

9160-9176 Sunset Boulevard Project

Recirculated Draft Environmental Impact Report

prepared by

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March 2026

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1 Introduction

The City of West Hollywood (City), as the lead agency, prepared this document, entitled "Recirculated Draft Environmental Impact Report" (RDEIR) (State Clearinghouse Number 2021060528), to analyze potential environmental impacts of the 9160-9176 Sunset Boulevard Project (the "Proposed Project" or "Project"). The Proposed Project will require approval of certain discretionary actions by the City and other governmental agencies. Therefore, the Proposed Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA), as described in detail below.

1.1 Project History

In 2022, the City initially reviewed the Proposed Project and prepared the applicable Draft Environmental Impact Report ("Original DEIR"). With that, and in compliance with Section 15082 of the CEQA Guidelines, a Notice of Preparation ("NOP") for a Draft EIR was prepared by the Community Development Department and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties on June 17, 2021. The NOP for the Original DEIR was circulated for 50 days, until August 4, 2021. The Appendices attached to the Original DEIR contain a copy of the NOP and written responses to the NOP, respectively. The Original DEIR was released on October 22, 2022, and was available for review and comments until December 12, 2022. It is important to note, a Final EIR was never prepared for the Proposed Project.

In response to public comments on the Original DEIR, the applicant has reduced the full-motion animated billboards associated with the Project. Although no other component of the Project has been changed, the City is recirculating this RDEIR pursuant to CEQA Guidelines Section 15088.5, Subdivision a(4) and (c), which requires the modified sections of an EIR to be circulated in certain circumstances, including in order to provide the public with a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. The RDEIR specifically analyzes the potential impacts associated with the changes to the full-motion animated billboards utilizing the most up-to-date methodologies and modeling programs and demonstrates that the Project as revised does not result in any new adverse environmental effect. Accordingly, this RDEIR replaces ten full sections of the Original DEIR, which are Project Description, Executive Summary, Aesthetics, Air Quality, Energy Greenhouse Gas Emissions, Noise, Transportation, and Alternatives. The full Original DEIR is available at the Community Development Department, 8300 Santa Monica Boulevard, West Hollywood, California 90069.

1.2 Document Purpose

Under CEQA and the CEQA Guidelines, a lead agency must recirculate an EIR (or portions thereof) for additional public review and comment when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under [CEQA Guidelines] Section 15087 but before certification" of the EIR. "Significant new information" added to an EIR requires recirculation when that information discloses any of the following:

a. A new significant environmental impact would result from the project or from new mitigation measure proposed to be implemented.

b. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
c. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
d. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. CEQA Guidelines Section 15088.5(a) also indicates the term "information," as used therein, may include changes in the project, changes in the environmental setting, additional data, or other relevant information that could significantly affect the analysis or conclusions of the EIR and thereby require recirculation to ensure adequate public review.

CEQA Guidelines Section 15088.5(c) provides that if revisions are limited to a few chapters or portions of an EIR, the lead agency need only recirculate the chapters or portions that have been modified. Accordingly, these ten recirculated sections of the Original DEIR has been prepared and includes new and/or revised analyses which supersede those previously provided in the Original DEIR. The impact analyses in the remainder of the Original DEIR concerning matters beyond those summarized below have not been re-examined in this document and remain valid.

In summary, the Project Description, Executive Summary, Aesthetics, Air Quality, Energy, Greenhouse Gas Emissions, Noise, Transportation, and Alternatives sections presented in this RDEIR supersede, in their entirety, the corresponding sections of the Original DEIR, as do the corresponding appendices Project Plans and Drawings, Digital Lighting Study, Air Quality and Greenhouse Gas Emissions Technical Study, Health Risk Assessment, and Noise Technical Study). Additionally, the Traffic Study was supplemented with an updated Trip Generation Assessment, a new Transportation Safety Memorandum was prepared to analyze any potential impacts associated with driver distraction from the digital billboards, and an Assessment of Lighting Effects on Biological Resources to analyze any potential impacts to wildlife associated with the digital billboards.

Because the impact analyses sections are not in alphabetical sequence, their section identifiers are not in numeric order. In the Original DEIR, the Aesthetics section was labeled Section 4.1, the Air Quality section was labeled Section 4.2, the Energy section was labeled Section 4.5, the Greenhouse Gas Emissions section was labeled Section 4.7, and the Noise section was labeled Section 4.11. In order to present the RDEIR in a format that facilitates its review by the public and decision makers, the sections have been assigned new section identifiers that are now in numeric sequence, as provided below. Please see Table 1-1, below, for an illustrative comparison.

Table 1-1 Summary of Environmental Documents

Original DEIR Section	Original Appendices	RDEIR Section	RDEIR Appendices
--	--	**1.0** Introduction	--
1.0 Executive Summary	--	**2.0** Executive Summary	--
2.0 Project Description	**Appendix B** Project Plans and Drawings (replaced)	**3.0** Project Description	**Appendix A** Project Plans and Drawings
4.0 Environmental Impact Analysis (replaced)	--	4.0 Environmental Impact Analysis	--

Original DEIR Section	Original Appendices	RDEIR Section	RDEIR Appendices
4.1 Aesthetics (replaced)	**Appendix C1** Digital Lighting Study (replaced)	**4.1** Aesthetics	**Appendix B1** Digital Lighting Study **Appendix B2** Transportation Safety Memorandum **Appendix B3** Assessment of Lighting Effects on Biological Resources
4.2 Air Quality (replaced)	**Appendix D** AQ and GHG Study (replaced) **Appendix Q** Construction HRA (replaced)	**4.2** Air Quality	**Appendix C** CalEEMod Outputs, Construction HRA, and Energy Calculations
4.5 Energy (replaced)	--	**4.3** Energy	**Appendix C** CalEEMod Outputs, Construction HRA, and Energy Calculations
4.7 Greenhouse Gas Emissions(replaced)	**Appendix D** AQ and GHG Study (replaced)	**4.4** Greenhouse Gas Emissions	**Appendix C** CalEEMod Outputs, Construction HRA, and Energy Calculations
4.11 Noise (replaced)	**Appendix L** Noise Study (replaced)	**4.5** Noise	**Appendix D** Noise Assumptions
4.12 Transportation (replaced)	**Appendix O** Traffic Study (replaced with supplements)	**4.6** Transportation	**Appendix E** Updated Trip Assessment
5.0 Alternatives (replaced)	--	**5.0** Alternatives	--

In accordance with state mandates, the City has prepared and circulated this RDEIR pursuant to CEQA Guidelines Section 15088.5, Subdivision (g). This RDEIR contains the following new and expanded sections to be recirculated for public comment:

2. This new Introduction section for the RDEIR (Section 1), which includes a revised discussion of what is proposed under this RDEIR and the purpose for the RDEIR consistent with CEQA guidelines.
3. Updated Executive Summary for the RDEIR (Section 2), which includes a revised Summary of potential impacts, includes all cumulative impacts, if any.
4. Updated Project Description (Section 3) and updated Project Plans and Drawings as an Appendix A.
5. Updated Environmental Impact Analysis discussions including the following:
    a. Updated Aesthetics section (Section 4.1) that incorporates an updated Digital Lighting Study and new Transportation Safety Memorandum;
    b. Updated Air Quality section (Section 4.2) that incorporates an updated Air Quality Technical Study and Health Risk Assessment, and analyzes the newly proposed construction schedule;
    c. Revised Energy section (Section 4.3) to incorporate design changes to the proposed full-motion animated billboards package;

d. Updated Greenhouse Gas Emissions section (Section 4.4) which incorporates an updated Greenhouse Gas Emissions Technical Study, discusses climate change and analyzes potential impacts to the environment;
e. Updated Noise section (Section 4.5) that includes an evaluation of potential construction related noise impacts from implementation of the Project and incorporates an updated Noise Study.
f. Updated Transportation Section (4.6) that incorporates an updated Trip Generation Assessment.

6. Updated Alternatives section (Section 5) to the Proposed Project that includes additional analysis supporting its conclusions and incorporates revised analysis in the Environmental Impact Analysis sections.

1.3 Project Summary

As detailed below, the Proposed Project consists of the same general development proposal (i.e., the same land uses, floor areas, project elements, and features) as were originally described in Section 2, Project Description, of the Original DEIR. Additionally, given the time that has passed since publication of the Original DEIR, the timing of project construction and buildout would change, but construction phasing and its duration would still consist of consecutive phases over the course of approximately one and a half years. Buildout is now anticipated in late 2027.

The Project Site is comprised of three contiguous lots located on the south side of Sunset Boulevard. The Project would consolidate the three lots into one and include construction of a five-story, commercial office building. The proposed new building would include approximately 52,999 square-feet of floor area on an 18,608-square-foot Project site, resulting in a Floor Area Ratio (FAR) of approximately 2.85 to 1. The maximum building height would be approximately 90-feet.

On the ground floor, the retail/high turnover restaurant uses would be provided in the west half of the building and in the northeast corner. These uses would also include provision of an additional 394 square-feet of open space for outdoor dining use. A lobby associated with the office uses would be located in the north-central part of the ground floor, and back-of-the-house uses, and bike showers would be located in the south-central part of the ground floor. A ramp to the underground parking structure would be located in the southwest corner of the Project Site.

The upper levels (i.e., levels two through five) would consist entirely of office spaces. Levels three through five and the roof level would be stepped back so that the building massing would be compatible with the existing residential scale buildings to the south. Vehicle parking (86 spaces) and additional bicycle parking (10 spaces), along with back-of-the-house uses, would be provided in three subterranean levels.

Terrace and landscape planting areas, including spiller hanging plants from levels two and three on the north side of the building, and levels three, four, and five on the south side of the building would be aesthetically pleasing. Effective screening also helps in softening the building edges by adding natural greenery to the building exterior. Mechanical, electrical and plumbing uses would be located on the roof of the structure.

Overall, the Proposed Project would be designed and constructed in compliance with applicable City codes, including, but not limited to, the 2022 California Building Code, California Plumbing Code, California Mechanical Code, California Electrical Code, and California Building Energy Efficiency Standards. The proposed building would be all-electric.

The Project proposes two full-motion animated billboards: one located along the northwest corner of the building on levels three through five ("Advertising Area 1"), and another located along the northeast corner of the building on level four ("Advertising Area 2").

1.4 Environmental Review Process

A 45-day review period has been set for the RDEIR during which written comments on the scope and adequacy of this draft document can be submitted to the Community Development Department. All comments on the RDEIR should be sent to the following City contact: Adrian Gallo, Community Development Department, 8300 Santa Monica Boulevard, West Hollywood, California 90069. Per CEQA Guidelines Section 15088.5, Subdivision (f)(2), new comments are limited to the text of the revised sections and appendices included in the RDEIR. As comments were already received on the Original DEIR, no new comments on old matters not included in this RDEIR will be addressed. Following the 45-day public review period, the City will prepare responses to the written comments received during the recirculation period that relate to the revised and recirculated portions of this RDEIR, as well as written comments received during the initial circulation period that relate to the portions of the Original DEIR that have not been superseded and recirculated. The comments and responses will be compiled into a Final EIR, which will consist of the following documents:

1. Original DEIR and appendices (without the sections that have been superseded and replaced by the corresponding sections in this RDEIR), including the Notice of Preparation;
2. RDEIR;
3. Comments and Responses to Comments received during the 45-day public comments period on the RDEIR;
4. Comments and Responses to Comments received during the original 45-day public comment period on the portions of the Original DEIR that were not recirculated; and
5. Corrections or additions to the Original DEIR and/or RDEIR, if any.

The Final EIR will provide the basis for City decision-makers, such as the City Planning Commission and City Council to consider the environmental implications of the Proposed Project as well as possible ways to mitigate any potential significant environmental impacts. Prior to making a decision on the Proposed Project, the City must certify that the Final EIR has been completed in compliance with CEQA and was presented to the City's decision-making body, that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Proposed Project, and that the Final EIR reflects the lead agency's independent judgment and analysis.

Finally, with regard to Section 6.0 (Other CEQA Considerations), this RDEIR does not revise that section and the reader is referred to the Original DEIR for the information contained therein.

1.5 Organization of RDEIR

This RDEIR is organized into five sections as follows:

I. **Introduction.** This section provides introductory information such as the Proposed Project title, the Project applicant, the lead agency for the Proposed Project, and the overall Environmental Review Process.

II. **Executive Summary.** This section summarizes any new potential impacts and associated mitigation measures, if any.

III. **Project Description.** This section contains the revised description of the full-motion animated billboards.

IV. **Environmental Impact Analysis.** This section contains the revised environmental impact sections that directly supersede, or portions thereof, sections of the Original DEIR.

V. **Alternatives.** This section contains the expanded alternatives to the Proposed Project. The alternatives analysis presented expands the discussion to the alternatives listed in the Original DEIR.

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2 Executive Summary

In accordance with California Environmental Quality Act (CEQA)[1] Guidelines[2] Section 15123, this section of the Recirculated Draft Environmental Impact Report (RDEIR) contains a brief summary of the 9160-9176 Sunset Boulevard Project (Project) and its potential environmental effects. More detailed information regarding the project and its potential environmental effects is provided in the following sections of this RDEIR. Also included in this section is a description of the organization of this RDEIR, a general description of the Project, a summary of the alternatives to the Project evaluated in this RDEIR, including identification of the Environmentally Superior Alternative, and a general description of known areas of controversy.

2.1 Purpose of this RDEIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this RDEIR is to focus the discussion on the project's potential environmental effects that the City of West Hollywood, as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This RDEIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this RDEIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

2.2 RDEIR Focus and Effects Found Not to Be Significant

In accordance with State CEQA Guidelines § 15128, the EIR shall contain a brief statement indicating reasons the various possible significant effects of a project were determined not to be significant and not discussed in detail in the RDEIR. The Initial Study and comment letters are included as Appendix A in the previously circulated Draft EIR (or Original DEIR). The original Initial Study provides a detailed discussion of the potential environmental impacts of the Project and the reasons that each environmental topic is or is not analyzed in the Original DEIR. The Initial Study found the potential for significant impacts to occur in the following environmental issues areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources

[1] Public Resources Code (PRC) Section 21000 et seq.
[2] Title 14 California Code of Regulations Section 1500 et seq.

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

The threshold questions that were not screened out in the Initial Study prepared for the Project were analyzed in the Original DEIR and are from the previous iteration of the CEQA Guidelines, as of January 1, 2021. The results of the Initial Study found that the Project would not have the potential to result in significant impacts related to: Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, and Recreation. Therefore, these environmental areas were not analyzed in the Original DEIR.

As discussed in Section I, Introduction, of this RDEIR, certain analyses previously provided in the Original DEIR have been revised to address new regulatory requirements and/or disclose potential new or altered impacts. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this document. Specifically, the sections of this RDEIR document includes new and/or revised analyses which supplement and in some cases supersede those sections previously presented in the Original DEIR.

2.3 RDEIR Organization

This RDEIR is comprised of the following sections:

1.0 **Introduction.** This section describes the intent of the document, brief overview of the Project, and overall context and purpose of the document.

2.0 **Executive Summary.** This section describes the purpose of this RDEIR, RDEIR focus and effects found not to be significant, RDEIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and summary of environmental impacts and mitigation measures.

3.0 **Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

4.0 **Environmental Impact Analysis.** This section contains the Project and cumulative impact analyses, mitigation measures (as necessary), and conclusions regarding the level of significance after mitigation for the following environmental issue areas: aesthetics, air quality, energy, greenhouse gas emissions, noise, and transportation.

5.0 **Alternatives.** This section analyzes a reasonable range of project alternatives, including the No Project/No Action Alternative, No Digital Canvas Alternative, Modified Land Use Alternative, and the Aboveground Parking Alternative.

2.4 Existing Project Site Conditions

The Project Site is located at 9160, 9166, and 9174 Sunset Boulevard in the City of West Hollywood, California. The Project Site is located on the south side of Sunset Boulevard, between Carol Drive and Cory Avenue. The City of West Hollywood is in west-central Los Angeles County, at the north margin of the Los Angeles Basin and at the south foot of the Hollywood Hills. The City of West

Hollywood is surrounded by the City of Los Angeles to the north, east, and south, and by the City of Beverly Hills to the west.

The Project Site currently consists of a two-story car dealership and a surface parking lot on a 0.43-acre lot. The Project Site is relatively flat and is surrounded by urban development on all sides. The Project Site is surrounded by multi-family residential, commercial and dining developments to the north and west, a multi-family residential building, a surface parking lot and single-family residences to the south, and a surface parking lot to the east (Google Earth Pro, 2021).

The General Plan land use and zoning designation for the Project Site is Sunset Specific Plan (SSP). The Project Site is within Area 8 - West End of the SSP area. The goals of the SSP in the West End area include accommodating additional office buildings and providing space for "creative" industries and anchor businesses. The SSP also encourages development of a building of landmark quality at the southeast corner of Sunset and Cory that dramatically marks the entrance to West Hollywood and acts as a "hinge" at the bend in the street. Ground-floor uses catering to the needs of area office workers are encouraged (City of West Hollywood, 2019, p. 241).

2.5 Brief Description of the Proposed Project

2.5.1 Project Overview

The Project consists of the development of a five-story, approximately 52,999-square-foot building with retail, food and beverage, and office uses on the first floor and office uses on the second, third, fourth and fifth floors. The Project would provide approximately 86 vehicle parking spaces and ten bicycle parking spaces in a three-level underground parking structure, in addition to six bicycle parking spaces on the ground level.

Discretionary Permits

The Project includes requests for several discretionary permits detailed below:

- A development permit for the construction of a new structure.
- A demolition permit for demolition of the portion of the automotive dealership building on the Project Site.
- A minor conditional use permit for alcohol sales for onsite consumption accessory to a restaurant or coffee shop, with the permitted hours of operation from 6 a.m. to 2 a.m.
- A development agreement for the construction of two full-motion animated billboards totaling 2,807 square feet.
- A vesting parcel map.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

Project Construction

The Project would be constructed in six phases (including demolition, site preparation, grading, building construction, paving, and architectural coating), beginning in 2026, and expected to be approximately 19 months long. Construction activities would include earthwork, rebar, structural steel, concrete slab, concrete panels, truss placement, mechanical, electrical, plumbing, glazing,

roofing, landscaping, hardscape, utilities, site drainage, and any associated offsite work that may be required. Construction would involve approximately 25,000 cubic yards (cy) of soil export.

2.6 Areas of Controversy

Based on the NOP comment letters provided in Appendix A2 of the Original DEIR, issues raised by the public included Project impacts to aesthetics, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, public services, tenants relocation and rights, transportation, and utilities.

Refer to Appendix A2 for all comments received during the public review period, including a comment tracking matrix that provides a summary of the comments received during the public review period and where those comments are addressed in the EIR. It should be noted that CEQA does not require the lead agency to respond individually to all comments received during the public scoping period.

2.7 Previous Public Review Process

As previously stated, the Initial Study for the Project was distributed for public review from June 17, 2021 to August 4, 2021, for 50 days, in excess of the 30-day required distribution under CEQA. Below is a summary of the public notification and scoping process for the Project. The Notice of Preparation (NOP) included information regarding the Project, notice of availability of the Initial Study, the public comment period, and notice regarding the public scoping meeting. Refer to Appendix A3 of the Original DEIR, which includes a copy of the NOP, the agency distribution list and the public mailing list. A copy of the NOP, which included notice for the scoping meeting, was sent to residents and owners within 500-feet of the Project Site.

On June 17, 2021 the following documents were submitted to the State Clearinghouse CEQA Submit database: One original signed copy of the NOC, a copy of the NOP, and an electronic version of the Initial Study and Initial Study Appendices. The NOP for the Project was published on June 17, 2021 in the Beverly Press, a newspaper of general circulation in the Project region; the newspaper publication affidavits are provided in Appendix A3 within the Original DEIR. A public scoping meeting for the Project was held from 6:30 p.m. to 8 p.m. on July 21, 2021. As part of the public distribution process for the Initial Study for the Project, Native American tribal contacts were sent a copy of the NOP and a CD with the Initial Study and Initial Study Appendices. Refer to Appendix A3 (Agency Distribution List) of the Original DEIR for a list of tribes to whom these documents were sent.

2.8 Current Environmental Review Process

A 45-day review period has been set for the RDEIR during which written comments on the scope and adequacy of this draft document can be submitted to the Community Development Department. All comments on the RDEIR should be sent to the following City contact: Adrian Gallo, AGallo@weho.org, 8300 Santa Monica Blvd., West Hollywood, CA 90069, (323) 848-6475. As CEQA Guidelines Section 15088.5, Subdivision (f)(2) permits, the City requests that reviewers limit the scope of their comments to that material which is within the text of the revised sections and the appendices included in the RDEIR. The City also requests that reviewers not make new comments on old matters not included in this RDEIR. Following the 45-day public review period, the City will prepare responses to the written comments received during the recirculation period that relate to

the revised and recirculated portions of this RDEIR, as well as written comments received during the initial circulation period that relate to the portions of the Original DEIR that have not been recirculated. and will compile the comments and responses into a Final EIR, which will consist of the following documents:

1. Original DEIR (without the sections that have been superseded and replaced by the corresponding sections in this RDEIR). The Notice of Preparation and comments are included as part of the Original DEIR;
2. RDEIR;
3. Comments and Responses to Comments on the RDEIR, received during the 45-day public comments period;
4. Comments and Responses to Comments on non-recirculated sections of the Original DEIR received during the original 50-day public comment period; and
5. Corrections or additions to the Original DEIR and RDEIR, if any.

The Final EIR will provide the basis for City decision-makers, such as the City Planning Commission and City Council to consider the environmental implications of the Project as well as possible ways to mitigate any potential significant environmental impacts. Prior to deciding on the Project, the City must certify that the Final EIR has been completed in compliance with CEQA and was presented to the City's decision-making body, that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Project, and that the Final EIR reflects the lead agency's independent judgment and analysis.

2.9 Summary of Environmental Impacts

Table 2-1 at the end of this section provides a summary of the environmental impacts of the Project evaluated in this RDEIR. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

The summary of environmental issues listed below replaces those subject areas of the Original DEIR Executive Summary. If the environmental issue area is not listed and discussed below, this RDEIR does not revise that topic.

2.9.1 Less Than Significant Impacts

Aesthetics

Scenic Quality Regulations

The City's General Plan encourages diverse architectural styles and buildings constructed with high-quality, permanent building materials. Additionally, the Sunset Specific Plan has zoned the Project Site as a landmark site intended to dramatize the western gateway into West Hollywood and the Sunset Strip. The Project would develop a landmark building on the Project Site using high-quality, permanent building materials and architectural features consistent with the General Plan, the Sunset Specific Plan, and applicable zoning and signage regulations governing scenic quality. The Project would comply with applicable height, floor area ratio, and urban design standards for the site and would not conflict with adopted regulations governing scenic quality. Therefore, there would be less than significant impacts with regard to scenic quality.

Light and Glare

The Project would introduce lighting that could potentially cause lighting and glare impacts. However, as discussed in Section 4.1, of this RDEIR, the Project's lighting and glare were evaluated through quantitative modeling and comparison to applicable City thresholds and regulatory standards. The results of this analysis demonstrate that lighting levels would remain below applicable thresholds at nearby properties and would not result in adverse glare effects. The Project would comply with applicable Municipal Code requirements, the Sunset Specific Plan, and the City's Signage Policy, including limits on luminance and operational controls for digital signage. Therefore, there would be less than significant impacts with regard to light and glare.

Air Quality

Applicable Air Quality Plans

As discussed in Section 4.2, of this RDEIR, the South Coast Air Quality Management District's (SCAQMD's) 2022 Air Quality Management Plan (AQMP) incorporates land use assumptions from local General Plans (GPs) and regional growth projections developed by the Southern California Association of Governments (SCAG) to estimate stationary and mobile air emissions associated with projected population and planned land uses. If the proposed land use is consistent with the local GP, then the impact of the Project is presumed to have been accounted for in the AQMP. This is because the land use and transportation control sections of the AQMP are based on the SCAG regional growth forecasts, which incorporates projections from local GPs. Because the Project would not change the GP designation, the land use would continue to be consistent with the local GP and the impacts of the Project would still be accounted for in the AQMP.

Another measurement tool in evaluating consistency with the AQMP is to determine whether a Project would generate population and employment growth and, if so, whether that growth would exceed the growth rates forecasted in the AQMP and how the Project would accommodate the expected increase in population or employment The Project does not include residential land uses and would not increase population. Project operation is estimated to generate approximately 125 employment opportunities.[3] It is anticipated that employees from the local workforce would be

[3] The job-generation estimate is based upon the Project applicant's estimate of 1 employee per 300 square feet of rentable square footage.

hired during both the construction and operational phases of the project and would not require workers from outside the region. The Project is not of the scope or scale to induce people to move from out of the Project area to work at the Project. The Project would be consistent with the growth projections in both the 2022 AQMP and the Connect SoCal - 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is SCAG's long range planning document for the region. This means that the plans considered developments, such as the Project, in their modeling and analyses and the Connect SoCal - 2020-2045 RTP/SCS vehicle trip and VMT reduction goals and policies. Because these growth assumptions are built into the AQMP demonstration of attainment with state and federal ambient air quality standards—and because the Project would not generate criteria pollutant emissions that exceed SCAQMD significance thresholds for ozone precursors (VOC and NOx) and PM2.5—the Project would not delay timely attainment of applicable air quality standards.[4] In summary, the Project would not increase population and would not significantly increase employment in the area. Therefore, there would be less than significant impacts related to consistency with applicable air quality plans.

Contribution to Cumulative Emissions

Air pollution is largely a cumulative issue, and SCAQMD recommends regional thresholds of significance for construction and operation to evaluate whether a project would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment. As described in Section 4.2 of this RDEIR, construction and operational emissions associated with the Project would be below SCAQMD's regional thresholds of significance. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under applicable federal or state ambient air quality standards, and impacts would be less than significant.

Pollutants and Toxic Air Contaminants

CONSTRUCTION

Project construction would generate temporary emissions of toxic air contaminants (TACs) associated with exhaust from construction equipment and construction-related vehicle trips, as well as VOC emissions during architectural coating and paving. Construction emissions would be below SCAQMD regional significance thresholds for TACs. In addition, localized construction emissions would be below SCAQMD Localized Significance Thresholds (LSTs). A health risk assessment (HRA) was prepared for construction-related emissions, which found the emissions from Project construction would be below SCAQMD significance thresholds. Therefore, Project construction impacts would be less than significant.

OPERATION

Operational TAC emissions from mobile, area, and stationary sources (including a 200-kW emergency generator) would be below SCAQMD regional significance thresholds and would not exceed SCAQMD LSTs. Office and restaurant land uses are not considered land uses that generate substantial TAC emissions. The emergency generator would be subject to SCAQMD permitting and

[4] On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). However, the SIPs were adopted prior to this date and relies on the demographic and growth forecasts of the 2020-2045 RTP/SCS; therefore, these forecasts are utilized in the analysis of the Project's consistency with the AQMP.

applicable standards. Therefore, operational criteria pollutant and TAC impacts would be less than significant.

CO Hotspots

A CO hotspot is a localized concentration of CO above an ambient air quality standard. The South Coast Air Basin has been in attainment of federal CO standards since 2007, and available monitoring data indicate CO concentrations well below the applicable standards. Typical development projects such as the Project do not emit CO at levels that would create localized hotspots. Based on the Project's estimated traffic levels (approximately 1,172 daily trips) and regional context, the Project would not create a new CO hotspot or exacerbate an existing hotspot, and impacts would be less than significant.

Odors

During construction, odors associated with diesel equipment and vehicle exhaust would be intermittent, temporary, and would cease upon completion. Construction would also be required to comply with SCAQMD Rule 402 (nuisance). During operation, office and restaurant uses are not land uses typically associated with substantial odor complaints, and solid waste would be stored and collected in a manner that would minimize odors. Therefore, the Project would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

Greenhouse Gas Emissions

Generate Greenhouse Gas Emissions, Either Directly or Indirectly

The Project would generate greenhouse gas (GHG) emissions during construction and operation. However, because the City of West Hollywood has not adopted a numerical GHG significance threshold, the significance of GHG impacts is evaluated based on whether the Project would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

The 2022 Scoping Plan's Building Decarbonization priority area focuses on projects that utilize all-electric appliances without any natural gas connections, use of propane, or other fossil fuels for space heating, water heating, or indoor cooking. With the implmenetation of PDFs, the Project would not utilize natural gas onsite and would install all-electric appliances. Additionally, the Project would install a photovoltaic system in accordance with the Building Efficiency Energy Standards and GHG-PDF-4. Therefore, the Project would not conflict with the 2022 Scoping Plan.

On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS ("Connect SoCal 2024"). The 2024-2050 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars in the SCAG region by 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018.[5] The 2024-2050 RTP/SCS focuses on four core categories: mobility, communities, environment, and economy. In addition, the SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. As discussed in Section 4.3, of this RDEIR, the Project would be consistent with applicable strategies in the 2024–2050 RTP/SCS and would not conflict with its GHG reduction goals.

[5] Eight percent emissions reduction from 2005 levels by 2020 target was achieved (SCAG 2024).

With the incorporation of PDFs related to energy efficiency, transportation demand management, electric vehicle infrastructure, water conservation, and solid waste reduction, the Project would also be consistent with climate measures in the City of West Hollywood Climate Action and Adaptation Plan (CAAP), which aims to achieve net carbon neutrality by 2035. This local goal aligns with the State's long-term goal of carbon neutrality by 2045. Therefore, although the Project would generate GHG emissions, it would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and GHG impacts associated with the Project would be less than significant.

Energy

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. A small amount of electricity would be used for power drills and other equipment during construction. This analysis assumes that an onsite portable diesel-fueled generator would supply the electricity for lighting equipment used during Project construction. Lighting equipment would comply with Title 24 standards/requirements (such as wattage limitations).

In addition to electricity, construction would consume fuels associated with the onsite use of off-road equipment and on-road construction-related trips (e.g., worker commuting, vendor trips, hauling, materials delivery, and waste disposal). Construction would also comply with applicable regulations that limit unnecessary fuel use (including idling restrictions), which would reduce the potential for wasteful or unnecessary energy consumption.

Considering the depth of the proposed excavation for underground parking, large amounts of water would not be used for dust control, as such water use would cause erosion down the face of the excavation and create difficult (muddy) working conditions in the bottom of the excavation. Water needed for dust control would be delivered by water trucks during demolition, Project Site preparation, and grading construction. Electricity use associated with water conveyance would be minimal, and overall construction-related electricity consumption would be small relative to regional electricity supply. Therefore, construction-related energy use would not result in wasteful, inefficient, or unnecessary consumption of energy.

Operation

The Project would consume energy through electricity use and transportation fuels. Through the application of existing regulatory requirements , and energy efficiency standards, the Project would reduce, where feasible, inefficient, wasteful, and unnecessary consumption of energy. Additionally, the Project's electrical consumption would be negligible compared to SCE's overall energy demand and available supply in the Project area. Therefore, Project compliance with energy-related regulatory requirements and the application of energy use efficiencies would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.

Renewable Energy and Energy Efficiency Plan Consistency

The Project would comply with the applicable portions of the California Building Standards Code (Title 24), including CALGreen and the Building Energy Efficiency Standards, which are intended to reduce energy use and increase efficiency in new construction. The Project would also incorporate

design features that increase energy efficiency and support renewable energy and transportation electrification, including exceeding the 2022 Title 24, Part 6 energy-efficiency requirements by approximately 4.2 percent, installing photovoltaic panels, and providing electric vehicle charging infrastructure. In addition, the Project would be consistent with state and regional transportation-related energy and vehicle miles traveled (VMT) reduction targets reflected in SCAG's RTP/SCS. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Noise

Ambient Noise

OPERATION

As discussed in this RDEIR, noise impacts associated with Project operations would be long term impacts. Long term noise impacts include Project-generated onsite and offsite operational noise sources. Onsite (stationary) noise sources would include operation of mechanical equipment such as air conditioners, landscape and building maintenance. Offsite noise would be attributable to Project induced traffic, which would cause an incremental increase in noise levels within and near the Project vicinity.

In summary, the Project would replace the existing commercial building with a commercial building with a higher density of use. However, the Project would not introduce major new onsite noise sources or bring existing noise sources closer to sensitive receivers. Therefore, there would be no change in exposure to the community and the impact would be less than significant.

Excessive Groundborne Vibration or Noise – Building Damage

CONSTRUCTION

Construction-related vibration from loaded trucks traveling in the alleyway south of the Project Site could result in vibration levels perceptible to nearby residents and structures. A loaded truck may be operated in the alleyway located south of the Project Site, as close as approximately 15 feet from the nearest multi-family residential structure located southeast of the Project Site. At this distance, a loaded truck would generate vibration levels up to 0.164 in/sec PPV, which would not exceed the FTA's threshold of 0.2 in/sec PPV at residential structures. Temporary vibration impacts related to building damage during construction of the Project would be less than significant.

Transportation

Vehicle Miles Traveled (VMT)

As detailed in this RDEIR, construction activities would not result in long-term trip generation, and any temporary increase in VMT would be short-term and would not substantially affect regional VMT. Operation of the Project would be consistent with CEQA Guidelines Section 15064.3(b) and the City's VMT screening approach for projects located in a high-quality transit area and not subject to exclusionary criteria. Therefore, VMT impacts would be less than significant.

Conflict With a Program Plan, Ordinance, or Policy

The Project would be consistent with regional and local circulation plans that address roadway, transit, bicycle, and pedestrian facilities (including Connect SoCal 2024, the City's General Plan, and the Sunset Specific Plan). While the Project has the potential to conflict with certain provisions of the City's Municipal Code, the Project would be required to implement applicable City requirements and standard conditions of approval (including submission of a Construction Management Plan during permitting), which would maintain circulation and emergency access around the Project Site during construction. Therefore, impacts related to conflicts with applicable circulation plans, ordinances, or policies would be less than significant.

Hazards Due to Geometric Design

CONSTRUCTION

Construction may require temporary sidewalk and/or lane closures, which could temporarily increase hazards in the Project vicinity. However, the Project would be required to implement the City's Construction Management Plan as a standard condition of approval to maintain safe circulation and access in the Project area during construction. Therefore, hazards related to geometric design features or incompatible uses during construction would be less than significant.

2.9.2 Less Than Significant with Mitigation

Noise

Ambient Noise Levels - Daytime Construction Work

CONSTRUCTION

Construction noise generated during daytime hours would exceed ambient noise levels at certain nearby sensitive receptors. Implementation of Mitigation Measure NOI-1, which includes installation of temporary noise barriers and other noise-reducing construction practices, would reduce daytime construction noise impacts to less than significant levels at affected receptors.

Transportation

Inadequate Emergency Access and Hazards Due to Geometric Design

OPERATION

During Project operation, vehicular access would be provided via a driveway from Cory Avenue and an alleyway from Carol Drive. The traffic study determined that both access points would function adequately; however, due to the proximity of the Cory Avenue driveway to the Cory Avenue/Sunset Boulevard/Doheny Road intersection, installation of a keep-clear sign is recommended to avoid potential queuing and maintain emergency access. With implementation of Mitigation Measure TRA-1, which requires installation of a keep-clear sign at the Cory Avenue driveway, operational impacts related to emergency access and hazards due to geometric design features would be reduced to less than significant.

2.9.3 Significant and Unavoidable

Noise

Ambient Noise Levels - Nighttime Construction Work

CONSTRUCTION

Nighttime construction activities would generate noise levels that exceed existing nighttime ambient noise levels at nearby sensitive receptors. Although Mitigation Measure NOI-1 would be implemented and includes measures such as temporary noise barriers and construction noise controls, nighttime construction noise levels would continue to exceed applicable thresholds at certain nearby residences. Therefore, nighttime construction noise impacts would remain significant and unavoidable.

Excessive Groundborne Vibration or Noise – Human Annoyance

Construction activities involving large earthmoving equipment would generate groundborne vibration levels perceptible to nearby sensitive receptors and exceeding established thresholds for human annoyance. While Mitigation Measure NOI-2 would reduce vibration associated with truck travel by improving pavement conditions, and Mitigation Measure NOI-1 would provide notification procedures, these measures would not reduce vibration impacts associated with earthmoving equipment to below applicable human annoyance thresholds. Therefore, vibration impacts related to human annoyance during construction would remain significant and unavoidable.

2.10 Project Design Features

2.10.1 Aesthetics

AES-PDF-1: At 20 minutes before sunset the Project digital billboard signage will be specified to begin transition from the maximum daytime luminance of 6,000 cd/m_2 to the maximum nighttime luminance of 300 candelas/m_2. Similarly, the Project digital billboard signage will be specified to transition from the night maximum luminance of 300 cd/m_2 to the day maximum luminance of 6,000 cd/m_2, beginning no earlier than 20 minutes before sunrise.

2.10.2 Air Quality

AQ-PDF-1: All construction off-road equipment will be Tier 4 Interim or better where applicable.

2.10.3 Geology and Soils

GEO-PDF-1: The project would implement all geotechnical recommendations for the development of the site, including earthwork, seismic design, retaining walls, shoring and foundation design as specified in the Geotechnical Engineering Investigation prepared for the project; completed by Geotechnologies, Inc. in December 2020 and provided in Appendix N of the Original DEIR.

2.10.4 Greenhouse Gas Emissions

As discussed in Section 4.7, the Project would comply with the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The following are proposed energy conservation measures that are beyond the minimum requirements of CalGreen:

Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements.

GHG-PDF-2: Use of natural heating and cooling features.

GHG-PDF-3: Use of improved insulation.

GHG-PDF-4: Installation of PV panels.

GHG-PDF-5: Use of efficient and durable roofing materials and exterior finishes.

GHG-PDF-6: Use of efficient and durable roofing materials and exterior finishes.

GHG-PDF-7: Use of efficient interior finishes.

Water Conservation

GHG-PDF-8: Water-efficient plumbing fixtures

Solid Waste Conservation

GHG-PDF-9: Use of recycled foundation materials.

Electric Vehicle

GHG-PDF-10: The Project would provide 86 parking spaces, including 20 spaces supplied with a 40-amp Electric Vehicle (EV) chargers and an additional 20 EV charging capable spaces., 16 bicycle parking spaces and two loading spaces.

2.11 Mitigation Measures

It should be noted that all other mitigation measures within the Original DEIR remain unchanged. The environmental factors requiring mitigation are:

- Biological Resources
- Cultural Resources
- Geology and Soils/Paleontological Resources
- Noise
- Transportation
- Tribal Cultural Resources

2.11.1 Biological Resources

Mitigation Measure BR-1: Nesting Bird Surveys

If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction clearance surveys within the BSA (Project Site and a 500-foot buffer) for special status species including nesting birds.

To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, and to avoid or minimize direct and indirect effects on migratory non-game nesting birds, and their nests, young, and eggs, the following measures shall be implemented.

- Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. The nesting bird nesting season is typically from February 1 through August 31, but can vary slightly from year to year, usually depending on weather conditions. Raptors are known to begin nesting early in the year and ends late. The raptor nesting bird season begins January 1 to September 15.
- If Project activities that will remove or disturb potential nest sites cannot be avoided during February 1 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of Project disturbance up to seven days prior to mobilization, staging and other disturbances. Preconstruction surveys shall be conducted no more than three days prior to vegetation, substrate, and structure removal and/or disturbance.
- If neither nesting birds nor active nests are observed during the pre-construction survey(s), or if they are observed and will not be affected (i.e. outside the buffer zone described below), then Project activities may begin and no further nesting bird monitoring will be required.
- If an active bird nest is located during the pre-construction survey and will potentially be affected, a no-activity buffer zone shall be delineated on maps and marked in the field by fencing, stakes, flagging, or other means up to 500 feet for raptors, or 100 feet for non-raptors. Materials used to demarcate the nests will be removed as soon as work is complete or the fledglings have left the nest. The biologist will determine the appropriate size of the buffer zone based on the type of activities planned near the nest and bird species. Buffer zones shall not be disturbed until a qualified biologist determines that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be affected by Project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. After the nesting cycle is complete, Project activities may begin within the buffer zone.

Mitigation Measure BR-2: Biological Monitor

- The applicant shall retain a qualified Biological Monitor to conduct pre-construction surveys and biological monitoring during construction. If special-status wildlife species or protected nesting birds are observed and determined present within the BSA during the pre-construction breeding bird surveys, then the qualified biological monitor shall be onsite to monitor throughout the duration of construction activities that result in tree or vegetation removal, to minimize the likelihood of inadvertent impacts to nesting birds and other wildlife species. Monitoring shall also be conducted periodically during construction activities to ensure no new nests occur during vegetation removal or building demolition activities between February 1 through August 31. The biological monitor shall ensure that biological mitigation measures, best management

practices, avoidance, and protection measures and mitigation measures described in the relevant project permits and reports are in place and are adhered to.

- Biological Monitor shall have the authority to halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If necessary, the monitoring biologist shall relocate the individual outside of the .
- work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in impacts on the species. The appropriate agencies shall be notified if a dead or injured protected species is located within the Project Site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include: location of the carcass, a photograph, cause of death (if known), and other pertinent information.

2.11.2 Cultural Resources

Mitigation Measure CUL-1: If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in a 30-foot radius and notify the project proponent. A Secretary of the Interior qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the Project Site while evaluation and treatment of historical or unique archaeological resources takes place.

Mitigation Measure CUL-2: If a local Native American tribal organization(s) request that a tribal monitor and/or a qualified archaeologist monitor construction at the project location, then the project proponent shall retain and schedule any required monitors during all subsurface excavations into native soil. At the discretion of the monitoring archaeologist, excavation or other ground-disturbing activities must be halted when an archaeological artifact or feature is observed. Tribal monitors may request the archaeological monitor to halt ground disturbing activities if they observe potential cultural finds. Native American monitors will be required to complete and submit daily monitoring logs while at the Project Site to the project proponent's lead archaeologist.

Mitigation Measure CUL-3: If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLDS (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

2.11.3 Geology and Soils

Mitigation Measure PAL-1: Fossils could be present in native soils onsite. A qualified paleontologist (approved by the County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site.

- Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final paleontological survey report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.
- Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site.
- The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The authority of the paleontologist to temporarily halt construction in part of the Project Site shall be included on project grading and construction plans. A copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

2.11.4 Noise

Mitigation Measure NOI-1: To ensure that construction noise does not exceed 10 dBA over ambient at the nearby sensitive receptors, the construction contractor will:

- Install temporary noise barriers at a minimum height of 12-foot-tall modular acoustic panels [STC 28–32]) with no gaps from grade to top of the barrier on the north edge of the site, the south edge of the site, and on the southwestern and southeastern corners where the distance to residential properties is shortest. The height of the barriers along the south, southwestern and southeastern edges of the Project will be at the highest feasible height to shield multi-story residences to the south, southwest, and southeast.
- Limit the use of noise-producing equipment to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday.

- Use types and models of noise-producing equipment that have the lowest horsepower and the lowest noise generating potential practical for their intended use.
- Fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.
- Ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.
- Have only necessary equipment on site.
- Use manually adjustable or ambient sensitive backup alarms.6
- Temporarily enclose localized and stationary noise sources.
- Store and maintain equipment, building materials, and waste materials as far as practical from as many sensitive receivers as practical.
- Schedule construction activities to avoid operating several pieces of equipment simultaneously whenever feasible.
- Restrict the use of bells, whistles, alarms, and horns to safety warning purposes only.

In addition, the Project applicant shall:

- Provide advance notice of the start of construction to all noise-sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur and provide contact information for filing noise complaints with the contractor and the City of West Hollywood.
- If a construction noise complaint(s) is registered and if a representative of the City's Code Enforcement is not available to take noise measurements, the contractor shall retain a City-approved acoustical consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of eight hours or a full construction workday, whichever is greater. The consultant shall prepare a letter report for Code Enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

Mitigation Measure NOI-2: Prior to construction, the following are provided to reduce vibration levels associated with construction of the Project related to human annoyance at nearby residences:

- Prior to the commencement of construction, the applicant shall fill any existing potholes and repair any asphalt deficiencies to ensure that the alleyway surface is made smooth. Ongoing maintenance will be performed throughout the duration of construction to keep the alleyway in good condition.

2.11.5 Transportation

Mitigation Measure TRANS-1: Wayfinding Signage: A "keep clear" sign shall be located at the proposed Cory Avenue driveway to ensure there would be less than significant traffic congestion near the Cory Avenue/Sunset Boulevard/Doheny Road intersection.

6 These are backup alarms that focus their noise on a specific area and/or automatically adjust the volume of the noise to be only slightly above that of the ambient level at the worksite.

2.11.6 Tribal Cultural Resources

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/Mitigation Measure definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the early commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project Site possesses the potential to impact Kizh/Gabrielino TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the Project Site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to

the Los Angeles County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

C. Construction activities may resume in other parts of the Project Site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the tribal monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3: Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant ("MLD"), and as determined by the Native American Heritage Commission, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project Site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

F. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

2.12 Summary of Alternatives

This RDEIR examines in detail four alternatives to the Project: Alternative 1: No Project Alternative, Alternative 2: No Digital Canvas Alternative, Alternative 3: Modified Land Use Alternative, and Alternative 4: Aboveground Parking Alternative. A general description of these alternatives is provided below. Refer to Section 5.0 of this RDEIR for a more detailed description of these four alternatives, a comparative analysis of the impacts of these alternatives to those of the Project, and a description of the alternatives that were considered but rejected as infeasible.

2.12.1 Alternative 1 – No Project Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development Project on an identifiable property consists of the circumstances under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain circumstances, the No Project Alternative mean 'no build' wherein the existing environmental; setting is maintained." Accordingly, for the purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved. The former automotive dealership onsite closed in May 2021. In this alternative the vacant auto dealership buildings would remain onsite and the Project Site would not be redeveloped.

While the No Project Alternative would avoid all of the Project's significant impacts, it would not achieve any of the Project objectives.

2.12.2 Alternative 2 – No Digital Canvas Alternative

This alternative would omit the digital canvas on the building exterior; otherwise, the design, construction, and operation of this alternative would be the same as for the Project. Alternative 2 would reduce aesthetics, light and glare, energy and greenhouse gas emissions impacts compared to the less than significant aesthetics, light and glare, energy and greenhouse gas impacts analyzed under the Project.

This alternative would achieve all of the objectives of the Project, with the exception of partially creating a landmark building that would dramatically mark the entrance of West Hollywood and developing a digital canvas. The digital canvas would be consistent with the bright lights character of the Sunset Strip and would dramatically mark the entrance to the City of West Hollywood.

2.12.3 Alternative 3 – Modified Land Use Alternative

This alternative consists of changing the high turnover restaurant on the first floor to retail use for the purpose of reducing trip generation. All other aspects of design, construction, and operation of this alternative would be the same as for the Project including land uses, intensity, and the digital signage.

This alternative would achieve all of the objectives of the Project, with the exception of partially creating a mixed-use building with ground-floor uses catering to the needs of area office workers. This alternative would remove a dining establishment that could serve the office workers in the area as well as the proposed new building.

2.12.4 Alternative 4 – Aboveground Parking Alternative

This alternative consists of replacing the retail, food and beverage, office, and BOH/MEP uses on the first and second floors with a two-level parking structure, the lower level would be at grade and the upper level above grade, with a total of approximately 50 parking spaces. Similar to Alternative 3, this alternative would reduce trip generation. In this alternative the underground parking structure in the Project would be omitted. Office, restroom, and MEP spaces would be provided on levels 3, 4, 5, and 6 (roof) with a total of 32,652 square-feet of office space. This alternative would omit the exterior stairway included in the Project on the west side of the building.

This alternative would achieve all of the objectives of the Project, with the exception of partially redeveloping the Project Site with land uses encouraged for the site by the SSP: (a) development of a mixed-use building of landmark quality at the southeast corner of Sunset and Cory that dramatically marks the entrance to West Hollywood and acts as a "hinge" at the bend in the street; and (b) with ground-floor uses catering to the needs of area office workers.

