>New offsite signage could be considered by the City in areas where such signage wasn't previously allowed</u>.

Policies in the proposed General Plan include a variety of actions intended to reduce the impact of signage. The Land Use and Urban Form Chapter includes the following policies:

- ► <u>The City should consider aesthetics, size, location, lighting, and siting in its</u> <u>evaluation of offsite signage.</u>
- Offsite signage should be designed and sited to minimize its impact on: adjacent properties, the public right of way, cultural resources, creation of shade and shadow, and potential conflict with the development of adjacent properties.
- Offsite signage in new developments should be designed in concert with the architectural lighting, landscape, and public art program of a development.
- The City may consider new offsite signage in strategic locations and where there is economic and urban design value.
- For new offsite signage located outside the Sunset Strip and outside the Eastside Redevelopment Area, the City should require applicants to remove equivalent amounts of existing offsite advertising either on-site, or at another location in the City.
- When evaluating the approval of offsite signage as part of a new development project the City may consider both the direct economic value of the project and the indirect economic value of the project to the economy as a whole.
- New development will be designed to function economically whether or not offsite signage is placed on the building.
- Offsite signage will be carefully integrated into new development so that the building and not the sign is the primary use of the land.
- ► When a new development includes an offsite sign, the City will require an offsetting public benefit.

- The City prohibits the use of roof signs, pole signs, and flashing and animated signs, except as part of a creative sign program.
- The City will rely on size, placement, location, and numeric limits for on-site signs that properly integrate into overall site development, avoiding undue proliferation of signage and preventing signs from dominating or overpowering buildings.
- The City will allow imaginative signage that is a positive contribution to its surroundings through the use of Creative Sign Permits, and in the execution of Comprehensive Sign Programs.
- <u>The City should encourage the retention of landmark signs with cultural or historic value.</u>
- The City limits the use of signs in residential neighborhoods except those necessary for religious institutions, the naming of residential buildings and facilities, public information, or political campaigns.
- The City prohibits all offsite advertising in residential neighborhoods except real estate directional signs on private, residentially zoned property.

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 <u>light or glare effects</u>. No light-sensitive uses, such as an observatory, are located in or near the City. Thus, continued application of standard review processes, <u>and adherence to General Plan policies</u> will reduce light and glare impacts to a **less-than-significant** level.

SECTION 3.2 AIR QUALITY

Page Clarification/Revision

3.2-27 Table 3.2-4: Summary of Modeled Operational Emissions of Criteria Air Pollutants and Precursors – 2035 Conditions upon Buildout of the Proposed General Plan was modified. Mobile source emissions and total unmitigated operational emissions were revised based on updated trip generation data.

	Emissions (lbs/day) ¹					
Source	ROG	NO _X	CO	SO _X	PM ₁₀	PM _{2.5}
Area Sources ²	251.6	98.2	55.3	0.2	2.1	2.0
Mobile Sources	163.2	<u>171.5</u>	<u>1729.4</u>	<u>5.8</u>	<u>954.0</u>	<u>184.3</u>
Total Unmitigated Emissions	<u>414.8</u>	<u>269.7</u>	<u>1784.7</u>	<u>6.0</u>	<u>956.1</u>	<u>186.3</u>
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceeds Threshold?	Yes	Yes	Yes	No	Yes	Yes

Notes: SCAQMD = South Coast Air Quality Management District; lbs/day = pounds per day; CO = carbon monoxide; NO_X = oxides of nitrogen; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; ROG = reactive organic gases; SO_X = oxides of sulfur.

Emissions modeled using the URBEMIS 2007 (Version 9.2.4) computer model, based on trip generation rates obtained from the analysis prepared for this project and proposed land uses identified in Chapter 2, "Project Description," and Section 3.14, "Transportation and Traffic." of this EIR.

² For this estimate, it was assumed that all residences would contain natural gas fireplaces only.

Note: The total emissions estimates shown are the highest values that would occur in the summer or winter season. Totals may not add up to individual values since the highest emissions for a pollutant from both area and mobile sources may not occur in the same season.

Refer to Appendix B for detailed assumptions and modeling output files. Source: Data modeled by AECOM in 2010

SECTION 3.3 BIOLOGICAL RESOURCES

Page <u>Clarification/Revision</u>

3.3-7 Text in the second sentence of the second paragraph under the *Conflict with Any Local Policies or Ordinances Protecting Biological Resources* was modified as follows:

Per the City's Municipal Code regulations on the treatment of street trees and trees on public lands, as well as the requirements under the Heritage Tree Program, new development would be required to replace any street trees and vegetation in the form of ornamental plantings removed as a result of the individual development project permitted for removal as a result of an individual development project with another tree or trees, of a type and quality to be determined by the City.

SECTION 3.4 CULTURAL RESOURCES

No changes or revisions were made in this section.

SECTION 3.5 GEOLOGY, SOIL, AND MINERAL RESOURCES

No changes or revisions were made in this section.

SECTION 3.6 HAZARDS AND HAZARDOUS MATERIALS

- Page <u>Clarification/Revision</u>
- 3.6-3 The text on page 3.6-3 was modified as follows:

Schools within and near (i.e., 0.25 mile) the City include are listed on Figure 3.9-2.

- ► Fairfax Senior High School, 7850 Melrose Avenue, Los Angeles
- ► Gardner Street Elementary School, 7450 Hawthorn Avenue, Los Angeles
- Laurel Elementary School 925 North Hayworth Avenue, Los Angeles
- ► West Hollywood Elementary School, 970 Hammond Street, West Hollywood
- ► Rosewood Avenue Elementary School, 503 North Croft Avenue, Los Angeles
- ► Melrose Avenue Elementary School, 731 North Detroit Street, Los Angeles
- Larchmont Charter School, 1265 North Fairfax Avenue, West Hollywood
- 3.6-20 The third sentence under the heading *Fire Safety* was modified to read:

LACFD serves almost 4.2 million residents, $1.\underline{12}$ million housing units, 58 district cities, $2,\underline{296}$ 305 total square miles, 72 miles of beach area, and 31 miles of public beach.

3.6-20 The following sentence was added to the last paragraph under the heading *Routine Use, Transportation, Disposal, and Release of Hazardous Materials*:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.6-20 The last paragraph under the heading Interference with an *Adopted Emergency Plan* was revised as follows:

Policies in the proposed General Plan include a variety of actions aimed at ensuring emergency response readiness. The Safety and Noise Element, in particular, contains policies specifically written to address impacts related to emergency preparedness as described in the analysis above regarding the routine use, transport, disposal, and release of hazardous materials, <u>and the analysis of police protection</u> in Section 3.12. Implementation of current state and federal regulations, the policies of the proposed General Plan, and the City's existing HMP and SEMS/NIMS procedures would serve

to reduce the potential impacts on emergency preparedness in the city. This impact would be **less than significant**. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If projectspecific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3-6.22 The last paragraph under the heading *Fire Safety* was revised to include the following sentence (in Final EIR, this revision will be on page 3.6-23):

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.6-23 The last paragraph under the heading *Underground Gas Hazards* was revised to include the following:

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 <u>underground gas hazards</u> in the City. This impact would be **less than significant**. <u>Individual development projects</u> would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

SECTION 3.7 HYDROLOGY AND WATER QUALITY

- Page <u>Clarification/Revision</u>
- 3.7-1 The second paragraph under the heading Surface Water Hydrology and Drainage heading has been revised as follows:

Storm drainage infrastructure in the City is jointly owned and operated by the City of West Hollywood and or the County of Los Angeles

3-7.20 The last sentence of the first paragraph under the heading Groundwater Resources was revised to include the following sentence:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3.7-22 The following language was added to the second sentence in the third paragraph:

The Safety and Noise Element, in particular, contains policies specifically written to address flood impacts, <u>as listed in the analysis of violation of water quality standards</u>.