2.12.5 Environmentally Superior Alternative

With respect to identifying an Environmentally Superior Alternative among those analyzed in this RDEIR, the range of feasible alternatives includes Alternative 1, Alternative 2, Alternative 3 and Alternative 4. A more detailed description of the potential impacts associated with each alternative is provided in the Alternatives Section of this RDEIR. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this RDEIR, Alternative 1 would avoid all of the Project's significant environmental impacts, including 's significant and unavoidable construction noise impacts. Although Alternative 1 would reduce most of the Project's less than significant and less than significant with mitigation impacts it would not meet any of the Project's objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than Alternative 1, a comparative evaluation of the remaining alternatives indicates that Alternative 4 would be the Environmentally Superior Alternative. This alternative

would reduce impacts in several areas, including energy use, greenhouse gas emissions, and transportation, without introducing any new or greater impacts compared to the Project.

Alternative 4 would fully meet four of the six objectives for the Project:

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

Alternative 4 would partially meet the following Project objective: deleting the digital signage would make the building a less dramatic landmark.

- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.

Alternative 4 would not meet the following objective:

- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.

Table 2-1 Summary of Impacts Under the Project

Impact		Mitigation Measure (s)	Residual Impact
Aesthetics			
Impact AES-1	Development of the project would alter the visual character of the project site; however, the project would be consistent with surrounding development, and the City's General Plan, SSP, and Signage Policy regulations governing scenic quality. The project would not conflict with applicable zoning and regulations regarding scenic quality.	Mitigation measures would not be required.	Less than significant
Impact AES-2	Development of the project would introduce new sources of light and glare on the project site; however, the project would comply with the regulations and standards in the City's Municipal Code, SSP, and Signage Policy related to signage, lighting, and illumination.	Mitigation measures would not be required.	Less than significant
Air Quality			
Impact AQ-1	The project would generate employment growth. However, such growth would not exceed the growth forecasts on which the 2022 AQMP is based or delay the timely attainment of air quality standards. Therefore, impacts related to AQMP consistency would be less than significant.	Mitigation measures would not be required.	Less than significant
Impact AQ-2	Construction and operation of the project would not exceed SCAQMD's regional thresholds of significance; therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under applicable federal or State ambient air quality standards, and impacts related to construction and operation would be less than significant.	Mitigation measures would not be required.	Less than significant
Impact AQ-3	The project would not exceed SCAQMD localized thresholds of significance and toxic air containments thresholds for cancer and chronic risk, and the project is not considered a land use that would generate substantial toxic air contaminants emissions. Additionally, the project would not increase carbon monoxide concentrations such that it would create carbon monoxide hotspots. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.	Mitigation measures would not be required.	Less than significant
Impact AQ-4	The project would not generate odors adversely affecting a substantial number of people during construction or operation. Impacts would be less than significant.	Mitigation measures would not be required.	Less than significant

Impact		Mitigation Measure (s)	Residual Impact
Greenhouse Gas Emissions			
Impact GHG-1	Although construction and operation of the project would generate GHG emissions, the project would incorporate features that would reduce GHG emissions and align with the goals of the applicable plans, policies, and regulations related to GHG emissions. Therefore, the project would not conflict with the applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.	Mitigation measures would not be required.	Less than significant
Energy			
Impact EN-1	Project compliance with energy regulatory requirements and the application of energy use efficiencies would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.	Mitigation measures would not be required.	Less than significant
Impact EN-2	The project would be consistent with the transportation VMT targets set forth by the State and therefore, would not conflict with nor obstruct a state or local plan for transportation-related energy consumption. Impacts related to conflicts with existing renewable energy plans would be less than significant.	Mitigation measures would not be required.	Less than significant
Noise			
Impact N-1	Construction and demolition activities associated with implementation of the project would intermittently generate noise exceeding applicable thresholds at sensitive receptors adjacent to the project site. Implementation of Mitigation Measure NOI-1 would reduce daytime construction noise impacts to less than significant levels at nearby sensitive receptors. However, even with implementation of Mitigation Measure NOI-1, nighttime construction noise impacts would remain significant and unavoidable. Noise associated with operation of the project would not exceed applicable noise standards at the nearest sensitive receptors and operational noise impacts would be less than significant.	**NOI-1**: To reduce construction noise at the nearby sensitive receptors, the construction contractor will: ▪ Install temporary noise barriers at a minimum height of 12-foot-tall modular acoustic panels [STC 28–32]) with no gaps from grade to top of the barrier around the Project Site. The height of the barriers along the south, southwestern and southeastern edges of the Project Site will be extended above 12 feet to the extent feasible to shield multi-story residences to the south, southwest, and southeast. ▪ Limit the use of noise-producing equipment to between 8:00 a.m. to 5:00 p.m., Monday through Friday. ▪ Use types and models of noise-producing equipment that have the lowest	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	horsepower and the lowest noise generating potential practical for their intended use. ▪ Fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer. ▪ Ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately. ▪ Have only necessary equipment on site. ▪ Use manually adjustable or ambient sensitive backup alarms.[7] ▪ Temporarily enclose localized and stationary noise sources. ▪ Store and maintain equipment, building materials, and waste materials as far as practical from as many sensitive receivers as practical. ▪ Schedule construction activities to avoid operating several pieces of equipment simultaneously whenever feasible. ▪ Restrict the use of bells, whistles, alarms, and horns to safety warning purposes only. In addition, the Project applicant shall: ▪ Provide advance notice of the start of construction to all noise-sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur and provide contact information for filing noise and/or vibration	

[7] These are backup alarms that focus their noise on a specific area and/or automatically adjust the volume of the noise to be only slightly above that of the ambient level at the worksite.

Impact		Mitigation Measure (s)	Residual Impact
		complaints with the contractor and the City of West Hollywood. ▪ If a construction noise complaint(s) is registered and if a representative of the City's Code Enforcement is not available to take noise measurements, the contractor shall retain a City-approved acoustical consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of eight hours or a full construction workday, whichever is greater. The consultant shall prepare a letter report for Code Enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.	
Impact N-2	Construction activities associated with implementation of the project would intermittently generate groundborne vibration levels in the vicinity of the project site. Vibration levels would exceed applicable thresholds for human annoyance; implementation of Mitigation Measure NOI-2 would help reduce vibration impacts but not to below applicable thresholds for human annoyance. Vibration levels generated during construction would exceed applicable building damage thresholds at nearby structures. However, Mitigation Measure NOI-2 would reduce project-generated vibration impacts to buildings to a less than significant level.	**NOI-2:** Prior to construction, the following are provided to reduce vibration levels associated with construction of the Project related to human annoyance at nearby residences: ▪ Prior to the commencement of construction, the applicant shall fill any existing potholes and repair any asphalt deficiencies to ensure that the alleyway surface is made smooth. Ongoing maintenance will be performed throughout the duration of construction to keep the alleyway in good condition.	Significant and Unavoidable

Impact		Mitigation Measure (s)	Residual Impact
Impact N-2	Vibration levels generated during construction would not exceed applicable building damage thresholds at nearby structures and a less than significant impact would occur.	Mitigation measures would not be required.	Less than significant
impact N-3	The project site is not located within the noise contours of the nearest airports. Therefore, people working at the project site would not be exposed to excessive airport-related noise levels and no impact would occur.	Mitigation measures would not be required.	No Impact
Transportation			
impact TRA-1	While the project would be consistent with Connect SoCal 2024, the City of West Hollywood 2035 general plan, and the City of West Hollywood Sunset Specific Plan, it has potential to conflict with the City of West Hollywood Municipal Code. However, this impact would be less than significant.	Mitigation measures would not be required.	Less than significant
Impact TRA-2	Construction activities associated with the project would not result in long-term trip generation, and any temporary increase in VMT would not substantially impact regional VMT. operation of the project would be consistent with CEQA Guidelines Section 15064.3 subdivision (b), and impacts would be less than significant.	Mitigation measures would not be required.	Less than significant
Impact TRA-3	Construction of the project could increase hazards due to geometric design features, and as such, a construction management plan would be required. With implementation of the City's Construction Management Plan condition of approval and Mitigation Measure TRA-1, impacts would be less than significant.	**TRA-1: Wayfinding Signage.** A "keep clear" sign shall be located at the proposed Cory Avenue driveway to ensure there would be less than significant traffic congestion near the Cory Avenue/Sunset Boulevard/Doheny Road intersection.	Less than significant with mitigation
Impact TRA-4	Construction of the project may involve temporary sidewalk or lane closures, and operation of the project would involve two egress routes near a busy intersection, both of which have the potential to inhibit emergency access. However, with implementation of Mitigation Measure TRA-1, Impacts would be less than significant.	Mitigation Measure TRA-1.	Less than significant with mitigation

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3 Project Description

3.1 Project Characteristics

3.1.1 Project Description

The Project site is located at 9160-9176 Sunset Boulevard Project and comprised of three contiguous lots located on the south side of Sunset Boulevard. Figure 3-1, below, includes a Project Location map that helps illustrate adjacent land uses and the overall outline of the Project Site. Overall, the Project would consolidate the three lots into one and include construction of a five-story, commercial office building. In order to facilitate a new development, the existing automotive dealership building, and related surface parking, would be demolished and removed before site preparation. The proposed new building would include approximately 52,999 square-feet of floor area on an 18,608-square-foot Project site, resulting in a Floor Area Ration (FAR) of approximately 2.85 to 1. The maximum building height would be approximately 90-feet. Land uses per floor are detailed below in Table 3-1.

On the ground floor, the retail/high turnover restaurant uses would be provided in the west half of the building and in the northeast corner. These uses would also include provision of additional open space for outdoor dining use. A lobby associated with the office uses would be located in the north-central part of the ground floor, and back-of-the-house uses and bike showers would be located in the south-central part of the ground floor. A ramp to the underground parking structure would be located in the southeast corner of the site. Bicycle parking (6 spaces) would be provided in the Project area along Sunset Boulevard. See Figure 3-2, Ground Floor Plan.

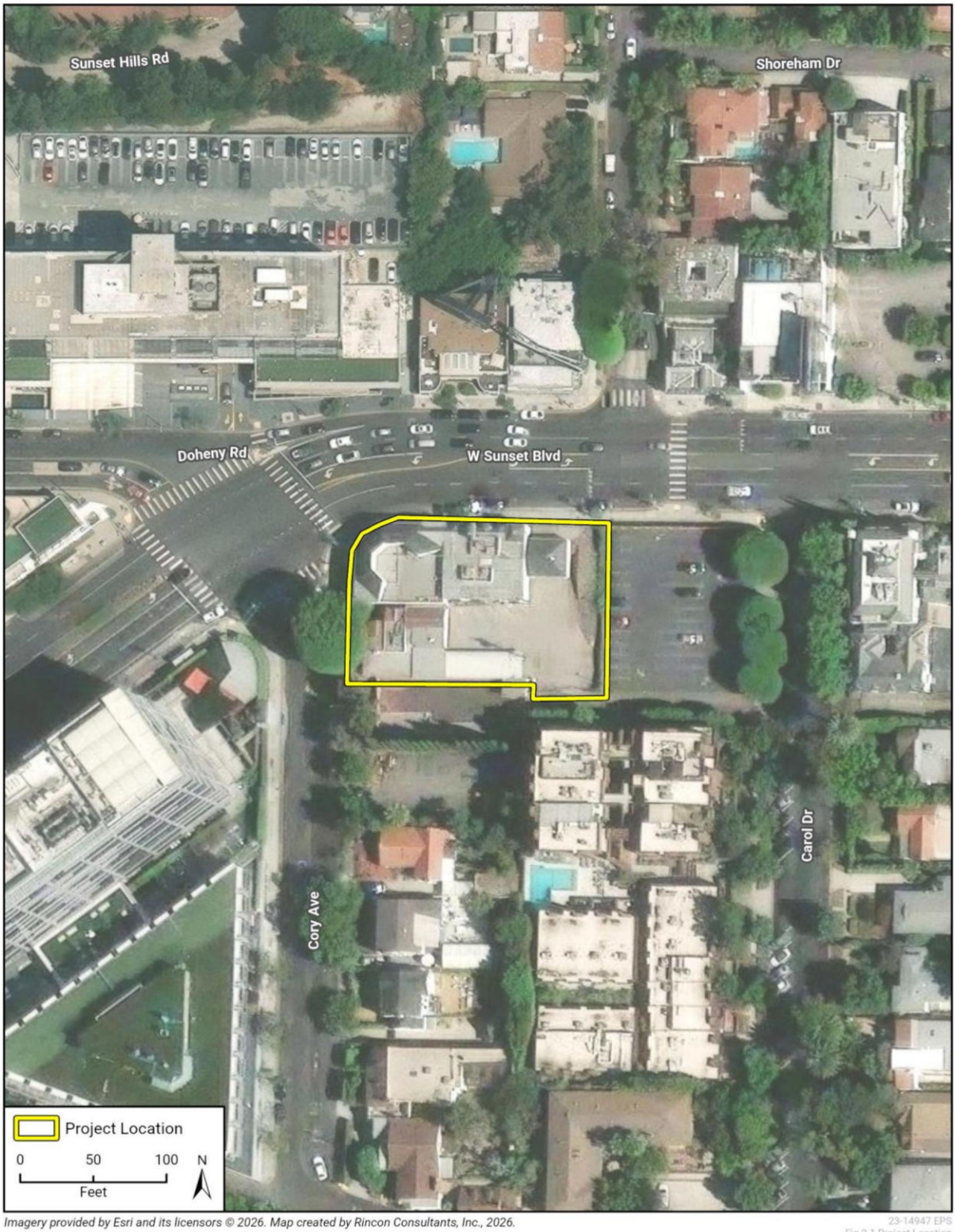
The upper levels (i.e., levels two through five) would consist entirely of office spaces. Levels three through five and the roof level would be stepped back so that the building massing would be compatible with the existing residential scale buildings to the south. Vehicle parking (86 spaces) and additional bicycle parking (10 spaces), along with back-of-the-house uses, would be provided in three subterranean levels. See Figure 3-3, Proposed Building Section.

Plants that are grown to hang over levels two and three on the north side of the building and levels three, four, and five on the south side of the building would provide green screening and help in softening the building edges by adding natural greenery to the building exterior. Mechanical, electrical and plumbing uses would be located on the roof.

The Project would be designed and constructed in compliance with applicable City codes, including, but not limited to, the 2022 California Building Code, California Plumbing Code, California Mechanical Code, California Electrical Code, and California Building Energy Efficiency Standards. The proposed building would be all-electric.

The Project proposes two full-motion animated billboards: one located along the northwest corner of the building on levels three through five (“Advertising Area 1”) and another located along the northeast corner of the building on level four (“Advertising Area 2”). The full-motion animated billboards are described in more detail below in Section 2.1.2 of this Recirculated Draft EIR.

Figure 3-1 Project Location Map



Imagery provided by Esri and its licensors © 2026. Map created by Rincon Consultants, Inc., 2026.

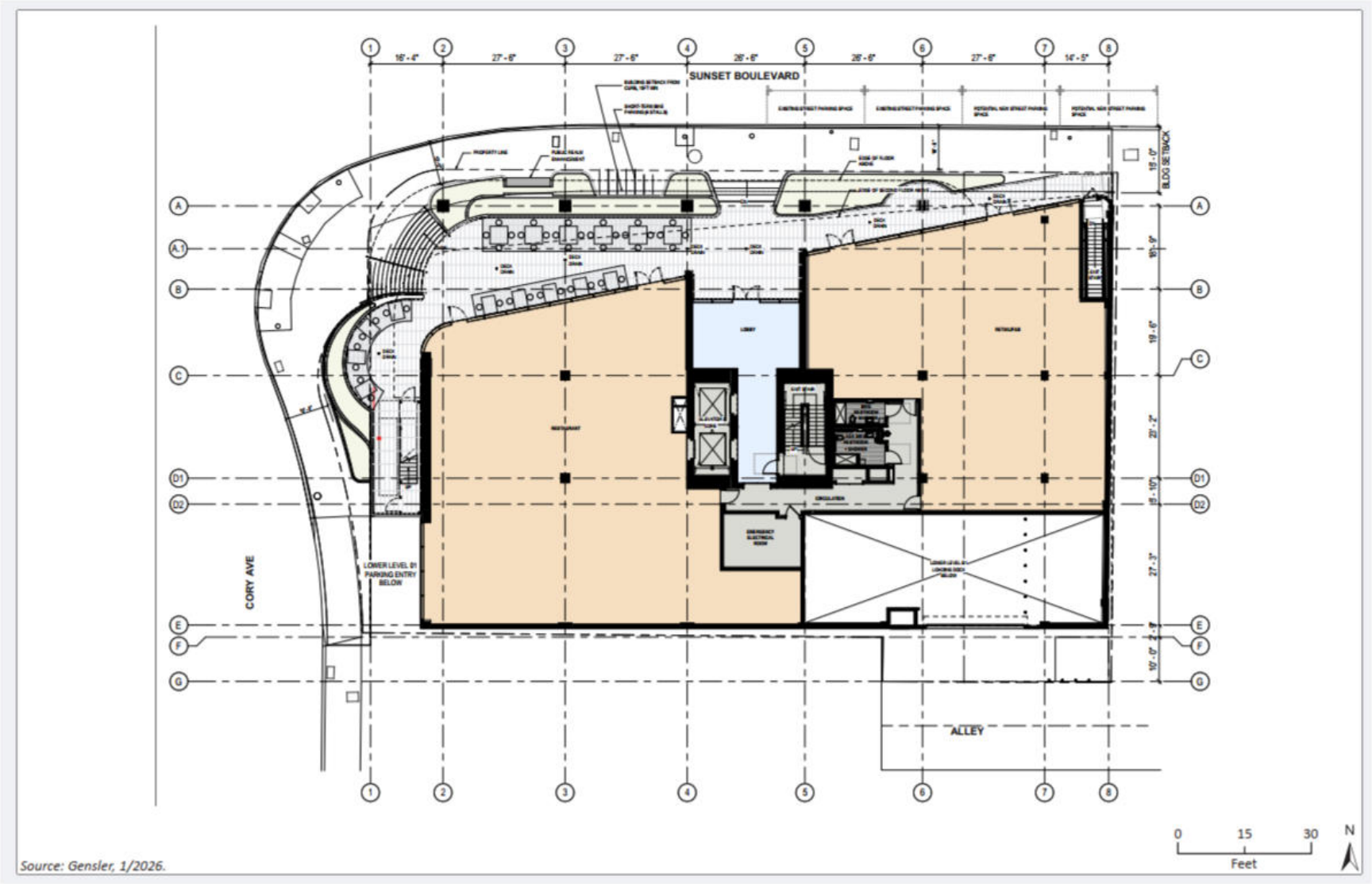
23-14947 EPS
Fig 2-1 Project Location

Table 3-1 Proposed Project Land Uses and Building Areas

Story	Land Use	Building Area (square feet)	Open Space (square feet)
1 (Ground Level)	Retail/High Turnover Restaurant	7,892	
	Office (Lobby)	590	
	Back of House/Mechanical/ Electrical/Plumbing (BOH/MEP)	2,077	
	Terrace/Plaza and Planting Area		622
	Level 1 Subtotal	10,559	
2	Office	11,616	
	Restrooms and MEP	1,356	
	Terrace and Planting Area		0
	Level 2 Subtotal	12,972	
3	Office	9,102	
	Restrooms and MEP	1,380	
	Terrace and Planting Area		3,943
	Level 3 Subtotal	10,482	
4	Office	7,974	
	Restrooms and MEP	1,358	
	Terrace and Planting Area		996
	Level 4 Subtotal	9,332	
5	Office	7,638	
	Restrooms and MEP	1,380	
	Terrace and Planting Area		
	Level 5 Subtotal	9,018	759
6 (Roof)	BOH/MEP	636	
Total		**52,999**	**6,320**
Subtotals			
Office (including Lobby)			36,920
Retail/Restaurant			7,892
Restrooms and BOH/MEP			8,187

Source: JBC/Gensler 2021.

Figure 3-2 Proposed Ground Floor Plan



Source: Gensler, 1/2026.

Figure 3-3 Proposed Building Section



Source: Gensler, 1/2026.

3.1.2 Full-Motion Animated Billboards

The Project proposes two full-motion animated billboards that would display off-site advertising and art, including public art required by the City's Sunset Boulevard Off-Site Signage Policy. Advertising Area 1 is located along the northwest corner of the exterior of the building, and Advertising Area 2 is located along the northeast corner of the exterior of the building. See Figure 3-4 for location of the Advertising Areas 1 and 2. Each Advertising Area is comprised of an area for the primary off-site advertising space ("Primary Advertising Area") and a smaller area with feathered lighting that will integrate the off-site advertising space with the office building ("Integration Area"). The Integration Areas will be coordinated with and designed to enhance the Primary Advertising Areas. See Figure 3-5 Project Rendering at Cory Avenue – View East.

Together, the Primary Advertising Area and Integration Area comprise the "Total Advertising Area." The Project proposes 2,807 square feet of Total Advertising Area, including 2,174 square feet of Primary Advertising Area and 633 square feet of Integration Area.

- **Advertising Area 1** consists of 2,307 square feet of Total Advertising Area, including 1,803 square feet of Primary Advertising Area and 504 square feet of Integration Area, spanning levels three through five at the northwest corner of the exterior of the building.
- **Advertising Area 2** consists of 500 square feet of Total Advertising Area, including 371 square feet of Primary Advertising Area and 129 square feet of Integration Area, spanning level four of the northeast corner of the exterior of the building.

The full-motion animated billboards within the Advertising Areas would comply with the Sunset Boulevard Off-Site Signage Policy, which is incorporated as part of the Specific Plan. Construction of a new full-motion animated billboard requires approval of a Development Agreement pursuant to the West Hollywood Municipal Code Chapter 19.66 as well as screening for design excellence. Consistent with the Sunset Boulevard Off-Site Signage Policy requirements, the full-motion animated billboards would be located at least 16 feet above the adjacent sidewalk level; their height would not exceed the maximum allowable height on-site; they would not obscure public sightlines to building entrances or publicly accessible open space; and they would be fully integrated with the building with no vertical space between the billboard face and the building.

Figure 3-4 Mapping of Project Digital Component

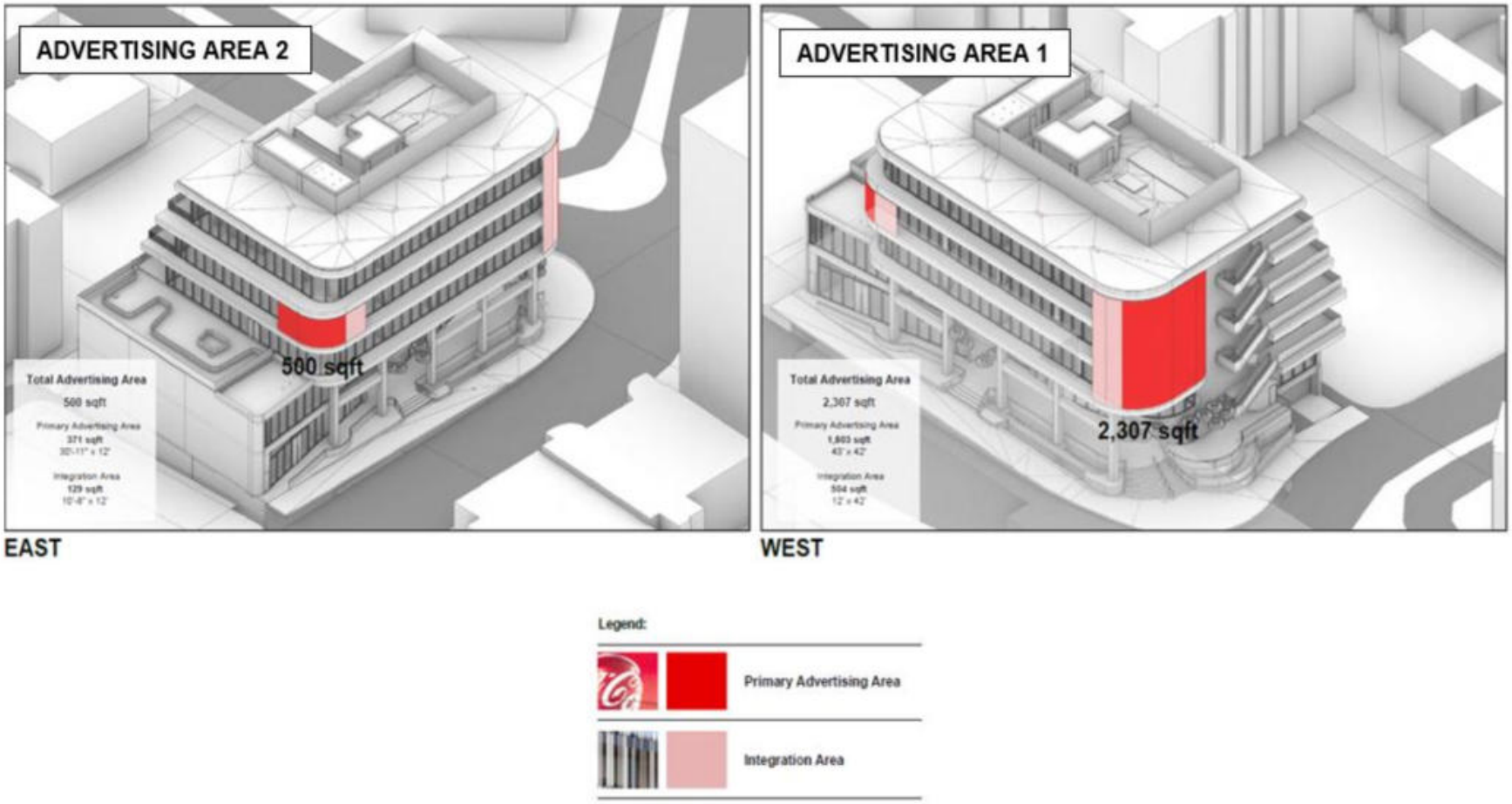


Figure 3-5 Project Rendering at Cory Avenue – View East



Source: Gensler, 1/2026.

3.1.2.1 Billboard Modules

The full-motion animated billboards are made up of variations of the same structure, or module. Each module is approximately 5.5 inches wide and includes one to four blades, or LED sticks, each of which are approximately 0.59 inches wide. The height of the modules align with the architecture. Within Advertising Area 1, the modules are 15 feet in height on levels three and four, and 12-feet in height on level five. The modules in Advertising Area 2 are proposed to be 12-feet in height.

Each of the modules within the Primary Advertising Areas will contain four blades, will be placed directly next to each other with no extra gaps, and will be programed between 300 and 6,000 candelas per meter squared in compliance with the Sunset Boulevard Off-Site Signage Policy. The lighting in the Integration Areas will be feathered to integrate the off-site advertising space in the Primary Advertising Areas with the office building. To achieve this effect, the modules within the Integration Areas will contain one to four blades, will be placed with varying sized gaps – ranging from inches to feet – between them, and will be programed to comply with the Sunset Boulevard Off-Site Signage Policy. See Figure 3-6, below, for diagrams demonstrating how the modules vary for the Primary Advertising Areas and the Integration Areas.

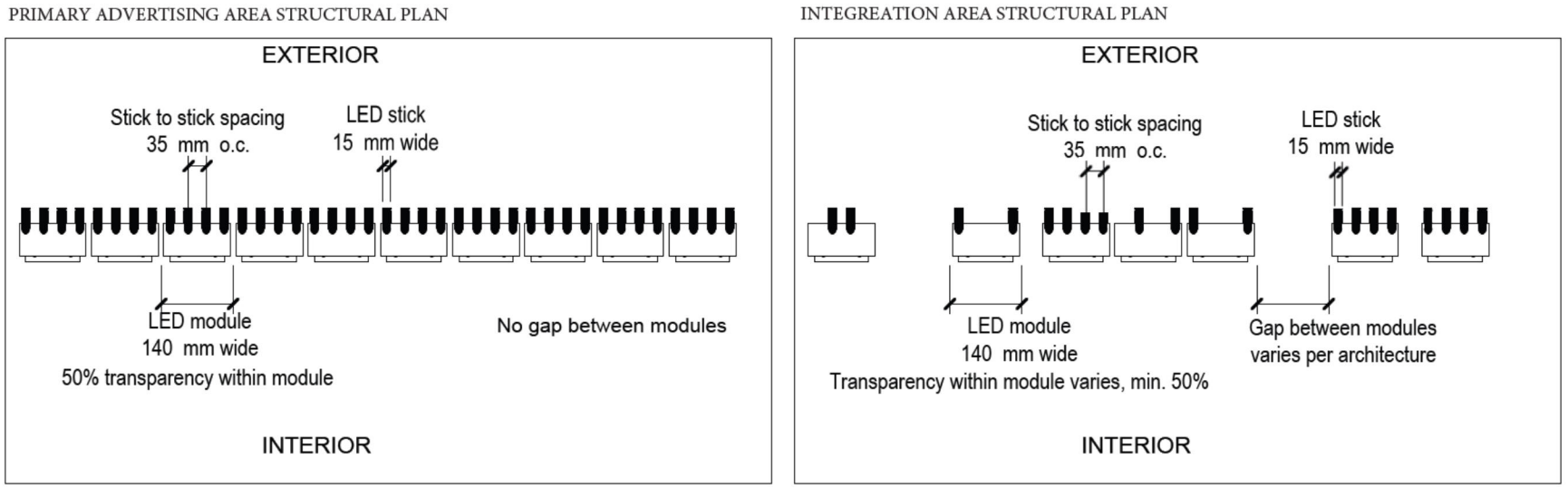
3.1.2.2 Billboard Operations

The Total Advertising Area of the full-motion animated billboards within Advertising Areas 1 and 2 shall comply with the Lighting and Operation Standards in Section 5 of the City of West Hollywood Sunset Boulevard Off-Site Signage Policy for lighting and digital technology.

- **Schedule:** Sign luminance shall adjust throughout the day in accordance with the following schedule:
  - Daytime: From sunrise until 20 minutes prior to sunset, luminance shall not exceed 6,000 candelas per meter squared.
  - Evening: From sunset until 20 minutes prior to sunrise, luminance shall not exceed 300 candelas per meter squared.[1]
  - After Hours: From 2:00 am until sunrise, no animated content or moving patterns shall be permitted.
- **Illuminance**
  - Illuminance from signs or architectural lights shall not exceed 1.4-foot candles at any adjacent residential zoned property line.
- **Sign Control and Transitions**
  - Sign luminance shall transition smoothly between the hours of operation limits above over a time period of no less than 20 minutes. All transitions shall be completed so that the maximum allowable luminance is achieved by the stated time listed above.
  - When ambient sunlight illuminance during daytime is less than 100-foot candles for more than 20 minutes, the full-motion animated billboard shall transition at a smooth rate of change from the daytime luminance level permitted above to the evening luminance level permitted over a time period of no less than 20 minutes.

[1] Pursuant to SSP Chapter 8, Section 5.A.4, the Project's Lighting Study (Appendix C1 of this RDEIR) demonstrates that the Project would not exceed the established lighting threshold of 1. 4 footcandles at any residentially zoned property line at 300 candelas per meter squared during the evening. Therefore, the Project would be subject to an evening luminance standard of 300 candelas per meter squared instead of the evening luminance standards set forth in Table 1 of SSP Chapter 8, Section 5.A.1.

Figure 3-6 Module Plans



LED Blade: 15mm wide

LED Module: 140mm width
-Four LED sticks per module in Primary Advertising Areas
-Number of LED sticks per module varies in Integration Areas

LED Module Transparency (gaps between LED Blades within a module)
-Fifty percent transparency in Primary Advertising Areas
-Transparency varies in Integration Areas

LED Module Gaps (gaps between LED Modules)
-None in Primary Advertising Areas
-Varies in Integration Areas from inches to feet

- Each advertising campaign or art image displayed on a full-motion animated billboard showing static or animated images shall fade in from the previous image over no less than one second and shall fade out over no less than one second.

- **Visual Comfort and Contrast Control**
  - Signs shall not incorporate driver interaction features.
  - No signs shall use colors or images that replicate or could be confused with traffic safety signage.
  - No signs shall use scrolling text.
  - Signs shall not use stroboscopic of flashing images or light which rapidly change direction, oscillate, flash or reverse in contrast.
  - Animated content shall not exhibit:
    - Rapidly changing images without dissolves for transitions between static images, and between static and animated content;
    - Sequences that result in visible brightness change over more than 10 percent of the total display area at a greater rate than three changes per second; or
    - Use flicker frequency or frame rates slower than 30 Hertz (30 Hertz means 30 flashes flickers, or frames per second).

- **Renewable Energy Use**
  - Sign assembly shall utilize the highest available clean energy tier from the City's energy provider to the extent feasible.
  - The incremental energy usage attributable to digital signs, as defined in 4.c of the Sunset Boulevard Off-Site Signage Policy, should be fully offset to the extent feasible through demonstrated improvement in the energy performance for new buildings or major renovations of existing buildings.

- **Monitoring**
  - Operators of all new or modified off-site advertising signs subject to a development agreement are required to allow the City's independent lighting consultant to prepare and conduct testing for the purpose of preparing a Lighting Monitoring Report. Light monitoring test results shall be reviewed and approved by the Director. This test must verify that the off-site advertising sign(s) meet the lighting standards in this section (Section 5 Lighting and Operational Standards) and must be completed prior to the issuance of a Certificate of Occupancy for the off-site advertising sign(s). The off-site advertising sign operator must schedule the City's consultant to prepare and submit the Lighting Monitoring Report for approval prior to a request for a Certificate of Occupancy for the off-site advertising sign(s). Thereafter, a light monitoring test is required at three-year intervals or at the City's request to confirm ongoing compliance with standards. Such tests shall be conducted by the City's independent lighting consultant at the Operator's expense. SSP Chapter 8, Section 5 outlines the contents of the Lighting Monitoring Report.

3.1.2.3 Billboard Repairs and Maintenance

The full-motion animated billboards within the Advertising Areas shall be repaired and maintained as follows:

- **Technology.** The LED surfaces will consist of independent LED modules attached to the building. The LED design will allow for replacement and/ or maintenance of the LED modules to ensure reliable performance.
- **Software Updates.** The full-motion animated billboard is remotely programmable and upgraded.
- **Brightness Control.** Display brightness is dimmable 0-100% and dynamically controlled through environmental data streams, ambient brightness sensors, as well as remote access software, which allows for direct adjustment of the brightness. The control system will respond to dynamic inputs and adjust the full-motion animated display accordingly.

3.1.2.4 Sunset Arts and Advertising Program

The City adopted the Sunset Arts & Advertising Program in 2019. This program includes a competitive vetting process and merit-based selection of signage projects and grants awards to projects that will contribute to a dynamic environment on the Sunset Strip. According to the Sunset Arts & Advertising Program, the selected projects are those that preserve the past, celebrate the culture of the strip, support artistic expression, rehabilitate existing building, generate new pedestrian-oriented development, and create signage that is creative and integrated into architecture, with advertising content as its own form of art. The selected projects update the concept of what a billboard can be by creatively using shape in relationship to the street and to the buildings that support them and will increase the visibility of the Sunset Strip as a preeminent location for outdoor advertising.

In September 2021, the City launched Round 2 of the Program and opened call for proposals. The Design Excellence Committee reviewed 27 new screening applications and granted awards to ten top scoring projects. On June 24, 2022, the Project was selected as a top scoring development and granted an award under Round 2 of the Sunset Arts & Advertising Program.

3.1.3 Project Design

The following information is taken directly from the owners/application package and is provided for informational purposes and is presented to help paint a visual picture of the area surrounding the Project and the overall design elements proposed.

The Project Site is the gateway to West Hollywood. Its curvilinear shape is contextual, but formally innovative. It recalls the vocabulary of streamline modernism without being literal or nostalgic. Eschewing overt formalism, the design is purposefully restrained and elegant focusing on material and detailing richness that enhances human experience and creates a timeless landmark of lasting value for the City of West Hollywood.

The building design has three major features integrating it with its location and purpose. The first is the integration of two digital canvases into the architectural form, highlighting the gateway potential of the site. The digital canvases augment and are informed by the architecture, alluding to the dynamism of the Sunset Strip and speed of cars moving through this iconic space. The canvases adapt the streamline and curvilinear forms of the building, reflecting this dynamic role. During the day, the three-story northwestern canvas serves as a delicate interior solar shading latticework that flows around the mass of the building at the northwest corner, protecting the sensitive western glass facade. At night, the digital canvases assert their presence on the boulevard commensurate with the buildings gateway position at the west end of the Sunset Strip. The content of the full-motion animated billboards in the northwest and northeast corners of the building moves across

the canvases, conceived as transparent veils which offers views out from behind their uniquely slender aspect ratio LED louvers.

Secondly, the digital canvas floats above a two-story, generously landscaped streetscape for pedestrians. This entry volume underneath a cantilevered ceiling is sheltered by a lush hanging garden over a publicly accessible terrace extending the sidewalk along the Sunset Strip inward, surrounded by landscaping and planting. While the digital canvases above address the scale and speed of automobiles, the hanging garden purposefully is scaled and designed for pedestrians as an intimate and memorable public space with café's, seating, and lush landscaping.

The third defining feature of the building is the stepping and lushly planted terraces on the south. Compared to the Sunset Boulevard side, the building radically softens and steps down to meet the adjacent residential scale on the southern side, shifting and showing itself as one building with two personalities. A bold, innovative façade for the Sunset Strip hovering over a lush garden and a sensitively scaled façade for the neighborhood.

In addition, and importantly, the design brings people to the west end of Sunset Boulevard. The terrace at the corner is an urban set piece, a visible, but protected stage set to watch and be seen from the boulevard. Conceptually, the design is more than a monumental sign or a set of landscaped terraces: it's a destination, a social space.

The combination of sophisticated architecture, urban design and artist engagement is what gives the Project its iconic potential.

3.1.3.1 Access, Circulation, and Parking

Vehicular ingress and egress would be from Cory Avenue to the west; and via an existing alley from Carol Drive east of the site to the entrance to the proposed ramp in the southwest corner of the site down to the proposed underground parking structure. Pedestrian access would be from Sunset Boulevard on the north side of the site and Cory Avenue on the west side of the site.

The Project would provide 86 parking spaces, including 20 spaces supplied with a 40-amp Electric Vehicle (EV) chargers and an additional 20 EV charging capable spaces., 16 bicycle parking spaces and two loading spaces. Parking and loading areas would be provided in three subterranean parking levels. Office workers and retail/restaurant patrons would enter the parking garage from driveways on Cory Avenue and on the rear alley off Carol Drive.

3.1.3.2 Landscaping and Open Space

The Project would include 622 square-feet of open space on Level 1 and a total of 5,698 square-feet of terraces on levels 2 through 5. The open space would be provided via a ground-floor plaza and a series of landscaped terraces at all levels of the proposed building. Each of these open spaces would be expansive and uninterrupted and would be integrated into the design of the building. The terraces would serve as key architectural elements at the eastern and southern ends of the building and the plaza would anchor the Project's street frontage and pedestrian orientation at the northwest corner. In addition to the open space plaza, the Project would provide streetscape improvements in compliance with Specific Plan standards, including retention of existing two street trees on Sunset Boulevard. One existing ficus tree in the parkway on Cory Avenue and one existing ficus tree on the Project Site would be removed. Project landscaping would include eight trees, five Chinese pistache and three Brisbane box.

3.1.3.3 Utilities

Sanitary Sewer: The Project proposes offsite sewer improvements to connect the sewer lines from the Project Site to the existing sewer network in surrounding roadways. All sewer line sizes and connections are subject to review by the city. The Project applicant will work with the City's Public Works Department for approval of construction of proposed sewer laterals.

Domestic Water: New water meters would be installed as required to meet the demands calculated by the plumber for the Project and in compliance with the requirements of the city's Public Works Department. The City of Beverly Hills Public Works Department provides water to the Project Site. The Project would install water laterals connecting to existing mains in surrounding roadways.

Dry Utilities: Electricity would be provided by Southern California Edison Company (SCE), and solid waste collection would be provided by Athens Services (City of West Hollywood, 2020c). The Project applicant is planning an all-electric building, and thus the building would not have natural gas service.

Stormwater: Stormwater generated on the Project Site would continue to drain into the existing 72-inch Los Angeles County storm drain line in Cory Avenue. Drainage patterns after Project development would remain similar to existing drainage patterns. The Project would implement comply with the City's Low Impact Development (LID) requirements and implement LID best management practices (BMPs) on-site, for reductions in the stormwater flows to the County's stormwater system.

3.1.3.4 Trash Collection and Loading Areas

The Project is designed to minimize the visual impact of trash receptacles and loading areas. Electrical rooms, storage rooms, trash enclosures, and loading spaces would be located within the Project Site and would not be visible from surrounding public streets or public views. Rooftop equipment would be set back from the roof parapet edge and appropriately screened from public view. The loading area for the commercial uses would be provided on the first subterranean parking level and would be accessed from the alley.

3.1.3.5 Sustainability and Green Building Program

The Project would include a number of sustainability features including site location[2]; natural heating and cooling features; use of recycled foundation materials; construction of an all-electric building; water-efficient plumbing fixtures; improved insulation; installation of PV panels and other energy efficiency measures; improvements to indoor air quality; use of efficient and durable roofing materials and exterior finishes; and use of efficient interior finishes.

3.1.3.6 Project Operation

The Project tenants are currently unknown. However, one of the goals of the SSP for Area 8 is provision of office space for creative industries. Project operational employment is estimated at 125 employees.

[2] The Project Site is previously developed and located in a developed urban area with existing road and public utilities infrastructure.

3.1.4 Public Realm Enhancements

The Project provides public realm enhancements along the Project Site's Sunset Boulevard frontage in the form of interactive public artwork that commemorates the site of the former Cock 'n Bull restaurant and bar as well as many other clubs from the vintage Hollywood era. The installation will feature sculptures depicting a lively bull and rooster serving drinks like the famous Moscow Mule created at the Cock 'n Bull. Internal lighting fixtures will be fixed to focus illumination on the characters and the bar structure. The structures will be durable to tolerate public contact and weather. The bar structure will be located behind the property line to allow clear passage on the sidewalk along Sunset Boulevard and will be positioned between planters on either side.

A small plaza east of the bar will include poster cases presenting video images rotating poster graphics about the various clubs in the area and their histories in West Hollywood. This area will be bounded by planters at the back and east end and on the west connecting to the bar. Music and descriptive narration will bring moments from the West Hollywood Night Club scene to life and will offer interactive opportunities to the passing public.

These public realm enhancements aim to engage the public physically and visually along Sunset Boulevard and to provide cultural information and educational moments that convey some of the history and spirit of club life during this vintage Hollywood era.

3.1.5 Public Benefits

The Project will provide a number of public benefits that will be secured by the Project's Development Agreement.

- The Project will provide a minimum of 17.5 percent of civic announcements or arts programing to be displayed on the full-motion animated billboards at the top of the hour or in connection with the Sunset Moment, as established by the West Hollywood Arts and Cultural Affairs Commission Art On the Outside Subcommittee.
- The Project provides public realm enhancements along the Project site's Sunset Boulevard frontage that commemorate the vintage Hollywood era, including the former Cock n' Bull restaurant and bar. The installation, described in Section 2.1.4 of this Draft EIR, will convey historic information and perspective through lively, interactive experiences.
- The Project will provide an extraordinary benefit to the City of West Hollywood in the form of a financial contribution to be negotiated in the Development Agreement.

3.2 Project Design Features

The following project design features (PDFs) would be implemented in addition to the Project characteristics noted above.

3.2.1 Aesthetics

AES-PDF-1: At 20 minutes before sunset the Project digital billboard signage will be specified to begin transition from the maximum daytime luminance of 6,000 cd/m_2 to the maximum nighttime luminance of 300 candelas/m_2. Similarly, the Project digital billboard signage will be specified to transition from the night maximum luminance of 300 cd/m_2 to the day maximum luminance of 6,000 cd/m_2, beginning no earlier than 20 minutes before sunrise.

3.2.2 Air Quality

AQ-PDF-1: All construction off-road equipment will be Tier 4 Interim or better where applicable.

3.2.3 Geology and Soils

GEO-PDF-1: The Project would implement all geotechnical recommendations for the development of the site, including earthwork, seismic design, retaining walls, shoring and foundation design as specified in the Geotechnical Engineering Investigation prepared for the Project; completed by Geotechnologies, Inc. in December 2020 and provided in Appendix N of this DEIR.

3.2.4 Greenhouse Gas Emissions

The Project would comply with the 2022 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The following are proposed GHG reduction measures that are beyond the minimum requirements of CalGreen:

3.2.4.1 Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide an energy efficiency of 4.2%, which exceeds Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2022 Building Energy Efficiency Standards requirements.[3]

GHG-PDF-2: Use of natural heating and cooling features.

GHG-PDF-3: Use of improved insulation.

GHG-PDF-4: Installation of PV panels.

GHG-PDF-5: Use of efficient and durable roofing materials and exterior finishes.

GHG-PDF-6: Use of efficient interior finishes.

3.2.4.2 Water Conservation

GHG-PDF-7: Water-efficient plumbing fixtures.

3.2.4.3 Solid Waste Conservation

GHG-PDF-8: Use of recycled foundation materials.

3.2.4.4 Natural Gas Conservation

GHG-PDF-9: No combustion of natural gas (100% reduction in emissions from natural gas use).

3.2.4.5 Electric Vehicle

GHG-PDF-10: The Project would provide 86 parking spaces, including 20 spaces supplied with a 40-amp Electric Vehicle (EV) chargers and an additional 20 EV charging capable spaces., 16 bicycle parking spaces and two loading spaces.

[3] For analysis purposes, a value of 4.2% more efficient than Title 24 was used in the CalEEMod model.

3.3 Project Construction and Phasing

3.3.1 Onsite Construction

Construction activities would include earthwork, rebar, structural steel, concrete slab, concrete panels, mechanical, electrical, plumbing, glazing, roofing, landscaping, hardscape consisting of asphalt concrete, fencing, associated site utilities, site drainage, and any associated offsite work that may be required.

Construction would include excavation for construction of the proposed three-level underground parking structure. The finished floor of the bottom (B03) level of the parking structure would be 36 feet below ground surface, and the structure would span the entire footprint of the proposed building. Construction would involve approximately 25,000 cubic yards (cy) of soil export. Exported soil would be transported to Chiquita Canyon Sanitary Landfill west of the city of Santa Clarita, approximately 36 miles to the north.

For safety reasons, temporary barricades would be used to limit access to the site during Project construction and allow for safe access for construction workers to be maintained throughout construction. It is anticipated that approximately 75 to 95 workers would be onsite during the peak construction phases.

The type of equipment utilized during construction is anticipated to include:

- Tractors, loaders, backhoes, dozers, excavators, skip loaders, scrapers, concrete trucks, concrete pumps, concrete vibrators, laser screeds, and dump trucks for site preparation and rough grading.
- Cranes, forklifts, backhoes, skip loaders, trucking, compacting equipment, manlifts, welders, paving-skip loaders, grading equipment, trucking and rollers for building construction.
- Skip loaders, backhoes, trenchers and trucking for utility improvements.
- Bobcats, air compressors, forklifts, and delivery trucks for landscaping and irrigation.

The majority of construction staging areas would be provided within the boundaries of the Project Site. The existing parking lane on Sunset Boulevard, along the Project Site boundary, would also be occupied during Project construction and used for construction material deliveries and concrete placement activities.

Construction workers' vehicles and construction trucks and equipment would be parked onsite and/or on nearby vacant lots that would be leased for use as construction staging/parking areas. Construction workers would also be encouraged to carpool or use mass transit.

3.3.2 Offsite Improvements

Under the Project, offsite improvements would include construction of utility laterals connecting to utility mains in surrounding roadways.

3.3.3 Construction Schedule

Construction of the Project would begin in February 2026 and end in October 2027, with construction activity occurring Monday through Saturday. Nighttime construction, lasting approximately eight hours per night, would take place during the early stages of the building construction phase.

3.4 Project Objectives

The following is a list of the overall objectives of the Project, which are provided to help decision making, establishing feasibility, and identifying the underlying purpose of the Project and provided Alternatives.

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.
- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

3.5 Standard Requirements and Conditions of Approvals

The Project would be reviewed in detail by applicable City of West Hollywood departments and divisions that have the responsibility to review land use application compliance with city codes and regulations. City staff is also responsible for reviewing this EIR to ensure that it is technically accurate and is in full compliance with CEQA. The departments and divisions at the City of West Hollywood responsible for technical review include:

- City of West Hollywood Planning and Development Services Department;
- City of West Hollywood Public Works Department;
- Los Angeles County Fire Department;
- City of West Hollywood Engineering Department.

3.6 Discretionary and Ministerial Approvals

For the Project to be implemented, the Project applicant would require West Hollywood City Council approval of a development permit, a minor conditional use permit, a development agreement and a lot merger to merge the lots comprising the Project Site.

Table 3-2 identifies ministerial permits and approvals required from either the city, other public agencies and/or quasi-public agencies (utilities).

Table 3-2 Ministerial Permits and Approvals

Agency	Permit or Approval
City of West Hollywood Building & Safety Division	Site Plan review and approval, Building Permits, and Demolition Permit.
Los Angeles County Fire Department	Building plan check and approval. Review for compliance with the 2022 California Fire Code, 2022 California Building Code, California Health & Safety Code and West Hollywood Municipal Code. Plans for fire detection and alarm systems, and automatic sprinklers.
West Hollywood Public Works Department	Approval for proposed offsite utility improvements and Tree Removal Permit.
City of Beverly Hills Public Works Department [water service]	Letter of authorization/consent for proposed improvements to provide water supply connection to new development.
Southern California Edison Company	Letter of authorization/consent for proposed improvements to provide electrical connection to new development.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the 9160-9176 Sunset Boulevard RDEIR Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the CEQA Guidelines Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the Proposed Project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*. The Executive Summary of this RDEIR summarizes all impacts and mitigation measures that apply to the Proposed Project.

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4.1 Aesthetics

This section addresses the existing environmental and regulatory setting as it relates to aesthetics and analyzes potential aesthetic changes associated with the Project. The Initial Study to the Original DEIR prepared by UltraSystems Environmental, Inc. (June 2021), determined that the Project would have no impacts related to scenic vistas and scenic resources, particularly scenic resources along a State scenic highway. Therefore, these impacts are not addressed further in this section.

The discussion in this section describes the existing visual setting of the City of West Hollywood (City), the existing visual character of the Project Site and public views into and beyond the Project Site, whether the development associated with the Project would conflict with applicable zoning and other regulations governing scenic quality, and whether the Project would introduce significant new sources of light or glare that would adversely affect day or nighttime views in the area. The analysis in this section is supported by the Lighting Study prepared for the Project in December 2025 by Francis Krahe & Associates, Inc. (Krahe), which is attached to this RDEIR as Appendix B1 replacing Appendix C1 of the Original DEIR.

Of note, Senate Bill (SB) 743 streamlines CEQA review for projects located within transit priority areas (TPA). Pursuant to SB 743, "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." The Project is a commercial office development with employment opportunities located on an infill site within a TPA[1], and therefore, the Project would not result in significant aesthetics impacts under CEQA. Nonetheless, the analysis in this section is provided for informational purposes to address comments on the Original DEIR about the Project's aesthetic effects, including consistency with regulations governing the billboards specifically and scenic quality generally.

4.1.1 Setting

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment (such as hills, vegetation, rock outcroppings, drainage pathways, and soils) features. Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views. Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity. Viewer groups identify who is most likely to experience the view. High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas. Duration of a view is the amount of time that a specific viewer group can see a particular view. Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features.

Visual resources are an important component of the quality of life of any community. As residents, workers, and/or visitors experience a place, their primary sensory interaction with that place is visual, and a wide variety of visual resources (or elements) form the aesthetic character. These elements include scenic vistas; the visual character and scenic quality of the area's topography, natural features, and urban form; and light and glare. Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which

[1] As discussed in this section, a transit priority area, or TPA, is defined as an area within 0.5 mile of a major transit stop that is either existing or planned.

the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest.

Visual Resources and Urban Character of the City

The City encompasses approximately 1.9 square miles and is surrounded by the City of Los Angeles to the north, east, and south, and the City of Beverly Hills to the west. West Hollywood is almost entirely developed and is characterized by a dense, compact urban form with small lots, a mix of land uses, and a walkable street grid. The West Hollywood General Plan 2035 (General Plan) does not identify any designated scenic vistas, routes, or corridors in the city. Visual resources in the city generally consist of viewsheds and other scenic public views. Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. Public views are those that can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than private views, which can only be seen from vantage points located on private property.

Local viewsheds are in the northern upper portion of West Hollywood and are defined by the hillside areas (e.g., Hollywood Hills in the City of Los Angeles) that lie further north of the city.[2] Scenic public views in the city are generally of the Hollywood Hills and are visible throughout the city. Public views of the Los Angeles Basin and buildings in downtown Los Angeles to the south are generally not visible at street level but are visible from higher vantage points throughout the city.

Defined as a "corridor city" by the General Plan Land Use and Urban Form Chapter, West Hollywood has major east-west (e.g., Santa Monica Boulevard) and north-south corridors (e.g., La Brea Boulevard), and much of its urban character is created by its public spaces, including its streets, streetscapes, and public buildings. The City's public spaces are its "public face" and are often the areas that visitors and residents remember and associate most with the city. Most residential neighborhoods in the city have tree-lined streets and sidewalks, whereas in commercial areas, most streets have interesting retail frontages along sidewalks, with amenities such as benches, landscaping, and street trees. Signage also contributes to the pedestrian-friendly urban environment and the City's image as a creative center. According to the General Plan Land Use and Urban Form Chapter, the most iconic signs in West Hollywood are the billboards, large screen full motion videos, and tall walls of Sunset Boulevard. Of note, these types of signage also contribute to existing lighting levels and glare in the City (West Hollywood 2011).

Visual Resources and Urban Character of the Project Site and Immediate Vicinity

The Project Site is located in the western portion of the City on the south side of Sunset Boulevard and the east side of Cory Avenue at 9160-9176 Sunset Boulevard. The Project Site and surroundings have a south slope of approximately 12 percent grade. The south foot of the Hollywood Hills is approximately 250 feet north of the Project Site. Visual resources in the vicinity of the Project Site include buildings, general cityscape, trees, and the Hollywood Hills to the north. The Project Site is visible at street level from Sunset Boulevard and from Cory Avenue.

[2] The Hollywood Hills extend east-west and are contiguous with the Santa Monica Mountains to the west; the Hollywood Hills and Santa Monica Mountains combined extend approximately 45 miles east-west from Griffith Park in the City of Los Angeles in the east to Point Mugu in Ventura County in the west.

Figure 4.1-1a on the following page depicts the locations and directional views of site photos taken of the Project Site, which are included in Figure 4.1-1b. The photos included in Figure 4.1-1b show the existing conditions both on the Project Site and the immediate vicinity development and surrounding neighborhood land uses, which consist of a mix of residential and commercial land uses. Following these figures, Table 4.1-1 describes the existing visual character and land uses on and surrounding the Project Site.

As illustrated in the photos and described in the table, the area of the Project Site and immediate surrounding community is completely developed consisting of highly urban uses such as restaurant, office, retail, and nighttime entertainment, thereby making it a cultural and economic hub for the City. Due to the nature of these uses, the area of the Project Site exists with several billboards, advertising signage, theater identification and general wayfinding light. It should be noted that land uses along the area of the Project Site are designed with a strong emphasis on creative advertising, public art, and design excellence. In particular, Sunset Boulevard is a dynamic and iconic corridor known for its concentration of entertainment venues and nightlife establishments. The area is a focal point for both local activity and international tourism, contributing significantly to the City's identity and economy.

Lighting

Existing light sources, during both day and evening hours, in the area of the Project Site and surrounding community consist of advertising signage, small and large billboards, street wayfinding light, exterior building light, parking lot lights, and temporary car headlights. Much of this lighting has been here for years and will continue to exist after development of land in this area of the City.

In particular, nighttime lighting levels, or 'illuminance,' were measured by Krahe at six residential property boundaries near the Project Site on September 24, 2024, between 8:47 p.m. and 9:17 p.m. using a Minolta LS-100 Luminance light meter. Measurements were conducted in accordance with procedures and best practices identified by the Illuminating Engineering Society of North America standards. All six measurement locations (i.e., Monitoring Sites) surrounding the Project Site are mapped in Figure 4.1-2 on the following page. As shown in Figure 4.1-2, the Monitoring Sites are within the public right-of-way adjacent to residential property boundaries and are representative of the view to the Project Site from the vicinity of the sensitive uses surrounding the Project Site to the north, east, south, and west (Krahe 2025).

Horizontal illuminance is light incident on a horizontal plane and is measured with the light meter facing upward. Vertical illuminance is light incident on a vertical plane and is measured with the light meter facing sideways. Illuminance is evaluated as high (over 1.4 footcandles [fc]); medium (0.75 to 1.4 fc), and low (0.74 fc and below) (Krahe 2025). Table 4.1-2 shows existing nighttime light levels near the Project Site, as measured at each Monitoring Site.

As shown in Table 4.1-2 , the highest existing horizontal illuminance level was recorded at Monitoring Site at M-W1 with 1.81 fc, while the lowest horizontal illuminance was recorded at Monitoring Site M-S1 at 0.20 fc. The highest existing vertical illuminance level was recorded at Monitoring Site M-W2 at 1.00 fc, while the lowest vertical illuminance was recorded at Monitoring Site M-N2 at 0.08 fc (Krahe 2025).

Figure 4.1-1a Site Photographs Locations Map



Figure 4.1-1b Visual Character of Project Area



PHOTO 1: View looking southwest of the auto dealership building onsite; the office building at 9200 Sunset Boulevard is in the right background.



PHOTO 2: View of the project site looking east from Cory Avenue.



PHOTO 3: View looking northwest of the south façade of the auto dealership building onsite; the medical office building at 9201 Doheny Road is in the background.

Table 4.1-1 Existing Visual Character and Land Uses in the Project Area

Location	Land Use Designation[1]	General Characteristics[2]	Existing Lighting[2]	Building Materials and colors[2]	Building Design	Landscaping
North of the Project Site	SSP	Commercial: 9-story office building and two 2-story buildings situated along Sunset Boulevard	Street lights on both sides of Sunset Boulevard; exterior and interior building lights; vehicle lights	Glass, metal, and stucco; blue, gray, white, and beige	Modern mid-rise office building with mostly glass walls; two 2-story buildings of contemporary design	Street trees; small, landscaped area, in front of one of the buildings
South of the Project Site	R3A – Residential Multi-Family Medium Density	Multi-family residential and Single-family residential; one and two stories (on Cory Avenue); and multi-family residential, which are three stories (on Carol Drive)	Street lights; exterior and interior building lights; vehicle lights	Brick, metal, glass; stucco; red tile roof	Three-story multifamily residential building in contemporary design; one-story single-family residence of no distinct style	Trees, shrubs, and ground covers
East of the Project Site	SSP	Office building, 2-3 stories	Street lights on both sides of Sunset Boulevard; exterior and interior building lights; vehicle lights	Stucco, wood, glass	Two- to three-story office building of	Trees and shrubs
West of the Project Site	SSP	High-rise office building over ten stories in height.	Street lights on both sides of Sunset Boulevard; exterior and interior building lights; vehicle lights	Glass and metal	High-rise office building, contemporary design	Grass, trees, and shrubs
Project Site	SSP	Car dealership consisting of two-story buildings	Street lights on both sides of Sunset Boulevard; exterior and interior building lights; vehicle lights; parking lot lighting	Stucco, wood, glass		Grass, trees, and shrubs

SSP = Sunset Specific Plan

[1] Land use designation as identified in the West Hollywood General Plan Land Use and Urban Form Chapter (West Hollywood 2011).

[2] According to Google Earth Pro (2020) and site visit to Project Site in December 2020 by UltraSystems staff.

Source: Rincon Consultants 2025

Table 4.1-2 Measured Illuminance at Monitoring Sites

Monitoring Site	Illuminance (fc)		Address; Distance from Project Site	Evaluation
	Horizontal	Vertical		
M-E1	0.69	0.90	Next to 1033 Carol Drive; 104 feet east of the Project Site	Low Horizontal, Medium Vertical illuminance
M-N1	0.48	0.50	Next to 1112 Cory Avenue; 215 feet north of the Project Site	Low Horizontal, Low Vertical illuminance
M-N2	0.22	0.08	Next to 1245 North Doheny Drive; 930 feet north of the Project Site	Low Horizontal, Low Vertical illuminance
M-W1	1.81	0.40	Next to 9233 Doheny Road; 375 feet west of the Project Site	High Horizontal, Low Vertical illuminance
M-W2	1.70	1.00	Next to 9255 Doheny Road; 524 feet west of the Project Site	High Horizontal, Medium Vertical illuminance
M-S1	0.20	0.29	Next to 1024 Cory Avenue; 105 feet south of the Project Site	Low Horizontal, Low Vertical illuminance

fc = footcandles
Source: Krahe 2025 (Appendix B1 of this RDEIR)

Glare

Glare is visual discomfort experienced from high luminance. For exterior environments at night, glare occurs when the range of luminance in a visual field is too large. The light energy incident at a point is measured by a scale of fc (footcandles) and is described in the term 'illuminance.' This incident light is not visible to the eye until it is reflected from a surface, such as pavement, wall, dust in the atmosphere or the surface of a light bulb. The visible brightness of a surface is measured in footlamberts (or metric equivalent candelas per square meter [cd/m^2]) and is described by the term 'luminance'.[3] Glare is measured as the ratio of the maximum luminance to the average luminance looking toward the Project Site. Luminance is evaluated as high (greater than 300 cd/m^2), medium (greater than 10 cd/m^2 and less than 300 cd/m^2), and low (below 10 cd/m^2). Furthermore, contrast is the ratio of one surface luminance to a second surface luminance or to the field of view.

Contrast is evaluated as high and uncomfortable (exceeding 30 to 1), medium (less than 30 to 1 but greater than 10 to 1), and low (10 to 1 or less). The visual evaluation of contrast describes the perception of how bright a visible object appears to the surrounding objects within any given field of view and context (Krahe 2025).

[3] Footlambert is a unit of luminance in United States units; one footlambert is approximately 0.318 candela per square foot.

Figure 4.1-2 Locations of Monitoring Sites



Source: Krahe 2025 (Appendix B of this RDEIR)

The measured luminance recorded at the Monitoring Sites within the view to the Project Site includes prominent, high brightness light sources and illuminated surfaces, such as streetlights, illuminated signs, and flood lighted buildings, as well as lower brightness surfaces such as sidewalks, parking lots, and un-illuminated walls and landscape areas. The existing Project Site light sources includes parking lot light poles and existing exterior lights. The site is well illuminated with many bright surfaces visible. Table 4.1-3 shows the average and maximum luminance, as measured at each Monitoring Site looking toward the Project Site.

Table 4.1-3 Existing Measured Luminance at Monitoring Sites

Monitoring Site	Luminance (cd/m²)		Contrast Ratio[1]	Address; Distance from Project Site	Evaluation
	Average	Maximum			
M-E1	594	5790	9.1	Next to 1033 Carol Drive; 104 feet east of the Project Site	High average luminance, high maximum luminance, low contrast
M-N1	137	1671	12.2	Next to 1112 Cory Avenue; 215 feet north of the Project Site	Medium average luminance, high maximum luminance, medium contrast
M-N2	255	4031	15.8	Next to 1245 North Doheny Drive; 930 feet north of the Project Site	Medium average luminance, high maximum luminance, medium contrast
M-W1	60.5	1249	20.7	Next to 9233 Doheny Road; 375 feet west of the Project Site	Medium average luminance, high maximum luminance, medium contrast
M-W2	240	4762	19.8	Next to 9255 Doheny Road; 524 feet west of the Project Site	Medium average luminance, high maximum luminance, medium contrast
M-S1	116	758	6.5	Next to 1024 Cory Avenue; 105 feet south of the Project Site	Medium average luminance, high maximum luminance, low contrast

cd/m² = candelas per square meter
[1] Glare is the ratio between the maximum luminance in a field of view to the average luminance within the same field of view; that is the contrast ratio which is unitless. For Monitoring Site M-N1, the contrast ratio is 1,671 cd/m² divided by 137 cd/m², that is, 12.2.
Source: Krahe 2025 (Appendix C1 of this RDEIR)

As shown in Table 4.1-3, the highest average luminance was measured at Monitoring Site M-E1 at 594 cd/m² (evaluated as high average luminance greater than 300 cd/m²), while the lowest average luminance was measured at Monitoring Site M-W1 at 60.5 cd/m². Aside from Monitoring Site M-E1, the average luminance at all other is evaluated as medium luminance (greater than 10 cd/m² and less than 300 cd/m²) (Krahe 2025).

The highest maximum luminance was also measured at Monitoring Site M-E1 with 5,790 cd/m², while the lowest maximum luminance was measured at Monitoring Site M-S1 at 758 cd/m². The maximum luminance at all six monitoring sites is evaluated as high luminance (greater than 300 cd/m²) (Krahe 2025).

The calculated contrast ratio (maximum luminance divided by average luminance) varies from a minimum of 6.5 to 1 at Monitoring Site M-S1 to a maximum of 20.7 to 1 at Monitoring Site M-1. The existing contrast ratio at Monitoring Site M-E1 and M-S1 are considered low contrast (less than 10 to 1), while the existing contrast ratio at Monitoring Sites M-N1, M-N2, M-W1, and M-W2 are considered medium contrast (less than 30 to 1 and greater than 10 to 1) (Krahe 2025).

4.1.2 Regulatory Setting

State Regulations

Senate Bill 743

In September 2013, the Governor of California signed SB 743 into law. This bill streamlines CEQA review for projects located within a TPA. Pursuant to SB 743 (Public Resources Code [PRC] Section

21099[d][1]), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area," or TPA, as an area within 0.5 mile of a major transit stop. PRC Section 21064.3 defines a "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099(a) defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA. According to PRC Section 21099(a), an "infill site" includes a lot located within an urban area that has been previously developed.

California Code of Regulations, Title 24

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, includes regulations for building lighting throughout the State of California.

The California Energy Code (CEC), which is Part 6 of Title 24, stipulates allowable energy use for Outdoor Lighting, with the aim of reducing energy consumption at night through efficient and effective use of outdoor building lighting equipment under Section 140.7 of the CEC. However, "(l)ighting of signs complying with the requirements of Sections 130.3 and 140.8" are exempt from the requirements of Section 140.7 of the CEC. The Project will comply with the control and energy requirements listed in CEC Sections 130.3 and 140.8. Therefore, the energy requirements in CEC Section 140.7 do not apply to the Project.

The California Green Building Standards Code (CalGreen), which is Part 11 of the Title 24, contains limits on light leaving a project with the intent to mitigate negative effects of light pollution at nearby properties and skyglow based on the applicable Lighting Zones 1-4 pursuant to Section 10-114 of the California Administrative Code, which is Part 1 of Title 24. Although the Project's digital billboards are also exempt from CalGreen Section 5.106.8 as signs complying with Sections 130.3 and 140.8, the Sunset Boulevard Off-Site Signage Policy (Signage Policy) of the Sunset Specific Plan (SSP) regulates light trespass illuminance associated with the Project at residential properties within the boundary of the SSP. Illuminance associated with the Project at residential properties outside the SSP boundary was analyzed against the CalGreen Section 5.106.8 light trespass limits to present a conservative analysis.

California Vehicle Code, Division 11

Chapter 2, Article 3 of the California Vehicle Code (CVC) stipulates limits to the location of light sources that may cause glare and impair the vision of drivers. The placement or maintenance or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway is prohibited.

Local Regulations

West Hollywood 2025 General Plan

The Land Use and Urban Form Chapter of the City's General Plan provides planning goals and policies related to land use and development patterns and is the primary means for guiding the urban form in West Hollywood. Goals and policies of the General Plan Land Use and Urban Form

Chapter that relate to aesthetics and apply to the project include the following (West Hollywood 2011):

Goal LU-1: Maintain an urban form and land use pattern that enhances quality of life and meets the community's vision for its future.

Policy LU-1.2: Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.

Goal LU-5: Encourage a high level of quality in architecture and site design in all construction and renovation of buildings.

Policy LU-5.1: Continue to encourage diverse architectural styles that reflect the City's diversity and creativity.

Policy LU-5.4: Continue to encourage diverse architectural styles that reflect the City's diversity and creativity. Encourage the use of high quality, permanent building materials that do not require excessive maintenance and utilize the design review process to evaluate such materials.

Goal LU-15: Maintain Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine of the City.

Policy LU-15.1: Continue to promote a great diversity of uses on Sunset Boulevard including the following:

a. Entertainment and related uses to support the community's vision of a high- quality national and international entertainment destination.
b. Offices catering particularly to entertainment and creative businesses.
c. Night clubs, music venues, theaters, and other live entertainment venues.
d. Restaurants, bars, and cafés that support both the daytime and night-time populations.
e. Neighborhood-serving retail businesses that provide goods and services for nearby residents.
f. Hotels and other hospitality uses.

Policy LU-15.3: Maintain the identity of Sunset Boulevard as an eclectic urban environment with varied building heights and architectural styles.

Policy LU-15.4: Require high density development identified in the Sunset Specific Plan to support the economic development goals of the City.

Policy LU-15.5: As feasible, locate parking behind buildings or in structures hidden from public view so as not to detract from the pedestrian experience.

Policy LU-15.6: Seek to create a park-once district for this area that allows for centralized, shared parking facilities from which customers and employees can then walk to and between multiple destinations.

Policy LU-15.7: Maintain the Sunset Specific Plan and update as appropriate.

Goal LU-16: Maximize the iconic urban design value and visual creativity of signage in West Hollywood.

Policy LU-16.1: Consider aesthetics, size, location, lighting, and siting in the evaluation of off-site signage.

Policy LU-16.2: Design and locate off-site signage 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.

Policy LU-16.3: Consider impacts to surrounding neighborhoods when evaluating off-site signage.

Policy LU-16.4: Design off-site signage in new developments in concert with the architectural lighting, landscape, and public art program of the development.

Policy LU-16.8: Carefully integrate off-site signage into new development so that the building and not the sign is the primary use of the land.

Goal LU-17: Ensure that on-site signs are an asset to the City.

Policy LU-17.1: Prohibit the use of roof signs, pole signs, and flashing and animated signs, except as part of a Creative Sign Program.

Policy LU-17.2: 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.

Policy LU-17.3: 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.

Policy LU-17.4: Encourage signage that is designed for pedestrians, especially where there is discretionary authority such as Creative Signs and Comprehensive Sign Programs.

West Hollywood Municipal Code

Title 19, Zoning Ordinance, of the West Hollywood Municipal Code (WHMC) establishes the City's various zoning districts and special planning areas. According to the City's Zoning Map, the site is zoned SSP which is consistent with the site's SSP designation. The SSP includes policies, standards, and guidelines that govern the design of development (e.g., density, height, massing, lighting, buffers, streetscape, open space, signage) along Sunset Boulevard. Additional information regarding the SSP is included in the following subsection, *Sunset Specific Plan*.

WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of off-site signs (billboards) in the city that emphasize public benefit, city image, and economic stimulation in the city. Development projects in the city are required to adhere to these requirements and standards. According to WHMC Section 19.34.080.A., all off-site signs on Sunset Boulevard are governed by the SSP, which in turn regulates sign illumination through the requirements within the City's Signage Policy, discussed further in the following subsection, *Sunset Boulevard Off-Site Signage Policy*.

Sunset Specific Plan

The SSP, adopted in 1996 (amended in 2019 and, most recently, amended in November 2025 under Resolution No. 25-073-SSP), is a detailed plan that guides the future development of Sunset

Boulevard in West Hollywood and acts as a supplement to the City's General Plan and Zoning Ordinance. Overall, land uses along this area of the Sunset Boulevard are guided by the SSP, which establishes tailored urban design standards, zoning regulations, and cultural resource guidelines to preserve the corridor's unique character. The SSP promotes design excellence, pedestrian-oriented development, and adaptive reuse, while supporting mixed-use projects that integrate residential, commercial, and hospitality functions. This particular area of the corridor is also home to a high concentration of off-site signage.

The SSP area is divided into eight geographic areas that extend the length of Sunset Boulevard in the city and typically encompasses one to two parcels north and south of the roadway. The SSP includes policies, standards, and guidelines which promote and preserve the unique qualities of Sunset Boulevard (West Hollywood 2019a)[4].

The Project Site is located in Area 8 (West End) of the SSP area, which extends from Doheny Drive to the western city boundary and includes the largest concentration of office buildings on Sunset Boulevard. According to the SSP, the goals for Area 8 include accommodating additional office buildings and provide space for "creative" industries and anchor businesses at this "western gateway" into West Hollywood. Open space, streetscape improvements, and other amenities would aim to create an attractive location for business to relocate to and operate. Objectives in the SSP particular to Area 8 support the area's goals (West Hollywood 2019a):

1. Encourage development that accommodates large firms associated with the "creative" industries by permitting additional FAR and height on the large sites west of Doheny Drive on the south side of Sunset [Boulevard], which can be accessed from Doheny [Drive] as well as from Sunset Boulevard.
2. Develop a building of landmark quality at the southeast corner of Sunset [Boulevard] and Cory [Avenue] that dramatically marks the entrance to West Hollywood and acts as a "hinge" at the bend in the street.
3. Preserve important historic buildings by allowing substantial additional height and density elsewhere on the same property.
4. Encourage infill development on small sites and remodeling of existing buildings not likely to be replaced in the near future to make them more pedestrian-oriented, visually distinctive, and more marketable to office tenants.
5. Implement streetscape improvements and, in particular, dramatize the western end of Sunset Boulevard in West Hollywood with special streetscape improvements west of Doheny Road.
6. Encourage ground-floor uses, like restaurants and retail, that cater to the ends of area office workers.

Sunset Boulevard Off-Site Signage Policy

The City's Signage Policy builds on the original principles of the SSP and sets forth goals, policies, and procedures for off-site signage on Sunset Boulevard that encourages creativity, allows for updated technology, and describes appropriate operations requirements. It describes design principles, administrative procedures, sign types and standards, lighting and operational standards,

[4] At the time of preparation of this RDEIR, the City's publicly available webpages for the SSP and the associated Signage Policy had not yet been updated to incorporate the November 2025 amendments. Nonetheless, this RDEIR relies on and cites the applicable regulatory documents, including the 2019 SSP, the 2019 Signage Policy, and the City's 2025 update materials for both the SSP and the Signage Policy for full reference adopted under Resolution No. 25-073-SSP.

architectural lighting, temporary creative billboards or tall walls, and temporary advertising installations (West Hollywood 2019b; West Hollywood 2025)[5].

Residential properties within 250 feet of Sunset Boulevard are considered within the area included and subject to the City's Signage Policy regulations. According to the Signage Policy, the 1.4 fc sign illuminance threshold applies to these residential properties.

4.1.3 Impact Analysis

The assessment of aesthetic impacts to the visual character of a neighborhood from Project development involves a qualitative analysis that is inherently subjective in nature. Different viewers react to aesthetic conditions differently. The impact analysis in this section analyzes whether the Project would conflict with applicable zoning and other regulations governing scenic quality. This impact analysis also analyzes whether the Project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

However, as discussed under subsection *State Regulations* of Section 4.1.1, *Setting*, and pursuant to SB 743 (PRC Section 21099[d][1]), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment."

Pertinent definitions applicable to PRC Section 21099(a) and the Project include:

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- "Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
- "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.
- "Major transit stop" is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.

As stated previously in this section, the Project includes construction of a commercial office building located on an infill site within a TPA that meets the criteria set forth in Section 21099(d)(1). The Project Site is considered an infill site since its neighborhood is an established highly urbanized built-up area. Over time, the Project Site has been developed with retail land uses and associated structures. Currently, the Project Site is developed with an automotive dealership building and related surfacing parking.

[5] At the time of preparation of this RDEIR, the City's publicly available webpages for the SSP and the associated Signage Policy had not yet been updated to incorporate the November 2025 amendments. Nonetheless, this RDEIR relies on and cites the applicable regulatory documents, including the 2019 SSP, the 2019 Signage Policy, and the City's 2025 update materials for both the SSP and the Signage Policy for full reference adopted under Resolution No. 25-073-SSP..

The Project Site is within a TPA since it is located within 0.5 mile from major transit stops. There are several bus stations that intersect within a 0.5 mile radius from the Project Site. Specifically, the Sunset Boulevard/Cory Avenue and Sunset Boulevard/Doheny Drive bus stops, both part of Los Angeles County Metropolitan Transportation Authority's (Metro) Bus Route 2, are approximately 60 feet west and 160 northwest of the Project Site. Both bus stops provide transit service within 10 to 15 minute increments during peak commute hours. In addition, the San Vicente/Sunset Boulevard bus stop along the Metro's Bus Route 105 is approximately 0.35 mile east of the Project Site (Metro 2025).[6]

Furthermore, the Project Site is within a TPA as mapped by the Southern California Association of Governments (SCAG) (SCAG 2022). Furthermore, the Project is a commercial office project with a restaurant use (and a FAR of 2.85) providing employment opportunities on an infill site within a TPA. Because the Project meets the requirements and the aesthetic impacts of the Project need not be considered for its potentially significant aesthetic impacts under *CEQA Guidelines*, pursuant to PRC Section 21099(d). Nonetheless, the analysis in this section is provided to address comments received on the Original DEIR regarding the Project's aesthetic effects, including consistency with regulations governing the Projects proposed billboards specifically, and scenic quality generally .

Methodology

The analysis in this section evaluates the existing Project Site setting, the proposed development being analyzed against the applicable regulatory framework and determines impacts of the Project. The determination that the Project would or would not result in "substantial" or "adverse effects" concerning aesthetic conditions and resources considers the relevant policies and regulations established by State, local, and regional agencies, and the Project's compliance with such policies and regulations.

The analysis in this section also includes an evaluation of the light trespass illuminance from the Project Site at adjacent sensitive use properties, and an evaluation of glare from the Project Site visible at sensitive use properties or at adjacent roadway locations. The Lighting Study prepared by Krahe for the Project (Appendix B1of this RDEIR) evaluates Project sign light trespass illuminance using the modeling software program AGI132 for the nearest sensitive use properties, including those more distant from Sunset Boulevard, outside of the City's Signage Policy boundary. The baseline lighting and glare conditions referenced in subsection 4.1.1, *Setting,* above, were based on levels measured by Krahe at six Monitoring Sites using a Minolta LS-100 Luminance light meter. Refer to subsections *Lighting* and *Glare* of Section 4.1.1, *Setting*, for respective measurement results.

Of note, the Lighting Study analyzed light trespass at sensitive use properties within the SSP (i.e., those within 250 feet of Sunset Boulevard) against the 1.4 fc threshold established by the Signage Policy. Furthermore, in order to provide a conservative analysis, the Lighting Study analyzed light trespass at sensitive use properties outside the SSP (i.e., those beyond 250 feet of Sunset Boulevard) against the more stringent CALGreen threshold of 0.74 fc. Also, to present a conservative analysis of light and glare impacts, the Lighting Study evaluated the signs under these thresholds with a maximum luminance of 6000 cd/m^2 during the day and 300 cd/m^2 at night with all signs operating simultaneously at all white. Project signs would not operate in this manner in practice (Krahe 2025).

[6] The Project Site is also within 0.5 mile of public transit routes served by City shuttles, including the Cityline Local Cedars-Sinai (westbound) and Cityline Local La Brea (eastbound), although it provides service approximately every 30 minutes.

The Lighting Study also evaluated whether lighting from the Project's signs create glare with new high contrast conditions, with contrast ratio greater than 30:1, visible from a field of view from a residentially zoned property.

Finally, the Lighting Study analyzed whether the maximum measured brightness of a light source within 10 degrees from the driver's normal field of view is more than 1,000 times the minimum measured brightness in the driver's field of view. When the minimum measured brightness in the field of view is 10 footlamberts or less, the Lighting Study analyzes whether the measured brightness of the light source in footlambert exceeds 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.

Significance Thresholds

The Original DEIR Initial Study (Appendix A1 of the Original DEIR) concluded that the Project would have no impacts related to the following thresholds under *CEQA Guidelines* Appendix G:

a. Would the Project have a substantial adverse effect on a scenic vista?
b. Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

For further discussion regarding Project impacts to scenic vistas and resources along a State scenic highway, refer to Appendix A1 of the Original DEIR. As stated in the Original DEIR Initial Study, no scenic vistas are visible from the Project Site. Views to the south from Sunset Boulevard fronting the north side of the project site are already blocked by the existing buildings in the project area. No north-south roadways/public thoroughfares are present directly north of the project site, offering views of scenic vistas that might be obstructed by the proposed building. Furthermore, the California Department of Transportation (Caltrans) provides information regarding officially designated or eligible state scenic highways, designated as part of the California Scenic Highway Program. According to Caltrans, there are no officially designated scenic highways within or adjacent to the project site, and no roadways near the Project Site are currently eligible for scenic highway designation.

Accordingly, the analysis of the RDEIR analyzes whether the Project would result in significant impacts under the following thresholds included in Appendix G of the *CEQA Guidelines*:

c. If in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?
d. Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Project Impacts and Mitigation Measures

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

Impact AES-1 DEVELOPMENT OF THE PROJECT WOULD ALTER THE VISUAL CHARACTER OF THE PROJECT SITE; HOWEVER, THE PROJECT WOULD BE CONSISTENT WITH SURROUNDING DEVELOPMENT, AND THE CITY'S GENERAL PLAN, SSP, AND SIGNAGE POLICY REGULATIONS GOVERNING SCENIC QUALITY. THE PROJECT WOULD NOT CONFLICT WITH APPLICABLE ZONING AND REGULATIONS REGARDING SCENIC QUALITY.

The following analysis discusses the project's consistency with applicable plans and regulations, including the City's General Plan, SSP, and Signage Policy.

West Hollywood 2025 General Plan

Table 4.1-4 outlines the Project's consistency with the applicable goals and policies of General Plan Land Use and Urban Form Chapter and includes those listed in Section 4.1.2, *Regulatory Setting*.

Table 4.1-4 Project Consistency with the General Plan

Goal/Policy	Project Consistency
Goal LU-1: Maintain an urban form and land use pattern that enhances quality of life and meets the community's vision for its future.	
▪ **Policy LU-1.2:** Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.	**Consistent.** The Project Site is in an urban area surrounded by multi-story medical office, commercial, multi-family residential uses opposite Sunset Boulevard to the north; high-rise commercial uses to the west opposite Cory Avenue; a Southern California Edison utility yard, single-family residential and multiple story multi-family residential developments to the south; and a surface parking lot for a nearby office building to the immediate east. The visual character of the area is diverse as the surrounding buildings have varying architectural styles, massing, and low- to high-rise heights. Although the Project would increase the scale and massing on the Project Site in comparison to existing on-site development (i.e., an increase from a two-story car dealership to a five-story commercial office building), it would not introduce a structure that exceeds the height of scale of most surrounding development in the urban area. Moreover, the design of the building considers the change brought by the proposed development–its recessed facades, and cutouts to gradually build up height and visually break up the building's scale and massing when compared to a more box-like structure with flat facades. The proposed building's unevenly layered floors on its southern facade, for instance, would allow for assorted balcony placements and other overhanging areas that would help reduce the abrupt change of the building's scale and massing within its urban context, particularly toward residences further south. Overall, West Hollywood is one of the densest areas in Southern California with a mix of heights, including high rise buildings. The Project would be implemented in accordance with WHMC Article 19-3, which provides development standards related to visual quality, including management of the aesthetic character (e.g.,

Goal/Policy	Project Consistency
	building heights, lot coverage, setbacks, landscaping, and signage) and light and glare levels.
Goal LU-5: Encourage a high level of quality in architecture and site design in all construction and renovation of buildings.	
▪ **Policy LU-5.1:** Continue to encourage diverse architectural styles that reflect the City's diversity and creativity. ▪ **Policy LU-5.4:** Continue to encourage diverse architectural styles that reflect the City's diversity and creativity. Encourage the use of high quality, permanent building materials that do not require excessive maintenance and utilize the design review process to evaluate such materials.	**Consistent.** As discussed in subsection *Project Design* in Section 2, *Project Description*, the architecture of the Project building has three major features integrating it with its location and purpose. The first is the integration of two digital canvases into the architectural form, highlighting the gateway potential of the site along the Sunset Strip. Secondly, the digital canvas floats above a two-story, landscaped streetscape for pedestrians, including a hanging garden over a publicly accessible space with cafés, seating, and additional landscaping. The third defining feature of the building are the sloped, planted terraces on the south elevation. This architectural form softens and steps down to meet the nearby residential scale on the southern side of the building. Refer to subsection *Project Design* in Section 2, *Project Description*, for a more detailed description of the Project as provided in the Project's application package submitted to the City, provided for informational purposes to help illustrate the overall design elements proposed under the Project.
Goal LU-15: Maintain Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine of the City.	
▪ **Policy LU-15.1:** Continue to promote a great diversity of uses on Sunset Boulevard including the following: a. Entertainment and related uses to support the community's vision of a high- quality national and international entertainment destination. b. Offices catering particularly to entertainment and creative businesses. c. Night clubs, music venues, theaters, and other live entertainment venues. d. Restaurants, bars, and cafés that support both the daytime and night-time populations. e. Neighborhood-serving retail businesses that provide goods and services for nearby residents. f. Hotels and other hospitality uses. ▪ **Policy LU-15.3:** Maintain the identity of Sunset Boulevard as an eclectic urban environment with varied building heights and architectural styles. ▪ **Policy LU-15.4:** Require high density development identified in the Sunset Specific Plan to support the economic development goals of the City. ▪ **Policy LU-15.5:** As feasible, locate parking behind buildings or in structures hidden from public view so as not to detract from the pedestrian experience.	**Consistent.** See analysis for Goal LU-1 and Goal LU-5. The Project would include development of a five-story, 90-foot-tall commercial office building with two full-motion animated billboards visible on its north, east, and west façades. The Project also proposes restaurant uses at the ground floor level, including outdoor dining areas, which will activate the Project frontage.. Vehicle parking would be provided in three subterranean levels, hidden from the public view. Pursuant to WHMC Chapter 19.66, the Development Agreement for the Project establishes standards and procedures for the design, review, and approval of billboards (including large screen digital signs) consistent with the City's off-site signage policies referenced by Policies LU-16-1 through LU-16-8 of the General Plan Land Use and Urban Form Chapter that emphasize public benefit, city image, and economic stimulation in the City.

Goal/Policy	Project Consistency
▪ **Policy LU-15.6:** Seek to create a park-once district for this area that allows for centralized, shared parking facilities from which customers and employees can then walk to and between multiple destinations. ▪ **Policy LU-15.7:** Maintain the Sunset Specific Plan and update as appropriate.	
Goal LU-16: Maximize the iconic urban design value and visual creativity of signage in West Hollywood.	
▪ **Policy LU-16.1:** Consider aesthetics, size, location, lighting, and siting in the evaluation of offsite signage. ▪ **Policy LU-16.2:** Design and locate offsite signage 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. ▪ **Policy LU-16.3:** Consider impacts to surrounding neighborhoods when evaluating off-site signage. ▪ **Policy LU-16.4:** Design offsite signage in new developments in concert with the architectural lighting, landscape, and public art program of the development. ▪ **Policy LU-16.8:** Carefully integrate offsite signage into new development so that the building and not the sign is the primary use of the land.	**Consistent.** . The proposed billboards would be consistent with all applicable requirements under the City's Signage Policy in Resolution No. 25-073-SSP. Furthermore, the billboards would be positioned flush with the buildings' exterior and would not substantially protrude from the building. Furthermore, the primary use of the Project Site would be the 52,999-sf commercial office building rather than the two proposed billboards, which occupy only 2,807 sf (or approximately five percent). Therefore, the proposed billboards are an accessory use to the primary Project uses. WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 also provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including sign illumination, for on-site signs. Detailed standards for the proposed billboards (i.e., off-site signage) are set forth in the Project's Development Agreement, pursuant to WHMC Chapter 19.66. Furthermore, impacts to surrounding neighborhoods were considered in the design of the billboard component of the Project. A Lighting Study was prepared for the Project (Appendix B1 of this RDEIR) that demonstrates that the Project would not exceed the established lighting threshold of 1.4 fc at any residentially zoned property line.
Goal LU-17: Ensure that on-site signs are an asset to the City.	
▪ **Policy LU-17.1:** Prohibit the use of roof signs, pole signs, and flashing and animated signs, except as part of a Creative Sign Program. ▪ **Policy LU-17.2:** 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. ▪ **Policy LU-17.3:** 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. ▪ **Policy LU-17.4:** Encourage signage that is designed for pedestrians, especially where there is discretionary authority such as Creative Signs and Comprehensive Sign Programs.	**Consistent.** See analysis for Goal LU-16. In addition to the two, full-motion animated billboards, other on-site signage would be properly integrated into and flush with the building's facades. WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 also provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including sign illumination, for on-site signage. Detailed standards for the proposed billboards (i.e., off-site signage) are set forth in the Project's Development Agreement, consistent with Goal LU-17 and pursuant to WHMC Chapter 19.66.

Source: West Hollywood 2025

Sunset Specific Plan

According to the SSP, the portion of the SSP the Project Site is in (i.e., SSP's Area 8 [West End]) is intended to accommodate office buildings with ground-floor uses, like restaurants, for office workers and incorporate streetscape improvements that "dramatize" the City's western gateway (West Hollywood 2019a). The SSP identifies a few specific urban design requirements for Area 8 in the SSP, including a height up to 100 feet and an FAR up to 2.85 for development on the Project Site, targeting office buildings with grade-level retail space with a "distinctive top," and/or for development of a distinctive landmark pavilion, building entrance, monument, or similar streetscape.

Consistent with the SSP, the Project would include development of a five-story, 90-foot-tall commercial office building with a 2.85 FAR and with full-motion animated billboards visible on its north, east, and west façades with 2,807 sf of Total Advertising Area.[7] The building's glass façade on levels 3 through 5 would function as a solar shading latticework during the day. Other materials in the building's exterior would be concrete, terrazzo, and metal siding. Hanging garden planters would be installed on the north sides of levels 2 and 3 and terrace planters on the south sides of levels 3, 4, and 5. The planters would provide green screening and help in softening the building edges by adding natural greenery to the building exterior, particularly over ground-floor pedestrian uses including cafes and seating.

The SSP also includes streetscape and open space recommendations applicable to the Project Site in Area 8 that promote visual quality, including recommendations that landscaping along site frontages be installed, that building facades have strong and continuous presence, and that pedestrian-active uses be provided. The architecture of the Project building has three major features integrating it with its location and purpose that also provide consistency with the SSP's recommendations. The first is the integration of two digital canvases into the architectural form and continuous facade facing Sunset Boulevard, highlighting the gateway potential of the site along the Sunset Strip. Secondly, the digital canvas floats above a two-story, landscaped streetscape for pedestrians, including a hanging garden over a publicly accessible space with cafés, seating, and additional landscaping. Lastly, the building contains sloped, planted terraces on the south elevation, providing the third distinct, defining feature. This architectural form softens and steps down to meet the nearby residential scale on the southern side of the building.

Sunset Boulevard Off-Site Signage Policy

The Total Advertising Area of the full-motion animated billboards within Advertising Areas 1 and 2 shall comply with the Lighting and Operation Standards in Section 5 of the Signage Policy for lighting and digital technology, which is integrated in the SSP (West Hollywood 2025).

- **Schedule:** Sign luminance shall adjust throughout the day in accordance with the following schedule:
  - Daytime: From sunrise until 20 minutes prior to sunset, luminance shall not exceed 6,000 cd/m^2.
  - Evening: From sunset until 20 minutes prior to sunrise, luminance shall not exceed 300 cd/m^2.[8]

[7] The Project's Primary Advertising Area and Integration Area comprise the "Total Advertising Area".
[8] Pursuant to SSP Chapter 8, Section 5.A.4, the Project's Lighting Study (Appendix B1 of this RDEIR) demonstrates that the Project would not exceed the established lighting threshold of 1.4 fc at any residentially zoned property line at 300 cd/m^2 during the evening. Therefore,

- After Hours: From 2:00 am until sunrise, no animated content or moving patterns shall be permitted.

- **Illuminance**
  - Illuminance from signs or architectural lights shall not exceed 1.4 fc at any adjacent residential zoned property line.

- **Sign Control and Transitions**
  - Sign luminance shall transition smoothly between the hours of operation limits above over a time period of no less than 20 minutes. All transitions shall be completed so that the maximum allowable luminance is achieved by the stated time listed above.
  - When ambient sunlight illuminance during daytime is less than 100 fc for more than 20 minutes, the full-motion animated billboard shall transition at a smooth rate of change from the daytime luminance level permitted above to the evening luminance level permitted over a time period of no less than 20 minutes.
  - Each static image displayed on a full-motion animated billboard shall not be refreshed more often than once every eight seconds.
  - Each advertising campaign or art image displayed on a full-motion animated billboard showing static or animated images shall fade in from the previous image over no less than one second and shall fade out over no less than one second.

- **Visual Comfort and Contrast Control**
  - Signs shall not incorporate driver interaction features.
  - No signs shall use colors or images that replicate or could be confused with traffic safety signage.
  - No signs shall use scrolling text.
  - Signs shall not use stroboscopic of flashing images or light which rapidly change direction, oscillate, flash or reverse in contrast.
  - Animated content shall not exhibit:
    - Rapidly changing images without dissolves for transitions between static images, and between static and animated content;
    - Sequences that result in visible brightness change over more than 10 percent of the total display area at a greater rate than three changes per second; or
    - Use flicker frequency or frame rates slower than 30 Hertz (30 Hertz means 30 flashes flickers, or frames per second).

- **Renewable Energy Use**
  - Sign assembly shall utilize the highest available clean energy tier from the City's energy provider to the extent feasible.
  - The incremental energy usage attributable to digital signs, as defined in 4.c of the Sunset Boulevard Off-Site Signage Policy, should be fully offset to the extent feasible through demonstrated improvement in the energy performance for new buildings or major renovations of existing buildings.

the Project would be subject to an evening luminance standard of 300 cd/m^2 instead of the evening luminance standards set forth in Table 1 of SSP Chapter 8, Section 5.A.1.

- **Monitoring**
  - Operators of all new or modified off-site advertising signs subject to a development agreement are required to allow the City's independent lighting consultant to prepare and conduct testing for the purpose of preparing a Lighting Monitoring Report. Light monitoring test results shall be reviewed and approved by the Director. This test must verify that the off-site advertising sign(s) meet the lighting standards in this section (Section 5 Lighting and Operational Standards) and must be completed prior to the issuance of a Certificate of Occupancy for the off-site advertising sign(s). The off-site advertising sign operator must schedule the City's consultant to prepare and submit the Lighting Monitoring Report for approval prior to a request for a Certificate of Occupancy for the off-site advertising sign(s). Thereafter, a light monitoring test is required at three-year intervals or at the City's request to confirm ongoing compliance with standards. Such tests shall be conducted by the City's independent lighting consultant at the Operator's expense. SSP Chapter 8, Section 5 outlines the contents of the Lighting Monitoring Report.

In support of the City's Signage Policy, the Project would also include an aesthetics-related project design feature (PDF).

AES-PDF-1: At 20 minutes before sunset the Project digital billboard signage will be specified to begin transition from the maximum daytime luminance of 6,000 candelas per meter squared (cd/m^2) to the maximum nighttime luminance of 300 cd/m^2. Similarly, the Project digital billboard signage will be specified to transition from the night maximum luminance of 300 cd/$m^2$to the day maximum luminance of 6,000 cd/m^2, beginning no earlier than 20 minutes before sunrise.

Overall, the Project would be implemented in accordance with the Development Agreement and WHCM Article 19-3, which provides development standards related to visual quality, including management of the aesthetic character in relation to Project signage and the proposed public realm enhancements. For instance, 25 percent of the programming time for the full-motion animated billboards would be art and civic announcements, including local artists or culturally relevant work.

Project development would not conflict with regulations regarding scenic quality, including applicable General Plan and SSP goals and objectives related to aesthetics or the City's Signage Policy governing the proposed full-motion animated billboards. Impacts would be considered less than significant prior to mitigation.

Mitigation Measures

Mitigation measures would not be required.