SECTION 3.8 LAND USE AND PLANNING

- Page <u>Clarification/Revision</u>
- 3-8.8 The following language was added to the last paragraph under the heading *Divide an Established Community*:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3-8.12 The following language was added to the end of the last paragraph under the heading *Conflict with an Adopted Land Use Plan*:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3-8.14 The following language was added to the end of the last paragraph under the heading *City of West Hollywood Specific Plans and West Hollywood Redevelopment Plan*:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

3-8.15 The following language was added to the end of the last paragraph under the heading *Conflict with an Applicable Habitat Conservation Plan*:

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

SECTION 3.9 NOISE

- Page Clarification/Revision
- 3.9-15 The legend of Figure 3.9-4 has been revised to indicate that the noise levels are greater than 60, 65 or 70 dB in the respective contour.
- 3.9-31 The legend of Figure 3.9-5 has been revised to indicate that the noise levels are greater than 60, 65 or 70 dB, in the respective contour.
- 3.9-43 The following language was added to bullet point one of mitigation measure 3.6-6:

Pile driving within a 50-foot radius of historic structures <u>or sensitive land uses</u> 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.

SECTION 3.10 PALEONTOLOGICAL RESOURCES

No changes or revisions were made in this section.

SECTION 3.11 POPULATION AND HOUSING

- Page <u>Clarification/Revision</u>
- 3.11-3 The following correction was made to the job projections in the last sentence of the second paragraph:

In 2035, proposed General Plan projections indicate an increase of $4,551 \ 5,794$ jobs to $28,847 \ 28,705$ jobs. Based on 2035 projected housing units, the jobs-to-housing unit ratio would increase slightly to 0.95 (Raimi and Associates 2010).

3.11-5 The following corrections were made to SCAG's RHNA projections in the second paragraph:

SCAG's RHNA for the planning years January 1, 2006, through June 30, 2014, projected a need for the construction of an additional 574 584 housing units within the City of West Hollywood, allocated as follows: very low income (141 142 units), low income (90 91 units), moderate income (93 99 units), and above moderate income (250 252 units). Construction of new housing is not mandated by the RHNA, which is intended as a planning tool and a guide to an equitable distribution of housing.

3.11-7 The second paragraph and corresponding bullet pointes were changed as follows:

The proposed Land Use and Urban Form Element of the General Plan contains numerous goals and policies to ensure that infill and redevelopment activities in the commercial subareas and throughout the City are compatible with adjacent development address potential displacement, including single-family residential areas. The Land Use and Urban Form The Housing Element, in particular, contains the following policies:

- Requiring development along commercial boulevards to employ architectural transitions to adjoining residential properties to ensure compatibility of scale and a sense of privacy for the existing residences.
- Requiring new buildings to incorporate combinations of setbacks, scale transitions, and buffers, as appropriate, in relation to existing residential areas to maintain physical compatibility between new and existing buildings.
- Requiring new buildings to incorporate combinations of setbacks, scale transitions, and buffers, as appropriate, in relation to existing residential areas and to maintain physical compatibility between new and existing buildings along Santa Monica Boulevard.
- Providing for the continuation and expansion of recreational, cultural, and religious land uses, provided that they are compatible with and complement adjacent land uses.
- ► Allowing for new institutional uses that are compatible with their surroundings.
- Addressing the effects of the vacancy de-control regulation (aka Costa-Hawkins) on the rent stabilized housing stock through local measures and legislative efforts.

- Retaining and maintaining existing affordable rental housing.
- ► Working to prevent or minimize displacement of existing residents.
- Encouraging the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households.
- Maintaining a condominium conversion ordinance aimed at preserving the City's rental housing stock, and providing tenant protections for units approved for conversion.

Development allowed under the proposed General Plan would not displace substantial numbers of housing or people necessitating the construction of replacement housing elsewhere. Most of the development 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. Therefore, impacts relating to displacement of a substantial number of housing or people necessitating the construction of replacement housing are **less than significant**. No mitigation measures are necessary.

SECTION 3.12 PUBLIC SERVICES AND UTILITIES

- Page <u>Clarification/Revision</u>
- 3.12-6 The following text was added after Table 3.12-2:

In addition to the public schools mentioned in Table 3.12-2 and illustrated in Figure 3.12-1, there are several affiliated charter schools, magnet schools, and other LAUSD facilities that serve the City of West Hollywood. Enrollment and capacity information was not included for these facilities that did not report any resident attendance (LAUSD 2010).

3.12-18 The second sentence in the last paragraph has been revised as follows (in Final EIR, this revision will be on page 3.12-19):

Under the new system, Sanitation District No. 4 pays a contracted amount equal to a discharge of approximately 5.9 MGD for the equivalent of actual flow on an annual basis, which is approximately 5 MGD.

3.12-19 The first sentence under the heading *Storm Drain System* has been modified as follows (in Final EIR, this revision will be on page 3.12-20):

The storm drain infrastructure in the City is jointly-owned and operated by the City of West Hollywood and or the County of Los Angeles. The Los Angeles County Flood Control District maintains the backbone flood control system, a network of catch basins and underground storm drain pipes.

3.12-27 The following sentence has been added to the end of first paragraph under the heading *Police Protection* (in Final EIR, this revision will be on page 3.12-28):

This is a potentially significant impact.

3.12-55 Second to last paragraph was deleted on this page (in Final EIR, this revision will be on page 3.12-56) and moved to the conclusion statement on page 3.12-57 in the Final EIR.

The specific environmental impact of construction of new electrical and gas infrastructure in the planning area cannot be determined at the General Plan level of analysis because no specific electrical and gas construction projects are proposed; however, like the development of other land uses allowed under the General Plan, individual development projects would be required to evaluate the potential impacts of the proposed project in accordance with CEQA. Mitigation measures would be required to reduce impacts to a less-than-significant level, as necessary.

3.12-56 The last paragraph on page 3.12-56 of the Draft EIR (3.12-57 of the Final EIR) was revised as follows:

Training City staff on an ongoing basis to implement the Green Building Program and to provide advice and expertise about green building to the public. Therefore, impacts realted to energy infrastructure would be less than significant.

 Training City staff on an ongoing basis to implement the Green Building <u>Program and to provide advice and expertise about green building to the</u> <u>public.</u>

The specific environmental impact of construction of new electrical and gas infrastructure in the planning area cannot be determined at the General Plan level of analysis because no specific electrical and gas construction projects are proposed; however, like the development of other land uses allowed under the General Plan, individual development projects would be required to evaluate the potential impacts of the proposed project in accordance with CEQA. Mitigation measures would be required to reduce impacts to a less-than-significant level, as necessary. In Furthermore, implementation of the policies above, in addition to the mandatory Green Building Ordinance adopted in 2007 (Zoning Ordinance; Section 19.20.060) and the continued coordination with local energy providers, would reduce impacts related to energy infrastructure to **less than significant**.

- 3.12-59 The following Mitigation Measure was deleted.
 - 3.12-7 Reinstate the "Beat Program" to enhance neighborhood safety and livability. This program will assign personnel direct responsibility for specific areas (beats) throughout the City and help foster Sheriff Departments vision of "Public Trust Policing."

Mitigation measures 3.12-8 through 3-12-14 were renumbered to reflect this change.

SECTION 3.13 RECREATION

- Page <u>Clarification/Revision</u>
- 3.13-13 The second sentence of the first paragraph under the heading *3.13.5 Mitigation Measures* was deleted.

However, impacts would remain significant and unavoidable at this Program EIR level of analysis.

SECTION 3.14 TRANSPORTATION AND TRAFFIC

- Page <u>Clarification/Revision</u>
- 3.14-9, 3.14-21; Appendix F Table 4, Table 8, and Table 10:

The traffic report erroneously assigned vehicle trips to gallery space instead of office space. Office space has a higher trip generation rate. Tables 3.14-5, and Table 3.14-6 in the Draft EIR have been revised to reflect these changes. No additional intersection impacts were identified.

3.14-49 The following sentence has been modified within the discussion of parking (in Final EIR, this revision will be on page 3.14-52):

The parking occupancy study results indicate that the number of spaces available in the study areas exceeds the demand. However, the current allocation, <u>including</u> <u>private ownership of some parking facilities</u>, of these spaces may not function efficiently to provide access to adequate parking, particularly during peak periods.

Figures 3.14-1 through 3.14-8:

Correction has been made to all these figures to accurate identify North Clark Street. Corrections were also made to the figures in Appendix F.