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

Impact AES-2 DEVELOPMENT OF THE PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE ON THE PROJECT SITE; HOWEVER, THE PROJECT WOULD COMPLY WITH THE REGULATIONS AND STANDARDS IN THE CITY'S MUNICIPAL CODE, SSP, AND SIGNAGE POLICY RELATED TO SIGNAGE, LIGHTING, AND ILLUMINATION.

The Project Site is in an urban developed area that already experiences urban lighting and glare. The primary sources of daytime and nighttime light at the Project Site and surrounding development

include building and structure lighting, street lighting, signs, and headlights from vehicles both driving by as well as entering and exiting individual properties. The primary source of glare at the Project Site and the surrounding existing development is the sun's reflection from metallic and glass surfaces. Overall, the level of existing light and glare at the Project Site and Project Site vicinity is typical of commercial land uses.

During construction, glare would be generated by reflective surfaces on construction equipment (e.g., metal, windows) during sunlight hours when construction would occur. However, these types of surfaces are already present in the surrounding urban developed area and glare from these surfaces are already a common occurrence. Moreover, the use of construction equipment would be temporary, limited to construction of the Project. In addition, construction activity would occur between the daytime hours of 8:00 a.m. and 7:00 p.m. Monday through Saturday. Therefore, Project construction would not require any illuminated construction signage or other light sources that would generate light on surrounding properties during nighttime hours.

Once operational, the windows and building materials proposed on the exterior elevations of the building would create new sources of daytime, evening, and nighttime light and daytime glare when compared to existing conditions. For instance, portions of the exterior façade on the podium levels and upper levels would include floor-to-ceiling glass windows that would increase all-day lighting and reflect sunlight during certain times of the day. In addition, because the overall building size would increase compared to the existing building on-site, these windows would be located at heights greater than existing development. However, the windows would be interspersed with non-reflective exterior materials and greenery to help reduce the potential incidents of reflected light or glare from the proposed building. Furthermore, as a commercial office building, it is reasonable to anticipate that any employees on-site would depart by the evening hours, which would also abate interior-to-exterior lighting during nighttime hours.

Headlights and taillights from vehicles entering and exiting the parking garage could also potentially shine onto adjacent development. However, the Project Site is in an urban area along a commercial corridor that experiences a steady flow of traffic along Sunset Boulevard, and therefore, lighting associated with cars is already a daily occurrence in the Project area.

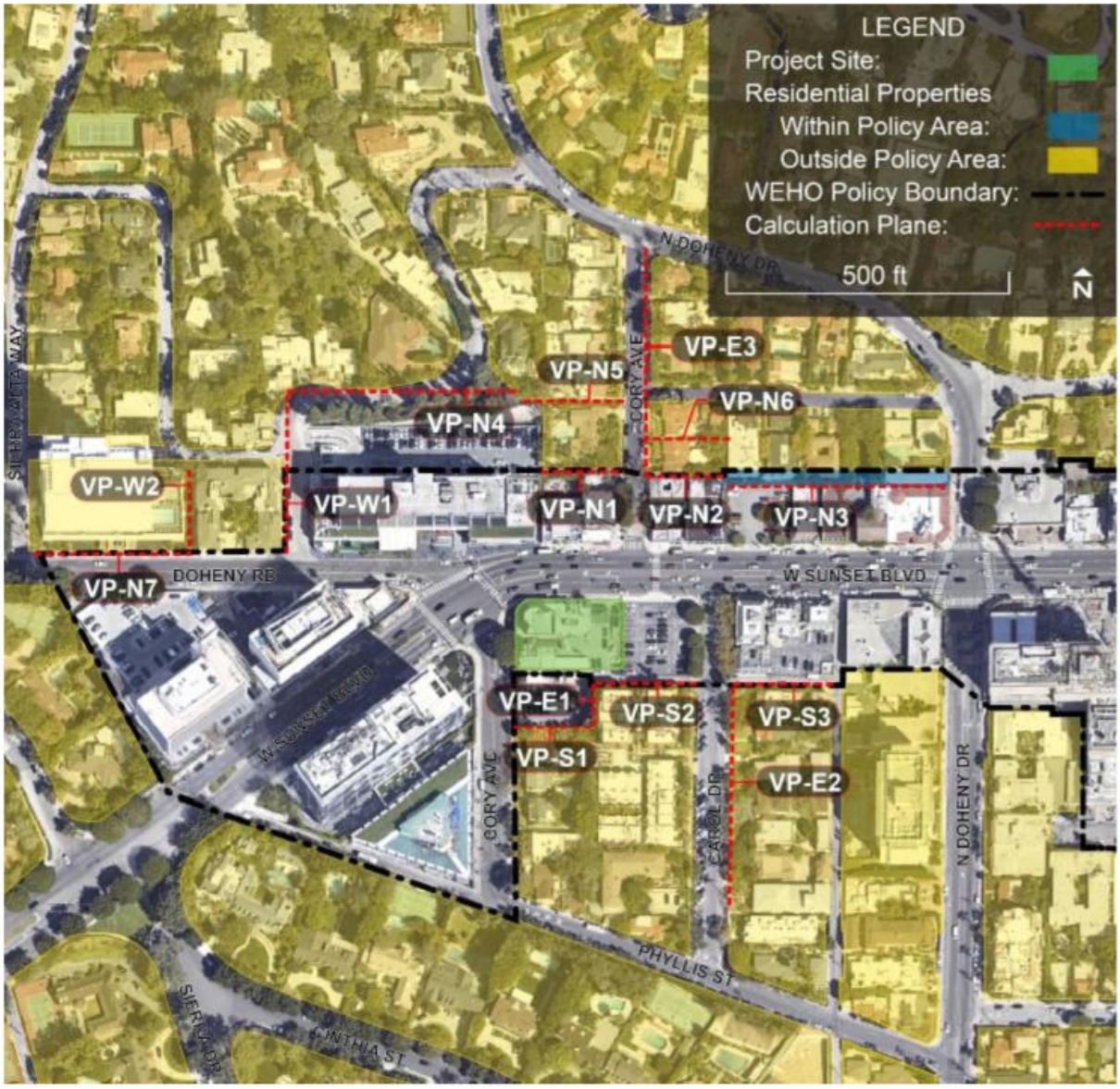
In addition to windows and building materials, the overall quantity of on-site lighting from the proposed building would increase from the illumination of the proposed full-motion animated billboards, particularly in the evening and nighttime hours. The following quantitative analysis is specific to analyzing lighting and glare from the proposed billboards.

Lighting and Glare

The light trespass analysis evaluates the illuminance in fc (footcandles) from the Project signage leaving the Project Site toward adjacent residential use or other sensitive use properties. Estimates of light levels from the proposed signage were made at 15 vertical planes as shown in Figure 4.1-3: 11 in the City and four planes in the City of Los Angeles. Significance thresholds are 1.4 fc for vertical planes within 250-feet of Sunset Boulevard, and 0.74 fc for planes over 250-feet from Sunset Boulevard. Light levels are identified in Table 4.1-5. As shown in Table 4.1-5, all light levels would be below the City's applicable thresholds.

Concerns were raised in comments on the Initial Study to the Original DEIR regarding health effects of light pollution on sleep. However, the Project would not be lit with rapidly changing or strobing/flashing signage, or use more light intensity than is absolutely necessary, pursuant to WHMC Section 19.20.100, in addition to the light trespass from the Project signage being well below the applicable thresholds.

Figure 4.1-3 Model Locations of 15 Vertical Planes Near the Project Site-



Source: Krahe 2025 (Appendix B1 of this RDEIR)

Table 4.1-5 Modeled Light Levels at 15 Vertical Planes Near the Project Site

Vertical Plane	Illuminance (fc)			Significant Impact?
	Max	Min	Average	
Planes Within 250 Feet of Sunset Boulevard (Threshold 1.4 fc)				
VP-N1	0.20	0.00	0.17	No
VP-N2	0.10	0.00	0.08	No
VP-N3	0.10	0.00	0.00	No
VP-N7	0.00	0.00	0.00	No
VP-S2	0.10	0.00	0.04	No
VP-S3	0.00	0.00	0.00	No
VP-W1	0.20	0.00	0.05	No
Planes Beyond 250 Feet of Sunset Boulevard (Threshold 0.74 fc)				
VP-E1	0.00	0.00	0.00	No
VP-E2	0.10	0.00	0.01	No
VP-E3	0.10	0.00	0.01	No
VP-N4	0.00	0.00	0.00	No
VP-N5	0.10	0.00	0.09	No
VP-N6	0.10	0.00	0.08	No
VP-S1	0.20	0.00	0.03	No
VP-W2	0.10	0.00	0.06	No

fc = footcandles

Source: Krahe 2025 (Appendix B1 of this RDEIR)

Glare from signage would occur when the light source is visible against a dark background, such as the night sky. The maximum nighttime sign luminance would be 300 cd/m^2. Sign luminance is compared to the average existing measured luminance in Table 4.1-6. As shown in Table 4.1-6 and discussed in further detail in the Lighting Study (Appendix B1 of this RDEIR), no glare would occur at any of the six Monitoring Sites shown in Figure 4.1-2.

Table 4.1-6 Modeled Contrast Ratio, Nighttime, at Monitoring Sites

Monitoring Site	Existing Measured Luminance (cd/m^2)		Project Sign Luminance (cd/m^2)		Evaluation
	Average	Maximum	Maximum	Contrast Ratio[1]	
M-E1	594	5790	300	0.5	Low contrast, no glare
M-N1	137	1671	300	2.1	Low contrast, no glare
M-N2	255	4031	300	1.2	Low contrast, no glare
M-W1	60.5	1249	300	5.0	Low contrast, no glare
M-W2	240	4762	300	1.3	Low contrast, no glare
M-S1	116	758	300	2.6	Low contrast, no glare

cd/m2 = candelas per square meter

[1] Contrast ratio is Maximum Project Sign Luminance/Average Existing Measured Luminance

Source: Krahe 2025 (Appendix B1 of this RDEIR)

GLARE ANALYSIS FOR IMPACTS TO ROADWAYS

Regulatory requirements from the CVC Section 21466.5 are summarized here and are explained further in the Lighting Study prepared by Krahe for the Project (Appendix B1 of this RDEIR).

Allowable sign luminance at night ranges from 500 footlamberts (1,713 cd/m^2) upward, depending on the angle between the driver's field of view and the light source. Signage would be operated at a maximum luminance of 87.6 footlamberts (300 cd/m^2) at night, that is, less than 20 percent of the most conservative limit allowed by the CVC.

The twilight periods analyzed were 20 minutes before sunrise to sunrise, and 20 minutes before sunset to sunset. For a conservative (i.e., worst-case) analysis the maximum allowable luminance during these periods was taken to be 500 footlamberts (1,713 cd/m^2), the same for nighttime. Signage would operate at a maximum luminance of 300 cd/m^2 the entire period from sunset to sunrise, including twilight. Project signage would not introduce a new source of substantial glare during twilight hours.

During daytime (sunrise till 20 minutes before sunset), the maximum allowable luminance from the Project signage would be 10,000 footlamberts or 34,300 cd/m^2 per the CVC. The maximum luminance of the sign would be 6,000 cd/m^2, well below the allowed maximum. Therefore, signage operation would not generate substantial glare during daytime hours.

During daytime, severe storms or heavy cloud cover can reduce ambient light levels such that the 10,000 footlamberts maximum does not apply. The digital billboards would include an electronic control system to reduce the sign luminance from 1,750 footlamberts (6,000 cd/m^2) to 87.6 footlamberts (300 cd/m^2) maximum when the ambient sun light falls to illuminance values similar to night, that is, less than 100 footlamberts.

During the day, when storms, cloud cover, or other low ambient sunlight conditions occur and when the ambient sunlight is less than 100 fc, Project signage will transition from the daytime 1,750 footlamberts (6,000 cd/m^2) to 87.6 footlamberts (300 cd/m^2) maximum and thereby ensure that the sign brightness remains less than the maximum brightness allowed by the CVC. Therefore, Project signage would not create a new source of glare during daytime periods with storm or severe overcast weather conditions.

Concerns were raised in written public comments on the Original DEIR concerning impacts from Project signage on driver and pedestrian safety. High light levels or intense glare have the potential to impact driver and/or pedestrian safety; however, high light levels and intense glare would not be produced from the Project as discussed in the preceding analysis. Furthermore, a Transportation Safety Memorandum dated April 5, 2023, was prepared by LLG (Appendix B2 of this RDEIR) to provide a review of transportation safety considerations related to digital billboards. The Transportation Safety Memorandum summarizes a Federal Highway Administration report, which found no significant differences in the amount of time drivers spent looking at digital billboards versus standard billboards except where the digital displays are high contrast with the surrounding environment (i.e., low visual complexity conditions). The Transportation Safety Memorandum explains that the Project's digital billboards would be consistent with the visual complex urban environment provided along Sunset Boulevard, including 120 existing billboards, which motorists, pedestrians, and bicyclists on Sunset Boulevard already have to visually process to safely navigate the street. Accordingly, the Project's digital billboard will not materially change the existing visual character of Sunset Boulevard, and therefore, will not cause new hazards with respect to safety for motorists, pedestrians, or bicyclists.

There were also concerns raised in comments on the Original DEIR regarding impacts from f Project signage on wildlife in the region. In order to address potential impacts to regional wildlife, an Assessment of Lighting Effects on Biological Resources (Lighting BRA) was prepared by South Environmental on August 25, 2023 and updated on June 30, 2025 (Appendix B3 of this RDEIR). The Lighting BRA found the nearest protected area that would contain habitat for special status or sensitive species is Greystone Mansion and Gardens, located approximately 2000-feet east of the Project, but the area does not provide adequate habitat as it is not native open space. Moreover, the nearest native habitats to the Project Site are located within the Franklin Canyon Open Space area that is located over 1-mile to the northwest of the Project site at Franklin Canyon Reservoir. The Lighting BRA concluded lighting from the Project's digital billboard would be disruptive to biological resources up to 385-feet away; however, as that area is entirely urbanized, no sensitive or special biological resources occur within that distance and lighting generated from the Project would not penetrate into regional wildlife areas to have an impact... Therefore, the project would avoid impacting the nearest biological resources.

Overall, the Project would comply with the regulations and standards in the WHMC, SSP, and the City's Signage Policy related to signage, lighting, glare, and illumination and would not introduce substantial new sources of light and glare and impacts would be considered less than significant prior to mitigation.

Mitigation Measures

Mitigation measures would not be required.

4.1.4 Cumulative Impacts

The Project would be viewed from one related development, a planned residential project at 1012 Cory Avenue approximately 220-feet south of the Project Site. The Project would not be within view from any other related project due to intervening buildings and, in some cases, intervening topography. The planned project at 1012 Cory Avenue is a six-unit condominium project, much smaller than the Project. Due to the residential nature of the Cory Avenue project, it is not expected to include lit outdoor signage, and exterior lighting is expected to be limited to safety and security lighting. Impacts of the Project and the project at 1012 Cory Avenue would not combine to create significant adverse impacts to visual character or scenic quality of the two sites and their surroundings, or light and glare. Moreover, with respect to applicable regulations governing scenic quality, light, and glare, all discretionary development projects in the City would be required to adhere to specific development standards in the City's General Plan and Zoning Ordinance designed to enhance the visual appeal of development and public views in the City. Therefore, Project impacts to aesthetics would not be cumulatively considerable.

Furthermore, there are existing and proposed Illuminated static and digital billboards associated with the Arts and Advertising Program in the vicinity of the Project Site which may contribute light to areas adjacent to the Project Site. The Lighting Study (Appendix B1 of this RDEIR) reviews the lighting from the Project in conjunction with two existing signs (9169 Sunset Boulevard and 9157 Sunset Boulevard) and two approved and not yet constructed signs (9229 Sunset Boulevard and 9200 Sunset Boulevard), all within 500 feet of the Project Site. Figures 20 through 23 of the Lighting Study illustrate the extent to which the Project in conjunction with the nearby signs could potentially exceed 1.4 fc at sensitive use properties. These figures demonstrate that the direction of light from each of the adjacent signs is not aligned with the direction of the Project, and that the

light from the Project and surrounding signs does not substantially increase the illuminance at any sensitive use properties.

4.1.5 References

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4.2 Air Quality

This section describes the affected environment and the regulatory setting for air quality and impacts on air quality from construction and operation of the Project, including impacts to nearby sensitive receptors and contributions to cumulative impacts. Construction and operational emissions associated with Project buildout were calculated using the California Emissions Estimator Model (CalEEMod) and daily vehicle trips provided in the Trip Generation Assessment for the Project (Appendix O.2).[1] Results of the calculations (refer to Appendix B of this Recirculated Draft Environmental Impact Report [RDEIR]) were compared to South Coast Air Quality Management District (SCAQMD) thresholds to determine impacts. A construction health risk assessment (HRA) was conducted to estimate off-site health risks to sensitive receptors, in accordance with the revised guidelines from the Office of Environmental Health Hazard Assessment (OEHHA) and SCAQMD's guidelines. For health risk calculations, refer to Appendix B of this RDEIR.

4.2.1 Setting

Climate and Topography

The Project Site is in the South Coast Air Basin (SCAB), which is under the jurisdiction of SCAQMD. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County.[2] The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the SCAB is primarily influenced by meteorology and a wide range of emission sources, such as dense population centers, substantial vehicular traffic, and industry.

Most annual rainfall in the SCAB occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the SCAB and along the coastal side of the mountains. West Hollywood has a Mediterranean climate with moderate, dry summers. The warmest month of the year is August, and the coldest month of the year is January. The annual average maximum temperature is 74.0 degrees Fahrenheit (°F), while the annual average minimum temperature is 55.8°F. Rainfall is concentrated in the winter months. Local climate conditions are summarized below in Table 4.2-1**.**

[1] CalEEMod was run using the latest version available at the time the NOP was issued, which incorporates the 2019 Energy Code. The 2025 Energy Code will take effect January 1, 2026, and the Project would comply with the most updated Codes when building plans are submitted. Therefore, the RDEIR conservatively estimates air quality emissions.
[2] A map of SCAQMD jurisdiction is available at: http://www.aqmd.gov/docs/default-source/default-document-library/map-of-jurisdiction.pdf

Table 4.2-1 Project Area Climate Conditions

Temperature Condition	Amount
Average annual rainfall	14.77 inches
Annual average maximum temperature	74.0°F
Annual average minimum temperature	55.8°F
Warmest month	August
Coolest month	January

°F = degrees Fahrenheit

Note: Averages are based on the period of record from July 1, 1877, to June 9, 2016, at the approximately 7.5 miles University Southern California Campus station, southeast of the Project Site.

Source: Western Regional Climate Center 2016

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific High-pressure system. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion layer (i.e., the upper layer) until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid- to late afternoons on hot summer days. Winter inversions frequently break by mid-morning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions in the SCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack). The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and

other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including CO, volatile organic compounds (VOC)/reactive organic gases (ROG),[3] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and VOC. VOC is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide (NO_2). NO_X is formed during the combustion of fuels, while VOC is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different atmosphere components. Consequently, high ozone levels tend to exist only while high VOC and NO_X levels are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. People most at risk from ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from ozone exposure. Depending on the level of exposure, ozone can cause coughing and a sore or scratchy throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; and increase the frequency of asthma attacks (USEPA 2025a).

Carbon Monoxide

CO is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2025b).

[3] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this analysis.

Nitrogen Dioxide

The primary sources of NO_x are motor vehicles, industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_x. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are generally at greater risk for the health effects of NO_2. The nitrate particles that result from NO_X make the air hazy and difficult to see though. It can also contribute to the formation of ozone, smog, and acid rain (USEPA 2024a).

Sulfur Dioxide

SO_2 is the component of greatest concern and is used as the indicator for the larger group of gaseous sulfur oxides (SO_x). Other gaseous SO_x (such as sulfur trioxide) are found in the atmosphere at concentrations much lower than SO_2. The largest source of SO_2 in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (USEPA 2025c).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mist. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2025a).

Lead

Pb is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA ’s regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions

were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (USEPA 2014). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (USEPA 2025d).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are a diverse group of airborne substances/air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2025a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2025e).

Current Air Quality

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the California and federal standards. The following is a summary of the monitoring stations closest to the Project Site.

The monitoring station closest to the Project Site is the West Los Angeles-VA Hospital monitoring station, located at 11301 Wilshire Boulevard in Los Angeles, approximately 4.3 miles southwest of the Project Site. The West Los Angeles-VA Hospital station collected 1-hour and 8-hour ozone, and NO_2 between 2022 and 2024. The Los Angeles-North Main Street station, located at 1630 North Main Street in Los Angeles, is approximately 9.5 miles east of the Project Site. The Los Angeles-North Main Street station collected CO, PM_{10} and $PM_{2.5}$ concentrations between 2022 and 2024.

Table 4.2-2 indicates the number of days that each of the federal and State standards has been exceeded at monitoring stations near the Project Site in each of the last three years for which data is available. At these stations, the State 1-hour ozone standard was exceeded in 2023 and 2024.The

PM_{10} State standard exceeded in 2023 and 2024, and the $PM_{2.5}$ federal standard in 2024. No other State or federal standards were exceeded at nearby monitoring stations.

Table 4.2-2 Annual Ambient Air Quality Data from Nearest Monitoring Stations

Pollutant	2022	2023	2024
Ozone (ppm), Worst 1-Hour[1]	0.081	0.109	0.093
Number of days above CAAQS (>0.09 ppm)	0	1	1
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average[1]	0.070	0.066	0.069
Number of days above CAAQS (>0.070 ppm)	0	0	0
Number of days above NAAQS (>0.070 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average[2]	1.5	1.2	1.6
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst 1-Hour[1]	0.051	0.044	0.054
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Particulate Matter <10 microns ($\mu g/m^3$), Worst 24 Hours[2]	43.7	51.6	71.1
Number of days above CAAQS (>50 $\mu g/m^3$)	0	1	2
Number of days above NAAQS (>150 $\mu g/m^3$)	0	0	0
Particulate Matter <2.5 microns ($\mu g/m^3$), Worst 24 Hours[2]	33.7	30.6	55.7
Number of days above NAAQS (>35 $\mu g/m^3$)	0	0	7

ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

[1] Data sourced from the CARB at the nearest monitoring station with available data at the West Los Angeles-VA Hospital station in Los Angeles.

[2] Data sourced from the CARB at the nearest monitoring station with available data at the Los Angeles-North Main Street station in Los Angeles.

Source: CARB 2025b and SCAQMD 2025

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly (over the age of 65), people engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, and schools, playgrounds, and childcare centers (SCAQMD 2005). Sensitive receptors nearest to the Project Site consist of multi-family residences (at 1033 Carol Drive) approximately 20 feet south of the Project Site. Other nearby sensitive receptors include single-family residences located approximately 100 feet to the south, single- and multi-family residences located approximately 210 feet to the northeast (9080 Shoreham Drive) and southeast

(1038 Carol Drive), and the Le Petit Gan International Preschool West Hollywood[4] approximately 670 feet southeast of the Project Site[5].

4.2.2 Regulatory Setting

The federal and state governments have authority under the federal and State CAA to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. An air quality standard is defined as "the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harming public health" (CARB 2025c). The USEPA is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in California. Federal and state AAQS have been established for six criteria pollutants: ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb, which can be harmful to public health and the environment. The CAA identifies two types of national AAQS. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings (USEPA 2024b). In addition, the State of California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards (CARB 2025d). The federal and California Clean Air Acts are described in more detail below.

a. Federal Regulations

The CAA was enacted in 1970 and amended in 1977 and 1990 (42 United States Code [USC] 7401) for the purpose of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the USEPA developed primary and secondary NAAQS.

The primary NAAQS "in the judgment of the Administrator[6], based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health," and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" (42 USC 7409[b][2]). The USEPA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. Table 4.2-3 lists the current federal standards for regulated pollutants.

To derive the NAAQS, the USEPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (USEPA 2024c). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant (San Joaquin Valley Air Pollution Control District 2015). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human

[4] The Doheny School, previously identified in the Original DEIR has since closed and the space is now occupied by the Le Petit Gan International Preschool West Hollywood.
[5] These distances are from property line to property line.
[6] The term "Administrator" means the Administrator of the United States EPA.

health (CARB 2025b and 2025c). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (USEPA 2015).

Table 4.2-3 Federal and State Ambient Air Quality Standards

Pollutant	NAAQS	CAAQS
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 μg/m^3 (rolling 3-month avg) 1.5 μg/m^3 (calendar quarter)	1.5 μg/m^3 (30-day avg)
Particulate Matter (PM_{10})	150 μg/m^3 (24-hr avg)	50 μg/m^3 (24-hr avg) 20 μg/m^3 (annual avg)
Particulate Matter ($PM_{2.5}$)	35 μg/m^3 (24-hr avg) 9 μg/m^3 (annual avg)	12 μg/m^3 (annual avg)
Visibility-Reducing Particles	No Federal Standards	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape. (8-hr avg)
Sulfates	No Federal Standards	25 μg/m^3 (24-hr avg)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; avg = average; μg/m^3 = micrograms per cubic meter

Source: CARB 2024 and USEPA 2024b

b. State Regulations

California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code (H&SC) §39000 et seq.). Under the CCAA, the State has developed the CAAQS, which are generally more stringent than the NAAQS. Table 4.2-3 lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant, based on the comparison of measured data within the CAAQS.

Toxic Air Contaminants

A TAC is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. TACs may result in long-term health effects such as cancer, birth defects, neurological damage, asthma, or genetic damage, or short-term acute effects such as eye watering, respiratory irritation, runny nose, throat pain, and headaches. TACs are considered either carcinogenic or non-carcinogenic based on the nature of the health effects associated with exposure. For carcinogenic TACs, potential health impacts are evaluated in terms of overall relative risk expressed as excess cancer cases per one million exposed individuals. Non-carcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

TACs include both organic and inorganic chemical substances. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as DPM; however, TACs may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities.

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures, and provisions for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill (SB) 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

State Implementation Plan

The SIP is a collection of documents that set forth a state's strategies for achieving the AAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

As the regional air quality management district, the SCAQMD is responsible for preparing and implementing the portion of the SIP applicable to the portion of the SCAB within its jurisdiction. The

air pollution control district for each county adopts rules, regulations, and programs to attain federal and State air quality standards and appropriates money (including permit fees) to achieve these objectives.

California Building Standards Code (Title 24)

Building Energy Efficiency Standards (Title 24, Part 6)

California Code of Regulations Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. Title 24, Part 6 sets forth California's energy efficiency standards for residential and nonresidential buildings and was established in 1978 in response to a legislative mandate to reduce California's energy consumption. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The 2022 Title 24 standards are the applicable building energy efficiency standards for the Project because they became effective on January 1, 2023 (California Energy Commission 2022a). The 2025 Title 24 Standards will take effect on January 1, 2026, and the Project would be designed to comply with these building standards. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code).[7] The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- Twenty percent reduction in indoor water use relative to specified baseline levels;[8]
- Waste reduction:
  - Non-residential and multi-family dwellings with five or more units: Provide readily accessible areas identified for the depositing, storage and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastic, organic waste, and metals; and/or
  - Non-residential: Reuse and/or recycling of 100 percent of trees, stumps, rocks, and associated vegetation soils resulting from primary land clearing;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;

[7] The 2025 Title 24 Standards will take effect on January 1, 2026.
[8] Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

- Electric vehicle (EV) charging for new construction:[9]
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations;
  - Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, and retail stores with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.4.1 of CalGreen Standards;
- Bicycle parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic are required to provide permanently anchored bicycle racks that allow at least two bikes to be parked in the rack, within 200 feet of visitor entrance; and/or;
  - Non-residential bicycle racks shall be implemented at a rate of five percent of new vehicle parking spaces; and/or;
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants shall provide secure bicycle parking shall be provided at a rate of 5 percent of vehicle parking spaces and a minimum of one bicycle parking facility.
- Shade trees (non-residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
- Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

[9] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2022 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

The voluntary standards, if adopted, require:

- Deconstruct existing buildings and reuse applicable salvaged materials;
- Tier I:
  - Stricter energy efficiency requirements;
  - Stricter water conservation requirements for specific fixtures;
  - Minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;
  - Minimum 20 percent permeable paving;
  - Minimum 20 percent cement reduction;
- Tier II:
  - Stricter energy efficiency requirements,
  - Stricter water conservation requirements for specific fixtures;
  - Minimum 75 percent reduction in construction waste with third-party verification,
  - Minimum 15 percent recycled content for building materials;
  - Minimum 30 percent permeable paving;
  - Minimum 25 percent cement reduction; and/or

California Code of Regulations

The California Code of Regulations is the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. They are compiled into Titles and organized into Divisions containing the regulations of state agencies. The following California Code of Regulations would be applicable to the Project:

- **Engine Idling.** In accordance with Section 2485 of Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Emission Standards.** In accordance with Section 93115 of Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

NAAQS and CAAQS Attainment Status

California is divided geographically into 15 air basins for managing the air resources of the State on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or State attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and State CAA, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas.

The Project Site is within Los Angeles County, which currently exceeds the NAAQS for 8 and 1-hour ozone, $PM_{2.5}$, and Pb. Los Angeles County is classified an attainment/maintenance area under the

CAAQS for CO, and attainment for $PM_{2.5}$. Los Angeles County is currently classified as a nonattainment area under the CAAQS for ozone, $PM_{2.5}$, and PM_{10} (CARB 2023).

c. Local Regulations

South Coast Air Quality Management District 2022 Air Quality Management Plan

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of air quality management plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the SCAB is to reduce NO_X emissions sufficiently to meet the 2037 ozone standard deadline for the non-Coachella Valley portion of the SCAB, as NO_X plays a critical role in the creation of ozone. The 2022 AQMP includes strategies to ensure the SCAQMD does its part to further the Air District's ability to meet the 2015 federal ozone standards. The SCAQMD would need to reduce emissions of NO_X by 67 percent beyond what is required by the adopted rules and regulations in 2037 to meet the 2015 federal ozone standard (SCAQMD 2022). The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technology, best management practices, co-benefits from existing programs, incentives, and other CAA measures to meet the 8-hour ozone standard. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the ozone standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of annual $PM_{2.5}$ standards (SCAQMD 2017).[10]

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, State, and local levels and industries. Most of these emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile source emissions that are beyond SCAQMD's control. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives, and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and USEPA. The SCAQMD will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP relies on substantial future development of advanced technologies to meet the standards, including the transition to zero and low emission technologies. Of the needed NO_X emissions reductions, 46 percent will come from federal actions, 34 percent from CARB actions, and 20 percent will come directly from SCAQMD actions (SCAQMD 2022).

The AQMP also incorporates the transportation strategy and transportation control measures from Southern California Association of Governments (SCAG)'s 2020-2045 RTP/SCS Plan (Connect SoCal) (SCAG 2020). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG coordinates with various air quality and transportation stakeholders in southern California to ensure compliance with the federal and State air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and

[10] Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and State air quality plans to attain the NAAQS. Connect SoCal includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG (SCAQMD 2022). Connect SoCal and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on SCAG's Connect SoCal.

The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's Connect SoCal. The region is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and 5 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels (SCAQMD 2022).

Project-level significance thresholds established by a local air quality management district sets the level at which a project would cause or have a cumulatively considerable contribution to an exceedance of the NAAQS and/or CAAQS. Therefore, if a project's air pollutant emissions exceed the NAAQS and/or CAAQS, the project could cause or contribute to human health impacts.

South Coast Air Quality Management District Rules and Regulations

The SCAQMD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the Project include the following:

- **Rule 401 (Visible Emissions):** This rule prohibits the discharge of visible air pollutant emissions from various sources as determined by shade and opacity criteria based on the Ringelmann Chart.
- **Rule 402 (Nuisance):** This rule prohibits the discharge of quantities of air contaminants or other material that causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- **Rule 403 (Fugitive Dust Control):** This rule includes various requirements to prevent, reduce, and mitigate the amount of particulate matter entrained in the ambient air from man-made fugitive dust sources.
- **Rule 1113 (Architectural Coatings):** This rule establishes VOC content limits for a variety of architectural coatings, including 50 grams per liter for flat and non-flat coatings.

City of West Hollywood General Plan

The City of West Hollywood General Plan Infrastructure, Resources, & Conservation, and Mobility Element was adopted in September 2011. The following goals and policies are applicable to air quality issues related to the Project (City of West Hollywood 2011):

Goal IRC-4: Reduce the total and per capita amount of energy used in the City

> **IRC-4.2:** Promote land use patterns and mobility decisions that result in reduced vehicle trips and therefore reduced overall energy use from the transportation sector.

Goal IRC-7: Improve air quality and reduce emissions of air pollution.

IRC-7.2: Support land use and transportation strategies to reduce driving rates and resulting air pollution, including pollution form commercial and passenger vehicles.

IRC-7.3: Promote fuel efficiency and cleaner fuels for vehicles as well as construction and maintenance equipment by requesting that City contractors provide cleaner fleets.

Goal M-5: Create an environmentally and financially sustainable transportation network that provides for the mobility and livability needs of West Hollywood residents, businesses, and visitors.

M-5.2: Prioritize property access to promote transit, walking, and bicycling over auto access.

4.2.3 Impact Analysis

Methodology

Air pollutant emissions generated by construction and operation of the Project were estimated using CalEEMod. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. CalEEMod allows for the use of standardized data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices C, D, and G (California Air Pollution Control Officers Associated 2022). The analysis reflects the details of construction and operation of the Project as described in Section 2.0, *Project Description*.

Construction

Project construction would primarily generate temporary criteria pollutant emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and import of materials off-site. Construction of the Project was analyzed based on the land use types, building square footage, construction equipment list, and construction phase schedule provided by the applicant. Construction of the Project would begin in February 2026 and end in October 2027, with construction activity occurring Monday through Saturday. Nighttime construction, lasting approximately eight hours per night, would take place during the early stages of the building construction phase. Therefore, it is assumed to occur during approximately 25 percent of the Project construction. All construction equipment during Project construction would be equipped with Tier 4 interim engines or retrofitted to Tier 4 interim standards and assumed to be fueled by diesel. Based on the applicant-provided land uses, CalEEMod provides assumptions for construction vendor vehicle trips. It is anticipated that approximately 75 to 95 workers would be onsite during the peak construction phases. Additionally, approximately 10 workers onsite during hauling activities in the grading phase. To conservatively estimate emissions, it is assumed that 95 workers would travel to the Project Site each day, with the exception of the grading phase. The Project would include the demolition of approximately 7,539 square-feet of existing structures. During the grading phase, the Project would export approximately 25,000 cubic yards of soil from the Project Site and would be transported to Chiquita Canyon Sanitary Landfill west of the city of Santa Clarita, approximately 36 miles to the north. It is assumed the Project would comply with

applicable regulatory standards such as SCAQMD Rule 403 for dust control measures and Rule 1113 for architectural coating VOC limits.

Operation

Operational emissions modeled include mobile, area source, and stationary source emissions. Mobile source emissions are generated by vehicle trips to and from the Project Site. The Project would generate approximately 1,172 net daily vehicle trips (refer to Appendix E of this RDEIR). The mobile trip generation rates in CalEEMod were adjusted to reflect the trip generation results. Area source emissions are generated by landscape maintenance equipment, consumer products and architectural coatings. Stationary source emissions would be generated from a 200-kW emergency generator. It is assumed that the emergency generator would be tested for up to two hours per day each month with 200 total annual operational hours for testing, maintenance, and emergency usage. The Project would not consume natural gas, so no energy source emissions were estimated.

Health Risk Assessment

The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015) and SCAQMD's Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (SCAQMD 2024a). The OEHHA Guidance considers the sensitivity of children to TAC emissions, different breathing rates, and time spent at home. Children have a higher breathing rate compared to adults and would likely spend more time at home in nearby residences resulting in longer exposure durations.

The process of assessing health risks and impacts includes a degree of uncertainty. The level of uncertainty depends on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to eliminate uncertainty from the analysis. In general, sources of uncertainty that may lead to an overestimation or an underestimation of the risk include extrapolation of the toxicity data associated with animal exposure used to estimate exposure effects in humans and uncertainty in the exposure estimates. In addition to uncertainty, there exists "a natural range or variability in measured parameters defining the exposure scenario" and the fact that "the greatest quantitative impact is variation among the human population in such properties as height, weight, food consumption, breathing rates, and susceptibility to chemical toxicants" (OEHHA 2015).

The greatest potential for TAC emissions during construction would be DPM emissions associated with heavy-duty equipment during Project construction. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These products would comply with all applicable SCAQMD rules for their manufacture and use. The Project would be subject to several SCAQMD rules designed to limit exposure to TACs during construction activities.

Cancer Risk Background

Health risk impacts are assessed using a health risk calculation methodology that is consistent with the 2015 OEHHA Guidance. This HRA addresses construction DPM emissions and the effects on nearby sensitive uses.

Health impacts are evaluated using a dose-response assessment, which describes the relationship between the level of exposure to a substance (i.e., the dose) and the incidence or occurrence of

injury (i.e., the response). To determine the total dose to off-site sensitive receptors, the applicable pathways of exposure (e.g., inhalation) should be identified for the emitted substances, and the receptor locations are identified. The applicable exposure pathways determine the exposure algorithms that are used to estimate dose. After the exposure pathways are identified, the applicable fate and transport algorithms are used to estimate concentrations in the applicable exposure media (e.g., air) and the exposure algorithms are used to determine the substance-specific dose. In accordance with the OEHHA Guidance, the inhalation pathway was evaluated for Project construction. For the inhalation pathway, the dose is directly proportional to the breathing rate. SCAQMD recommends using high end breathing rates (95th percentile) for children from the 3rd trimester through age two (SCAQMD 2024a).

Once dose is calculated, cancer risk is calculated by accounting for cancer potency of the specific pollutant, age sensitivity, exposure duration, averaging time for lifetime cancer risk, and fraction of time spent at home (sensitive receptor). The cancer potency factor (CPF) is specific for each pollutant and is determined through peer-reviewed scientific studies. For example, the Scientific Review Panel recommends a CPF for DPM of 3.0×10-4 (µg/m^3) and a slope factor of 1.1 (ppm-day). The age sensitive factor (ASFs) account for greater susceptibility in early life as compared to adult exposure, starting from the third trimester of pregnancy to 16 years. The fraction of time at home (FAH) takes into account the time actually residing at the sensitive receptor location. FAH also takes into account time spent at home for various age groups. For example, newborns are expected to reside at home for longer periods of time compared to school-age children, and the elderly (retirees) are expected to spend more time at home compared to people of working age. FAH consistent with OEHHA guidelines were used for the analysis. As the Le Petit Gan International Preschool West Hollywood is within the 1,000-foot buffer, FAH was initially assumed to be 1 for all receptors under 17 years of age. As shown in Appendix B of this RDEIR, the preschool did not result in a cancer risk equal to or greater than one in one million based on residential risk factors. Therefore, a FAH of 0.85 was applied to the third trimester and to the age bins from birth to two years.

Each age group has different exposure parameters which require cancer risk to be calculated separately for each age group. The estimation of cancer risk uses the following algorithms:

Risk = Dose inhalation × Inhalation CPF × ASF (Equation 1)

Where:

Dose inhalation = CAIR × DBR × A × EF × ED × FAH/AT (Equation 2)

Inhalation CPF = inhalation cancer potency factor

ASF = age-sensitivity factor

Where:

CAIR = concentration of compound in air in micrograms per cubic meter (µg/m3)

DBR = breathing rate in liter per kilogram of body weight per day (L/kg-body weighty/day)

A = inhalation absorption factor (1 for DPM)

EF = exposure frequency in days per year (day/year)

ED = exposure duration in years (year)

FAH = fraction of time at home

AT = averaging time period over which exposure is averaged in days (day)

The incremental increase in cancer risk is the result of multiplying the dose by the pollutant-specific CPF values. Cancer risk is calculated by multiplying the inhalation dose by the inhalation CPF to yield the potential inhalation excess cancer risk. Cancer risk was evaluated for residences in the surrounding area. Risk for all receptors as well as modeling output is included as part of Appendix B of this RDEIR.

Non Cancer Risk Background

Non-cancer chronic impacts were assessed based on the hazard index (HI). The evaluation of chronic impacts is based on the maximum annual emissions over a 12-month period of construction activity. The chronic HI is calculated by dividing the maximum modeled annual average concentration at the maximum impacted sensitive receptor by the recommended exposure limit (REL). The REL is the concentration at or below which no adverse health effects are anticipated. For example, OEHHA has recommended an ambient concentration of 5 $\mu g/m^3$ as the chronic inhalation REL for DPM exhaust. Therefore, a sensitive receptor exposed to an annual average DPM concentration of 5 $\mu g/m^3$ or less would not result in a chronic impact. Non-cancer chronic impacts affect specific target organ systems (also called toxicological endpoints), such as the eye, nervous system, reproductive system, and respiratory system. The chronic health impact with the maximum HI for the same target organ system is used for impact determination.

Construction Health Risk Assessment

Construction emissions rates were based on anticipated max daily emissions modeled using CalEEMod; refer to Appendix B of this RDEIR for the data output sheets. The construction area used in the HRA aligns with the Project Site boundary shown in Figure 2.1 of Section 2.0, *Project Description*, and is consistent with the construction details described in Section 2.0, *Project Description*.

CalEEMod differentiates between particulate matter emitted from engine exhaust (i.e., DPM) and particulate matter emitted from ground disturbing activities (i.e., fugitive dust, which does not constitute DPM) (California Air Pollution Control Officers Association 2022). DPM concentration was estimated based on the PM_{10} exhaust emissions (not including fugitive PM_{10}) provided by CalEEMod, which are DPM emissions resulting from combustion of diesel-fueled vehicles and off-road equipment during construction. PM_{10} exhaust is composed of DPM and other air toxics; therefore, PM_{10} exhaust is a conservative estimate for DPM emissions estimates. Please refer to Appendix B of this RDEIR for more information related to construction health risk calculations.

DISPERSION MODELING

Dispersion modeling was performed using the USEPA-approved American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) with meteorological data from the representative SCAQMD monitoring station located near the Project Site. SCAQMD specifically recommends that projects use the nearest representative SCAQMD meteorological station for modeling, which is usually the nearest station. Santa Monica Airport is the nearest representative meteorological station and is approximately 6.14 miles southwest of the Project Site. The Project is consistent with SCAQMD's recommendation to use National Elevation Dataset GeoTiff digital terrain files for terrain data at resolution of one arc-second (10 meters). Vehicle exhaust emissions sources for the Project were located on the Project Site corresponding to the areas of construction. The daytime and nighttime construction activity were modeled as area sources in AERMOD with an assumed release height of five meters, corresponding to the approximate height

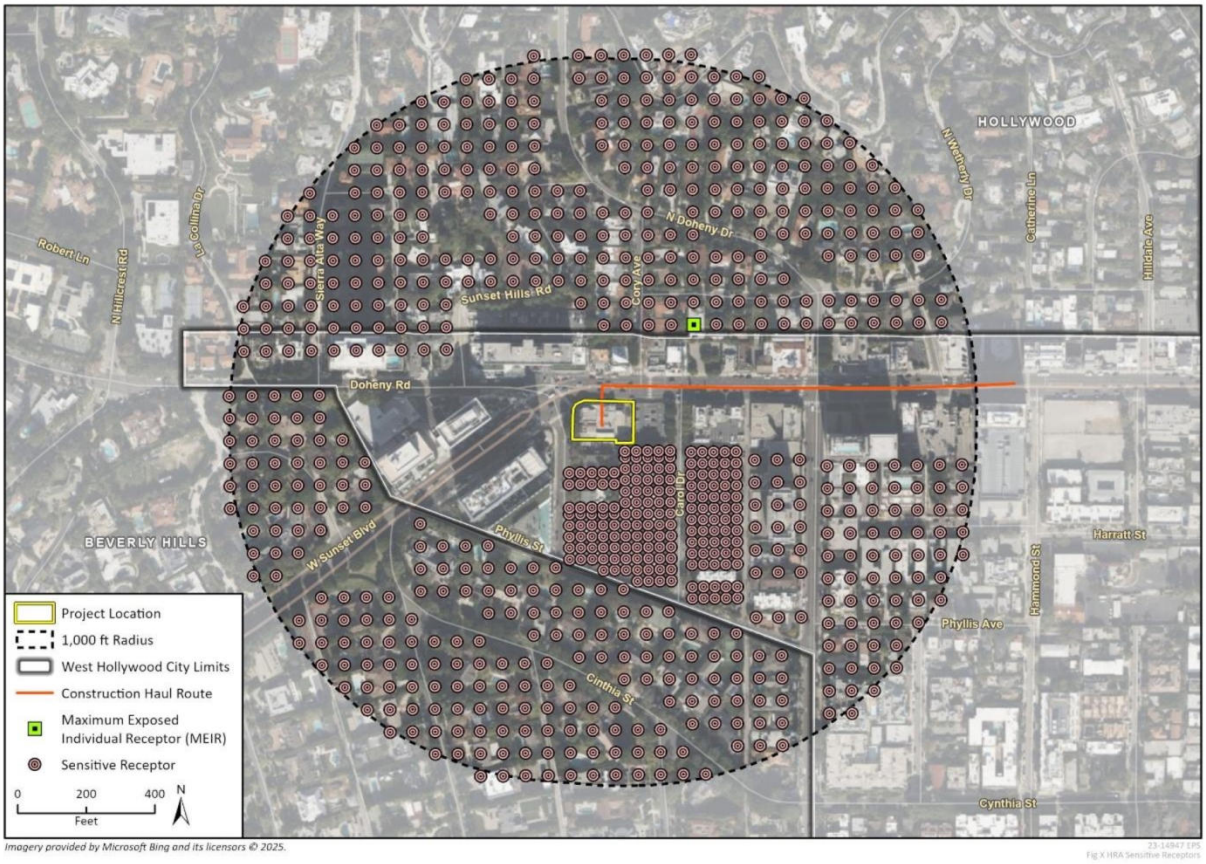
of off-road equipment mufflers from which exhaust emissions would be released (SCAQMD 2008). Line volume sources were used to represent the construction haul route. The presence of buildings and other structures disturbs downwind air flow. However, building downwash is only calculated for point sources and not appropriate to include in AERMOD for this HRA because there are no point sources in the analysis. AERMOD provides the concentration estimated by the air quality model based on an emission rate of one gram per second (OEHHA 2015). The dispersion modeling allocates the emissions during active daytime construction hours, which span approximately 11 hours per day from Monday through Saturday. Nighttime construction activities are scheduled to begin as early as 1:00 a.m. and would continue for up to eight hours per night, Monday through Saturday. Consistent with SCAQMD's *Modeling Guidance for AERMOD*, the urban dispersion option was applied using an estimated population of 9,663,345 for Los Angeles County (SCAQMD 2024b).

To represent existing sensitive receptors around the Project Site, as shown in Figure 4.2-1, 936 receptors were used in AERMOD with 10-meter and 20-meter spacing. Sensitive receptors identified for modeling were placed at the location of nearby sensitive land uses, which includes residences within 1,000 feet from the Project Site and along the haul truck route on West Sunset Boulevard. Students at Le Petit Gan International Preschool West Hollywood were modeled as residential receptors as it is assumed that some students at this preschool would live within 1,000 feet of the Project Site, therefore increasing risk exposure for those students. By modeling the school as a residential receptor, the potential maximum risk for students is conservatively estimated. Sites that were not specifically modeled would result in risk that would be less than the risk modeled for those receptors included in the analysis that are immediately near the Project Site, as modeled concentrations of air toxics reduces exponentially with distance.

HEALTH RISK

Health risk was calculated using in-house spreadsheets which are consistent with the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015) and SCAQMD's *Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act* (SCAQMD 2024a). The nearest sensitive receptor that is subject to the highest cancer risk from Project construction emission is the property located across Sunset Boulevard at 9080 Shoreham Drive (Figure 4.2-1, Construction Sensitive Receptors), the increased cancer risk at this location is due to the local prevailing and uniform wind direction in its vicinity.

Figure 4.2-1 Construction Source and Receptors



Significance Thresholds

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would do any of the following:

a. Conflict with or obstruct implementation of the applicable air quality plan
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard
c. Expose sensitive receptors to substantial pollutant concentrations
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

SCAQMD Regional Significance Thresholds

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the SCAB. These thresholds, shown in Table 4.2-4, are used to evaluate a project's potential air quality impacts.