SECTION 3.15 GLOBAL CLIMATE CHANGE

Page Clarification/Revision

3.15-24 Mobile source GHG emissions, total operational emissions, and annual GHG emissions per service population were revised in Table 3.15-3 based on updated trip generation data. See below:

Source	CO ₂ e Emissions ¹		
Construction Emissions over Buildout Period (2011–2035) (metric tons)	15,470		
Operational Emissions at Buildout (Year 2035) (metric tons)	/year)		
Area Sources	15,355		
Mobile Sources	<u>87,450</u> 92,197		
Electricity Consumption	15,478		
Water Consumption	1,764		
Total Operational Emissions	120,046 124,793		
Operational GHG Efficiency Metrics			
Additional Residential Population Accommodated by Plan	6,834		
Additional Employment Accommodated by Plan	4,551		
Additional Service Population (SP) Supported by Plan	11,385		
Annual CO ₂ e/SP (metric tons/year)	<u>10.5</u> 10.9		
GHG Efficiency Benchmark - Annual MT CO ₂ e/SP			
benchmark that reflects statewide target for Year 2020	6.6		
(metric tons/year)			

3.15-29 The text in the second paragraph has been modified as follows:

As shown in Table 3.15-3, estimated GHG emissions associated with operation of the land uses proposed under the General Plan would total approximately 120,000 <u>125,000</u> MT annually. At buildout the increase in residential population accommodated by the Plan would be approximately 6,834 residents; and the increase in number of jobs associated with implementation of the proposed General Plan would be approximately 4,551. When estimated CO₂e emissions are normalized with

respect to service population (combined increase in residential population and jobs), the average annual efficiency rate of operations under buildout of the proposed project would be 10.5 10.9 MT CO₂e/SP/year.

CHAPTER 4.0 ANALYSIS OF LONG-TERM EFFECTS

No changes or revisions were made in this chapter.

CHAPTER 5.0 ALTERNATIVES

Page Clarification/Revision

5-31 Table 5-6: Daily Performance Measures Comparison has been revised as follows:

	Per Capita				Average Trip
Alternative Scenario	VMT	VMT	VHT	VT	Length
Existing Conditions (2008)	24.62	1,503,718	44,557	354,967	7.02
Dranaged Draiget	23.57	1,712,004	55,396	406,527	6.98
Proposed Project	<u>27.55</u>	1,726,427	56,004	409,341	<u>6.99</u>
No Project/Existing General	23.98	1,722,524	55,804	408,160	6.99
Plan	27.73	<u>1,737,545</u>	56,440	411,077	7.00
Two Transit Overlay Areas	22.01	1 651 090	52 005	202 211	6.05
Only Alternative	25.91	1,031,080	55,005	393,311	0.95
Extensive TDM Alternative	23.55	1,691,569	54,597	402,052	6.97

Note: Per capita VMT calculation includes both population and employment. Source: Fehr & Peers 2010

CHAPTER 6.0 CLARIFICATIONS AND MODIFICATIONS

This chapter was added to the Final EIR to document the clarifications and modifications made to the Draft EIR.

CHAPTER 7.0 ACRONYMS

There were no changes or revisions to this chapter.

CHAPTER 8.0 REFERENCES

There were no changes or revisions to this chapter.

CHAPTER 9.0 PREPARERS

There were no changes or revisions to this chapter.

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CHAPTER 7.0 ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
AEP	Annual Exceedance Probability
AF	acre-feet
AFY	acre-feet per year
ALUC	Airport Land Use Commission
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxics Control Measure
BAAQMD	Bay Area Air Quality Management District
BACT	best available control technology
Basin	South Coast Air Basin
BMP	best management practice
BSC	California Building Standards Commission
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal EMA	California Emergency Management Agency
CAL FIRE	California Department of Forestry and Fire
Cal/EPA	California Environmental Protection Agency
CalARP	California Accidental Release Prevention Program
Cal-OSHA	California OSHA
CalRecycle	Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Code
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDP	Comprehensive Development Plan
CEC	California Energy Commission
CEQA	California Environmental Quality Act
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CERCLA	Comprehensive Environmental Response, Compensation, and
	Liability Act of 1980
CESA	California Endangered Species Act
CFC	California Fire Code
CFCs	chlorofluorocarbons
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHL	California Historical Landmark
CHP	California Highway Patrol
CIP	Capital Improvement Program
City	City of West Hollywood
CLOMR	Conditional Letters of Map Revision
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO ₂ e	CO ₂ -equivalent
CO2e/year	CO ₂ -equivalent per year
COG	Council of Government
Cortese List	Government Code Section 65962.5
CRA	Colorado River Aqueduct
CRHR	California Register of Historical Resources
CTR	California Toxics Rule
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
d/D	depth of flow/diameter
dB	decibel
dBA	A-weighted decibel
DDR	Design Development Report
DFG	California Department of Fish and Game
diesel PM	diesel particulate matter
DPH	California Department of Public Health
DRS	Disposal Reporting System
DTSC	California Department of Toxic Substance Control
EAP	Emergency Action Plan

EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRMs	Flood Insurance Rate Maps
FTA	Federal Transit Authority
g	gravitational acceleration
GHG	greenhouse gas
GIS	geographic information system
gpcd	gallons per capita per day
GWP	global warming potential
HAP	hazardous air pollutant
HCD	Department of Housing and Community Development
HFC	hydrofluorocarbon
HMP	Hazard Mitigation Plan
HPC	Historic Preservation Commission
HTP	Hyperion Treatment Plant
HVAC	heating, ventilation, and air conditioning
Hz	hertz
I-10	Interstate 10
I-405	Interstate 405
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
kWh	kilowatt hours
LAA	Los Angeles Aqueduct
LACFD	Los Angeles County Fire Department
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAUSD	Los Angeles Unified School District
LCIS	La Cienega Interceptor Sewer
LCSFVRS	La Cienega San Fernando Valley Relief Sewer
LDL	Larson Davis Laboratories
LGBT	Lesbian, gay, bisexual, and transgender

LOMR	Letters of Map Revision
LOS	Level of Service
LUST	leaking underground storage tank
М	Earthquake Magnitude
M&I	Municipal and Industrial
MACT	Maximum available control technology
MBTA	Migratory Bird Treaty Act
MCE	maximum credible earthquake
MCL	Maximum Contaminant Level
MEI	maximally exposed individual
Metro	Metropolitan Transit Authority of Los Angeles County
MG	million gallons
mg/L	milligrams per liter
MGD	million gallons per day
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric tom
MUN	Municipal and Domestic Supply
MWD	Metropolitan Water District
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NEHRP	National Earthquake Hazards Reduction Program
NEHRPA	National Earthquake Hazards Reduction Program Act
NESHAPs	national emissions standards for HAPs
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO ₂	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO _X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NTR	National Toxics Rule
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research

OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PDC	Pacific Design Center
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter of 10 microns or less
PM _{2.5}	particulate matter with an aerodynamic diameter of 2.5 microns or less
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Program EIR	Program Environmental Impact Report
Proposition 65	Safe Drinking Water and Toxic Enforcement Act of 1986
RADS	Reactive Airways Disease Syndrome
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RHNP	Regional Housing Need Plan
RMS	root-mean-square
ROG	reactive organic gas
RTP	Regional Transportation Plan
RWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills-Leaks-Investigations-Cleanup
SLM	sound-level meter
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMARA	Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SP	service population
SSP	Sunset Specific Plan
STC	Sound Transition Class

SUSMP	Standard Urban Stormwater Mitigation Plan
SWP	California State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Program
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAZ	traffic analysis zone
TDM	Transportation Demand Management
TDS	total dissolved solids
TIS	Traffic Impact Studies
TMDL	Total Maximum Daily Load
TOD	Transit-Oriented Development
TPY	tons per year
TRU	transportation refrigeration unit
TSCA	Toxic Substances Control Act
U.S. 101	Hollywood Freeway
UBC	Uniform Building Code
UFC	Uniform Fire Code
ULARA	Upper Los Angeles River Area
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDOT	U.S. Department of Transportation
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume to capacity
VdB	vibration decibels
VHT	vehicle hours of travel
VMT	vehicle miles traveled
VOC	volatile organic compound
VT	vehicle trip generation
WDR	Waste Discharge Requirement
WHIP	West Hollywood is Prepared
WHMC	West Hollywood Municipal Code

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CHAPTER 9.0 EIR PREPARERS

9.1 PERSONS RESPONSIBLE FOR PREPARATION OF THE EIR

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Sara Dietler, Staff Archaeologist, AECOM

Noise Impact Analysis

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Traffic Impact Analysis Fehr & Peers

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