Table 4.2-4 SCAQMD Air Quality Significance Thresholds

Pollutant	Construction (pounds per day)	Operation (pounds per day)
NO_x	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_x	150	150
CO	550	550

NO_x = Nitrogen Oxides; VOC = Volatile Organic Compounds; PM_{10} = Particulate Matter with a diameter no more than 10 microns; $PM_{2.5}$ = Particulate Matter with a diameter no more than 2.5 microns; SO_x = Sulfur Oxide; CO = Carbon Monoxide

Source: SCAQMD 2023

SCAQMD Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions within site areas that measure one, two, or five acres. If a site is greater than five acres, SCAQMD recommends a dispersion analysis be performed. LSTs only apply to emissions in a fixed stationary location (such as fugitive dust, equipment exhaust, and operational energy and area sources) and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008, 2009).

The Project Site is within SRA 2 (Northwest Coastal LA County). SCAQMD provides LST lookup tables for project sites that measure one, two, or five acres. The Project Site is approximately 0.43 acres; therefore, the LST analysis uses one-acre LSTs. LSTs are provided for receptors at a distance of 25 meters, 50 meters, 100 meters, 200 meters, 500 meters from the Project disturbance boundary to the sensitive receptors. The border of construction activity would occur adjacent to multi-family residences. Therefore, the analysis below uses the LST values for 25 meters to evaluate emissions. LSTs for construction and operations in SRA 2 on a one-acre site with a receptor 25 meters away are shown in Table 4.2-5.

Table 4.2-5 SCAQMD LSTs for Construction and Operation

	Allowable Emissions for a One-Acre Site in SRA-2 for a Receptor 25 Meters Away (pounds per day)	
Pollutant	Construction	Operation
Gradual conversion of NO_X to NO_2	103	103
CO	680	680
PM_{10}	4	1
$PM_{2.5}$	3	1

NO_x = Nitrogen Oxides; NO_2 = Nitrogen Dioxide; CO = Carbon Monoxide; PM_{10} = Particulate Matter with a diameter no more than 10 microns; $PM_{2.5}$ = Particulate Matter with a diameter no more than 2.5 microns

Source: SCAQMD 2009

Toxic Air Containments Thresholds

SCAQMD has developed significance thresholds for the emissions of TACs based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in one million (1×10^{-6}) or a cancer burden of 0.5 excess cancer cases in areas exceeding one in one million risks. Additionally, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0 (SCAQMD 2023).

d. Project Impacts and Mitigation Measures

Threshold a:	Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROJECT WOULD GENERATE EMPLOYMENT GROWTH. HOWEVER, SUCH GROWTH WOULD NOT EXCEED THE GROWTH FORECASTS ON WHICH THE 2022 AQMP IS BASED OR DELAY THE TIMELY ATTAINMENT OF AIR QUALITY STANDARDS. THEREFORE, IMPACTS RELATED TO AQMP CONSISTENCY WOULD BE LESS THAN SIGNIFICANT.

According to SCAQMD's CEQA Air Quality Handbook, a project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. Additionally, if a project may cause or contribute to new violations or delay timely attainment of air quality standards (SCAQMD 1993). The 2022 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and the SCAG 2020-2045 RTP/SCS's socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2022, SCAG 2020) [11]. The Project does not include residential land uses; therefore, it would not contribute to regional population growth and is excluded from this analysis.

The employment growth forecasts in SCAG's 2020-2045 RTP/SCS for City of West Hollywood estimate that the total number of jobs would increase from 21,700 in 2016 to 38,100 in 2045, for an increase of 16,400 jobs (SCAG 2020). The Project would involve the construction of a 52,999-square-foot building, consisting of 7,892 square-feet of high-turnover restaurant space and 45,107 square feet of office space[12]. The Project would include approximately 125 employment opportunities. Therefore, the Project would be within the SCAG's projected 2045 employment increase of 16,400 from 2016, and the Project would not cause the City of West Hollywood to exceed official regional employment projections.

The AQMP also provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and $PM_{2.5}$. As shown in Table 4.2-6 and Table 4.2-7 in analysis for Impact AQ-2, the Project would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Since the Project would also be consistent with population growth projections for the City, the Project would not conflict with or

[11] On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). However, the SIPs were adopted prior to this date and relies on the demographic and growth forecasts of the 2020-2045 RTP/SCS; therefore, these forecasts are utilized in the analysis of the Project's consistency with the AQMP.

[12] Approximately 8,187 square feet of the building is allocated to restrooms and mechanical rooms, which are categorized under office space in this analysis.

obstruct implementation of the applicable air quality plan and impacts would be less than significant.

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

Impact AQ-2 CONSTRUCTION AND OPERATION OF THE PROJECT WOULD NOT EXCEED SCAQMD'S REGIONAL THRESHOLDS OF SIGNIFICANCE; THEREFORE, THE PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE REGION IS IN NONATTAINMENT UNDER APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARDS, AND IMPACTS RELATED TO CONSTRUCTION AND OPERATION WOULD BE LESS THAN SIGNIFICANT.

Construction Emissions

Construction of the Project would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles, in addition to VOC emissions that would be released during the drying of architectural coating and paving phases. Table 4.2-6 summarizes the estimated maximum daily emissions of pollutants during construction of the Project. As shown therein, construction-related emissions would not exceed SCAQMD thresholds, and the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or State ambient air quality standard and impacts would be less than significant.

Table 4.2-6 Project Construction Emissions

	Maximum Daily Emissions (pounds per day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2026	3	19	41	<1	3	1
2027	2	12	26	<1	1	<1
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations.

Source: Table 2.2 "Construction Emissions by Year, Unmitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. See CalEEMod worksheets in Appendix B

Operational Emissions

Operation of the Project would generate criteria air pollutant emissions associated with mobile sources (i.e., vehicle trips to and from the Project Site), area sources (e.g., architectural coatings, consumer products, and landscaping equipment), and stationary sources (i.e., generator). Table 4.2-7 summarizes the Project's maximum daily operational emissions by emission source. As shown therein, operational emissions would not exceed SCAQMD regional thresholds for criteria pollutants, and the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or State ambient air quality standard and impacts would be less than significant.

Table 4.2-7 Project Operational Emissions

Emission Source	Maximum Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	4	3	28	<1	6	2
Area	2	<1	4	<1	<1	<1
Stationary	1	3	2	<1	<1	<1
Project Emissions	**7**	**6**	**34**	**<1**	**6**	**2**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations.

Source: Table 2.5 "Operations Emissions by Sector, Unmitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. See CalEEMod worksheets in Appendix B

Threshold c: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 THE PROJECT WOULD NOT EXCEED SCAQMD LOCALIZED THRESHOLDS OF SIGNIFICANCE AND TOXIC AIR CONTAINMENTS THRESHOLDS FOR CANCER AND CHRONIC RISK, AND THE PROJECT IS NOT CONSIDERED A LAND USE THAT WOULD GENERATE SUBSTANTIAL TOXIC AIR CONTAMINANTS EMISSIONS. ADDITIONALLY, THE PROJECT WOULD NOT INCREASE CARBON MONOXIDE CONCENTRATIONS SUCH THAT IT WOULD CREATE CARBON MONOXIDE HOTSPOTS. THEREFORE, THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed under Section 4.2.1, Setting the closest sensitive receptors are multi-family residences (at 1033 Carol Drive) south of the Project Site. Other nearby sensitive receptors include single-family residences located approximately 100 feet to the south, single- and multi-family residences located approximately 210 feet to the northeast (9080 Shoreham Drive) and southeast (1038 Carol Drive), and the Le Petit Gan International Preschool West Hollywood[13] approximately 670 feet southeast of the Project Site[14]. Localized air quality impacts to sensitive receptors typically result from criteria pollutants and TACs, which are discussed in the following subsections.

Localized Significance Thresholds

SCAQMD's *Final LST Methodology* was developed to be used as a tool to analyze localized air quality impacts associated with project-level development. If the calculated emissions for construction or operation of the Project are below the LST emission levels found on the LST mass rate look-up tables (Appendix C of *Final LST Methodology;* SCAQMD 2009) and no potentially significant impacts to air quality are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant for air quality. The analysis assumes the main construction activities would occur adjacent to sensitive receptors. The allowable emissions for the Project utilizes the 25 meter receptor distance[15], and the Project Site is in SRA 2 (Northwest Coastal LA County). Table 4.2-8 summarizes the Project's maximum localized daily construction emissions. As

[13] Note that the Doheny School previously identified in the Original DEIR was permanently closed and the Le Petit Gan International Preschool West Hollywood took occupancy of the building since publication of the Original DEIR.
[14] These distances are from property line to property line.
[15] See the *Localized Significance* discussion within the *SCAQMD Significance Thresholds* subsection of Section 4.1.3, *Impact Analysis,* for an explanation of why this distance was chosen.

shown therein, localized construction emissions would not exceed SCAQMD LST thresholds. Therefore, localized criteria pollutant emissions impacts from Project construction would be less than significant.

Table 4.2-8 Project LST Construction and Operational Emissions

	Maximum Daily Emissions (pounds per day)			
Year	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Construction Onsite Emissions	18	32	<1	<1
SCAQMD LST	103	680	4	3
Threshold Exceeded?	**No**	**No**	**No**	**No**
Maximum Operational Onsite Emissions	3	6	<1	<1
SCAQMD LST	103	680	1	1
Threshold Exceeded?	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum onsite emissions are the highest emissions that would occur on the Project Site from onsite sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Source: CalEEMod worksheets are provided in Appendix B, see Table 3.1 – 3.17 "Construction Emissions Details" emissions. Highest of Summer and Winter emissions results are shown for all emissions.

Toxic Air Contaminants

Construction

An HRA was prepared for the construction activities associated with Project. Construction-related activities would result in temporary DPM exhaust emissions from off-road, heavy-duty diesel equipment for demolition, site preparation, grading, building construction, and other construction activities. Results of the analysis were compared to SCAQMD thresholds for a cancer risk threshold of 10 in one million persons, and a chronic HI significance threshold of 1.0. DPM is not associated with acute health risks (OEHHA 2023); therefore, acute risk was not evaluated in this construction HRA.

The maximum unmitigated risk from construction of the Project was identified for all sensitive (residential and school) receptors near the Project Site boundary as detailed in Appendix B of this RDEIR. The maximum off-site residential cancer risk would be 8.8 in one million at 9080 Shoreham Drive, which is northeast of the Project Site across West Sunset Boulevard. The maximum off-site school cancer risk would be 0.27 in one million at the Le Petit Gan International Preschool West Hollywood located approximately 670 feet southeast of the Project Site. The maximum off-site residential chronic non-cancer risk would have a HI of 0.033 at the residential sensitive receptor northeast of the Project Site (at 9080 Shoreham Drive). The maximum off-site school chronic non-cancer risk would have an HI of 0.001 at the Le Petit Gan International Preschool West Hollywood. The Project would not exceed SCAQMD's 10 in one million cancer risk thresholds and HI of 1. Therefore, construction TAC impacts would be less than significant.

Operations

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic

emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). CARB guidelines recommend siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. Office and restaurant land uses are not considered land uses that generate substantial TAC emissions based on reviewing the air toxic sources listed in CARB's guidelines. The expected hazardous TACs generated on site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. However, nearby sensitive receptors would be intermittently exposed to TAC emissions from the proposed 200-kW diesel emergency generator. The emergency generator would operate for up to approximately two hours during each routine testing session, and up to a total of 200 hours annually during emergency situations, such as power outages. The City would be required to obtain a permit from SCAQMD for the emergency generator and meet the requisite standards for protection of human health. Therefore, Project operation would not expose sensitive receptors to substantial localized TAC concentrations, and impacts would be less than significant.

CO Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. The SCAB has been in attainment of federal CO standards since 2007, and most air quality monitoring stations no longer report CO levels (SCAQMD 2017). The nearest monitoring station from the Project Site that monitors CO measured a maximum 1-hour and 8-hour CO concentrations of 1.8 ppm and 1.6 ppm, respectively, in 2024 (SCAQMD 2025). These concentrations are well below the respective 1-hour and 8-hour standards of 20 ppm and 9 ppm. In addition, typical development projects, such as the Project, do not emit the levels of CO necessary to result in a localized hot spot.

As an example, a detailed CO analysis was conducted during the preparation of the SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB that are expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate 405, approximately 3.9 miles southwest of the Project Site. The concentration of CO at this intersection was 4.6 ppm, which is well below the State and federal standards. The Wilshire Boulevard/Veteran Avenue intersection had an ADT of approximately 100,000 vehicles per day at the time of the study (SCAQMD 2003a).

The Project would produce an estimated 1,172 ADT, as shown in Appendix O.2. The highest ADT along Monterey Road and Huntington Drive intersection is significantly below the 100,000 ADT at the Wilshire Boulevard/Veteran Avenue intersection studied by SCAQMD in the 2003 AQMP, which found that CO emissions at that intersection were below the federal standards. Therefore, the Project would not expose sensitive receptors to substantial CO pollutant concentrations and impacts would be less than significant.

Threshold d:	Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 THE PROJECT WOULD NOT GENERATE ODORS ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE DURING CONSTRUCTION OR OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary and would cease upon completion, and odors disperse with distance. In addition, Project construction would be required to comply with SCAQMD Rule 402, which specifies that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Overall, Project construction would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people and impacts would be less than significant.

With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project's office and restaurant land uses are not identified on this list. In addition, solid waste generated by the proposed on-site uses would be properly stored in lidded dumpsters and/or trash cans and collected by a contracted waste hauler, ensuring that on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, the Project's operational activity would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people and impacts would be less than significant.

4.2.4 Cumulative Impacts

The geographic scope for the cumulative air quality impact analysis is the SCAB. Because the SCAB is designated a nonattainment area for the federal and State one-hour and eight-hour ozone standards, State PM_{10} standards, federal 24-hour $PM_{2.5}$ standard, and federal and State annual $PM_{2.5}$ standard, there is an existing adverse effect in the SCAB relative to these pollutants and additional, unplanned growth in the area has the potential to exacerbate the pollution and hinder the achievement of the NAAQS and CAAQS within the SCAB.

This cumulative impact analysis is based on the SCAQMDs recommendations included in their *CEQA Air Quality Handbook* and *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD 1993 and 2003b). Individual projects under the SCAQMD's jurisdiction would cause a cumulatively considerable increase in emissions for which the SCAB is in non-attainment if the individual project exceeds the SCAQMD's recommended thresholds.

a. Cumulative Impact AQ-1

Air pollution is largely a cumulative issue, and SCAQMD has provided guidance about cumulative impacts. According to SCAQMD, if a project is inconsistent with the 2022 AQMP, it would be considered to result in a cumulatively adverse air quality impact. As described above under Impact AQ-1, the Project would be consistent with the 2022 AQMP. Growth generated by the Project would not result in an exceedance of the 2022 AQMP growth assumptions. Additionally, the Project's daily emissions during construction and operation would not exceed SCAQMD regional thresholds.

Therefore, the Project's contribution to cumulative air quality impacts due to a conflict with the 2022 AQMP would not be cumulatively considerable.

b. Cumulative Impact AQ-2

SCAQMD's Appendix D of the *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD 2003b), recommends that project-specific air quality impacts be used to determine if a project's contribution to cumulative air quality impacts would be significant. As discussed above, the Project is consistent with the SCAQMD 2022 AQMP. Additionally, the construction and operation of the Project would not exceed regional significance thresholds. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment.

c. Cumulative Impact AQ-3

Cumulative projects could expose sensitive receptors to cancer risks exceeding the SCAQMD 10 in one million thresholds. However, similar to the Project, cumulative projects would be required to comply with SCAQMD regulations and thresholds to reduce the potential for significant impacts to sensitive receptors. Currently, no other nearby projects have been identified that would contribute to cumulative TAC emissions in the Project vicinity. Additionally, SCAQMD has not established cumulative significance threshold for TAC. As described under Impact AQ-3, construction LST and TAC from the Project would be less than significant. Therefore, the Project's contribution to cumulative TAC impacts would not be cumulatively considerable.

d. Cumulative Impact AQ-4

Construction of cumulative projects would result in construction equipment-related odors; however, the temporary nature of construction result in less than significant cumulative odor impacts. Operation of cumulative projects could adversely affect sensitive receptors from odor emissions if cumulative projects include typical odor-producing land uses. The Project is not identified as an odor producing facility nor are there developments near the Project Site or included in the cumulative development list that would produce significant odors. Therefore, cumulative odors from the surrounding area from construction and operations would not combine at the same receptors, and the Project's cumulative contribution to cumulative odor emission impacts would not be considerable.

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4.3 Greenhouse Gas Emissions

This section evaluates the potential impacts of greenhouse gas (GHG) emissions associated with the Project. Construction and operational GHG emissions associated with the Project are calculated using the California Emissions Estimator Model (CalEEMod), (Appendix C).[1]

The Project's consistency with applicable GHG reduction plans is also analyzed. The information in this section is based in part on applicable regional and local plans relevant to GHG emissions, such as the City of West Hollywood Climate Action and Adaptation Plan (CAAP), the State's 2022 Scoping Plan; and the Southern California Association of Governments' (SCAG's) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

4.3.1 Setting

Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and

[1] CalEEMod was run using the latest version available at the time the NOP was issued, which incorporates the 2019 Energy Code. The 2025 Energy Code will take effect January 1, 2026, and the Project would comply with the most updated codes when building plans are submitted. Therefore, the RDEIR conservatively estimates GHG emissions.

land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees °C cooler (World Meteorological Organization 2025). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels. Specifically, 34,522 MMT of CO_2e, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent, international transport contributed two percent, and land-use changes and forestry contributed to two percent of the total global GHG emissions (United States Environmental Protection Agency [USEPA] 2025a).

United States Emissions Inventory

United States GHG emissions were 6,341.2 MMT of CO_2e in 2022 or 5,487 MMT CO_2e after accounting for sequestration. Emissions decreased by 3.1 percent from 2021 to 2022. Between 2021 and 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. In 2022, the energy sector (including transportation and industrial) accounted for 76.4 percent of nationwide GHG emissions while agriculture, commercial, and residential sections accounted for approximately 23.6 percent of nationwide GHG emissions (USEPA 2024b).

California Emissions Inventory

Based on California Air Resource Board's (CARB) California Greenhouse Gas Inventory for 2000-2022, California produced 371.1 MMT of CO_2e in 2022, which is 9.3 MMT of CO_2e lower than 2021 levels. The major source of GHG emissions in California is the transportation sector, which comprises 37.7 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 19.6 percent of the state's GHG emissions while electric power accounts for approximately 16.1 percent (California Air Resources Board [CARB] 2024). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as

compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e. The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. The year 2024 was the warmest year since global records began in 1850 at 1.29°C (2.32°F) above the 20th century average of 13.9°C (57.0°F). This value is 0.10°C (0.18°F) more than the previous record set last year. The 10 warmest years in the 175-year record have all occurred during the last decade (2015–2024) (National Oceanic and Atmospheric Administration 2025). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land Surface Air Temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. *California's Fourth Climate Change Assessment* (California Natural Resource Agency 2019) includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally specific climate change case studies. However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows that includes some of the potential effects that climate change could generate in California.

Air Quality and Wildfires

Scientists project that annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century. Higher temperatures are conducive to air pollution formation and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (California Natural Resource Agency 2019). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. With increasing temperatures, shifting weather patterns, longer dry seasons, and more dry fuel loads, the frequency of large wildfires and area burned is expected to increase (California Natural Resources Agency 2021).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). For example, the winter of 2022-2023 had severe storms and flooding from increased rainfall and snowmelt, which the California Department of Water Resources identified as "the latest example that California's climate is becoming more extreme" (California Department of Water Resources 2023). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (California Natural Resource Agency 2019). The Sierra Nevada Mountains snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (California Natural Resource Agency 2019).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (California Natural Resource Agency 2019). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2024, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2025). Global mean sea levels in 2013 were about 0.23 meter higher than those of 1880 (National Oceanic and Atmospheric Administration 2023). Sea levels are rising faster now than in the previous two millennia, and the rise will likely accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (California Natural Resource Agency 2019). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

In 2023, California's agricultural exports totaled $22.4 billion in value, representing a decrease of 5.9 percent compared to the previous year. California's agricultural exports have trended upward over the past 10 years with total export value increasing by 4.0 percent since 2014. California's share of

total U.S. agricultural exports for 2023 was 12.8 percent, up from 12.2 percent in 2022. (California Department of Food and Agriculture 2025). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (California Natural Resource Agency 2019). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions due to higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; California Natural Resource Agency 2019).

4.3.2 Regulatory Setting

a. Federal Regulations

The United States Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the USEPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act (CAA). The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that established the GHG permitting thresholds that determine when CAA permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the United States Supreme Court held the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

b. State Regulations

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles, and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). In October 2023, CARB launched a new effort to consider potential amendments to the Advanced Clean Cars II regulations, including updates to the tailpipe greenhouse gas emission standard and limited revisions to the LEV and Zero-emission Vehicle regulations. The Advanced Clean Cars II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles (CARB 2025).

On June 12, 2025, House Joint Resolution 88 was signed into law nullifying the U.S. EPA's notice which granted CARB's request for the regulation. Therefore, enforcement of the Advanced Clean Cars II regulation remains uncertain at this time. The future of implementation remains unclear as California pursues legal action against the resolution (H.J. Ress.88, 2025).

California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

CARB approved the 2013 Scoping Plan update in May 2014. The plan update defined CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On

December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2017 Scoping Plan also puts increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Assembly Bill 1279

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the State will achieve net zero GHG emissions as soon as possible, but no later than 2045, and will achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (CARB 2022). The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused paths to achieve California's climate target. The 2022 update includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045; and takes an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 update, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's NWL and using a variety of mechanical approaches" (CARB 2022). Specifically, the 2022 update includes the following:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs
- Integrates equity and protection for California's most impacted communities as driving principles throughout the document

- Incorporates the contribution of NWL to the State's GHG emissions, as well as their role in achieving carbon neutrality
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture
- Evaluates the substantial health and economic benefits of taking action
- Identifies key implementation actions to ensure success

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 update includes emissions and carbon sequestration in NWL and explores how NWL contributes to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed into law by the Governor Schwarzenegger in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in per capita GHG emissions from passenger vehicles by 2020[2] and a 19 percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

[2] SCAG met the 2020 GHG emissions reduction target, as described in the 2024-2050 RTP/SCS.

SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

On September 10, 2018, former Governor Brown issued Executive Order (EO) B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Building Standards Codes

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below. The 2025 Title 24 Standards will take effect on January 1, 2026, and the Project would be designed to comply with these building standards.

Part 6 – Building Energy Efficiency Standards/Energy Code

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2022 Title 24 standards are the applicable building energy efficiency standards for the Project because they became effective on January 1, 2023.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective on January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards applicable to air quality require:

- Minimum 20 percent reduction in indoor water use relative to specified baseline levels;[3]
- Waste Reduction:
  - Minimum 65 percent non-hazardous construction/demolition waste diverted from landfills;
  - Non-residential: Reuse and/or recycling of 100 percent of trees, stumps, rocks, and associated vegetation soils resulting from primary land clearing;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards; and
- Electric Vehicle (EV) Charging for New Construction:[4]
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations;
  - Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, and retail stores with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.4.1 of the California Green Building Standards;
- Bicycle Parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility.

[3] Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

[4] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2022 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

- Shade Trees (Non-Residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
  - Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

The voluntary standards include:

- Deconstruct existing buildings and reuse applicable salvaged materials;
- Tier I:
  - Stricter energy efficiency requirements;
  - Stricter water conservation requirements for specific fixtures;
  - minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;
  - Minimum 20 percent permeable paving;
  - Minimum 20 percent cement reduction;
- Tier II:
  - Stricter energy efficiency requirements,
  - Stricter water conservation requirements for specific fixtures;
  - Minimum 75 percent reduction in construction waste with third-party verification,
  - Minimum 15 percent recycled content for building materials;
  - Minimum 30 percent permeable paving;
  - Minimum 25 percent cement reduction.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

Executive Order N-79-20

On September 23, 2020, Governor Newsom issued EO N-79-20, which established the following new statewide goals:

- All new passenger cars and trucks sold in-state to be zero-emission by 2035
- All medium- and heavy-duty vehicles in the state to be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks
- All off-road vehicles and equipment to be zero-emission by 2035 where feasible

EO N-79-20 directs CARB, the Governor's Office of Business and Economic Development, the California Energy Commission, the California Department of Transportation, and other State agencies to take steps toward drafting regulations and strategies and leveraging agency resources toward achieving these goals.

Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

Adopted on September 16, 2022, SB 1020 creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all State agencies by 2035. This bill shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling.

c. Local Regulations

2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2024-2050 RTP/SCS and includes four core goals focused on mobility, communities, environment and economy. By 2050, the population of the region is projected in Connect SoCal 2024 to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent. However, growth is not expected to be uniform across the region's counties or cities. Connect SoCal 2024 would increase transportation efficiency and deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel-time reliability, air quality, economic productivity, environmental justice and transportation asset condition. The SCS outlines growth strategies for land use and transportation and helps reduce the State's GHG emissions from cars and light-duty trucks (SCAG 2024).

City of West Hollywood Climate Action and Adaptation Plan

The City of West Hollywood approved its Climate Action and Adaptation Plan (CAAP) in December 2021, which outlines the City's intended path to dramatically reduce greenhouse gas emissions and adapt to the impacts of a changing climate, while centering equity and quality of life outcomes for the West Hollywood community. This plan will enable the City to achieve carbon neutrality by the year 2035 and maintain net-negative emissions thereafter. The following strategies and measures are applicable to the Project (City of West Hollywood 2021).

Energy

EN-2: Promote, support, and expand the use of local solar power and battery energy storage.

EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction.

EN-4: Enhance community energy resilience.

EN-5: Promote electric vehicle readiness.

Transportation, Mobility and the Public Realm

TM-1: Increase sustainable mode share (walking, bicycling, transit).

TM-2: Promote zero and near zero carbon transportation.

TM-3: Rethink curb space and parking assets.

TM-4: Implement transportation demand management (TDM) solutions.

Zero Waste

ZW-1: Improve source reduction and recycling.

ZW-2: Divert organic waste.

Natural Environmental

NE-1: Protect and expand the urban tree canopy.

NE-3: Improve water management.

NE-4: Encourage green infrastructure

4.3.3 Impact Analysis

a. Significance Thresholds

To determine whether a project would result in a significant impact related to GHG emissions, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]). Per *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with a previously approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. Therefore, *CEQA Guidelines* Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions.

Section 15064.4 of the *CEQA Guidelines* recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, which include the following: the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold;

and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHG emissions.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold is supported by substantial evidence. See *CEQA Guidelines* Section 15064.7(c). The City of West Hollywood has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Neither Southern California Air Quality Management District (SCAQMD), Governor's Office of Land Use and Climate Innovation (formerly known as the Governor's Office of Planning and Research), CARB, California Air Pollution Control Officers Association (CAPCOA), nor any other State or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project.

In the absence of any adopted or accepted numeric threshold, the significance of the Project's GHG emissions are evaluated in terms of consistency with *CEQA Guidelines* Sections 15064.4(b) and 15064(h)(3) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, the significance of the Project's potential impacts regarding GHG emissions and climate change is evaluated based on the threshold of significance established by the City, namely whether the Project complies with applicable plans, polices, regulations and requirements adopted to implement a statewide, regional or local plan for the purposes of reducing GHG emissions and mitigating the effects of climate change. For this Project, as a land use development project, the most applicable adopted regulatory plans to reduce GHG emissions and mitigate the effects of climate change are the City of West Hollywood CAAP, the 2022 Scoping Plan, and the SCAG's 2024 RTP/SCS. The GHG emissions from the construction and operation of the Project are provided for informational purposes.

b. Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential effects of the Project related to GHG emissions. The analysis focuses on CO_2, CH_4, and N_2O because these comprise 98 percent of all GHG emissions by volume and are the GHG emissions the Project would emit in the largest quantities (IPCC 2014). Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (i.e., CO_2e). Minimal amounts of other GHGs (such as chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the total.

Construction

During construction, the Project would generate GHG emissions primarily from the use of internal combustion engines to power on-site equipment as well as off-site transportation of workers and materials. Further detail for the assumptions included in the modeling of GHG emissions is provided in Section 4.2, *Air Quality*. Because construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. In accordance with SCAQMD's recommendation, GHG emissions from construction of the Project were amortized over a 30-year period and added to annual operational emissions to determine the Project's total annual GHG emissions (SCAQMD 2008).

Operation

Operation of the Project would begin in 2027. GHG emissions associated with Project construction and operational activity were calculated using CalEEMod (see Appendix C for calculations). Details for mobile source and area source inputs included in the modeling of GHG emissions are provided in Section 4.2, *Air Quality.* Additional sources detailed in Section 4.2, *Air Quality,* which contribute to the release of GHG emissions include the following:

Energy Sources

Energy source emissions are based on CalEEMod default assumptions for the proposed land use types in each buildout scenario. Emissions from energy use include electricity. Since the Project would utilize all-electric appliances, natural gas is not considered in this analysis. The Project would generate GHG emissions from electricity use associated with household appliances and lighting for the proposed office, restaurant, and parking land uses. The Project would be served by Southern California Edison (SCE). Specific energy intensity factors (i.e., the amount of CO_2e per megawatt-hour) from SCE are used in the calculation of GHG emissions.

The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. CalEEMod assumption values for office, restaurant, and parking lot fixtures were used in the analysis.

Waste Sources

GHG emissions from waste generation were also calculated in CalEEMod and are based on CARB's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CARB 2010). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by CalRecycle.

Water and Wastewater Sources

The analysis used CalEEMod default water and wastewater consumption rates to determine GHG emissions from water and wastewater sources. CalEEMod calculated GHG emissions from water and wastewater usage based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California and the average values for northern and southern California.

b. Project Impacts

Threshold a:	Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold b:	Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 ALTHOUGH CONSTRUCTION AND OPERATION OF THE PROJECT WOULD GENERATE GHG EMISSIONS, THE PROJECT WOULD INCORPORATE FEATURES THAT WOULD REDUCE GHG EMISSIONS AND ALIGN WITH THE GOALS OF THE APPLICABLE PLANS, POLICIES, AND REGULATIONS RELATED TO GHG EMISSIONS. THEREFORE, THE PROJECT WOULD NOT CONFLICT WITH THE APPLICABLE PLANS, POLICIES, AND REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed under Section 4.3.3, *Significance Thresholds*, plans and policies have been adopted to reduce GHG emissions in the Southern California region, including the City of West Hollywood CAAP,

State's 2022 Scoping Plan, and the SCAG's 2024-2050 RTP/SCS. The Project's consistency with these plans and applicable policies is discussed in the following subsections. As discussed herein, the Project would not conflict with plans and policies aimed at reducing GHG emissions. GHG emissions are provided for informational purposes following the consistency analysis.

Consistency with Applicable Plans and Policies

City of West Hollywood Climate Action and Adaptation Plan

In December 2021, the City of West Hollywood updated its CAAP to significantly reduce greenhouse gas emissions, build resilience to climate change, and prioritize equity and quality of life for the entire West Hollywood community. To mitigate carbon emissions and adapt to a changing climate, the City of West Hollywood intends to move forward with 20 climate measures and 60 sub-actions, organized into five categories, which will enable West Hollywood to achieve carbon neutrality by 2035 and become a more climate resilient city. The CAAP is consistent with the State's GHG reduction targets established under AB 32 and SB 32 and positions the City to achieve the State's carbon neutrality goal ahead of the 2045 target. Table 4.3-1 summarizes the Project's consistency with the CAAP. As discussed therein and with implementation of the Project Design Features (PDFs) GHG-PDF-1 through GHG-PDF-10, the Project would be consistent with the actions and measures contained in the local GHG reduction plan.

2022 Scoping Plan

The principal State plan to monitor and regulate GHGs is AB 32, the California Global Warming Solutions Act of 2006, which was followed by SB 32. The quantitative goal of AB 32 was to reduce GHG emissions to 1990 levels by 2020. According to CARB, California achieved its 2020 GHG emission reduction target in 2016. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the Project include the following:

- Reducing fossil fuel use, energy demand, and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

The 2022 Scoping Plan Appendix D, Local Actions, provides suggestions (also referred to as "priority area") for prioritizing the various types of mitigation, starting with on-site GHG-reducing design features and mitigation measures, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging.

Table 4.3-1 Project Consistency with City of West Hollywood Climate Action and Adaptation Plan

Action	Project Consistency
Energy	
EN-2: Promote, support, and expand the use of local solar power and battery energy storage.	**Consistent.** With implementation of GHG-PDF-4 the Project would include installation of photovoltaic panels and supporting the expansion of local renewable energy generation.
EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction.	**Consistent.** With the implementation of GHG-PDF-1 through GHG-PDF-10, the Project would include a number of sustainability features including site location[5]; natural heating and cooling features; use of recycled foundation materials; construction of an all-electric building; water-efficient plumbing fixtures; improved insulation; installation of photovoltaic panels and other energy efficiency measures; improvements to indoor air quality; use of efficient and durable roofing materials and exterior finishes; use of efficient interior finishes; and installation of EV chargers and infrastructure. These PDFs support the decarbonization of new building stock and reflect best practices in sustainable and resilient construction.
EN-4: Enhance community energy resilience. Sub-action: Implement heat preparation and response measures such as passive cooling design, cool/green roofs, weatherization, and low-energy active cooling systems; additional shade canopies and shade trees; and cooling centers, pools, drinking water fountains and filling stations.	**Consistent.** With the implementation of GHG-PDF-2 and GHG-PDF-3, the Project would include natural heating and cooling features and improved insulation for the building. These PDFs enhance community energy resilience.
EN-5: Promote electric vehicle readiness.	**Consistent.** With the implementation of GHG-PDF-10, the Project would provide 20 parking spaces equipped with 40-amp EV chargers, along with an additional 20 spaces that would be 40-amp EV charging capable. The Project shall install a ChargePoint voltage regulator system to 'divide' the electrical current between EV charging stations in the building. This would not increase electric demand initially proposed for the Project, nor require an additional transformer. This PDF would facilitate future electric vehicle infrastructure deployment and support the reduction of GHG emissions associated with transportation.
Transportation, Mobility and the Public Realm	
TM-1: Increase sustainable mode share (Walking, Bicycling, Transit)	**Consistent.** The Project includes 16 bicycle parking spaces; and the Project Site is in a high-quality transit area with several bus stops within 0.25 miles of the site. Therefore, the Project would increase alternative modes of transportation.
TM-2: Promote zero and near zero carbon transportation	**Consistent.** With the implementation of GHG PDF-10, the Project would provide 20 parking spaces equipped with 40-amp EV chargers, 20 parking spaces that would be 40-amp EV charging capable. The Project would include 16 bicycle parking spaces. Therefore, the Project would potentially reduce the reliance of single motor vehicles and promote zero or near zero carbon transportation.

[5] The Project Site is previously developed and located in a developed urban area with existing road and public utilities infrastructure.

Action	Project Consistency
TM-4: Implement transportation demand management (TDM) solutions	**Consistent.** The Project is required to adhere to the West Hollywood Municipal Code § 10.16, TDM Requirements, and would create a TDM plan that consists of at least eight traffic trip reduction strategies, to include bikeshare and car share programs.
Zero Waste	
ZW-1: Improve source reduction and recycling.	**Consistent.** With the implementation of GHG-PDF-8, the Project would include the use of recycled foundation materials. The Project design includes storage areas for recyclable materials and organic wastes.
ZW-2: Divert organic waste	**Consistent**. The Project design includes storage areas for organic wastes.
Natural Environment	
NE-1: Protect and expand the urban tree canopy	**Consistent.** Project landscaping would include eight trees, five Chinese Pistache and three Brisbane box. The Project design would protect two existing street trees and involve removal of two street trees.
NE-3: Improve water management	**Consistent.** With the implementation of GHG-PDF-7, the Project design includes water-efficient plumbing fixtures and low- and very-low water use plants.
NE-4: Encourage green infrastructure	**Consistent.** With the implementation of GHG-PDF-1 through GHG-PDF-10, the Project would include a number of sustainability features including natural heating and cooling features; use of recycled foundation materials; construction of an all-electric building; water-efficient plumbing fixtures; improved insulation; installation of photovoltaic panels; and EV charger and infrastructure. Additionally, the Project would exceed 2022 Title 24 building standards by 4.2 percent.

Source: City of West Hollywood 2021

The 2022 Scoping Plans' Transportation Electrication priority area focuses on projects that would provide EV charging infrastructure that meets the most ambitious volutnary standard. With the implementation of GHG PDF-10, the Project would provide 20 parking spaces equipped with 40-amp EV chargers and 20 parking spaces that would be 40-amp EV charging capable. Additionally, the Project would install a ChargePoint voltage regulator system to 'divide' the electrical current between EV charging stations in the Project building. This would not increase electrical demand initially proposed for the Project, nor require an additional transformer. Therefore, the Project would be consistent with the 2022 CALGreen voluntary Tier 2 EV infrastructure standards for nonresidential land uses and aligned with the goals of this priority area.

The 2022 Scoping Plan's VMT Reduction priority area focuses on projects that are infill sites, located near existing urban uses, do not result in the loss or conversion of natural and working lands, and are in proximity to existing transit stops. The Project Site would utilize existing utilities onsite and is within 0.25-miles of Los Angeles County Metropolitan Transprtation Authority's Metro Bus Line 2 along Sunset Boulevard. The Project Site is not considered natural working land and would be consistent with this priority area.

The 2022 Scoping Plan's Building Decarbonization priority area focuses on projects that utilize all-electric appliances without any natural gas connections, use of propane, or other fossil fuels for space heating, water heating, or indoor cooking. With the implmenetation of PDFs, the Project would not utilize natural gas onsite and would install all-electric appliances. Additionally, the Project would install a photovoltaic system in accordance with the Building Efficiency Energy Standards and GHG-PDF-4. Therefore, the Project would not conflict with the 2022 Scoping Plan.

SCAG's 2024-2050 RTP/SCS

On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). The SCAG 2024-2050 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars in the SCAG region by 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018.[6] The 2024-2050 RTP/SCS focuses on four core categories: mobility, communities, environment, and economy. In addition, the SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The Project's consistency with the 2024-2050 RTP/SCS is discussed in Table 4.3-2. As shown therein, the Project would not conflict with the 2024-2050 RTP/SCS.

Table 4.3-2 Project Consistency with Applicable SCAG RTP/SCS Strategies

Reduction Strategy	Project Consistency
Mobility/Communities ▪ Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit). ▪ Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	**Consistent.** The Project would be an infill site with existing utility infrastructure. The Project provide connectively with several residential neighborhoods and commercial areas. The Project Site would be within a quarter of a mile of the existing transit bus stops along Sunset Boulevard, which could potentially promote walking and biking near the Project Site. Additionally, the Project

[6] Eight percent emissions reduction from 2005 levels by 2020 target was achieved (SCAG 2024).

Reduction Strategy	Project Consistency
▪ Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities ▪ Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.	Site would install 16 bicycle parking spaces. Therefore, the Project would be consistent with SCAG 2024-2050 RTP/SCS mobility and community strategies.
Environment ▪ Support communities across the region to advance innovative sustainable development practices. ▪ Support investments that reduce hazardous air pollutants and greenhouse gas emissions. ▪ Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable. ▪ Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment.	**Consistent.** With the implementation of GHG-PDF-1, the Project would achieve energy efficiency levels approximately 4.2 percent above the baseline requirements of Title 24, Part 6 of the 2022 California Energy Code. Additionally, implementing GHG-PDF-2 through GHG-PDF-10 would involve the installation of an on-site photovoltaic system, the exclusion of natural gas infrastructure, the use of all-electric appliances throughout the Project, and the installation of20 parking spaces equipped with 40-amp EV chargers and 20 parking spaces that would be 40-amp EV charging capable spaces. A ChargePoint voltage regulator system would be installed to 'divide' the electrical current between EV charging stations in the building. This would not increase electric demand initially proposed for the Project, nor require an additional transformer. Furthermore, GHG-PDF-7 would include all plumbing fixtures with low-flow fixtures meeting U.S. Green Building Council fixture flow rates. Therefore, the Project aligns with SCAG's 2024-2050 RTP environmental policies and strategies aimed at reducing GHG emissions.

Source: SCAG 2024

With the incorporation of PDFs related to energy efficiency, climate change and water and solid waste conservation, the Project would be consistent with climate measures in the West Hollywood CAAP, which aims to achieve net carbon neutrality by 2035. This aligns with the State's long-term goal of carbon neutrality by 2045. Therefore, GHG impacts associated with the Project would be less than significant.

GHG Emissions for Informational Purposes

GHG emissions below are provided for informational purposes. Construction of the Project would generate temporary GHG emissions primarily from the operation of construction equipment on-site as well as from vehicles transporting construction workers to and from the Project Site and heavy trucks to transport building materials. Project construction would begin in February 2026. As shown in Table 4.3-3, construction of the Project would generate an estimated total of 1,215 MT CO_2e. Amortized over a 30-year period per SCAQMD guidance, construction of the Project would generate an estimated 41 MT CO_2e per year.

Table 4.3-3 Estimated Construction Emissions of Greenhouse Gases

Construction	Project Emissions MT CO_2e
2026	748
2027	467
Total	**1,215**
Amortized over 30 Years	**41**

MT CO_2e = metric tons of carbon dioxide equivalent

Source: Appendix C, CalEEMod worksheets, see Table 2.2 "Construction Emissions by Year, Unmitigated" annual emissions.

Operation of the Project would generate GHG emissions associated with mobile sources, area sources, energy and water usage, and wastewater and solid waste generation, and stationary sources. Table 4.3-4 combines the estimated construction and operational GHG emissions associated with development of the Project. As shown therein, annual emissions would be approximately 1,240 MT of CO_2e per year.

Table 4.3-4 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**41**
Operational	**1,199**
Mobile	783
Area	2
Energy	324
Water	25
Waste	42
Refrigerant	2
Stationary	20
Total	**1,240**

MT CO_2e = metric tons of carbon dioxide equivalent

[1] Amortized construction related GHG emissions over 30 years

Source: Appendix C, CalEEMod worksheets, see Table 2.5 "Operational Emissions by Sector, Unmitigated" annual emissions.

As noted above, GHG impacts are determined through analysis of consistency with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, and GHG emissions shown in Table 4.3-3 and Table 4.3-4 are provided for informational purposes. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, therefore, impacts would be less than significant.

4.3.4 Cumulative Impacts

GHG emissions and climate change are, by definition, cumulative impacts. Although GHG emissions have worldwide repercussions, the contribution of the Project to cumulative impacts is addressed considering the goals for reducing statewide emissions. Therefore, the geographic scope for considering cumulative impacts related to GHG emissions is the State of California.

Statewide GHG emissions are considered an existing significant cumulative impact. As such, the State has established the following statewide emissions reductions targets:

- By 2020, reduce GHG emissions to 1990 levels
- By 2030, reduce GHG emissions to 40 percent below 1990 levels
- By 2045, to achieve carbon neutrality

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the Project. In the absence of an adopted numeric threshold for the City of West Hollywood, the significance of the Project's GHG emissions is evaluated on the consistency with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis provided GHG emissions for informational purposes. For this Project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the City of West Hollywood CAAP, the 2022 Scoping Plan, and the SCAG's 2024-2050 RTP/SCS.

As discussed under Impact GHG-1, the City CAAP developed measures and sub-actions that will enable West Hollywood to achieve carbon neutrality by 2035, which is consistent with the State's long-term goal of carbon neutrality by 2045. The Project would include PDFs such as natural heating and cooling features; use of recycled foundation materials; construction of an all-electric building; water-efficient plumbing fixtures; improved insulation; and installation of photovoltaic panels that would reduce GHG emissions. Additionally, the Project would utilize existing utilities onsite and install 20 parking spaces equipped with 40-amp EV chargers and 20 parking spaces that would be 40-amp EV charging capable. The Project Site would provide 16 bicycle parking spaces and is located within 0.25 miles of the Los Angeles County Metropolitan Transportation Authority's Metro Bus Line 2 along Sunset Boulevard. This proximity to public transit and active transportation infrastructure would support the use of alternative travel modes, thereby contributing to a reduction in vehicle miles traveled and GHG emissions. As discussed in the impact analysis, the Project would be consistent with the 2022 Scoping Plan and 2024-2050 RTP/SCS. Thus, based on the *CEQA* Guidelines for determining the significance of GHG emissions, while cumulative impacts are considered significant, the Project's contribution to cumulative GHG emissions impacts would not be cumulatively considerable.

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4.4 Energy

4.4.1 Introduction

The following discussion focuses on Project impacts to energy use. The information in this section is based on the generation of electricity and burning of fuels accounted for in Section 4.2, *Air Quality*, and Section 4.3, *Greenhouse Gas Emissions* of the Recirculated Draft Environmental Impact Report (RDEIR). The California Emissions Estimator Model (CalEEMod) was used to estimate emissions resulting from the Project.[1] Construction and operational energy consumption were modeled based on the size and proposed land use type. The CalEEMod results are provided in Appendix C of this RDEIR.

4.4.2 Regulatory Framework

Federal

Corporate Average Fuel Economy (CAFE) Standards

Enacted in 1975, the Corporate Average Fuel Economy (CAFE) Standards aim to reduce energy consumption by improving the fuel economy of cars and light trucks. The Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) regulates CAFE standards. NHTSA sets and enforces CAFE standards under the Energy Policy and Conservation Act (EPCA) and the U.S. Environmental Protection Agency (USEPA) calculates average fuel economy levels and sets GHG standards under the Clean Air Act (US Department of Transportation, 2020).

Energy Independence and Security Act

Enacted in 2007, the Energy Independence and Security Act (EISA) reinforces energy reduction goals by aiming to increase the production of clean renewable fuels, improve efficiency of products, and promote research on GHG capture options. Additionally, the EISA aims to protect American consumers by moving the United States toward increased energy independence and security. Three primary provisions of the EISA are (1) the CAFE standards, (2) the Renewable Fuel Standard, and (3) the appliance/lighting efficiency standards (USEPA, 2020).

State

California Code of Regulations (CCR) Title 24, Part 6

CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration of and possible incorporation of new energy efficiency technologies and methods.

[1] CalEEMod was run using the latest version available at the time the NOP was issued, which incorporates the 2019 Energy Code. The 2025 Energy Code will take effect January 1, 2026, and the Project would comply with the most updated Codes when building plans are submitted. Therefore, the RDEIR conservatively estimates energy consumption.

The Title 24 standards are updated on a three-year schedule, with the most current 2022 standards went into effect on January 1, 2023. The Title 24 standards require the installation of insulated hot water pipes, improved window performance, improved wall insulation, and mandatory duct sealing. Title 24 also requires roofs to be constructed to be solar ready, with cool roofing shingles, a minimum one-inch air space between roof material and roof deck, and a minimum of R-22 roof/ceiling insulation. All lighting is required to be high efficiency and daylight sensors and motion sensors are required for outdoor lighting, bathrooms, utility rooms and other spaces. The forced air systems are required to limit leakage to 5% or less and all heat pump systems must be equipped with liquid line filter driers. Nonresidential buildings under the 2022 standards benefit from enhanced lighting efficiency, ventilation improvements, and expanded solar and battery storage requirements. The 2025 Title 24 Standards will take effect on January 1, 2026, and the project would be designed to comply with these building standards.

California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (Title 24) was developed in response to continued efforts to reduce energy, water, and material consumption. The most current version is the 2022 California Green Building Standards Code (CALGreen), which became effective on January 1, 2023.[2] One focus of CCR Title 24, Part 11 is clean air vehicles and increasing requirements for electric vehicle (EV) charging infrastructure, which would reduce pollutant emissions. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Applicable mandatory standards include:

- Minimum 20 percent reduction in indoor water use relative to specified baseline levels;[3]
- Waste Reduction:
  - Minimum 65 percent non-hazardous construction/demolition waste diverted from landfills;
  - Non-residential and multi-family dwellings with five or more units: Provide readily accessible areas identified for the depositing, storage and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastic, organic waste, and metals; and/or
  - Non-residential: Reuse and/or recycling of 100 percent of trees, stumps, rocks, and associated vegetation soils resulting from primary land clearing;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards; and

[2] The 2025 Title 24 Standards will take effect on January 1, 2026, and the project would be designed to comply with these building standards.

[3] Like the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

- EV Charging for New Construction:[4]
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations;
- Bicycle Parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility.
- Shade Trees (Non-Residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
  - Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

<u>Voluntary</u> standards include:

- Deconstruct existing buildings and reuse applicable salvaged materials;
- Tier I:
  - Stricter energy efficiency requirements;
  - Stricter water conservation requirements for specific fixtures;
  - minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;

[4] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2022 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

  - Minimum 20 percent permeable paving;
  - Minimum 20 percent cement reduction;

- Tier II:
  - Stricter energy efficiency requirements,
  - Stricter water conservation requirements for specific fixtures;
  - Minimum 75 percent reduction in construction waste with third-party verification,
  - Minimum 15 percent recycled content for building materials;
  - Minimum 30 percent permeable paving;
  - Minimum 25 percent cement reduction.

California Renewable Portfolio Standard

Senate Bill 1078 (SB 1078), enacted in 2002, required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017. In 2006, Senate Bill 107 (SB 107) changed the target date to 2010. Executive Order S-14-08, signed on November 2008, changed the State's Renewable Energy Standard to 33% renewable energy by 2020. The executive order was codified by Senate Bill X1-2. Finally, Executive Order S-21-09 directed the CARB to adopt regulations by July 31, 2010, to enforce S-14-08.

Senate Bill 350

Senate Bill 350 (SB 350), the Clean Energy and Pollution Reduction Act, was enacted in 2015 and includes aggressive clean energy goals to address climate change. The law creates new clean energy, clean air, and GHG reduction goals for 2030. SB 350 adopts a GHG reduction target of 40 percent below 1990 levels by setting targets for efficiency and renewable electricity, primarily in the energy and transportation sectors. The SB 350 is part of a larger statewide effort to reduce GHG emissions to 80 percent below 1990 levels by 2050. To implement SB 350, the Energy Commission is working closely alongside the California Public Utilities Commission (CPUC) and the CARB. Additionally, SB 350 tasks states agencies with studying and identifying barriers to, and opportunities for, utilizing clean, renewable energy in low-income communities (California Energy Commission, 2020a).

Senate Bill 100

Senate Bill 100 (SB 100), officially known as "The 100 Percent Clean Energy Act of 2018," requires that public utilities, including electric corporations, must design renewable energy portfolios so that all retail sales are generated from renewable and zero-carbon energy sources by 2045. SB 100 updates the state's Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of California's electricity is renewable (California Energy Commission [CEC] 2021).

Assembly Bill 32

In 2006, the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires the CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and best management practices that are technologically feasible and cost effective.

CARB's AB 32 Scoping Plan, which was adopted in 2009, proposes a variety of measures including strengthening energy efficiency and building standards; targeted fees on water and energy use; a market-based cap-and-trade system; achieving a 33percent renewable energy mix; and a fee regulation to fund the program. The 2014 update to the Scoping Plan identifies strategies moving beyond the 2020 targets to 2050. The cap and trade program established under Scoping Plan sets a statewide limit on sources responsible for 85 percent of California's GHG emissions and has established a market for long-term investment in energy efficiency and cleaner fuels since 2012.

Senate Bill 32

On September 8, 2016, the governor signed SB 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100. The 2017 Scoping Plan also puts increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Assembly Bill 1279

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the State will achieve net zero GHG emissions as soon as possible, but no later than 2045, and will achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan (2022 Update) in November 2022 (CARB 2022). The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused paths to achieve California's climate target. The 2022 Update includes policies to help achieve a significant reduction in fossil fuel combustion; further reductions in short-lived climate pollutants; support for sustainable development; increased action on natural and working lands (NWL) to reduce emissions and sequester carbon; and the capture and storage of carbon.

The 2022 Update also assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030 (as called for in SB 32 and laid out in the 2017 Scoping Plan); addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045; and takes an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Update, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the

state's NWL and using a variety of mechanical approaches" (CARB 2022). Specifically, the 2022 update includes the following:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs
- Integrates equity and protection for California's most impacted communities as driving principles throughout the document
- Incorporates the contribution of NWL to the State's GHG emissions, as well as their role in achieving carbon neutrality
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture
- Evaluates the substantial health and economic benefits of taking action
- Identifies key implementation actions to ensure success

In addition to reducing emissions from the transportation, energy, and industrial sectors, the 2022 Update includes emissions and carbon sequestration in NWL and explores how NWL contributes to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Also, Cap-and-Trade regulation continues to be a large component in overall reduction scheme for near-term emissions to meet the accelerated 2030 reduction target. Also, every sector of the economy will have to initiate transition in this decade, to meet r GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), adopted in 2009 and implemented in 2011, was crafted pursuant to California AB 32 and Executive Order S-01-07. The LCFS is one of nine action measures to reduce California's GHG emissions and emissions that cause climate change and smog-forming pollutants by improving vehicle technology, improving fuel efficiency, and increasing alternative transportation options. The LCFSs encourage production and use of clean low-carbon fuels across the state and establish a ten percent reduction in carbon intensity of fuel products by 2020. Moreover, providers of transportation fuels in the state must meet LCFS carbon intensity standards for each annual compliance period. The CARB administers the LCFS (California Air Resources Board, 2020a).

California Advanced Clean Cars Regulation

The Advanced Clean Cars regulation was adopted in 2012 by the CARB to reduce emissions from passenger vehicles. Regulations were developed in coordination with the USEPA and NHTSA and aim to control criteria pollutants and GHG emissions. The program aims to promote the development of

environmentally advanced cars that promote high performance while also reducing smog-forming pollution and GHG emissions (California Air Resources Board [CARB] 2020b). The program requires a greater number of zero-emissions vehicle (ZEV) models for the years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the low-emissions vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. Implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered (CARB 2025a).

On June 12, 2025, House Joint Resolution 88 was signed into law nullifying the U.S. EPA's notice which granted CARB's request for the regulation.[1] Therefore, enforcement of the Advanced Clean Cars II regulation remains uncertain at this time. The future of implementation remains unclear as California pursues legal action against the resolution (Congress.gov 2025).

Sustainable Communities and Climate Protection Act of 2008- SB 375

SB 375 promotes the State's climate goals by helping reduce GHG emissions through coordinated transportation, housing, and land use planning. Under SB 375, the CARB creates regional targets for GHG reductions from passenger vehicles for 2020 and 2035 for the 18 metropolitan planning regions. The targets were last updated in 2018. In accordance with SB 375, each MPO must develop a Sustainable Communities Strategy (SCS) that would allow the region to meet the CARB's targets. Additionally, SB 375 provides incentives to encourage sustainable development, including CEQA exemptions (CARB 2020d). In March 2018, CARB updated the SB 375 targets for the Southern California Association of Governments (SCAG) region to require an eight percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions (CARB 2025b).

Assembly Bill 758

Assembly Bill 758 (AB 758), adopted in 2009, requires the CEC to develop a comprehensive program to achieve greater energy savings in the state's residential and nonresidential buildings. AB 758 requires publicly-owned electric utilities to implement energy efficiency programs that encourage energy savings in GHG reductions and report its implementation status to the state. Programs may include, but are not limited to, upgrading infrastructure or providing consumers with information on energy usage (California Legislative Information, 2020c).

Senate Bill 1389

Senate Bill 1389 (SB 1389), adopted in 2002, requires the CEC to develop an integrated energy policy report on or before November 2003, and every two years thereafter. The bill requires the commission to conduct assessments and forecasts to evaluate energy supply, production, distribution, demand and price (California Legislative Information, 2020d). The most recent report was completed in February 2024 and includes, "an integrated assessment of major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors." The Integrated Energy Policy Report contains recommendations on energy usage policies such as decarbonizing buildings, energy efficiency savings, increasing flexibility in the electrical system to integrate more renewable energy and improve energy reliability, and reducing gasoline and diesel use in cars and trucks by up to 50 percent (CEC 2024a).

California Environmental Quality Act

Appendix F of the CEQA Guidelines, titled Energy Conservation, identifies State goals of conserving energy and presents means of achieving the goal, including decreased per capita energy consumption, decreased reliance on natural gas, and increasing reliance on renewable energy. To ensure that energy implications are considered when assessing proposed projects, CEQA requires that EIRs discuss potential energy impacts with an emphasis on reducing inefficient consumption of energy. Appendix F of the CEQA Guidelines details the way impacts to energy must be addressed in various parts of an EIR, including, but not limited to, the project description, mitigation measures, and alternatives.

Assembly Bill 1109

California Assembly Bill 1109 (AB 1109), also known as the Lighting Efficiency and Toxics Reduction Act, requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by (1) at least 50 percent from 2007 levels for indoor residential lighting, and (2) at least 25 percent from 2007 levels for indoor commercial and all outdoor lighting by 2018.

Regional

SCAG

2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2024-2050 RTP/SCS and includes four core goals focused on mobility, communities, environment and economy. According to Connect SoCal 2024, by 2050, the population of the SCAG region is projected to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent (SCAG 2024). However, growth is not expected to be uniformly increased throughout the State and will vary throughout the various SCAG sub-regions. Connect SoCal 2024 would increase transportation efficiency and deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel-time reliability, air quality, economic productivity, environmental justice and transportation asset condition. The SCS outlines growth strategies for land use and transportation and helps reduce the State's GHG emissions from cars and light-duty trucks (SCAG 2024).

Local

City of West Hollywood Climate Action and Adaptation Plan

The City of West Hollywood approved its Climate Action Plan (CAAP) in 2021. The CAAP enables the City to achieve carbon neutrality by 2035 and maintain net-negative carbon emissions thereafter (City of West Hollywood, 2021, p. 6).

The CAAP lays out measures and sub-actions grouped in five categories described below, intended to enable the City to reach carbon neutrality by 2035 (City of West Hollywood, 2021, p. 64):

- **Climate Leadership and Governance.** The intent of measures in this category is for the City to lead by example to reduce emissions and adopt climate-responsive practices, work with partners across Southern California, and bolster community resilience at large.
- **Energy.** Climate measures in the Energy category detail how the city – including its renters who make up a majority of the population – will tackle the transition to a future without fossil fuels, which requires both existing buildings and new construction to become fully electric and incorporate EV charging.
- **Transportation, Mobility and the Public Realm.** Measures in this category include increasing sustainable mode share (walking, bicycling, transit); promoting zero and near zero carbon transportation; rethinking curb space and parking assets; and implementing transportation demand management (TDM) solutions.
- **Zero Waste.** Climate measures in the Zero Waste category include the City's efforts to reduce waste at the source and divert as much as possible from landfills.
- **Natural Environment.** Climate measures in the Natural Environment category include greening efforts that expand the tree canopy, add vegetation, and restore soils, which can occur along public rights-of-way, private yards and roofs, alleyways, and other interstitial spaces.

West Hollywood General Plan

The West Hollywood General Plan Infrastructure, Resources, and Conservation Element sets forth the following goal and policies:

Goal IRC-4: Reduce the total and per capita amount of energy used in the City.

Intent: To reduce the harmful environmental effects of energy consumption through efficiency, conservation, and the renewable production of energy.

Policy IRC-4.1: Promote building energy efficiency improvements through strategies that may include the following:

- Retrofits of existing buildings with energy efficient technology
- 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

Policy IRC-4.2: Promote land use patterns and mobility decisions that result in reduced vehicle trips and therefore reduced overall energy use from the transportation sector.

Policy IRC-4.3: Maximize 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, or 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

> **Policy IRC-4.4:** As feasible, coordinate 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.

City of West Hollywood Municipal Code

City of West Hollywood Municipal Code Section G-12.040 sets forth energy conservation requirements for commercial and public-use buildings such as the following applicable to the Project:

> **Standard D - Energy Conservation**
>
> **4:** To reduce electrical energy consumption, the following should be considered: a) increase window area to the point where yearly energy consumption balances the savings achieved by using natural light; b) locate windows high to increase reflection and reduce glare; and c) provide exterior natural and artificial shading devices or building configuration and detailing that eliminate direct sunlight but reflect light to building interiors.

4.4.3 Existing Conditions

Electricity

Most of the electricity generated in California is from natural gas-fired power plants, which generated approximately 44 percent of the State's total electricity in 2023. In 2023, California produced 281,140 gigawatt per hour (GWh) of electricity with 215,623 GWh (77 percent) of the electricity generated in-state and the other 33 percent difference was imported electricity. (CEC 2025a). Los Angeles County consumed approximately 62,908 GWh of electricity in 2023 from residential and non-residential uses (CEC 2025b). With a population of 9,834,286 in 2023 (Department of Finance [DOF] 2025), the County's 2023 per capita electricity consumption was approximately 6,397 kilowatt hours (kWh), or approximately 24 million Btu.

Southern California Edison (SCE) provides electricity to residents and businesses in West Hollywood. Total electricity consumption in SCE's service area is forecast to be 107,369 GWh in 2025 and 118,430 GWh in 2030 (CEC 2024b); one GWh is equivalent to one million kilowatt-hours. Sources of SCE electricity in 2023, the latest year for which data are available, were 37.6 percent renewable including 19.8 percent solar and 11.7 percent wind; 4.5 percent large hydroelectric; 20.0 percent natural gas; 9.1 percent nuclear; and 28.8 percent unspecified (SCE, 2025).

Transportation Energy

Transportation accounted for approximately 43 percent of California's total energy consumption in 2023 (U.S. Energy Information Administration [EIA] 2025a). In 2023, California consumed 13.6 billion gallons of gasoline and 2.9 billion gallons of diesel fuel (California Department of Tax and Fee Administration 2025a and 2025b). Petroleum-based fuels currently account for 86 percent of California's transportation energy sources (EIA 2025b). However, the State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gas (GHG) emissions from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. In 2023, gasoline and diesel sales in Los Angeles County were approximately 3.0 billion gallons and 290 million gallons, respectively (CEC 2024c).

4.4.4 Methodology

Construction

Construction energy use was assessed based on applicant-provided information, as detailed in Section 4.2, Air Quality, of the RDEIR. Project construction is anticipated to start in 2026 and would include on- and off-road construction vehicles. If, for various site planning, financial, or other reasons, the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner burning standard construction equipment and vehicle fleet mix would be expected in the future. This is because the In-Use Off-Road Diesel Fueled Fleets regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Construction activities can vary substantially, day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. These construction energy estimates present a "worst case scenario" that assumes each piece of construction equipment would operate eight hours per day. Therefore, construction energy estimates would be conservative.

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix, load factors, hours per day of use, and number of days of use provided in the CalEEMod construction output files included in Appendix C of this RDEIR. Total horsepower was multiplied by the hours of use, days of use, load factor, and Compression-Ignition Engine Brake-Specific Fuel Consumption factor provided by the USEPA to estimate fuel usage (USEPA 2021). Fuel consumption from construction on-road worker trips and vendor and delivery/haul trucks was calculated using the trip rates and distances provided in the emissions modeling worksheets and CalEEMod construction output files. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using the United States Department of Transportation (USDOT) National Transportation Statistics (USDOT 2023a and 2023b). CalEEMod assumed trip lengths were used for worker commutes and vendor and haul truck trips. Refer to RDEIR Appendix C for project-specific detailed energy calculations.

Construction equipment, vendor trucks, and haul trucks would primarily be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment would be diesel-fueled. In addition, it is assumed the haul trucks would be diesel-fueled.

Operation

CalEEMod was used to estimate energy source emissions resulting from the Project. Operational energy consumption are based on CalEEMod default assumptions for the proposed land use types in each buildout scenario. The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. CalEEMod assumption values for general office, restaurant, and parking lot fixtures were used in the analysis. The Project-specific CalEEMod results provided in Appendix C of this RDEIR,

show the values used in this analysis to determine the approximate anticipated energy consumption during construction and approximate consumption during operation of the Project.

4.4.5 Environmental Impact Analysis

Thresholds of Significance

Appendix G of the CEQA Guidelines specifies two criteria for evaluating the significance of energy resources; a project would result in impacts related to energy resources if it would:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation;
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Analysis of Project Impacts

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

IMPACT EN-1 PROJECT COMPLIANCE WITH ENERGY REGULATORY REQUIREMENTS AND THE APPLICATION OF ENERGY USE EFFICIENCIES WOULD RESULT IN A LESS THAN SIGNIFICANT IMPACT RELATED TO THE WASTEFUL, INEFFICIENT, AND UNNECESSARY CONSUMPTION OF ENERGY.

Construction

The following forms of energy would be expended during construction:

- Diesel fuel for off-road equipment (gallons).
- Electricity to deliver water for use in dust control (kWh).
- Motor vehicle fuel for worker commuting, materials delivery and waste disposal (gallons).

During construction, the Project would consume fuels associated with the onsite use of equipment, off-site hauling of materials and supplies, and worker transportation. The CCR requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location.[5] Compliance with this regulation would prevent unnecessary consumption of energy from use of diesel fuel during construction. Natural gas is not consumed during Project construction. It was therefore omitted from this analysis. In the interest of both environmental awareness and cost efficiency, the analysis assumes conservatively, construction contractors would not necessarily utilize fuel in a manner that is wasteful or unnecessary.

Off-Road Equipment Fuel Use

The number of horsepower-hours of each off-road equipment type was calculated using equipment characteristics and scheduling generated by CalEEMod for the air quality and greenhouse gas

[5] California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.

emissions analyses (see Section 4.2 and Section 4.7 of the RDEIR). As shown below in Table 4.4-1, off-road equipment is estimated to use approximately 80,301 gallons of diesel fuel.

Table 4.4-1 Construction Energy Use

Category	Units	Quantity
Off-road Equipment	Gallons, diesel fuel	80,301
Workers	Gallons, gasoline	36,482
Vendors	Gallons, diesel fuel	9,435
Haulers	Gallons, diesel fuel	15,227
Electricity for Water Conveyance	Kilowatt-hours	741

Transportation Fuel Use

The fuel consumption that is necessary to power off-road equipment is based on the quantity and type of equipment that would be used for each construction phase, the duration of use each day, the total construction period duration, and the hourly construction equipment fuel consumption factors that are made available by the OFFROAD model. On-road equipment includes haul trucks and vendor trucks, which would be powered by diesel fuel, as well as vehicles associated with construction worker commuter trips, which are assumed to be powered by gasoline. The fuel consumption for on-road trucks is based on fuel consumption information from the USDOT's National Transportation Statistics (USDOT 2021). The fuel demand for construction worker commuter trips is based on the estimated number of workers for each phase of construction and the average distance that workers travel from CalEEMod, as well as on the emissions factors from the EMFAC model. As shown in Table 4.4-1, Project construction activities would result in the consumption of approximately 104,963 gallons of diesel fuel and 36,482 gallons of gasoline.

Electricity Use

During Project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. A small amount of electricity would be used for power drills and other equipment during construction. This analysis assumes that an onsite portable diesel-fueled generator would supply the electricity for lighting equipment used during Project construction. Lighting equipment would comply with Title 24 standards/requirements (such as wattage limitations). This compliance would ensure that electricity use during Project construction would not result in the wasteful, inefficient, or unnecessary use of energy.

Considering the depth of the proposed excavation for underground parking—the finished floor for the bottom (B03) level of the parking structure would be 36 feet below ground surface, and shoring to be used after excavation—large amounts of water would not be used for dust control, as such water use would cause erosion down the face of the excavation and create difficult (muddy) working conditions in the bottom of the excavation. Convey water needed for water trucks would be used two times per day for the duration of demolition, site preparation, and grading construction. Based on this, site watering activities would consume approximately 243,589 gallons of water, which corresponds with 741 kWh of electricity. Therefore, the Project would be within SCE's annual forecasted energy to serve load of 102,905 GWh in 2027 (CEC 2024b). Over the course

of the construction period, the Project would consume a minimal amount of electricity. Electricity for water conveyance is estimated above in Table 4.4-1.

Operations

The following forms of energy would be expended during Project operation:

- Electricity for the proposed office and commercial uses, street lighting, space and water heating, and conveyance and treatment of water.
- Gasoline for on-road motor vehicles.

Note that the Project would be an all-electric building, and thus natural gas is omitted from the analysis of operational energy impacts. Energy would be consumed during Project operation for lighting, electric appliance use, space and water heating, water conveyance, landscaping maintenance, solid waste disposal, and vehicle trips from visitors, delivery vehicles and employees. The digital canvas is estimated to use approximately 463,550 kWh annually, or approximately 23 percent of total electricity consumption. The former automotive dealership onsite closed in May 2021; however, no existing electricity use is deducted from Project use.[6] Project operational electricity use per year is estimated below in Table 4.4-2.

Table 4.4-2 Project Operational Electricity Use

Land Use	Square Feet	Electricity Use, kWh/yr
Office	45,107[1]	984,115
Quality Restaurant	7,892	476,033
Parking	Not applicable	126,985
Digital canvas	Not applicable	463,550
Total	Not applicable	**2,050,683**

[1] Approximately 8,187 square feet of the building is allocated to restrooms and mechanical rooms, which are categorized under office space in this analysis.

Sources: Appendix C

The Project would generate additional demand for electricity from SCE. As estimated by CalEEMod, the Project's total electricity demand would be approximately 2,050,683 kilowatt hours per year (kWh/year) or 2.05 GWh per year. SCE supplies more than 76,840 GWh per year of electricity to customers (CEC 2025b). The Project's total electricity demand would be less than one hundredth of a percent of SCE's projected total energy to serve load of 102,905 GWh in 2027 (CEC 2024b). Therefore, the Project would not result in a substantial increase in electricity demand compared to available supply. In addition, the Project would be required to comply with the applicable portions of the CEC and CALGreen Code, which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations and continued energy efficient programs implemented by SCE, the Project's potential impacts regarding wasteful or inefficient use of electricity would be less than significant.

[6] Any lighting for safety and security on the site of the closed auto dealership would be minor and thus is not analyzed here.

As shown in the Operational Fuel Use worksheet provided in Appendix C of this RDEIR regarding vehicle use, the Project would generate approximately 2,225,168 VMT annually, 94 percent of which would comprise light-duty vehicles with a gross vehicle weight rating (GVWR) of up to 8,500 pounds, and approximately six percent of which would comprise heavy-duty vehicles (GVWR > 8,500 pound). For this analysis, light-duty vehicles are considered gasoline-powered and heavy-duty vehicles are considered diesel-fueled. After complete Project build-out, operation of the Project would generate approximately 2,094,415 annual VMT with gasoline-fueled vehicles, and approximately 130,707 annual VMT with diesel-fueled vehicles. Based on the State's projected fleet fuel mileage for 2024, after complete Project build-out, annual operation of the Project would require transportation fuels of approximately 97,738 gallons of gasoline, and approximately 16,545 gallons of diesel fuel. Diesel usage is anticipated during operation due to the default fleet mix derived from EMFAC2021 v1.0.1, which includes diesel vehicles reflecting the operational year fleet mix-average for the selected analysis scale, such as County or air basin. The anticipated transportation activity would be insignificant compared to Los Angeles County's total energy consumption. As described in Section 4.4.3, *Transportation Energy,* the Project's gasoline consumption and diesel fuel consumption represent less than one hundredth of a percent of Los Angeles County's total gasoline and diesel sales. Therefore, the Project's potential to result in impacts regarding wasteful or inefficient use of transportation fuels would be less than significant.

The design of the Project is required to comply with all standards set in the latest iteration of the California Building Standards Code (CCR Title 24). California's CALGreen standards (CCR Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, per CALGreen, all plumbing fixtures used for the Project would be high-efficiency fixtures, which would minimize the potential for the inefficient or wasteful consumption of energy related to water and wastewater. As described in Section 4.3, *Greenhouse Gas Emissions,* the Project would incorporate the GHG- Project Design Feature (PDF)-1, which would design the Project's building features to exceed the applicable energy efficiency standards by approximately 4.2 percent.

In summary, the Project would consume energy by electricity use and for transportation fuels. Through the application of existing regulatory requirements , federal, State, and local regulation, the Project would aim to reduce ,where feasible, the inefficient, wasteful, and unnecessary consumption of energy. Additionally, the Project's electrical consumption would be negligible compared to the overall energy demand for SCE services in the Project area. Therefore, Project compliance with energy regulatory requirements and its application of energy use efficiencies the Project would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.

Threshold b:	Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

IMPACT EN-2 THE PROJECT WOULD BE CONSISTENT WITH THE TRANSPORTATION VMT TARGETS SET FORTH BY THE STATE AND THEREFORE, WOULD NOT CONFLICT WITH NOR OBSTRUCT A STATE OR LOCAL PLAN FOR TRANSPORTATION-RELATED ENERGY CONSUMPTION. IMPACTS RELATED TO CONFLICTS WITH EXISTING RENEWABLE ENERGY PLANS WOULD BE LESS THAN SIGNIFICANT.

The City of Hollywood CAAP contains measures intended to increase energy efficiency and expand the use of renewable energy in West Hollywood. As described above, the Project would comply with CALGreen, and the state's Building Energy Efficiency Standards. The Project would comply with measures EN-5 and NE-4, which promote EV readiness and green infrastructure. With the implementation of GHG PDF-10, as detailed in Section 4.3, *Greenhouse Gas Emissions,* the Project would allocate 20 spaces with a 40-amp EV chargers and an additional 20 EV charging capable spaces. Additionally, with the implementation of GHG-PDF-1 through GHG-PDF-9, the Project would further reduce energy impacts by including a number of sustainability features including site location[7]; natural heating and cooling features; use of recycled foundation materials; construction of an all-electric building; water-efficient plumbing fixtures; improved insulation; installation of photovoltaic panels and other energy efficiency measures; improvements to indoor air quality; use of efficient and durable roofing materials and exterior finishes; and use of efficient interior finishes. These PDFs would be consistent with the CAAP's measure EN-2, EN-3, and EN-4, support the expansion of solar power, decarbonizing new buildings, and enhance new construction energy resilience.

Regarding transportation-related energy consumption, the Project would not conflict with the goals of SCAG's 2024–2050 RTP/SCS, which incorporates VMT targets established by SB 375. SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of that approach, the 2024–2050 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT. With the implementation of GHG PDF-10, the Project would include 20 spaces with 40-amp EV chargers and an additional 20 EV charging capable spaces. In addition, the Project would be consistent with the transportation-related energy use policies emphasized in the 2024–2050 RTP/SCS by being in an area well-served by existing and planned public transit. In addition, the Project is within half a mile of existing residential and commercial land uses and transit, which could reduce reliance of motor vehicle use by the Project's commercial tenants. Because the Project is consistent with the transportation VMT targets set forth by the State, the Project would not conflict with nor obstruct a state or local plan for transportation-related energy consumption and impacts related to conflicts with existing renewable energy plans would be less than significant.

The Project incorporates multiple design features consistent with the 2022 Title 24 Standards. It would exceed the 2022 Title 24, Part 6 energy-efficiency requirements by 4.2 percent in accordance with GHG PDF-1 and would install photovoltaic panels consistent with the 2022 Building Energy Efficiency Standards and GHG PDF-4. With implementation of GHG PDF-10, the Project would provide 20 parking spaces equipped with 40-amp EV chargers and 20 additional spaces that are 40-amp EV-capable. The Project would also install a ChargePoint voltage regulator system to distribute electrical load among EV charging stations. Therefore, the Project would comply with the

[7] The Project Site is previously developed and located in a developed urban area with existing road and public utilities infrastructure.

2022 CALGreen voluntary Tier 2 EV infrastructure standards for nonresidential uses. The Project would also provide 16 bicycle parking spaces, consistent with the 2022 CALGreen requirements for nonresidential development. Therefore, the Project would be consistent with the energy measures in the 2022 Title 24 Standards.

4.4.6 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (CEQA Guidelines Section 15065[a][3]). The geographic scope for analysis of the Project and associated cumulative impacts of energy consumption is, Los Angeles County. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is at the county level.

Cumulative development would increase demand for energy resources; however, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. As described above under Impact E-1, with the implementation of GHG PDF-1, the Project would be built to exceed the California Building Energy Efficiency Standards and CALGreen by 4.2 percent. The Project's electricity consumption would be less than one hundredth of a percent of all projected low-demand supply in SCE in 2027. In addition, the Project would result in a net increase of approximately 97,738 gallons of gasoline, and approximately 16,545 gallons of diesel use for transportation fuels per year. The Project's transportation fuel usage would represent a small percentage of total fuel consumption within Los Angeles County. Additionally, the Project would reduce VMT and associated transportation fuel use, by its location to high quality public transit options and improvements to the pedestrian environment. Therefore, the Project's use of energy during construction or operation would not be considered a cumulatively considerable contributor due to wasteful, inefficient, or unnecessary consumption of energy resources.

It is expected that cumulative transportation fuel usage resulting from the Project and cumulative projects, including projects throughout the county, would be required to be consistent with projections regarding future transportation fuel usage and supply. Additionally, the Project would implement PDF-GHG-4, GHG PDF-9, and GHG PDF-10, detailed in Section 4.3, *Greenhouse Gas Emissions*, which would install photovoltaic systems, 20 spaces with a 40-amp EV chargers and an additional 20 EV charging capable spaces, and all-electric appliances onsite. Additionally, the Project would receive electricity procured in compliance with SB 1020, which promotes the use of renewable energy. Furthermore, the Project would be consistent with the City of West Hollywood CAAP and Connect SoCal 2024. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy efficiency and the Project's operation impacts related to energy would not be cumulatively considerable.

4.4.7 Mitigation Measures

Project-level impacts related to energy use have been determined to be less than significant. The Project's cumulative impacts related to energy use and policy consistency was not considerable and no mitigation measures are required for the Project.

4.4.8 Level of Significance after Mitigation

Impacts related to energy use would be less than significant without mitigation.

4.4.9 References

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4.5 Noise

This section documents the existing noise environment at the Project Site, presents applicable standards used to evaluate potential noise impacts, and analyzes potential noise impacts resulting from construction and operation of the Project.

4.5.1 Setting

a. Overview of Sound

Sound is a vibration that transmits through a medium (such as a gas, liquid, or solid) created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired, and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as the doubling of vehicle traffic volumes, results in a noise level increase of 3 dB, whereas dividing the energy in half results in a 3 dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy (i.e., the perception of sound is not linear in terms of dBA or in terms of sound energy). Two sources, each containing the same sound energy, do not "sound twice as loud" as one source. It is widely accepted that the average healthy human ear can detect changes (either increases or decreases) of 3 dBA, which is recognized as being barely perceptible to most people. Similarly, a change of 5 dBA is readily perceptible and a change of 10 dBA sounds twice (or half) as loud (Crocker 2007).

The level and frequency content of sound change as it travels from the source to a receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which sound is reduced with distance depends on factors, such as the type of source (e.g., a point or line source), the path the sound travels, site conditions, and the presence of intervening structures or other obstacles. Noise from a point source (e.g., construction equipment, industrial machinery, ventilation units) typically is reduced at a rate of 6 dBA per each doubling of distance away from the source. Noise from a line source (e.g., roadway, pipeline, railroad) typically is reduced at a rate of 3 dBA per doubling of distance away from the source (Caltrans 2013). The propagation of noise is also affected by the absorption characteristics of the ground: a hard site, such as a parking lot or smooth body of water, provides no absorption/attenuation and the changes in noise levels with distance result simply from the geometric spreading of the source (i.e., 3 or 6 dBA reduction per doubling of distance for a point source or line source, respectively). Conversely, a soft site, such as soft dirt, grass, or scattered bushes and trees, may provide additional absorption/attenuation, potentially reducing noise levels an additional 1.5 dBA per doubling of distance away from the source (Caltrans 2013). Noise levels may also be reduced by intervening structures. The amount of reduction provided by the "shielding" of these features depends on the

size of the structure/s, the location of the structure/s relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight between a noise source and receiver will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). The presence of building structures can substantially reduce noise levels from the exterior to the interior as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

Descriptors

The impact of noise is not a function of loudness alone. The time of day at which noise occurs and the duration of the noise are also important factors when considering potential noise impacts. Most noise that lasts for more than a few seconds is variable in its amplitude (i.e., the noise level continuously fluctuates over time). Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent continuous sound level (L_{eq}), which considers both duration and the sound power level of the source. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. The extent of sound level fluctuations over a period of time is characterized by the minimum (L_{min}) and maximum (L_{max}) sound pressure levels, which represent the lowest and highest sound pressure levels measured during a given period, respectively.

The sound level that is exceeded "n" percent of time during a given sample period in the percentile noise level is represented as L_n. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum), and this is often known as the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

Noise that occurs at night tends to be more disturbing than noise that occurs during the day. Community noise is usually measured using the Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) hours. It is also measured using the Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring during evening hours (7:00 p.m. to 10:00 p.m.) and a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) (Caltrans 2013). Noise levels described by the L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night.

b. Overview of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a vibrating source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body ranges between less than 1 Hz to 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as that from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern of vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV), or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018). Vibration significance ranges from approximately 50 VdB (the typical background vibration-velocity level) to 100 VdB, the general threshold where minor damage can occur in fragile buildings (FTA 2018).

c. Sensitive Receptors

Noise exposure standards for various types of land uses reflect the varying noise sensitivities associated with those uses. The City of West Hollywood General Plan 2035 Noise Element defines the following as noise-sensitive receptors: residences, schools, hospitals, religious facilities, theaters, concert halls, libraries, offices, and parks (City of West Hollywood 2011).

The nearest sensitive receptors in the vicinity of the Project Site include a multi-family residential property located approximately 20 feet south of the Project Site boundary and a single-family residential property located approximately 95 feet south of the Project Site boundary. Other nearby sensitive receptors include additional single-family and multi-family residences located farther to the south, single-family residences located to the north across from Sunset Boulevard, and the Sierra Towers Condominium Complex located to the northwest.

d. Existing Noise Environment

The most prominent source of noise in the vicinity of the Project Site is vehicle traffic on nearby roadways (primarily Sunset Boulevard). To characterize the ambient noise environment in the Project vicinity, two short-term (15-minute) and two long-term (24-hour) noise level measurements were conducted on November 3 through 4, 2025. A SoftdB Piccolo-II, ANSI Type 2 integrating sound level meter was used to conduct the measurements. The sound level meter was field calibrated before and after the measurements. All measurements were made at five feet above the ground and at least six feet away from reflective surfaces. Short-term measurement 1 (ST-1) was conducted along Cory Avenue, near the southwestern corner of the Project Site boundary and ST-2 was conducted along Sunset Boulevard, near the northeastern corner of the Project Site boundary. Long-

term measurement 1 (LT-1) was conducted along Cory Avenue, near the southwestern corner of the Project Site boundary and LT-2 was conducted along Sunset Boulevard at the Sierra Towers Condominium complex located northwest of the Project Site. Approximate noise measurement locations are shown in Figure 4.5-1. Short-term measurement results are shown in Table 4.5-1 and long-term measurement results are shown in Table 4.5-2 and Table 4.5-3.

Table 4.5-1 Short-Term Noise Measurement Results

Measurement Location	Location Description	Sample Times[1]	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST-1	Along Cory Avenue, near southwestern corner of Project boundary	6:52 – 7:07 a.m.	Approximately 35 feet east of centerline of Cory Avenue	64.3	46.6	80.9
ST-2	Along Sunset Boulevard, near northeastern corner of Project boundary	6:25 – 6:40 a.m.	Approximately 55 feet south of centerline of Sunset Boulevard	69.2	49.7	82.9

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{min} = minimum sound level, L_{max} = maximum sound level

[1] All short-term noise measurement locations were conducted on November 3, 2025.

See Figure 4.5-1 for approximate noise measurement locations; see Appendix X for short-term noise measurement data.

Table 4.5-2 Long-Term Noise Measurement Results (LT-1)

Sample Time	dBA L_{eq}	Sample Time	dBA L_{eq}
LT-1, Southwestern Corner of Project Site – November 3 – 4, 2025			
6:00 a.m.	64.0	6:00 p.m.	63.4
7:00 a.m.	66.0	7:00 p.m.	62.9
8:00 a.m.	65.9	8:00 p.m.	63.1
9:00 a.m.	67.8	9:00 p.m.	62.1
10:00 a.m.	66.1	10:00 p.m.	63.0
11:00 a.m.	64.5	11:00 p.m.	59.6
12:00 p.m.	65.0	12:00 a.m.	64.4
1:00 p.m.	64.7	1:00 a.m.	51.2
2:00 p.m.	64.7	2:00 a.m.	53.5
3:00 p.m.	64.0	3:00 a.m.	49.9
4:00 p.m.	62.5	4:00 a.m.	54.4
5:00 p.m.	66.7	5:00 a.m.	66.6
24-hour Noise Level (dBA CNEL)			**68.6**
24-hour Noise Level (dBA L_{dn})			**68.3**

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; CNEL = Community Noise Equivalent Level; L_{dn} = day-night average sound level

See Figure 4.5-1 for approximate noise measurement locations; see Appendix D for graphical long-term noise measurement data.

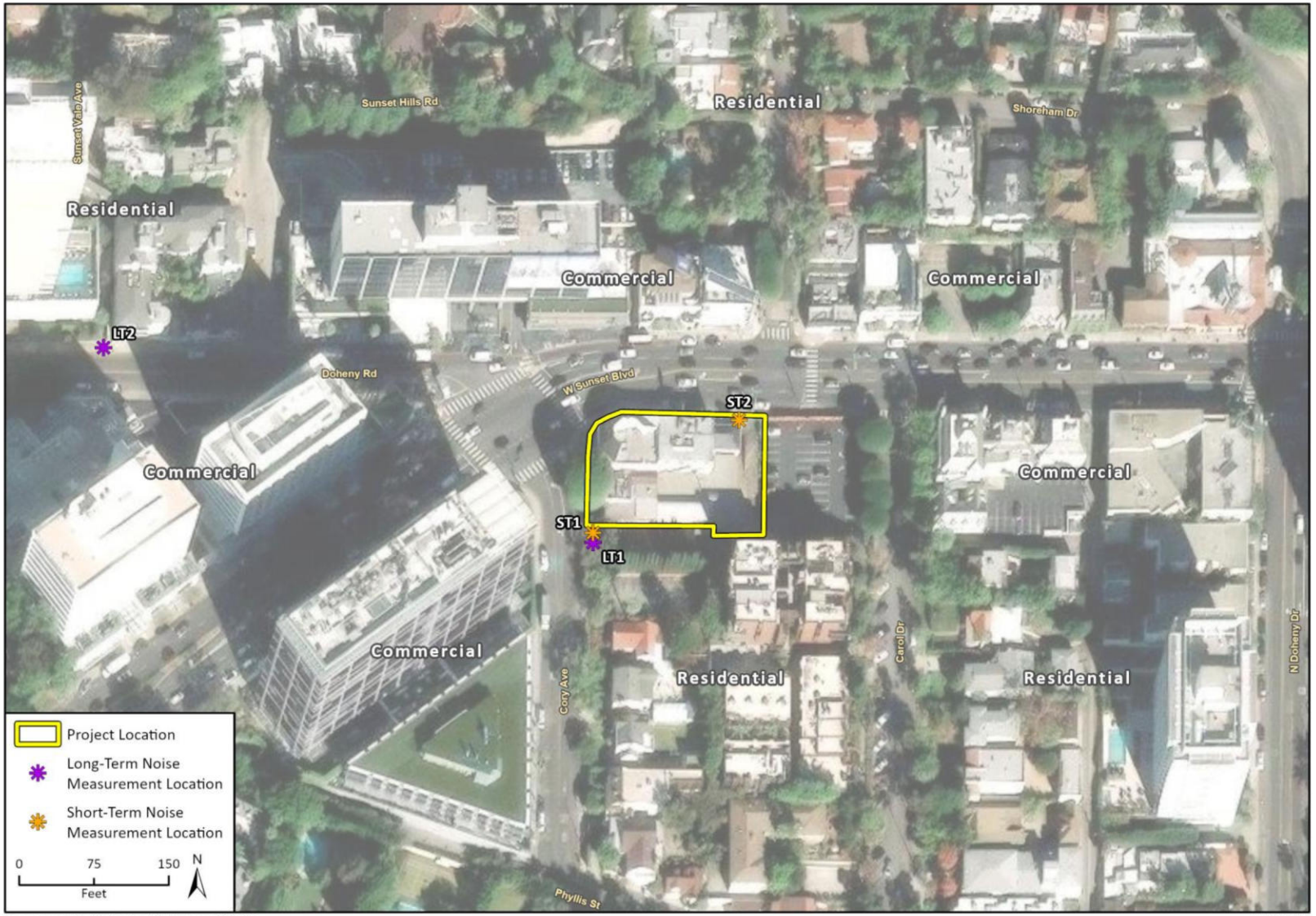
Table 4.5-3 Long-Term Noise Measurement Results (LT-2)

Sample Time	dBA L_{eq}	Sample Time	dBA L_{eq}
LT-2, Sierra Towers Condominium Complex – November 3 – 4, 2025			
6:00 a.m.	66.9	6:00 p.m.	67.8
7:00 a.m.	69.3	7:00 p.m.	66.1
8:00 a.m.	68.9	8:00 p.m.	64.4
9:00 a.m.	71.1	9:00 p.m.	63.6
10:00 a.m.	72.0	10:00 p.m.	65.5
11:00 a.m.	69.4	11:00 p.m.	60.9
12:00 p.m.	68.3	12:00 a.m.	59.8
1:00 p.m.	68.7	1:00 a.m.	55.7
2:00 p.m.	66.7	2:00 a.m.	56.0
3:00 p.m.	67.8	3:00 a.m.	54.2
4:00 p.m.	67.8	4:00 a.m.	59.3
5:00 p.m.	68.1	5:00 a.m.	65.9
24-hour Noise Level (dBA CNEL)			**70.3**
24-hour Noise Level (dBA L_{dn})			**70.0**

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; CNEL = Community Noise Equivalent Level; L_{dn} = day-night average sound level

See Figure 4.5-1 for approximate noise measurement locations; see Appendix D for graphical long-term noise measurement data.

Figure 4.5-1 Approximate Noise Measurement Locations



e. Regulatory Setting

State

California General Plan Guidelines

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

California Building Code: California Green Building Standards Code

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code. The California Green Building Standards Code noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA L_{eq}(1-hour).Local

City of West Hollywood General Plan 2035 Safety and Noise Element

The City of West Hollywood General Plan 2035 Safety and Noise Element aims to protect residents' quality of life by maintaining an environment free from excessive or harmful noise. Goals and policies within the Safety and Noise Element that are related to noise and relevant to the Project include the following:

Goal SN-3: Minimize the impact of point source noise and ambient noise levels throughout the community.

Policy SN-3.1 As feasible, ensure that construction and occupancy of new development is compatible with and does not exceed thresholds defining the acceptable noise environment in surrounding areas.

Policy SN-3.2 Require the inclusion of noise-reducing design features in development projects to address the impact of noise on residential development.

Policy SN-3.3 Review development proposals to ensure that noise standards and compatibility criteria set forth in the General Plan are met.

Policy SN-3.4 Require all proposed development within the 65 dB L_{dn} contour as shown on Figure 10-5 in the Safety and Noise Chapter of the General Plan to comply with Title 24, as amended.

Policy SN-3.6 Require development projects to implement mitigation measures, where necessary, to reduce noise levels to meet the adopted standards and criteria. Such measures may include, but are not limited to, berms, walls, and sound attenuating architectural design and construction methods.

Policy SN-3.7 Require new development to meet adopted noise standards and regulations.

Goal SN-4: Minimize transportation-related noise.

Policy SN-4.1 Require new development and/or modifications to existing development to include sound-reducing design measures, where needed, to maintain compatibility with adjacent and surrounding uses.

Goal SN-5: Create a healthy physical environment related to noise.

Policy SN-5.1 Work to minimize stationary noise impacts on sensitive receptors and noise emanating from construction activities, private developments/residences, landscaping activities, night clubs and bars, and special events.

Policy SN-5.3 Require that entertainment uses, restaurants, and bars engage in responsible management and operation to control the activities of their patrons on-site and within reasonable and legally justifiable proximity to minimize noise impacts on adjacent residences.

In addition to the goals and policies identified above, the City's General Plan 2035 Safety and Noise Element also provides exterior noise standards (presented in Table 4.5-4) and land use compatibility guidelines for various noise environments (presented in Table 4.5-5). The noise standards presented in Table 4.5-4 represent the acceptable noise levels generated by proposed development as measured at any adjoining residential property.

Table 4.5-4 Non-Transportation Source Noise Standards Effecting Noise-Sensitive Land Uses

	Daytime Hourly Noise Level (8 a.m. to 10:00 p.m.)	Nighttime Hourly Noise Level (10:00 p.m. to 8:00 a.m.)
Exterior Noise Standards[1]	55 dBA L_{eq}	50 dBA L_{eq}

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

[1] Noise levels should be measured, or modeled, at the property line of the affected property or a primary exterior use area within the affected property.

Source: City of West Hollywood General Plan 2035 Safety and Noise Element, Table 10-1 (City of West Hollywood 2011).

Table 4.5-5 City of West Hollywood General Plan Noise Land Use Compatibility Matrix

	Community Noise Exposure (L_{dn} or CNEL)			
Land Use	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential	≤60	60-70	70-75	75-85
Transient Lodging - Motel, Hotel	≤60	60-75	75-80	80+
Schools, Libraries, Churches, Hospitals, Nursing Homes	≤60	60-70	70-80	80+
Auditoriums, Concert Halls, Amphitheaters	N/A	<70	N/A	70+

Land Use	Community Noise Exposure (L_{dn} or CNEL)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Sports Arenas, Outdoor Spectator Sports	N/A	<75	N/A	75+
Playgrounds, Parks	≤70	N/A	70-75	75+
Golf Courses, Riding Stables, Water Recreation, Cemeteries	≤70	N/A	70-80	80+
Office Buildings, Business Commercial, and Professional	≤65	60-75	75+	N/A
Industrial, Manufacturing, Utilities, Agriculture	≤70	70-80	80+	N/A

L_{dn} = day-night average sound level; CNEL = Community Noise Equivalent Level

[1] **Zone A – Normally Acceptable:** Specified land use is satisfactory, based upon the assumption that any buildings involved meet conventional Title 24 construction standards. No special noise insulation requirements.

[2] **Zone B – Conditionally Acceptable:** New construction or development shall be undertaken only after a detailed noise analysis is made and noise reduction measures are identified and included in the project design.

[3] **Zone C – Normally Unacceptable:** New construction or development is discouraged. If new construction is proposed, a detailed analysis is required, noise reduction measures must be identified, and noise insulation features included in the design.

[4] **Zone D – Clearly Unacceptable:** New construction or development should not be undertaken.

City of West Hollywood Municipal Code

Chapter 9.08 of the West Hollywood Municipal Code (WHMC) establishes regulations pertaining to noise. The following sections describe prohibited noises that are relevant to the Project:

Section 9.08.50(c) Loading and Unloading Waste in or Near Residential District: Loading, unloading, opening, closing or other handling of boxes, containers, building materials, or similar objects in a residential district or within fifty feet of a residential district, between the hours of 10:00 p.m. and 8:00 a.m., excluding normal handling of solid waste, and recycling containers by a franchised collector pursuant to Title 15.

Section 9.08.50(d) Construction:

(1) Construction between the hours of 7:00 p.m. and 8:00 a.m. on weekdays; or at any time on Saturday (except, between the hours of 8:00 a.m. and 7:00 p.m., interior construction is permissible); or at any time on Sunday, New Year's Day, Martin Luther King Day, President's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, the day after Thanksgiving, Christmas Day and observed holidays; all except as provided in subsection (d) of Section 9.08.060. If New Year's Day, Independence Day or Veterans Day falls on a weekend, then the following Monday or preceding Friday is a holiday.

(2) To minimize the disturbance to the surrounding community, the motors and engines for construction related vehicles and equipment shall not be left idling and shall be turned off when not in use.

Section 9.08.50(h) Leaf Blowers: The use or operation or allowing the use or operation of any portable machine powered with a combustion or gasoline engine used to blow leaves, dirt and other debris off sidewalks, driveways, lawns and other surfaces

Section 9.08.50(i) Commercial Establishments Adjacent to Residential Property: Notwithstanding any provision of this code to the contrary, continuous, repeated or sustained noise from the premises of any commercial establishment which is adjacent to one or more

residential dwelling units, including any outdoor area part of or under the control of the establishment, between the hours of 10:00 p.m. and 8:00 a.m. that is plainly audible from the residential dwelling unit's property line.

In addition to the prohibited noises described above, Chapter 19.20 of the WHMC specifies the following provisions regarding noise mitigation requirements for new developments:

Section 19.20.090(A) Maximum Noise Level: Proposed development and land uses shall comply with the requirements of the city's Noise Control Ordinance in Chapter 9.08 of the Municipal Code.

Section 19.20.090(C) Commercial Project Mitigation: Developers of commercial projects adjacent to residential zoning districts or existing residential uses shall incorporate noise mitigating construction techniques to ensure that noise from the proposed commercial activities is abated to acceptable levels in compliance with Chapter 9.08 of the Municipal Code.

Section 19.20.090(D) Mechanical Equipment: Equipment located on the rooftop of a structure shall be enclosed or incorporate other elements to prevent adverse noise that might be heard by persons on adjacent properties.

4.5.2 Impact Analysis

a. Methodology

Construction Noise

CONSTRUCTION EQUIPMENT

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receptors near the Project Site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment, as is characteristic of "point" sources of noise.

Construction activity would result in temporary noise in the Project area, exposing surrounding sensitive receptors to increased noise levels. Construction of the Project would involve demolition, site preparation, grading, building construction, paving, and architectural coating phases. Construction noise would typically be higher during the heavier periods of initial construction (i.e., demolition and grading) and would be lower during the later construction phases (i.e., architectural coating). The construction equipment list was based on the CalEEMod default equipment list for a Project of this type and size, developed as part of the air quality analysis in Section 4.2 of this RDEIR. Typical noise levels associated with equipment expected to be used during construction of the Project are presented in Table 4.5-6.

Table 4.5-6 Typical Noise Levels Generated by Various Construction Equipment

Equipment	Average Noise Level at Reference Distance of 50 feet (dBA L_{eq})	Acoustical Usage Factor (percent)
Backhoe	76	40
Crane	77	16
Dump Truck	80	40
Excavator	81	40
Forklift	78	20
Front-End Loader	76	40
Grader	81	40
Paver	82	50
Pressure Washer	78	20
Tractor	80	40
Trencher	79	50

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

Source: FHWA 2006

Construction equipment would continually move around the Project Site over the course of a typical workday. Due to the complex and mobile nature of construction activity within a Project Site, the FTA *Transit Noise and Vibration Impact Assessment Manual* document recommends evaluating construction noise impacts from the center of the construction site, stating that the distance variable in its recommended construction noise calculation "assumes that all equipment operates at the center of the Project" (FTA 2018). Therefore, construction noise impacts were evaluated from the approximate center of the Project Site, which was assumed to be 55 feet from the northern/southern property lines and 85 feet from the eastern/western property lines. Construction noise levels were estimated under the conservative assumption that the three loudest pieces of equipment within each phase would be operating simultaneously at the approximate center of the Project Site for an entire construction day and using RCNM acoustical usage factors.

CONSTRUCTION VEHICLE TRIPS

During construction, the Project would temporarily generate additional traffic noise on nearby roadways due to worker, vendor, and hauling trips to and from the Project Site. Temporary construction-related vehicle trips are assumed to occur primarily on Sunset Boulevard and Cory Avenue, which have annual average daily traffic (AADT) volumes of 35,286 and 1,771 vehicles on segments in the vicinity of the Project Site (Replica 2024), respectively. Existing traffic volumes on this roadway were compared to the number of daily vehicle trips expected during construction to determine the temporary traffic noise increase. According to output information from CalEEMod developed as part of the air quality analysis, the Project would generate a maximum of 97 daily one-way trips during the peak phase of construction (demolition phase). Total construction traffic generated by the Project would include both inbound and outbound traffic, therefore the Project would generate 194 daily vehicle roundtrips during the peak periods of construction. Table 4.5-7 shows a comparison between existing traffic volumes on Sunset Boulevard and additional temporary vehicle trips during construction.

Table 4.5-7 Comparison of Existing and Project-Generated Vehicle Trips (Construction)

Roadway	Segment	Existing AADT (Year)	Daily Project Construction Vehicle Trips	Existing AADT + Daily Project Construction Vehicle Trips
Sunset Boulevard	East of Doheny Road	35,286 (2024)	194	35,480
Cory Avenue	Phyllis Street to West Sunset Boulevard	1,771 (2024)		1,965

AADT = annual average daily traffic

Source: Replica 2024.

To assess the temporary increase in traffic noise during construction, the following equation was used, which is based on the principle that a doubling of roadway vehicle volumes results in a 3 dBA noise increase:

$$Traffic\ Noise\ Increase = 10 * LOG(\frac{Project - Generated\ Traffic\ Volume}{Existing\ Traffic\ Volume})$$

Groundborne Vibration

Operation of the Project would not include any substantial vibration sources; therefore, construction activities would have the greatest potential to generate levels of groundborne vibration affecting nearby receptors. Neither blasting nor pile driving would be required for construction of the Project. The greatest source of vibration expected during construction would be large earthmoving equipment (such as a backhoe, dozer, or grader). Table 4.5-8 shows typical vibration levels for these pieces of construction equipment. Vibration levels at nearby offsite structures were estimated using the reference vibration levels shown in Table 4.5-8 based on the closest distances this equipment may operate relative to these structures.

Table 4.5-8 Typical Vibration Levels Generated by Construction Equipment

Equipment	PPV at 25 ft. (in/sec)	Vibration Level at 25 ft (VdB)
Large[1] Earthmoving Equipment (such as a Backhoe, Dozer, or Grader)	0.089	87
Loaded Truck	0.076	86

PPV = peak particle velocity; in/sec = inches per second

[1] "Large" in this context means equipment rated at 100 horsepower or greater.

Source: FTA 2018

Operational Noise

Operation of the Project would include both onsite stationary and offsite mobile noise sources. The methodology used in determining noise impacts from these sources are discussed further in the following sections.

ONSITE STATIONARY NOISE SOURCES

The Project would introduce new onsite stationary sources of noise in the vicinity of the site, primarily in the form of rooftop heating, ventilation, and air-conditioning (HVAC) equipment and a generator. Based on the roof plan for the Project, these pieces of equipment would be housed in a penthouse situated near the center of the Project building. There would be a cluster of 10 HVAC units located at the southwestern corner of the penthouse and one generator located near the northwestern corner of the penthouse.

This analysis assumes the use of a typical HVAC system for commercial applications, a 20-ton Carrier WeatherMaker 50FCQM28 unit, which produces a noise level of 77.9 dBA at a distance of 1 meter (3.3 feet) (see Appendix D for equipment specification sheets). For the generator, this analysis assumes a Caterpillar DE110 GC unit, which produces a noise level of 83.3 dBA at a distance of 1 meter (3.3 feet) when operating under 100 percent load (see Appendix D for equipment specification sheets).

Noise levels generated by the Project's HVAC equipment were estimated at the property lines of the nearest sensitive receptors. In evaluating operational noise impacts, the generator and HVAC units were conservatively assumed to be operating simultaneously and continuously at full power. All equipment was assumed to operate as point sources of noise, which have a characteristic noise reduction of 6 dBA per doubling of distance away from the source.

Additionally, the Project roof plan depicts a 10-foot-tall plaster wall surrounding the equipment penthouse, which would provide additional noise reduction measures that shield surrounding receptors from noise generated by rooftop equipment. The noise reduction provided by this proposed wall was determined using the methodology described in the *Design Guidelines for Highway Noise Barriers* (Klingner et al. 2003), which takes into account barrier height and orientation to sources and receptors.

Noise levels at nearby sensitive receptors were calculated using the closest distances between the equipment and receptors (i.e., the direct-path distance between the sources and receptors when accounting for both the vertical distance of equipment on the rooftop and horizontal distances between the equipment and receptors).

OFFSITE MOBILE NOISE SOURCES (TRAFFIC)

During operational activities, the Project would generate additional vehicle trips on nearby roadways due to workers and users of the Project traveling to and from the Project. Traffic volume increases are expected to occur primarily along Sunset Boulevard and Cory Avenue, which have AADT volumes of 35,286 and 1,771 vehicles on segments in the vicinity of the Project Site, respectively (Replica 2024). Operational Project-generated traffic volumes were based on the Trip Generation Assessment prepared for the Project by LLG (included as Appendix E), which determined that the Project would generate an additional 1,172 daily vehicle trips during operation. Table 4.5-9 presents traffic data used in this analysis for evaluating permanent increases in traffic noise associated with the Project during operation.

Table 4.5-9 Comparison of Existing AADTs and Project-Generated Vehicle Trips (Operation)

Roadway	Segment	Existing AADT (Year)	Daily Project-Generated Trips	Existing AADT + Daily Project-Generated Trips
Sunset Boulevard	East of Doheny Road	35,286 (2024)	1,172	36,458
Cory Avenue	Phyllis Street to West Sunset Boulevard	1,771 (2024)		2,943

AADT = annual average daily traffic volume
Source: Replica 2024; LLG 2025.

Similar to the methodology for evaluating traffic noise increases during construction of the Project discussed in the *Construction Vehicle Trips* section above, traffic noise increases associated with operation of the Project were estimated using the following equation:

$$Traffic\ Noise\ Increase = 10 * LOG(\frac{Project - Generated\ Traffic\ Volume}{Existing\ Traffic\ Volume})$$

b. Significance Thresholds

As listed in Appendix G of the *CEQA Guidelines*, a project is considered to have a significant impact related to noise if it would result in:

1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2) Generation of excessive groundborne vibration or groundborne noise levels; or
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels.

Construction Noise

Consistent with the approach of previous CEQA documentation for the City's General Plan and for individual development projects within the City (Rincon Consultants, Inc. 2025), construction noise impacts would be considered significant if construction activities were to increase the existing ambient noise environment by 10 dBA or more at nearby sensitive receptors.

Construction Vibration

In absence of quantitative vibration limits established by the City, vibration impacts associated with the Project were evaluated based on vibration limits established in the FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018), shown in Table 4.5-10. The vibration limits shown in Table 4.5-10 represent the limits at which minor architectural (i.e., non-structural) damage may occur to structures of various construction types. For purposes of this analysis, the Project's vibration impacts would be significant if vibration levels were to exceed 0.2 in/sec PPV at offsite residential structures.

Table 4.5-10 FTA Vibration Criteria (Building Damage)

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second
Source: FTA 2018

In addition to the FTA's vibration criteria for building damage shown above, vibration impacts were also evaluated based on the FTA's vibration criteria for human annoyance. The FTA establishes a vibration velocity level of 75 vibration decibels (VdB) as the threshold between barely perceptible and distinctly perceptible vibration. This threshold was used to evaluate vibration impacts related to human annoyance.

Operational Noise

ONSITE STATIONARY NOISE SOURCES

Noise impacts associated with the Project's onsite stationary noise sources (i.e., HVAC equipment) would be considered significant if noise levels were to exceed the City's noise standards contained within the City's General Plan (shown in Table 4.5-4). HVAC equipment is conservatively assumed to be operational during all hours of the day; therefore, the lower nighttime threshold was used. The Project's onsite stationary operational noise impacts would be considered significant if noise levels were to exceed 50 dBA L_{eq} at nearby residential properties.

OFFSITE MOBILE NOISE SOURCES (TRAFFIC)

Noise impacts associated with the Project's offsite mobile noise sources (i.e., traffic) would be considered significant if traffic noise levels were to increase the existing ambient noise environment by 3 dBA L_{dn} or more, which is the minimum change in noise level that is perceptible to most people with average hearing (Crocker 2007).

c. Project Impacts and Mitigation

Threshold 1:	Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

IMPACT N-1 CONSTRUCTION AND DEMOLITION ACTIVITIES ASSOCIATED WITH IMPLEMENTATION OF THE PROJECT WOULD INTERMITTENTLY GENERATE NOISE EXCEEDING APPLICABLE THRESHOLDS AT SENSITIVE RECEPTORS ADJACENT TO THE PROJECT SITE. IMPLEMENTATION OF MITIGATION MEASURE NOI-1 WOULD REDUCE DAYTIME CONSTRUCTION NOISE IMPACTS TO LESS THAN SIGNIFICANT LEVELS AT NEARBY SENSITIVE RECEPTORS. HOWEVER, EVEN WITH IMPLEMENTATION OF MITIGATION MEASURE NOI-1, NIGHTTIME CONSTRUCTION NOISE IMPACTS WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE. NOISE ASSOCIATED WITH

OPERATION OF THE PROJECT WOULD NOT EXCEED APPLICABLE NOISE STANDARDS AT THE NEAREST SENSITIVE RECEPTORS AND OPERATIONAL NOISE IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Daytime Construction Work

Following the methodology discussed above, construction noise levels were estimated at the nearest sensitive receptors for each phase of construction. For the main noise calculations, the distances were from the centers of construction activity to each sensitive receptor. Estimated construction noise levels are presented in Table 4.5-11. Note that noise levels shown in Table 4.5-11 conservatively do not account for shielding from any intervening buildings, terrain, or other nearby structures or site features.

Table 4.5-11 Estimated Daytime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase

	Construction Noise Level (dBA L_{eq} [8-hour])			
Construction Phase	**Nearest Single-Family Residential Property to South**	**Nearest Multi-Family Residential Property to Southeast**	**Nearest Residential Property to North**	**Sierra Towers Condominium Complex to Northwest**
Distance (feet)	**55**	**90**	**260**	**590**
Demolition[1]	82.3	78.0	68.8	61.7
Site Preparation[2]	84.7	80.4	71.2	64.1
Grading[3]	83.1	78.8	69.6	62.5
Building Construction[4]	81.5	77.2	68.0	60.9
Paving[5]	83.7	79.4	70.2	63.1
Architectural Coating[6]	82.83	78.5	69.3	62.2
Ambient Noise Level[7]	62.1	62.1	62.1	63.6
Noise Threshold[8]	72.1	72.1	72.1	73.6

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] Demolition phase was evaluated assuming simultaneous operation of one backhoe, excavator, and front-end loader.

[2] Site preparation phase was evaluated assuming simultaneous operation of one excavator, grader, and tractor.

[3] Grading phase was evaluated assuming simultaneous operation of one backhoe, excavator, and trencher.

[4] Building construction phase was evaluated assuming simultaneous operation of one crane, front-end loader, and trencher.

[5] Paving phase was evaluated assuming simultaneous operation of one forklift, paver, and pressure washer.

[6] Architectural coating phase was evaluated assuming simultaneous operation of one dump truck, forklift, and pressure washer.

[7] During the noise measurements, the lowest hourly daytime noise level at the nearest single-family residential property to the south, multi-family residential property to the southeast, and residential property to the north were measured to be 62 dBA L_{eq}, while the lowest hourly daytime noise level at the Sierra Towers Condominium Complex to the northwest was measured to be 64 dBA L_{eq}.

[8] Ambient noise levels plus 10 dBA.

[9] Bolded noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

As shown in Table 4.5-11, construction noise levels generated during all phases of Project construction would range between approximately 81 and 85 dBA L_{eq} (8-hour) at the nearest single-family residential property located to the south of the Project Site, which would exceed the lowest average hourly daytime noise level measured near this sensitive receptor (62 dBA L_{eq}) by more than

10 dBA. Construction noise impacts upon this nearest sensitive receptor would be potentially significant. Therefore, the Project would implement Mitigation Measure NOI-1, which requires a number of noise reducing measures, including a temporary noise barrier around the Project Site.

Construction noise levels generated at the nearest multi-family residential property to the southeast would range between 77 and 80 dBA L_{eq} (8-hour), which would exceed the existing ambient noise environment (62 dBA) by more than 10 dBA. Construction noise impacts upon this sensitive receptor would be potentially significant. Therefore, the Project would implement Mitigation Measure NOI-1, which requires a number of noise reducing measures, including a temporary noise barrier around the Project Site.

Construction noise levels would continue to decrease with distance from the Project Site, including at the Sierra Towers Condominium Complex where construction noise levels would reach up to 64 dBA L_{eq} (8-hour) and the nearest single-family residential property to the north where construction noise levels would reach up to 71 dBA L_{eq} (8-hour). The lowest average hourly daytime noise levels measured near the Sierra Towers Condominium Complex was 64 dBA L_{eq} and the nearest single-family residential property to the north was 62 dBA L_{eq}. Therefore, construction noise levels generated upon these sensitive receptors would not exceed the respective ambient noise environments by more than 10 dBA. Construction noise impacts upon these and farther sensitive receptors would be less than significant.

Construction Vehicle Trips

During construction, the Project would generate new, temporary vehicle trips due to worker, vendor, and haul trips to and from the Project Site that would increase noise levels on nearby roadways (primarily Sunset Boulevard). The Project is anticipated to generate a maximum of 194 daily vehicle trips during the peak phases of construction. A temporary increase of 194 daily vehicle trips on segments of Sunset Boulevard and Cory Avenue in the vicinity of the Project Site would result in a noise increase of less than 0.1 dBA L_{dn} on Sunset Boulevard and a noise increase of 0.5 dBA L_{dn} on Cory Avenue, which would be well below the 3 dBA L_{dn} significance threshold for a perceptible noise increase. Noise impacts associated with temporary construction vehicle trips would be less than significant.

Nighttime Construction Work

Based on information provided by the Project applicant, nighttime construction work would be required for approximately 5.25 months of the overall construction period. Nighttime construction work would primarily consist of concrete pours and utilize equipment such as concrete trucks, a concrete pump, concrete finishing tools, cranes, forklifts, loaders, buggies, and a man lift. A scenario consisting of simultaneous operation of a concrete mixer truck, crane, and pump were evaluated to estimate noise impacts associated with nighttime construction work. Noise levels associated with nighttime construction work at nearby sensitive receptors are presented in Table 4.5-12.

Table 4.5-12 Estimated Nighttime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase

Construction Phase	Construction Noise Level (dBA L_{eq} [8-hour])			
	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast	Nearest Residential Property to North	Sierra Towers Condominium Complex to Northwest
Distance (feet)	**55**	**90**	**260**	**590**
Nighttime Construction[1]	82.3	78.0	68.8	61.7
Ambient Noise Level[2]	49.9	49.9	49.9	54.2
Noise Threshold[3]	59.9	59.9	59.9	64.2

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] Nighttime construction phase was evaluated assuming simultaneous operation of one concrete mixer truck, crane, and pump.

[2] During the noise measurements, the lowest hourly nighttime noise level at the nearest single-family residential property to the south, multi-family residential property to the southeast, and residential property to the north were measured to be 50 dBA L_{eq}, while the lowest hourly nighttime noise level at the Sierra Towers Condominium Complex to the northwest was measured to be 54 dBA L_{eq}.

[3] Ambient noise level plus 10 dBA.

[4] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

Similar to daytime construction, nighttime construction work would be potentially significant if construction noise levels were to exceed the existing ambient noise level by 10 dBA or more. As shown in Table 4.5-2, the lowest average hourly nighttime noise level measured at LT-1 (the measurement location representative of the nearest single-family residential property to the south, nearest multi-family residential property to the southeast, and nearest residential property to the north of the Project Site) was approximately 50 dBA L_{eq}. As indicated in Table 4.5-13, nighttime construction noise levels at these three sensitive receptors would range approximately between 69 and 82 dBA L_{eq}, which would exceed the existing nighttime ambient noise level by more than 10 dBA; therefore, nighttime construction noise impacts upon these sensitive receptors would be potentially significant, and the Project would implement Mitigation Measure NOI-1, which requires a number of noise reducing measures, including a temporary noise barrier around the Project Site.

As shown in Table 4.5-3, the lowest average hourly nighttime noise level measured at LT-2 (the measurement location representative of the Sierra Towers Condominium Complex) was approximately 54 dBA L_{eq}. As indicated in Table 4.5-13, nighttime construction noise levels at this sensitive receptor would reach up to approximately 62 dBA L_{eq}, which would not exceed the existing nighttime ambient noise level by more than 10 dBA. Nighttime construction noise impacts upon this sensitive receptor would be less than significant.

Additionally, as described above, Section 9.08.050 of the City's Municipal Code prohibits construction occurring between 7:00 p.m. and 8:00 a.m. on weekdays and Saturdays and at any time on Sundays and holidays. Therefore, an exemption for nighttime construction work would be required as detailed in Section 9.08.060(d) of the WHMC, which states "[t]he provisions of Section 9.08.050 do not apply to any person who performs construction, repair, earthmoving work, excavation or commercial tree trimming and removal services if and to the extent that the City Manager has given express prior written permission to perform such work at times prohibited in Section 9.08.050. In order to be given such permission, the person must submit to the City Manager an application in writing, stating the reasons for the request and the facts upon which such reasons

are based. The City Manager may grant or conditionally grant such permission if the City Manager, City Engineer, Code Enforcement Officer or Building Official has found that:

- The work proposed to be done is necessary to protect or promote public safety or welfare or is otherwise in the public interest; or
- Hardship, including, but not limited to, unreasonable delay due to weather, acts of God or labor strikes, would result from the interruption thereof during the hours and days specified in Section 9.08.060; or
- The building or structure involved is devoted or intended to be devoted to a use immediately incidental to public defense."

Operation

Onsite Stationary Noise Sources

Following the methodology discussed above, noise impacts associated with the Project's rooftop equipment were estimated at the property lines of the nearest sensitive receptors. Note that operational noise levels are only presented at the nearest residential receptors and are not presented at the nearest commercial uses (e.g., the office building located southwest of the Project Site), as commercial uses are not typically considered to be noise-sensitive uses. Furthermore, operational noise levels are conservatively evaluated based on nighttime operation of the Project equipment, as this represents the potential for the greatest noise impacts (i.e., residential uses have increased sensitivity to noise during nighttime hours, as this is when people are sleeping). Operational noise levels at the nearest sensitive receptors are presented in Table 4.5-14, which shows both individual noise levels from HVAC units and the generator as well as the combined noise levels due to simultaneous operation of these sources. As shown in Table 4.5-14, combined operational noise levels at the property line of the nearest residential property to the south would reach up to 47 dBA L_{eq} under the conservative assumption that all HVAC units and the generator would be operating simultaneously during nighttime hours. This combined noise level would not exceed the City's nighttime noise threshold of 50 dBA L_{eq}. Furthermore, as shown in Table 4.5-2, the lowest nighttime hourly noise level measured by Rincon at this residential property to the south was 49.9 dBA L_{eq}; therefore, operational noise levels associated with the Project's rooftop equipment would also not exceed the existing nighttime ambient noise level at this nearest sensitive receptor. Operational noise levels at farther receptors would continue to decrease with distance from the Project Site and would also not exceed applicable City standards at farther receptors. For example, operational noise levels at the Sierra Towers Condominium Complex would be a combined 33 dBA L_{eq}. Operational noise impacts associated with the Project's onsite stationary noise sources would be less than significant.

Table 4.5-13 Operational Noise Levels at Nearest Sensitive Receptors

Noise Source	Operational Noise Level (dBA)[1] Nearest Residence to South	Nearest Residence to Southeast	Nearest Residence to North	Sierra Towers Condominium Complex to Northwest	Applicable Threshold (dBA)	Exceeds Applicable Threshold?
HVAC Units	42	42	38	31	50	No
Generator	45	40	31	27	50	No
Combined (HVAC Units and Generator)	47	44	39	33	50	No

dBA = A-weighted decibels; HVAC = heating, ventilation, and air conditioning

[1] All noise levels presented account for the noise reduction provided by the proposed 10-foot-tall plaster wall surrounding all rooftop equipment.

Offsite Mobile Noise Sources

The Project would not make substantial alterations to roadway alignments or substantially change the vehicle classifications mix on local roadways. Therefore, the primary factor affecting off-site noise levels would be increased traffic volumes on nearby roadways (Sunset Boulevard and Cory Avenue), which have AADT volumes shown in Table 4.5-9. The Project is expected to generate an additional 1,172 daily vehicle trips, assumed to occur primarily on these roadways. A permanent increase in the total number of vehicles on Sunset Boulevard and Cory Avenue would result in noise increases of 0.1 and 2.2 dBA L_{dn}, respectively. These noise increases would be below the 3 dBA L_{dn} significance threshold. Therefore, permanent noise impacts associated with the Project's offsite mobile noise sources (i.e., traffic) would be less than significant.

Mitigation Measures

The following measures shall be implemented during the Project construction phase to reduce construction noise impacts to the extent feasible:

NOI-1: To reduce construction noise at the nearby sensitive receptors, the construction contractor will:

- Install temporary noise barriers at a minimum height of 12-foot-tall modular acoustic panels [STC 28–32]) with no gaps from grade to top of the barrier around the Project Site. The height of the barriers along the south, southwestern and southeastern edges of the Project Site will be extended above 12 feet to the extent feasible to shield multi-story residences to the south, southwest, and southeast.
- Limit the use of noise-producing equipment to between 8:00 a.m. to 5:00 p.m., Monday through Friday.
- Use types and models of noise-producing equipment that have the lowest horsepower and the lowest noise generating potential practical for their intended use.
- Fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.
- Ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.
- Have only necessary equipment on site.

- Use manually adjustable or ambient sensitive backup alarms.[1]
- Temporarily enclose localized and stationary noise sources.
- Store and maintain equipment, building materials, and waste materials as far as practical from as many sensitive receivers as practical.
- Schedule construction activities to avoid operating several pieces of equipment simultaneously whenever feasible.
- Restrict the use of bells, whistles, alarms, and horns to safety warning purposes only.

In addition, the Project applicant shall:

- Provide advance notice of the start of construction to all noise-sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur and provide contact information for filing noise and/or vibration complaints with the contractor and the City of West Hollywood.
- If a construction noise complaint(s) is registered and if a representative of the City's Code Enforcement is not available to take noise measurements, the contractor shall retain a City-approved acoustical consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of eight hours or a full construction workday, whichever is greater. The consultant shall prepare a letter report for Code Enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1 would require various measures of reducing construction noise, including installation of mufflers on equipment and construction of temporary noise barriers around the Project Site.

The noise reduction provided by the temporary noise barriers was determined using the methodology described in the *Design Guidelines for Highway Noise Barriers* (Klingner et al. 2003). Based on the orientation of the Project Site to nearby receptors, the temporary 12-foot-tall noise barriers are estimated to provide approximately 11 dBA of noise reduction to the nearest single-family residence located to the north, 13 dBA of noise reduction to the nearest single-family residence located to the south, and approximately 12 dBA of noise reduction to living units on the first floor of the nearest multi-family building located to the southeast. Note that the multi-family units located on upper floors would not be shielded and the temporary construction barriers would not substantially reduce noise levels at upper multi-family units. The height of the temporary noise barriers along the southern portion of the Project Site described in Mitigation Measure NOI-1 shall be extended to the extent feasible and thus may result in increased noise reduction at receptors located to the south. Feasibility of the noise barrier along the southern portion of the Site will depend on the following considerations: structural safety and wind loading, engineering and code limitations, site logistics and constraints, public safety and maintenance, and Occupational Safety and Health Administration regulations. For purposes of this analysis, mitigated noise levels are

[1] These are backup alarms that focus their noise on a specific area and/or automatically adjust the volume of the noise to be only slightly above that of the ambient level at the worksite.

conservatively evaluated assuming the noise reduction provided by the minimum height of the noise barriers (i.e., 12-feet-tall).

Mitigated construction noise levels at the nearest sensitive receptors are presented in Table 4.5-15. As shown in Table 4.5-15, implementation of Mitigation Measure NOI-1 would reduce noise generated during daytime construction activities to 72[2] dBA L_{eq} (8-hour) and below at the single-family residence located to the south of the Project Site, which would not exceed the existing ambient noise level of 62 dBA L_{eq} by 10 dBA or more and daytime construction noise impacts would be less than significant with mitigation.

Mitigated nighttime construction noise levels at the nearest single-family residential property to the south would reach 69 dBA L_{eq} (8-hour), which would exceed the existing nighttime ambient noise level of 50 dBA L_{eq} by more than 10 dBA. Nighttime construction noise impacts upon the nearest single-family residential property to the south would remain significant and unavoidable.

Mitigated daytime construction noise levels at the first floor of the nearest multi-family residential property to the southeast of the Project Site would be 68 dBA L_{eq} and below; therefore, mitigated daytime Project construction noise levels would not exceed the existing ambient noise level of 62 dBA L_{eq} by 10 dBA or more at these sensitive receptors and daytime construction noise impacts would be less than significant with mitigation. Conversely, daytime construction noise levels at upper floors of the nearest multi-family residential building located to the southeast would still reach up to 80 dBA L_{eq} (8-hour), which would exceed the existing ambient noise level of 62 dBA L_{eq} by more than 10 dBA. Implementation of Mitigation Measure NOI-1 would not reduce daytime construction noise impacts at upper floors of this sensitive receptor and daytime construction noise impacts upon the upper floors of this sensitive receptor would remain significant and unavoidable.

Mitigated nighttime construction noise levels at the nearest multi-family residential property to the southeast would be reduced to 66 dBA L_{eq} (8-hour) at lower floors, which would still exceed the ambient of 50 dBA L_{eq} by more than 10 dBA. Similarly, nighttime construction noise levels at upper floors of this sensitive receptor would still reach up to 78 dBA L_{eq} (8-hour), which would also exceed the ambient of 50 dBA L_{eq} by more than 10 dBA; therefore, nighttime construction noise impacts upon this sensitive receptor would remain significant and unavoidable.

Daytime construction noise levels at the nearest single-family residence to the north were less than significant prior to mitigation. Mitigated nighttime construction noise levels at this sensitive receptor would reach up to 58 dBA L_{eq} (8-hour), which would not exceed the existing noise level of 50 dBA L_{eq} at this receptor by more than 10 dBA. Nighttime construction noise impacts upon this sensitive receptor would be less than significant with mitigation.

[2] Note that the mitigated noise level at this sensitive receptor would be 71.7 dBA L_{eq} (8-hour), which would not exceed the significance threshold of 72 dBA L_{eq}. This mitigated noise level was rounded to the nearest whole number for consistency with the rest of the analysis, which reports noise levels as whole numbers.

Table 4.5-14 Mitigated Daytime Construction Noise Levels at Nearest Sensitive Receptors

Construction Phase	Construction Noise Level (dBA L_{eq} [8-hour])		
	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast (First Floor of Building)	Nearest Multi-Family Residential Property to Southeast (Upper Floors of Building)
Distance (feet)	**55**	**90**	**90**
Demolition	69.3	66.0	**78.0**
Site Preparation	71.7	68.4	**80.4**
Grading	70.1	66.8	**78.8**
Building Construction	68.5	65.2	**77.2**
Paving	70.7	67.4	**79.4**
Architectural Coating	69.8	66.5	**78.5**
Ambient Noise Level[1]	62.1	62.1	62.1
Noise Threshold[2]	72.1	72.1	72.1

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] During the noise measurements, the lowest hourly daytime noise level at the nearest single-family residential property to the south and multi-family residential property to the southeast was measured to be 62.1 dBA L_{eq}.

[2] Ambient noise levels plus 10 dBA.

[3] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

Table 4.5-15 Mitigated Nighttime Construction Noise Levels at Nearest Sensitive Receptors

	Construction Noise Level (dBA L_{eq} [8-hour])		
	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast (First Floor of Building)	Nearest Multi-Family Residential Property to Southeast (Upper Floors of Building)
Distance (feet)	**55**	**90**	**90**
Nighttime Construction	**69.3**	**66.0**	**78.0**
Ambient Noise Level[1]	49.9	49.9	49.9
Nosie Threshold[2]	59.9	59.9	59.9

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] During the noise measurements, the lowest hourly nighttime noise level at the nearest single-family residential property to the south and multi-family residential property to the southeast was measured to be 49.9 dBA L_{eq},

[2] Ambient noise levels plus 10 dBA.

[3] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

IMPACT N-2 CONSTRUCTION ACTIVITIES ASSOCIATED WITH IMPLEMENTATION OF THE PROJECT WOULD INTERMITTENTLY GENERATE GROUNDBORNE VIBRATION LEVELS IN THE VICINITY OF THE PROJECT SITE. VIBRATION LEVELS WOULD EXCEED APPLICABLE THRESHOLDS FOR HUMAN ANNOYANCE; IMPLEMENTATION OF MITIGATION MEASURE NOI-2 WOULD HELP REDUCE VIBRATION IMPACTS BUT NOT TO BELOW APPLICABLE THRESHOLDS FOR HUMAN ANNOYANCE. VIBRATION LEVELS GENERATED DURING CONSTRUCTION WOULD EXCEED APPLICABLE BUILDING DAMAGE THRESHOLDS AT NEARBY STRUCTURES. HOWEVER, MITIGATION MEASURE NOI-2 WOULD REDUCE PROJECT-GENERATED VIBRATION IMPACTS TO BUILDINGS TO A LESS THAN SIGNIFICANT LEVEL.

Construction

Use of heavy-duty equipment during the Project phase would introduce vibration in the vicinity of the Project Site. Equipment expected to generate the highest levels of vibration would include large earthmoving equipment (such as a backhoe, dozer, or grader rated at 100 hp or more) and heavy-duty trucks. Vibration levels were evaluated based on the closest distances these equipment types may operate relative to the nearest off-site residential structures. Large earthmoving equipment is assumed to operate along the Project boundary, while loaded trucks are assumed to operate in the incoming travel lane of the alleyway south of the Project Site. As shown in Table 4.5-8, large earthmoving equipment rated at 100 hp or more generates a vibration level of 0.089 in/sec PPV at a reference distance of 25 feet and a loaded truck generates a vibration level of 0.076 in/sec PPV at a reference distance of 25 feet (FTA 2018). Based on the site plan, large earthmoving equipment may be used along the Project boundary, as close as 20 feet from the nearest multi-family residential structure located southeast of the Project Site. At this distance, large earthmoving equipment would generate vibration levels up to 0.124 in/sec PPV, which would not exceed the FTA's recommended vibration threshold of 0.2 in/sec PPV at residential structures. A loaded truck may be operated in the alleyway located south of the Project Site, as close as approximately 15 feet from the nearest multi-family residential structure located southeast of the Project Site. At this distance, a loaded truck would generate vibration levels up to 0.164 in/sec PPV, which would not exceed the FTA's threshold of 0.2 in/sec PPV at residential structures. Temporary vibration impacts related to building damage during construction of the Project would be less than significant.

At a distance of 20 feet, large earthmoving equipment would generate vibration levels up to 90 VdB at the nearest multi-family residence located southeast of the Project Site, which would exceed the FTA's human annoyance threshold of 75 VdB. The use of large earthmoving equipment would not exceed the FTA's human annoyance threshold of 75 VdB if operated more than 65 feet from a nearby sensitive receptor.

A loaded truck operating within 15 feet from this nearest multi-family residence would generate vibration levels up to 93 VdB, which would also exceed the FTA's human annoyance threshold of 75 VdB. Temporary vibration impacts related to human annoyance during construction of the Project would be potentially significant.

Operation

Operation of the Project would not include any substantial vibration sources; therefore, operational vibration impacts would be less than significant.

Mitigation Measures

NOI-2: Prior to construction, the following are provided to reduce vibration levels associated with construction of the Project related to human annoyance at nearby residences:

- Prior to the commencement of construction, the applicant shall fill any existing potholes and repair any asphalt deficiencies to ensure that the alleyway surface is made smooth. Ongoing maintenance will be performed throughout the duration of construction to keep the alleyway in good condition.

Significance After Mitigation

Implementation of Mitigation Measure NOI-2 would require the Project applicant to fill existing potholes and repair asphalt deficiencies that exist in the alleyway located south of the Project Site. Vibrations generated by vehicle travel on roadways primarily result from the tires coming into contact with large cracks or irregularities in the pavement. Repair of the asphalt deficiencies on the alleyway to the south would create a smooth surface for incoming trucks to travel on, thus reducing vibration levels generated by truck movements. According to the FTA's *Transit Noise and Vibration Impact Assessment Manual*, "[i]f the roadway is fairly smooth, the vibration from rubber-tired traffic is rarely perceptible" (FTA 2018). Additionally, Caltrans' *Transportation and Construction Vibration Guidance Manual* states "[b]ecause vibration from vehicle operations is almost always the result of pavement discontinuities, the solution is to smooth the pavement to eliminate the discontinuities. This step will eliminate perceptible vibration from vehicle operations in virtually all cases" (Caltrans 2020). Therefore, implementation of Mitigation Measure NOI-2 is expected to reduce vibration generated by loaded trucks to levels that are not perceptible at the nearest multi-family residence located to the south. With implementation of Mitigation Measure NOI-2, vibration impacts associated with human annoyance resulting from use of loaded trucks would be less than significant with mitigation.

Implementation of Mitigation Measure NOI-2 would not reduce vibration impacts associated with use of earthmoving equipment; however, Mitigation Measure NOI-1 would include notification of nearby sensitive receptors prior to the initiation of construction activities and establish a contact for registering complaints related to vibration. Therefore, vibration impacts associated with human annoyance resulting from use of earthmoving equipment would remain significant and unavoidable.

Threshold 3:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact N-3 THE PROJECT SITE IS NOT LOCATED WITHIN THE NOISE CONTOURS OF THE NEAREST AIRPORTS. THEREFORE, PEOPLE WORKING AT THE PROJECT SITE WOULD NOT BE EXPOSED TO EXCESSIVE AIRPORT-RELATED NOISE LEVELS AND NO IMPACT WOULD OCCUR.

The Project Site is not located within an airport land use plan, or within two miles of a public or private airport. The closest airport is the Santa Monica Airport (SMO), which is located approximately six miles southwest of the Project Site. The Project Site is not located within the noise contours of this airport according to the Los Angeles County Airport Land Use Plan (Los Angeles County Airport Land Use Commission 1991); therefore, the Project would not result in exposure of future people working on the Project to aircraft noise, and no impact would occur.

Mitigation Measures

No mitigation measures would be required.

d. Cumulative Impacts

Construction Noise

Noise generated during construction of the Project, in combination with construction activities for other nearby cumulative projects that may be constructed simultaneously could, without mitigation, substantially increase noise levels in the vicinity of future projects if occurring in close proximity. Mitigation Measures NOI-1 and NOI-2, have been identified to help reduce noise during construction of the Project; therefore, unless construction of cumulative projects occurs in close proximity to each other and simultaneously, noise from individual construction projects has a small chance of combining to create significant cumulative impacts. Noise from construction of development projects is localized and typically has the potential to affect noise-sensitive uses within approximately 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to cumulatively considerable noise impacts for receptors located midway between the two construction sites. The Project is located near one planned development, a residential project at 1012 Cory Avenue situated approximately 220-feet south of the Project Site. Assuming that construction of the 1012 Cory Avenue project would generate similar noise levels as the Project (i.e., up to 72 and 69 dBA L_{eq} [8-hour] during daytime and nighttime hours, respectively, at a reference distance of 55 feet), cumulative construction noise levels at the midway point between both project sites would reach approximately 68 and 65 dBA L_{eq} (8-hour) during daytime and nighttime hours, respectively. Based on the existing noise measurements completed for the analysis, it is likely that these noise levels would increase the existing ambient noise environment during nighttime hours by more than 10 dBA. While mitigation measures have been identified to reduce Project-generated construction noise impacts, there is still potential for cumulatively considerable construction noise impacts, especially for nighttime construction activities. Cumulative daytime construction noise impacts to the first floors of nearby sensitive receptors would be less than significant with mitigation; however, cumulative daytime construction noise impacts upon upper floors of nearby sensitive receptors and nighttime construction noise impacts would remain significant and unavoidable.

Operational Noise

Cumulative development would result in stationary (non-traffic) operational noise and vibration increases in the Project vicinity. Operational noise impacts may occur to sensitive receptors located in the vicinity of two or more projects. As discussed above, the nearest cumulative project is the planned residential project located at 1012 Cory Avenue, situated approximately 220 feet from the Project Site. Assuming that the 1012 Cory Avenue project would generate similar stationary operational noise levels as the 9176 Sunset Boulevard Project (i.e., 47 dBA L_{eq} at a reference distance of 100 feet), stationary operational noise levels would reach approximately 49 dBA L_{eq} at receptors located between both project sites. This cumulative operational noise level would not exceed the City's daytime or nighttime thresholds of 55 and 50 dBA L_{eq}, respectively. Furthermore, each cumulative project would be required to complete project- and site-specific noise and vibration assessments for operational noise impacts and mitigate each project accordingly to below the City's noise standards. Therefore, cumulative operational noise impacts would be less than significant.

Groundborne Vibration

Although there could be other cumulative projects simultaneously under construction near the Project, the potential for construction groundborne vibration impacts is within relatively close distances (e.g., within approximately 25-feet for a vibratory roller) due to the fact that groundborne vibration levels attenuate rapidly through the ground at large distances. Since there are no other cumulative projects located within this distance from the Project Site, cumulative vibration levels are not expected to exceed applicable standards. Cumulative groundborne vibration impacts would be less than significant.

Overall Level of Cumulative Significance

Overall, noise generated during construction of the Project, in combination with construction activities for other nearby cumulative projects that may be constructed simultaneously could, without mitigation, could substantially increase noise levels in the vicinity of future projects if occurring in close proximity. While mitigation measures have been identified to reduce Project-generated construction noise impacts, there is still potential for cumulatively considerable construction noise impacts, especially for nighttime construction activities. Thus, cumulative impacts associated with construction noise, including vibration, would remain significant and unavoidable.

Cumulative development would result in stationary (non-traffic) operational noise and vibration increases in the Project vicinity. However, each cumulative project would be required to complete project- and site-specific noise and vibration assessments for operational noise impacts and mitigate each project accordingly to below the City's noise standards. With that, cumulative operational noise impacts would be less than significant.

Finally, since there are no other cumulative projects located within this distance from the Project Site, cumulative vibration levels are not expected to exceed applicable standards and would be less than significant.

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4.6 Transportation

This section analyzes the Project's potential impacts regarding transportation. Information in this section, including potential cumulative impacts, is based on findings from the Traffic Study included as Appendix O of the Original DEIR and the new Trip Generation Assessment prepared for the Project by Linscott, Law and Greenspan Engineers (LLG), which is included in Appendix E of this RDEIR document. The Trip Generation Assessment evaluates the thresholds of vehicle miles traveled (VMT) per the implementation of California Senate Bill 743 (SB 743) for CEQA significant impacts, the City of West Hollywood Traffic Impact Analysis Guidelines – April 2021 (City Guidelines) and current ITE Trip Generation Manual (12th Edition) rates. The assessment provides background regulatory information and existing setting in the Project regional traffic/transportation conditions, provides updated trip generation forecasts for daily, AM and PM, peak hours, accounting for all gross floor area and compares them to the Traffic Study prepared by Omar Sarsour October 2021 (Sarsour 2021).

SB 743, went into effect in January 2014 and requires the Governor's Office of Land Use and Climate Innovation (LCI) to change the way public agencies evaluate transportation impacts of projects under the requirements of CEQA. Specifically, under SB 743, the focus of transportation analysis shift from driver delay, which is typically measured by traffic level of service (LOS), to , vehicle miles traveled (VMT), to better addresses the state's goals regarding reduction of greenhouse gas (GHG) emissions, creation of multi modal transportation networks, and promotion of mixed-use developments. VMT replaced LOS as the main assessment of transportation system operation in the 2018 CEQA Guidelines Update. SB 743 also required cities and counties to establish a VMT analysis methodology by July 1, 2020.

4.6.1 Setting

Existing Roadways

The key roadways that traverse the study intersections and serve the Project Site are discussed below. Classifications are based on the City of West Hollywood 2035 General Plan Mobility Element (West Hollywood 2011).

- **Sunset Boulevard** is a designated major arterial roadway that runs east-west and abuts the north side of the Project Site. It provides regional access to the Project Site, with four travel lanes, two in each direction, and left-turn pockets in each direction. Metered two-hour parking, prohibited on weekdays between 4:00 a.m. and 7:00 a.m., is generally provided on both sides of the street within the Project vicinity.
- **Doheny Road** is a designated minor arterial roadway that has two segments within the Project vicinity and provides local and sub-regional access to the Project Site. It begins in the east-west direction just west of the Cory Avenue / Sunset Boulevard / Doheny Road intersection just northwest of the Project Site and then continues south of Sunset Boulevard. The roadway segment generally includes two travel lanes, one in each direction. Unmetered daytime parking (parking permits exempt) is generally available on both sides of the street further west of the intersection.
- **Cory Avenue** is a designated local/residential roadway that runs in the north-south direction and abuts the Project Site to the west . It provides local access to the Project Site, with two travel lanes, one in each direction. Unmetered daytime parking (parking permits exempt) is

generally available on the east side of the street while metered parking is available for portions of the west side of the street.

- **Phyllis Street** is a designated local/residential roadway that runs in the northwest-southeast direction approximately 0.1 miles south of the Project Site. It provides local access to the Project Site, with two travel lanes, one in each direction. Unmetered daytime parking (parking permits exempt) is generally available on both sides of the street.
- **Carol Drive** is a designated local/residential roadway that runs in the north-south direction and provides access to the alley way on the east side of the Project Site. It provides local access to the Project Site, with two travel lanes, one in each direction. Unmetered daytime parking (parking permits exempt) is generally available on both sides of the street.

Existing Transportation

Bus Transit

The Project is well served by public transit and is located in an area defined as a "transit priority area" under SB 743. Bus transit service in the vicinity of the Project Site is available along Sunset Boulevard via Metro Local Line 2, which includes stops at the intersection of Cory Avenue / Sunset Boulevard/Doheny Rd (Sarsour 2021). The City also provides a trolley transit program called WeHo Pickup, which provides free transit within the City along Santa Monica Boulevard between Robertson Boulevard and North La Brea Avenue (WeHo Pickup 2021); the closest stop to the Project Site is bus stop 17, located at the intersection of Santa Monica Boulevard and Ramage Street, approximately 0.6 mile southeast of the Project Site (Google Earth Pro 2021). Additionally, the city provides a free bus transit service called Cityline, which is comprised of Cityline Local that provides transit services every 30 minutes, and the Cityline Commuter that provides rush hour and Saturday evening service (until eight pm) to and from Hollywood and Highland and the Metro B line every 15 minutes (West Hollywood 2021a); the closest Cityline bus stop to the Project Site is bus stop three, located at the intersection of Palm Avenue and Nellas Street, approximately 0.5 mile east of the Project Site (West Hollywood 2021b); Google Earth Pro).

Bicycle Routes

Bicycling is permitted along Sunset Boulevard and the surrounding local roadways but are not denoted with pavement markings or striping such as bicycle sharrows, lanes, or signed routes within the Project Site vicinity.

Existing Pedestrian Facilities

Pedestrian access to and from the Project Site includes the sidewalk on the northern portion of the Project Site along Sunset Boulevard and the alley on the eastern portion of the Project Site that is along Carol Drive.

4.6.2 Regulatory Framework

a. Federal

No federal regulations pertain to this issue area.

b. State

Caltrans Manual on Uniform Traffic Control Devices

Chapter 6C of the California Department of Transportation (Caltrans) CA Manual on Uniform Traffic Control Devices (MUTCD) outlines the essential components and principles for establishing safe and effective Temporary Traffic Control zones during road work or incidents. The goal is to ensure the safety of road users and workers while maintaining efficient traffic flow. Key guidance elements include proper signage, buffer zones, barriers and channelizing devices, reduced speed limits, and lane closure (Caltrans 2014).

California Transportation Plan 2050

The California Transportation Plan is prepared by Caltrans every five years to provide a long-range policy framework to meet the State's future mobility needs and reduce greenhouse gas (GHG) emissions to goals set by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB 32] and implementing legislation Senate Bill (SB) 375 (discussed below). The most recent California Transportation Plan 2050 was adopted in 2021 (Caltrans 2021). The California Transportation Plan defines goals, performance-based policies, and strategies to achieve the State's collective vision for California's future Statewide, integrated, multimodal transportation system by envisioning a sustainable system that improves mobility and enhances quality of life. Through ongoing engagement, the California Transportation Plan is intended to provide goals and visions to support a fully integrated, multimodal, sustainable transportation system that supports the quality of life, prosperous economy, human and environmental health, and social equity.

Senate Bill 375

Metropolitan Planning Organizations (MPO) are federally mandated, locally-focused transportation policy-making body for urbanized areas with populations over 50,000, and include local, state, and transportation agencies representing the regions within which they are located in. The mandate of the MPO is to provide a planning process that provides a roadmap for the long-range transportation plans and improvement programs that use of federal funds for highway and transit projects. The Southern California Association of Governments is the City of West Hollywood's MPO.

The City of West Hollywood is located within the designated Metropolitan Southern California Association of Governments (SCAG). The commitment of SCAG to regional planning includes land use, transportation, housing, and economic development to achieve sustainability goals from the Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), such goals include reducing greenhouse gas emissions related to land use, natural hazards, and climate change. SCAG's Regional Council adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS) on April 4, 2024. The 2024 RTP/SCS sets a long-range vision plan for Southern California to balance future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS integrates land use and transportation planning to promote smart growth and sustainable goals.

Under Senate Bill (SB) 375 SCAG is required to adopt a sustainable communities strategy as part of its regional transportation plan to further the reduction of GHG emissions from cars and light trucks. Additionally, SB 375 requires the State Air Resources Board, to work with SCAG, to adopt GHG emission reduction target for the automobile and light truck sector. SB 375 provides CEQA incentives for development projects that are consistent with the RTP/SCS and meets those GHG reduction targets.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of California Environmental Quality Act (CEQA) compliance. These changes eliminated automobile delay, level of service, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reductions of GHG emissions. In December 2018, the Office of Land Use and Climate Innovation (LCI) released the final update to *CEQA Guidelines* consistent with SB 743, which recommends using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance no later than July 1, 2020. Simultaneously, LCI also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State's greenhouse gas emissions reductions targets (LCI 2018).

In September 2025, Caltrans released the Second Edition of "Transportation Analysis under CEQA." While the framework remains largely the same, the Second Edition includes clarifications on screening criteria, thresholds of significance, and mitigation strategies for VMT analysis, as well as refinements for induced travel and multimodal considerations (Caltrans 2025).

State CEQA Guidelines Section 15064.3 and OPR Technical Advisory

State CEQA Guidelines Section 15064.3 implements SB 743 and establishes VMT as the most appropriate measure of transportation impacts. The primary components of Section 15064.3 include:

- Identifies VMT as the most appropriate measure of transportation impacts;
- Declares that a project's effect on automobile delay shall not constitute a significant environmental impact (except for projects increasing roadway capacity);
- Creates a rebuttable presumption of no significant transportation impacts for (a) land use projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allows a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Gives lead agencies discretion to select a methodology to evaluate a project's VMT but requires lead agencies to document that methodology in the environmental document prepared for the project.

CEQA lead agencies were required to comply with the State Guideline Section 15064.3 no later than July 1, 2020.

c. Regional and Local

Congestion Management Program (CMP)

The Los Angeles County Metropolitan Transportation Authority (Metro) formerly issued Congestion Management Program (CMP) documents in compliance with Proposition 111 (Traffic Congestion Relief and Spending Limitation Act Of 1990). Metro announced in August 2019 that Los Angeles County had exempted itself from CMP requirements (SCAG 2020a).

Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal)

As briefly described above, in 2024, SCAG adopted the 2024-2050 RTP/SCS – a plan now called Connect SoCal, which presents a vision for the region in 2050. Connect SoCal is a major planning document for our regional transportation and land use network. It balances the region's future mobility and housing needs with economic, environmental and public health goals. The 2024-2050 Connect SoCal Plan includes an investment of $751.7 billion primarily in operations and maintenance to ensure the continued performance of the existing transportation system, while planning to add 181,200 new miles of transit revenue service, 4,000 new miles of bikeways, and 869 miles of express lanes, with goals related to Complete Streets and the integration of emerging technologies to improve safety and efficiency. It projects that 66 percent of new households and 54 percent of new jobs between 2019 and 2050 will be located in Priority Development Areas near transit or in walkable communities and anticipates a transition from fuel taxes to user-based fees to create a funding mechanism as fuel efficiency and zero-emission vehicle usage increases (SCAG 2024).

South Coast Air Quality Management District Air Quality Management Plan (AQMP)

The AQMP is a plan devised by the South Coast Air Quality Management District (SCAQMD) to reduce emissions from on-road motor vehicles by establishing more stringent tail-pipe emission standards, using less-polluting fuels, and reducing vehicle use (e.g. vehicle trips and vehicle miles traveled). A Transportation Demand Management (TDM) program that consists of AQMP-recommended Transportation Control Measures (TCM) will reduce vehicle use.

City of West Hollywood General Plan 2035 Mobility Chapter

The City of West Hollywood's mobility strategy is to create a balanced and multi-modal transportation system that meets the needs of the community, and to improve the quality of life within West Hollywood while also serving as an active participant in regional strategies to address regional transportation issues. The City's Mobility Element includes strategies for many different components of the multi-modal transportation system: enhancements to the pedestrian and bicycle network, improvements to public transit, land use strategies to improve transit use, transportation demand management, and innovative parking solutions. Together, these strategies are intended to reduce traffic congestion by discouraging the use of single occupancy vehicles on city streets while creating a more efficient and healthy transportation system (West Hollywood 2011).

Since incorporation in 1984, the City has had a primary goal of creating a pedestrian community. Specific strategies have included creating pedestrian-friendly storefronts, limiting ground-floor uses to pedestrian-friendly uses, widening sidewalks, encouraging outdoor dining, and encouraging neighborhood-serving uses (West Hollywood 2011).

The City is located in the Los Angeles subregion of SCAG, an area that SCAG predicts to have a population increase of approximately 8.2 percent between 2020 and 2035. Therefore, auto congestion may also continue to increase because of growth in the City and the Los Angeles region, even if no new growth occurs within the City. This is partly because new housing development many miles from the City will continue to attract more individuals interested in spending time or seeking employment in West Hollywood, or who simply pass through the City to reach other destinations (West Hollywood 2011).

There are four primary strategies that the City implements to help reduce travel demand and enhance the multi-modal transportation system by encouraging people to walk, bike and take transit instead of driving. These are sometimes referred to as the 4D's of travel—density, diversity, design, and destinations. The 4D's encompass both improvements to the physical form of the transportation network and policies, programs, and services that sustainably and equitably meet the travel needs of all users and support a multi-modal transportation system (West Hollywood 2011).

Street Network

The City of West Hollywood has the following three classification of streets.

- Local Street: a roadway that primarily serves the residential neighborhood. These include most of the City's residential streets.
- Secondary/Collector Street: a roadway that generally carries vehicular traffic to and from the residential neighborhood. In West Hollywood these also often carry regional and local traffic seeking alternative routes to avoid congestion.
- Arterial Street: a roadway that primarily serves regional as well as local vehicular traffic along commercial corridors.

City of West Hollywood Sunset Specific Plan

Adopted in 1996 and amended in 2019, the Sunset Specific Plan was developed to encourage responsible development along Sunset Boulevard, known internationally as "The Strip." (Sunset Specific Plan 2019). In order for Sunset Boulevard to be an attractive place to visit and an economically vital location to do business, people must be able to walk, drive, and park conveniently. Addressing the needs of people walking, bicycling, and traveling by public transit, is as critical to the ability to reduce congestion on the street as are physical traffic improvements (West Hollywood 2019).

The Sunset Specific Plan has the following transportation goals:

1. Facilitate walking and enhance the safety and comfort of people who walk to, from, and along Sunset Boulevard.
2. Facilitate demand by bicyclists who want to ride to, from, and along Sunset Boulevard.
3. Support the use of public transit by improving service and increasing safety and comfort on transit lines and at waiting areas.
4. Promote a decrease in automobile use among employees of Sunset Boulevard workplaces.
5. Reduce congestion caused by inefficient use of existing parking and poorly distributed parking locations and make public parking available and accessible.
6. Maximize the efficiency of Sunset Boulevard's capacity to carry vehicular traffic.
7. Improve visibility and safety of crosswalks.

Transportation Requirements of the Sunset Specific Plan

The City of West Hollywood has the following applicable transportation requirements (West Hollywood 2019):

1. The developer shall comply with requirements of the City's Transportation Demand Management (TDM) ordinance and participate in the programs of the GoWeHo TMO.
   a. The TDM ordinance should be consulted by developers and business owners prior to receiving project approvals.
   b. All businesses will be required to cooperate with the City's efforts and requirements that result from the CMP, GoWeHo TMO, and TDM.
   c. The City will permit and encourage nonrequired members to join the GoWeHo TMO and will develop a prototype rideshare program.
   d. The City will reduce parking requirements for developments that agree to join the GoWeHo TMO.

2. Operate traffic control devices and employ engineering and transportation systems management to provide optimal vehicular circulation.
   c. When possible, driveways shall be located on signalized secondary streets.
   d. Medians shall be used to prevent left turns onto Sunset from new projects.
   e. All circulation, other than exit and entry, shall take place on the building site.

3. Prevent intrusive valet parking.
   a. Parking operations shall conform to Transportation Department guidelines for on-site queuing and circulation in parking areas.
   b. Valet operators shall not park on residential streets.

4. Shared Parking:

   Shared parking is defined as parking spaces that can be used to serve two or more individual land uses. It may be on-site or off-site in private, public, or jointly developed parking structures.

5. Guidelines for parking structures:
   c. Developers will be permitted to construct up to 120% of the City's requirements.
   d. Developers may construct more than 120% of the required parking spaces only if the additional spaces are made available to the public.
   e. The City will encourage the use of the latest parking technology, such as I.D. cards, electric gates, and individual timers.
   f. All parking structures should be constructed to allow for convenient retrofitting of the building for the recharging of electric vehicles, in accordance with the West Hollywood Zoning Ordinance.

6. Transportation Commission review is required for all projects of 20,000 square-feet or more.
7. A joint meeting of the Transportation Subcommittee and the Planning Commission, or their representatives, will decide on the specific access requirements for each site.

City Transportation Programs

The City of West Hollywood has the following transportation programs (West Hollywood, 2019):

1. **City of West Hollywood General Plan** Mobility Element described above.
2. **Air Quality Management Plan (AQMP)** – As described above, the AQMP includes recommended TCMs to reduce vehicle use. Many of these state and federally mandated TCMs are being pursued as recommendations as well as requirements for new development on Sunset Boulevard via the Sunset Specific Plan. The Sunset Specific Plan requires that the design and facility improvement of new developments promote bicycle and pedestrian transportation through the development of bikeways, bicycle parking, lockers, and pedestrian facilities implementation of these alternative mobility tools aid in the reduction of air quality emissions associated with mobile emissions from passenger vehicles and light duty trucks.
3. **West Hollywood Transportation Demand Management Program (GoWeHo TMO)** – GoWeHo TMO was established in May 2025 to formally implement the City of West Hollywood's Transportation Demand Management (TDM) Ordinance, which is described below. GoWeHo TMO provides support for developers and employers to assist compliance with the ordinance and connects West Hollywood residents, visitors, and employees to sustainable transportation options, advancing the accessibility of walking, biking, public transit, rideshare, and micro-mobility options within the City.
4. **Transportation Demand Management (TDM) Ordinance** – In 1993, the City adopted a TDM ordinance applying to all employers of five or more employees at a work site that is 10,000 square feet or more, whether newly constructed or a new use. This ordinance establishes a program of transportation demand management tools that reduce travel demand and manage the movement of people and vehicles within the City. These tools are created to change the way people travel to work, reduce congestion, and improve air quality in the City.

City of West Hollywood Municipal Code

The City's municipal code contains regulations that support the goals of the general plan and zoning designations throughout the city. The City's transportation municipal code regulations in regard to the Project includes Transportation Demand Management (TDM) plans, required amount of parking spaces, and required transportation infrastructure guidelines to ensure adequate project operation.

- **Chapter 10.16 (Transportation Demand Management)** – Establishes the TDM program. The program establishes requirements for certain developments and employers to implement TDM strategies to reduce vehicle trips and promote sustainable and active transportation.
    - Pursuant to Chapter 10.16 of the West Hollywood Municipal Code, commercial or mixed-use developments greater than 5,000 square feet, residential projects with 10 or more dwelling units, or employers with 10 or more employees are required to submit a TDM plan for new developments and major remodels. Examples of strategies to be included in the TDM plans include marketing non-auto transportation options, annual surveys and reports to track average vehicle ridership and vehicle miles traveled, and implementing measures such as bike racks, electric vehicle charging stations, carpool parking, and transit subsidies.
- **Ordinance No. 18-1027 (2018) –** Amends the City of West Hollywood Municipal Code to adopt local CALGreen standards, requiring conduit and electrical capacity for electric vehicle charging stations in new developments and compliance with CALGreen Sections 4.106.4 and 5.106.3.

- **Ordinance No. 23-22 (2023)** – Amends Chapter 19.28, Off-Street Parking and Loading Standards, of the City of West Hollywood Municipal Code to establish standard parking ratios by land use and provide reductions for mixed-use projects, proximity to high quality transit, car-share spaces, and ground-level vegetative space, provided that parking demand studies are performed to qualify for certain reductions. The ordinance also included standards for the design of parking and driveways, bicycle parking and support facilities, EV charging, and loading areas.

4.6.3 Impact Analysis

a. Methodology and Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to transportation if it would:

1. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b); or
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 WHILE THE PROJECT WOULD BE CONSISTENT WITH CONNECT SOCAL 2024, THE CITY OF WEST HOLLYWOOD 2035 GENERAL PLAN, AND THE CITY OF WEST HOLLYWOOD SUNSET SPECIFIC PLAN, IT HAS POTENTIAL TO CONFLICT WITH THE CITY OF WEST HOLLYWOOD MUNICIPAL CODE. HOWEVER, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The primary plans addressing the circulation system in the Project area are the RTP/SCS (SCAG 2024), the City of West Hollywood 2035 General Plan, the City of West Hollywood Sunset Specific Plan, and the City of West Hollywood Municipal Code. Together the plans address various modes of transportation, including roadway vehicle, transit, bicycle, and pedestrian facilities, and include goals, policies, and objectives related to these modes of transportation.

As described in Chapter 2, *Project Description*, implementation of the Project would involve construction activities such as excavation for construction of the proposed subterranean parking structure, the export of approximately 25,000 cubic yards of soil to be transported to the Chiquita Canyon Sanitary Landfill, the implementation of temporary barricades to limit access to the site to ensure safe access for construction workers, and the use of staging areas within the Project Site and the existing parking lane on Sunset Boulevard. Other proposed construction activities would involve earthwork, rebar, structural steel, concrete slab, concrete panels, mechanical, electrical, plumbing, glazing, roofing, landscaping, hardscape consisting of asphalt concrete, fencing, associated site utilities, site drainage, and any associated offsite work that may be required.

The Project would consolidate three lots located at 9160-9176 Sunset Boulevard into one, with the purpose of constructing a 5-story commercial office building. The proposed commercial office building would include approximately 52,999 square-feet of floor area on an 18,608 site, with a floor

to area ratio of 2.85. The ground floor of the building would include retail/restaurant uses, a lobby associated with office uses, back of house uses and bike showers, and a ramp to three levels of underground parking. Levels 2-5 of the building would house commercial office spaces. The building would also facilitate the development of two full-motion animated billboards, with one located along the northwest corner of the building on Levels 3-5 (Advertising Area 1) and the other on the northeast corner of the building on Level 4 (Advertising Area 2).

The Project's consistency with applicable programs, plans, ordinances and policies addressing the regional/local circulation system, including transit, roadway, bicycle and pedestrian facilities during construction and operational activities is discussed below.

Applicable Plans, Ordinances, and Policies

SENATE BILL 743

As detailed below in Impact TRA-2, the Project would adhere to SB 743.

CITY OF WEST HOLLYWOOD 2035 GENERAL PLAN – MOBILITY ELEMENT

Table 4.6-1 details the applicable goals and policies in the 2035 General Plan, Mobility Chapter, as applicable to the Project:

Table 4.6-1 City of West Hollywood 2035 General Plan – Mobility Element

Policy	Consistency
Goal M-1: Develop a world-class transit system in West Hollywood.	
M-1.3 Consider requiring development projects to include transit amenities and transit incentive programs.	The Project would include transit amenities such as bike racks and would include transit incentive programs as part of the TDM program. Therefore, the Project would be consistent with this policy.
M-1.10 Seek ways to reduce the emissions of greenhouse gases by transit vehicles.	The Project would provide 86 parking spaces, including 20 spaces supplied with a 40-amp Electric Vehicle (EV) chargers and an additional 20 EV charging capable spaces, and would reduce greenhouse gas emissions compared to cars that use gasoline. Therefore, the Project would be consistent with this policy.
Goal M-2: Collaborate on regional transportation solutions that improve mobility, quality of life, and environmental outcomes.	
M-2.5 Develop programs and strategies that work to achieve greenhouse gas or VMT reduction standards established by regional, state, and/or federal agencies.	The Project would provide 86 parking spaces, including 20 spaces supplied with a 40-amp Electric Vehicle (EV) chargers and an additional 20 EV charging capable spaces. The Project is a mixed-use development that contains retail and dining uses on the ground floor with open seating, which would incentivize proposed office workers to walk in the area of the Project, rather than using cars. Additionally, the Project Site is located in a transit-priority area, which would incentivize workers to take public transit rather than using individual cars. Therefore, the Project would be consistent with this policy.

Policy	Consistency
Goal M-3: Maintain and enhance a pedestrian-oriented City.	
M-3.1 Encourage and provide incentives and programs for people to walk more and drive less.	The Project is a mixed-use development that contains retail and dining uses on the ground floor with open seating, which would incentivize proposed office workers to walk within the Project area, rather than using cars. Additionally, the Project would include bike racks that would incentivize pedestrian transit in the Project area. Therefore, the Project would be consistent with this policy.
M-3.2 Seek to prioritize space for pedestrians and bicycles in the design and improvement of public rights of way.	The Project is a mixed-use development that contains retail and dining uses on the ground floor with open seating. Additionally, the Project would support pedestrian-oriented amenities by constructing ground floor seating and installing public realm enhancements along the Project's Sunset Boulevard frontage in the form of interactive public artwork that commemorates the site of the former Cock 'n Bull restaurant and bar as well as many other clubs from the vintage Hollywood era. The Project would provide bike racks, lockers and showers. Accordingly, the Project would prioritize space for pedestrians and bicycles. Therefore, the Project would be consistent with this policy.
M-3.4 Where feasible, provide the following pedestrian amenities throughout the street network, consistent with the desired urban form and land use in this General Plan: ▪ Wider sidewalks ▪ Street trees and landscaping ▪ Bulb-outs ▪ Seating areas ▪ Pedestrian-oriented lighting	The Project would increase sidewalk width and include street trees and landscaping, outdoor seating areas on the ground floor, and pedestrian-oriented lighting for safety purposes. Therefore, the Project would be consistent with this policy.
M-3.6 Continue to work with businesses and business groups to improve walkability on major corridors and support private investment into pedestrian-oriented amenities.	The Project would be located in a high-quality transit area (HQTA), which would improve walkability on major corridors such as Sunset Boulevard. Additionally, the Project would support pedestrian-oriented amenities by constructing ground floor seating and installing public realm enhancements along the Project's Sunset Boulevard frontage in the form of interactive public artwork that commemorates the site of the former Cock 'n Bull restaurant and bar as well as many other clubs from the vintage Hollywood era. Therefore, the Project would be consistent with this policy.
M-3.9 Require new commercial development to provide for the construction of pedestrian rights of way to allow convenient and unimpeded circulation to, though and within the property being developed.	The Project would not expand its Project boundaries into existing ROWs that would impede circulation within or around the Project area. Therefore, the Project would be consistent with this policy.
M-3.10 Require design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.	The Project would be located in a HQTA and include bike racks that would allow the connections to the Project Site and adjacent developments. Therefore, the Project would be consistent with this policy.
Goal M-4: Create a comprehensive bicycle network throughout the City	
M-4.2 As feasible, ensure that new development of commercial and multi-family residential uses enhance the City's bicycle network and facilities.	The Project would install bike racks, lockers, and showers that would enhance the city's bicycle facilities. Therefore, the Project would be consistent with this policy.

Policy	Consistency
M-4.3 Where feasible, install bicycle amenities including parking, storage, dedicated bicycle lanes, and bicycle way-finding/signage along planned bicycle routes, throughout commercial areas, and at public facilities.	The Project would install bike racks, lockers, and showers. Therefore, the Project would be consistent with this policy.
M-4.4 Explore 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	The Project would include the installation of bike racks, lockers, and showers. Therefore, the Project would be consistent with this policy.
M-4.6 Require 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.	The Project would include the installation and construction of bike racks, lockers and showers. Therefore, the Project would be consistent with this policy.
Goal M-5: Create an environmentally and financially sustainable transportation network that provides for the mobility and livability needs of West Hollywood residents, businesses, and visitors.	
M-5.8 Allow for the collection of fees from developers to undertake the following infrastructure projects to support new development: ▪ Sidewalk improvements ▪ Landscaping ▪ Bicycle infrastructure ▪ Traffic calming devices ▪ Traffic signals ▪ Other improvements that promote/maintain the pedestrian-oriented character of the community (i.e. traffic calming devices and TDM programs).	During the permitting process, the Project Applicant would pay all applicable fees in regard to the Project. Therefore, the Project would be consistent with this policy.
M-5.9 Require new development to pay its share of transportation improvements necessitated by that development.	During the permitting process , the Project Applicant would pay all applicable fees in regard to the Project. Therefore, the Project would be consistent with this policy.
M-5.11 Ensure that emergency vehicles have secure and convenient access to the City's street network.	The Project would ensure that emergency vehicles have convenient access to the Project Site and Project area during the construction phase by implementing a Construction Management Plan as a Standard Condition of Approval of the Project, which would provide adequate multi-modal circulation opportunities within and around the Project Site during construction. During the operational phase, there would be no impediment to access to the Project area because the Project would adhere to all applicable City guidelines in regard to site access. Therefore, the Project would be consistent with this policy.
Goal M-6: Utilize Transportation Demand Management strategies to reduce auto travel.	
M-6.2 Require new projects to provide an estimate of new trips generated and/or additional VMT. The degree of specificity required will be reasonably proportional to the project size.	The City's Trip Generation Assessment (LLG Engineers 2025) for the Project provided an estimate of new trips generated by the Project, including a VMT analysis. Therefore, the Project would be consistent with this policy.

Policy	Consistency
M-6.4 Consider requiring new residential and commercial development to provide a partial transit subsidy for employees and/or residents of the new development.	The Project would provide partial transit subsidies as part of the Project's TDM program. Therefore, the Project would be consistent with this policy.
M-6.7 Support carpool, rideshare, and telecommuting programs in partnership with the City's business community, and strive for increased participation rates.	The Project would provide carpool, rideshare, and telecommuting programs as part of the Project's TDM program. Therefore, the Project would be consistent with this policy.
M-6.9 Respond to changes in demand by replacing auto infrastructure with other types of transportation infrastructure. For example, the City may replace some auto parking with bicycle parking as bicycle use grows or designate auto lanes for public transit only.	The Project would install new bike racks in a location where there are none to respond to growing bicycle and transportation infrastructure. Therefore, the Project would be consistent with this policy.
Goal M-8: Manage parking supply to serve residents, businesses and visitors.	
M-8.9 Require all new development to provide adequate parking whether on-site, offsite, through shared parking or park-once strategies, or other methods.	The Project would provide 86 parking spaces. Therefore, the Project would be consistent with this policy.
M-8.15 Require private parking operators in commercial areas to post information about parking prices, time restrictions, and availability in a consistent manner for all commercial parking.	The Project would include posted information about parking prices, time restrictions, and availability in a consistent manner for all commercial parking. Therefore, the Project would be consistent with this policy.
Goal M-9: Facilitate sustainable, effective, and safe movement of goods and commercial vehicles.	
M-9.3 Utilize alleys for access to parking, delivery loading/unloading and trash collection and, where possible, provide additional green space and pedestrian amenities.	The Project would utilize an alleyway on the southern boundary of the Project Site, along Carol Drive, for access to parking, and loading and unloading. Therefore, the Project would be consistent with this policy.
M-9.5 Prohibit commercial vehicles from excessive idling during deliveries and while parked.	The Project Applicant would prohibit commercial vehicles from excessive idling during deliveries and while parked and would install signage about this requirement. Therefore, the Project would be consistent with this policy.

Source: Rincon 2025

CITY OF WEST HOLLYWOOD SUNSET SPECIFIC PLAN (SSP)

Table 4.6-2 details all the applicable transportation goals the SSP has in regard to the Project and how the Project would adhere to them.

Table 4.6-2 City of West Hollywood Sunset Specific Plan – Transportation Goals

Goals	Consistency
Facilitate walking, and enhance the safety and comfort of people who walk to, from, and along Sunset Boulevard	The Project would create a ground-floor with retail and dining uses that would facilitate walking. Additionally, the Project would introduce lighting for visibility and safety purposes. Therefore, the Project would adhere to this goal.
Facilitate demand by bicyclists who want to ride to, from, and along Sunset Boulevard	The Project would install bike racks to facilitate demand from bicyclists who would want to ride to, from, and along Sunset Boulevard. Therefore, the Project would adhere to this goal.

Goals	Consistency
Promote a decrease in automobile use among employees of Sunset Boulevard workplaces.	The Project Site would be located within a High-Quality Transit Area, which has several public transit routes within the vicinity that would promote proposed employees of the Project to use public transportation and decrease the use of automobiles. Therefore, the Project would adhere to this goal.

Source: City of West Hollywood, 2019, p. 113

CITY OF WEST HOLLYWOOD MUNICIPAL CODE

As described in Section 4.6.3, *Regulatory Framework*, the City's Municipal Code contains regulations that support the goals of the 2035 General Plan and SSP and zoning throughout the City. As described in Section 4.10, *Land Use and Planning*, the Project is consistent with the 2035 General Plan land use designation of SSP and zoning code designation of SSP.

To ensure the Project's compliance with Policy M-5.11 of the City's General Plan Mobility Element regarding emergency access during the construction phase, the Project would be required as a Standard Condition of Approval to submit a detailed Construction Management Plan to be reviewed and approved by the City of West Hollywood. Implementation of the Construction Management Plan would ensure that circulation and emergency access surrounding the Project Site would be maintained throughout construction of the Project. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant prior to mitigation.

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 CONSTRUCTION ACTIVITIES ASSOCIATED WITH THE PROJECT WOULD NOT RESULT IN LONG-TERM TRIP GENERATION, AND ANY TEMPORARY INCREASE IN VMT WOULD NOT SUBSTANTIALLY IMPACT REGIONAL VMT. OPERATION OF THE PROJECT WOULD BE CONSISTENT WITH CEQA GUIDELINES SECTION 15064.3 SUBDIVISION (B), AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Section 15064.3, Determining the Significance of Transportation Impacts, of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Section 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project area compared to existing conditions should be presumed to have a less than significant transportation impact" (CEQA Guidelines § 15064.3).

There are several bus stops that are within a 0.5 mile radius from the Project Site that are considered high-quality transit corridors. The Sunset Boulevard/Cory Avenue and Sunset Boulevard/Doheny Drive bus stops, both part of the Metro Local Line 2, are approximately 60 feet west and 160 feet northwest of the Project Site, respectively, and both are high-quality transit corridors with buses stopping within 15 minute increments during peak commute hours. Additionally, the San Vicente/Sunset Boulevard bus stop along the 105 Metro Local Line is approximately 0.35 mile east of the Project Site and is also a high-quality transit corridor (Metro 2021). Therefore, the Project would be consistent with CEQA Guidelines section 15064.3, subdivision (b), and there would be less than significant impacts.

Impacts related to VMT during construction of the Project would be primarily associated with the construction equipment, worker vehicles, and truck deliveries accessing the site. Pursuant to *CEQA Guidelines* Section 15064.3(b), construction-related VMT is generally evaluated qualitatively. Any increase in the number of trips taken on roadways in the Project area due to construction activities would be temporary in nature and would cease to occur once the construction period is over. Construction would not result in long-term trip generation, and any temporary increase in VMT would not substantially impact regional VMT. Therefore, construction impacts related to VMT would be less than significant.

A Trip Generation Assessment was prepared in 2022 (see Appendix O of the Original DEIR) and updated in 2025 (see Appendix E in the RDEIR) to assess if operation of the Project has the potential to generate VMT above an applicable threshold of significance. The results of the 2025 Trip Generation Assessment are depicted below in Table 4.6-3, below.

Table 4.6-3 Estimated Trip Generation Rates

Land Use	Size (Gross Square Feet)	Daily Trips	AM Peak Hour	PM Peak Hour
Office (ITE Land Use Code 710)	45,107	353	56	53
High-Turnover Retail/Restaurant (ITE Land Use Code 932)	7,892	819	71	72
Total		1,172	127	125

Source: LLG Engineers 2025

Compared to the 2022 Traffic Study initially prepared for the Project, the updated Trip Generation Assessment found there would be 73 fewer daily trips generated by the Project (including 6 additional AM Peak hour trips and 5 additional PM peak hour trips). Subsequent to the preparation of the Trip Generation Assessment in 2022, ITE released multiple updates of their Trip Generation Manual publication. The 2025 Trip Generation Assessment utilizes the most recent trip generation rates provided in the recently released ITE Trip Generation Manual, 12th Edition, which results in fewer trips.

The City of West Hollywood VMT guidelines incorporate the Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA and CEQA Guidelines section 15064.3 and considers a development project to not have a significant impact on transportation if said project is located within a high-quality transit area[1] and is noy subject to any of the exclusionary criteria described below. As discussed in Section 4.1 of this RDEIR, the Project is located within a high-quality transit area because it is located within 0.5 miles of a major transit stop. Specifically,

[1] High-quality transit areas are aeras within 0.5 mile of an existing major transit stop or an existing stop along a high quality transit corridor.

the Sunset Boulevard/Cory Avenue and Sunset Boulevard/Doheny Drive bus stops, both part of Los Angeles County Metropolitan Transportation Authority's (Metro) Bus Route 2, are approximately 60 feet west and 160 northwest of the Project Site. Both bus stops provide transit service within 10 to 15 minute increments during peak commute hours. In addition, the San Vicente/Sunset Boulevard bus stop along the Metro's Bus Route 105 is approximately 0.35 mile east of the Project Site (Metro 2025).[2]

Further, the Project is not subject to any of the exclusionary criteria.

a. A project with a floor area ratio (FAR) of less than 0.75;

- The Project has a FAR of 2.85. Therefore, the Project is not subject to this criteria.

b. A project with more than the required number of parking spaces;

- The Project would adhere to section 19.28.040, Number of Spaces Required, and 19.28,160, Off-Street Loading Space Requirement, of the City's Municipal Code. Refer below which lists the number of required minimum parking spaces based on Project land use and how the Project would adhere to them.
- Offices: two spaces per 1,000 sq. ft. for the first 25,000 sq. ft. plus one space for each additional 1,000 square feet. Additionally, one loading space per 40,000 sq. ft. of office use area.
  - The Project would have approximately 36,920 sq. ft. of office space and approximately 8,187 sq. ft. of back of house/ mechanical electrical plumbing (BOH/MEP) space for office use, for a total of 45,107 sq. ft. of office use space. Therefore, the Project would be required to have a minimum of 70 parking spaces and two loading spaces. The Project would provide 86 parking spaces for office use, with two loading spaces in the subterranean garage.
- Restaurants: 3.5 spaces per 1,000 sq. ft. Outdoor dining: 3.5 spaces per 1,000 sq. ft. if outdoor dining area is 251 sq. ft. or more; none required otherwise.
  - The Project would have approximately 7,892 sq. ft. of restaurant/retail space and approximately 394 sq. ft. of outdoor seating for restaurant/retail. Therefore, the Project would be required to have a minimum of 28 parking spaces. Although the Project may develop a retail or restaurant space as part of the 7,892 sq. ft. of space, it is unknown at this time and the Project relies on the higher number of minimum of parking spaces to adhere to this policy. The Project would provide 14 parking spaces of the required 28 for restaurant/retail use allowed through a 50 percent reduction in minimum parking requirement for secondary use spaces including restaurant/retail use, permitted under section 19.28.060, Reduction of Off-street Parking Requirements.

The Project would adhere to the City's applicable parking requirements and provide a total of 86 parking spaces with a 50 percent reduction in the minimum parking requirement for secondary use spaces including restaurant/retail use, permitted under section 19.28.060, Reduction of Off-Street Parking Requirements. For these 86 spaces, the Project would adhere to sections 19.28.050, Disabled Parking Requirements and 19.28.170, Electric Vehicle Charging Readiness. Therefore, the

[2] The Project Site is also within 0.5 mile of public transit routes served by City shuttles, including the Cityline Local Cedars-Sinai (westbound) and Cityline Local La Brea (eastbound), although it provides service approximately every 30 minutes.

Project would not develop more than the required minimum number of parking spaces and would not be subject to this criteria.

c. A project that is inconsistent with the applicable Sustainable Communities Strategy;

The SCS details how, through coordination of transportation investments and a regional development pattern, the region can achieve the GHG reduction targets set forth by California Air Resources Board (ARB). SCAG's SCS current target is to reduce greenhouse gas (GHG) emissions from automobiles and light duty trucks by eight percent per capita by 2020 and 19 percent by 2035 from 2005 emissions levels (SCAG 2024).

The SCS does not have specific regulations for projects to adhere to, rather, SCAG engages one-on-one with local jurisdictions early in the planning process to identify on-the-ground conditions related to land use, resource areas, transportation infrastructure and locally anticipated growth that are specific to each jurisdiction. Since then, a large majority of jurisdictions have adopted SCS strategies into their General Plan and Zoning Codes (SCAG 2024). Therefore, since there are no specific regulations to adhere by the analysis shown below in Table 4.6-4 lists the SCS strategies and goals that are applicable to the Project and how the Project would adhere to them.

Table 4.6-4 SCAG 2024-2050 Connect SoCal Sustainable Community Strategies

Goals	Compliance
Mobility: Build and maintain an integrated multimodal transportation network	
. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	The Project would develop an office, retail and restaurant use building in a high-quality transit area, which has frequent multimodal access options to the Project Site and other nearby destinations. The current Project Site does not have any bike infrastructure. The Project would build bike racks and have showers, lockers and changing rooms for bikers, as well as wider sidewalks and pedestrian-oriented lighting. Therefore, the Project would adhere to this goal.
Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery	Although the Project would not involve new technologies or micromobility devices, it would include amenities that encourage walking, such as wider sidewalks and pedestrian-oriented lighting. In addition, the Project site is located in a high-quality transit area with multimodal access options to the site. Therefore, the Project would adhere to this goal.
Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety	The Project would involve the construction of an office, retail and restaurant-use building within a high-quality transit area that has several high-quality transit stops within a mile of its location, as well as multimodal access to the Project site. Accordingly, the Project would provide residents with an accessible location to work, shop, and eat. Therefore, the Project would adhere to this goal.
Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	The Project would involve the construction of an office, retail and restaurant-use building within a high-quality transit area that has several high-quality transit stops within a mile of its location, as well as multimodal access to the Project site. Accordingly, the Project would provide residents with an accessible location to work, shop, and eat. Therefore, the Project would adhere to this goal.

Goals	Compliance
Communities: Develop, connect and sustain livable and thriving communities	
Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled	The Project would be designed to have retail and restaurant uses on the ground floor to encourage future office workers and surrounding workers to walk and lessen the reliance of solo car trips to other areas. Also, the Project Site is adjacent to many other mixed-use areas that would encourage pedestrian use and lessen the reliance of solo car trips. Therefore, the Project would adhere to this goal.
Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality	The Project would develop a mixed-use building with office spaces, as well as retail and restaurant uses on the ground floor. Given The Project site's location within a high-quality transit area, proximity to several bus stops within a 0.5 mile radius, and multi-modal access, development of the Project would help to realize a 15-minute community as residents would have accessible employment opportunities as well as food and retail establishments. Therefore, the Project would adhere to this goal.
Environment: Create a healthy region for the people of today and tomorrow	
Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	The Project would provide residents with an opportunity to work, shop, and eat at one accessible location, reducing the need for excessive trips for employment or procuring necessities. It would include infrastructure to support pedestrian and bicyclist access, as well as EV charging infrastructure to reduce the use of resources associated with gas-powered SOV. Therefore, the Project would adhere to this goal.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region	
Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure	While the City has experienced substantial growth in economic activity since its incorporation in 1984, its controlled-growth policies have resulted in a shortage of top-quality office and retail space (City of West Hollywood, 2019, p. 21). The Project would build office and retail spaces that would balance the shortage of office and retail spaces in the city. Additionally, the Project Site is located in a high-quality transit area and would implement pedestrian and bicycle infrastructure as well as EV charging. Therefore, the Project would adhere to this goal.
Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services	The Project develop a mixed-use building providing office space, retail, and restaurant uses within a high-quality transit area with multimodal accessibility and several bus stops within a 0.5 mile radius from the Project Site. Therefore, the Project would broaden safe and efficient access to mobility services that improve connections to jobs and basic services and would adhere to this goal.

Source: SCAG 2024; UltraSystems, 2021; Rincon 2025

All of the SCS strategies, measures and policies collectively support achievement of the region's greenhouse gas reduction targets established by the California Air Resources Board, or a 19 percent per capita reduction by 2035 relative to 2005 levels. (SCAG 2024). The Project would adhere to all

applicable SCS strategies and would be consistent with the SCS. Therefore, the Project is not subject to the following criteria.

d. A project that replaces affordable residential units with fewer, moderate- or high-income residential units.

- The Project would not replace affordable housing units with fewer, moderate- or high-income residential units. The Project would replace a closed automobile dealership with a commercial building comprised of restaurant, retail and office uses. Therefore, the Project would not replace affordable housing units with fewer, moderate- or high-income residential units, and is not subject to this criteria.

e. A project with the potential for significant regional draw.

- A project that may have the potential for regional draw is a development that attracts visitors from outside the local community by offering a specialized service such as an amusement park or specialized hospital. However, the Project would be develop a commercial building with office, restaurant and retail services that are common of every City and would not cause for regional significant draw. Additionally, the city has a shortage of office and retail space in the city (City of West Hollywood, 2019, p. 21). The Project would allow for a better jobs/housing balance within the city and allow residents to find work closer to their homes. Therefore, the Project is not subject to this criteria.

Given that the Project would not generate long-term VMT impacts associated with construction, and that operation of the Project would be consistent with VMT guidelines created by the LCI, SCAG, and the City of West Hollywood, impacts related to consistency with CEQA Guidelines Section 15064.3 subdivision (b) would be less than significant.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant prior to mitigation.

Threshold 3:	Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact TRA-3 CONSTRUCTION OF THE PROJECT COULD INCREASE HAZARDS DUE TO GEOMETRIC DESIGN FEATURES, AND AS SUCH, A CONSTRUCTION MANAGEMENT PLAN WOULD BE REQUIRED. WITH IMPLEMENTATION OF THE CITY'S CONSTRUCTION MANAGEMENT PLAN STANDARD CONDITION OF APPROVAL AND MITIGATION MEASURE TRA-1, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

During the construction phase of the Project, there may be temporary sidewalk and lane closures that could possibly increase hazards due to geometric design features or incompatible uses. However, implementation of the City's Construction Management Plan Standard Condition of

Approval would reduce the potential for hazards due to geometric design features and incompatible uses to less than significant during the Project construction phase.

Operation

The Project would not alter the surrounding roadways. Vehicular access to the Project Site during Project operation would occur on a driveway from Cory Avenue and an alleyway from Carol Drive. The Project would comply with all applicable requirements of the City of West Hollywood regarding traffic-related design features and would be designed to provide adequate lines of sight, proper emergency access, and vehicle flow within the Project Site. Additionally, Mitigation Measure TRA-1 would prevent traffic congestion near the Cory Avenue/Sunset Boulevard/Doheny Road intersection. Therefore, the Project would not increase hazards due to a design feature, and impacts would be less than significant with mitigation.

Mitigation Measures

MM TRA-1 **Wayfinding Signage.** A "keep clear" sign shall be located at the proposed Cory Avenue driveway to ensure there would be less than significant traffic congestion near the Cory Avenue/Sunset Boulevard/Doheny Road intersection.

Significance After Mitigation

Impacts would be less than significant with implementation of the above mitigation measure.

Threshold 4: Would the Project result in inadequate emergency access?

Impact TRA-4 **CONSTRUCTION OF THE PROJECT MAY INVOLVE TEMPORARY SIDEWALK OR LANE CLOSURES, AND OPERATION OF THE PROJECT WOULD INVOLVE TWO EGRESS ROUTES NEAR A BUSY INTERSECTION, BOTH OF WHICH HAVE THE POTENTIAL TO INHIBIT EMERGENCY ACCESS. HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

Construction

During the construction phase of the Project, there may be temporary sidewalk and lane closures that could possibly result in inadequate emergency access. However, preparation of a Construction Management Plan under the City's Standard Condition of Approval, as detailed above in Impact TRA-3, would result in less than significant impacts regarding inadequate emergency access to the Project Site during the Project construction phase.

Operation

In order to ensure adequate ingress and egress is provided to visitors to the Project Site, a forecast for vehicle queues at the Doheny Road-Cory Avenue/Sunset Boulevard intersection (adjacent to the Project parking structure). During operation, two driveways would provide ingress and egress from the Project Site; one from Cory Avenue, and one along a driveway connected to Carol Drive. The 2022 Traffic Assessment (Appendix O of the Original DEIR) found both driveways to have no issues with access; however, the traffic study recommends a keep-clear sign at the Cory Avenue driveway due to the close proximity to the Cory Avenue/Sunset Boulevard/ Doheny Road intersection (Sarsour 2022). Therefore, the Project would implement MM TRA-1, as described under Impact TRA-3, above, which would require such a keep-clear sign, and would reduce emergency access impacts during operation to less than significant. Therefore, a driveway at this location would not be a new

geometric design feature to the adjacent street network. Further, the Project's driveway on Cory Avenue is consistent with nearly all commercial properties located along Sunset Boulevard adjacent to side streets in West Hollywood (i.e., driveways provided along local streets intersecting Sunset Boulevard). Therefore, the Project cannot be considered an incompatible use. Accordingly, the Project would have a less than significant impact prior to mitigation.

Since the Project would implement the Construction Management Plan Standard Condition of Approval and Mitigation Measure TRA-1, described above and below, the Project would reduce emergency access impacts during construction and operation to less than significant. Additionally, the Project Site plan would be reviewed by the Los Angeles County Fire Department and would comply with all emergency access and sight line requirements.

Mitigation Measures

Implementation of MM TRA-1, described above, would be implemented to reduce potential impacts.

Significance After Mitigation

Impacts related to adequate emergency access would be less than significant with mitigation.

4.6.4 Cumulative Impacts

Construction

The Project would have less than significant transportation impacts during the construction phase with implementation of the City's Construction Management Plan Standard Condition of Approval. Other projects proposed in the City of West Hollywood would be required to implement mitigation measures (as warranted) for potential short-term construction impacts regarding potential conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential construction-phase impacts regarding conflict with plans/programs. Therefore, Project impacts would be less than cumulatively considerable.

Operation

The Project would have less than significant transportation impacts during the operation phase with implementation of MM TRA-1. Other projects proposed in the City of West Hollywood would be required to implement mitigation measures (as warranted) for potential long-term construction impacts regarding conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential operational impacts regarding conflict with plans/programs. Therefore, Project impacts would be less than cumulatively considerable.

Emergency Access

As mentioned above, the Project would have less than significant impacts in regard to emergency access with implementation of MM TRA-1. The Project, as well as other projects proposed in the City of West Hollywood, would be required to implement mitigation measures (as warranted) for potential short-term and long-term impacts from projects. It is anticipated that cumulative projects, just as with the Project, would be required to provide adequate emergency vehicle access to Project

Sites both during the short-term construction period and long-term operational phases. Therefore, Project impacts would not be cumulatively considerable.

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5 Alternatives

5.1 Introduction

An essential aspect of the environmental review process under CEQA is the identification and analysis of alternatives to a project. Specifically, Public Resources Code (PRC) Section 21001 states that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives which would avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1 (a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Section 15126.6 of the CEQA Guidelines provides direction regarding the consideration and discussion of project alternatives in an EIR. More specifically, CEQA Guidelines Section 15126.6(a) states the following:

> An EIR shall 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. 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.

Furthermore, the CEQA Guidelines advise that alternatives be selected primarily based on the ability to avoid or substantially lessen significant impacts relative to those of the project, even if the alternatives would impede, to some extent, the attainment of the project objectives or would even be more costly. The CEQA Guidelines further instruct that the identification of alternatives be guided by a "rule of reason," so that only those alternatives necessary to permit a reasoned choice are addressed. In selecting alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...]

In addition, the CEQA Guidelines Section 15126.6(e) requires analysis of a "no project" alternative and Section 15126.6(f)(2) requires an evaluation, if feasible, of alternative location(s) for the project. Based on the alternatives analysis, an environmentally superior alternative is then designated. If the No Project/No Build Alternative is found to be the "environmentally superior alternative", then the EIR shall identify an environmentally superior alternative among the other alternatives.

Under CEQA, the goal of identifying the environmentally superior alternative is to assist decision-makers in considering project approval. However, CEQA does not require an agency to select an environmentally superior alternative (CEQA Guidelines Section 15042-15043). Specifically, CEQA Guidelines Section 15043 states that a public agency may approve a project even though the project

would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:

(a) There is no feasible way to lessen or avoid the significant effect (see CEQA Guidelines Section 15091); and

(b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see CEQA Guidelines Section 15093).

As stated in CEQA Guidelines Section 15093(a):

> CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

In accordance with CEQA Guidelines Section 15126.6, the following section discusses a reasonable range of alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen potential significant impacts of the project and evaluate the comparative merits of the alternatives."

5.2 Overview of Selected Alternatives

As discussed above, alternatives are identified that would reduce the significant impacts of a Project. Based on the analyses provided in Chapter 4.0, *Environmental Impact Analysis*, of this Recirculated Draft EIR (RDEIR), implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to construction noise (Section 4.4, *Noise,* of the RDEIR). After implementation of mitigation measures, the Project would still have significant environmental effects, which would necessitate the adoption of a Statement of Overriding Considerations for impacts regarding construction noise.

Therefore, the alternatives to the Project, listed below, were selected for evaluation based on the significant environmental impacts of the Project, the basic objectives established for the Project as presented in Chapter 2.0, *Project Description*, of this RDEIR, and the feasibility of the alternatives considered. Each of these alternatives is described in the sections that follow.

- Alternative 1: No Project Alternative
- Alternative 2: No Digital Signage Alternative
- Alternative 3: Modified Land Use Alternative
- Alternative 4: Aboveground Parking Alternative

In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described under Section 5.3, *Alternatives Considered and Rejected as Infeasible*.

5.2.1 Relationship of Alternatives to Project Objectives

The alternatives analyzed in Chapter 5.0, *Alternatives*, were developed based on their potential to reduce or eliminate significant impacts identified in Chapter 4.0, *Environmental Impact Analysis*, of this RDEIR, while still achieving most of the goals of the Project.

The Project objectives include the following:

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.
- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

Each alternative was evaluated for its ability to meet these objectives, recognizing that some alternatives may only partially fulfill certain goals. The alternatives were also assessed for feasibility based on site constraints, regulatory considerations, and economic viability. Table 5-1, *below,* provides a comparative summary of how each alternative aligns with the Project objectives.

5.3 Alternatives Considered and Rejected as Infeasible

According to CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. The factors that may be used to eliminate an alternative from detailed consideration may include the alternative's failure to meet most of the basic Project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include the following:

- **Alternative Project Site:** The Project's objectives are intimately tied to the concept of activating this section of the Sunset Strip and creating a landmark building at the Project Site to serve as a gateway to the City, which would satisfy the SSP's objectives for the area. Development on an alternative site would result in no changes to existing on-site conditions, which would provide no potential to achieve these objectives. In addition, the Project applicant already owns the Project Site, and, given the area is entirely built out with no other sites available, it would be infeasible for the applicant to acquire, control, or have access to another site to develop the Project. For example, the site to the east, which is contemplated for development of a smaller project at a maximum of 45 feet, could not accommodate the Project without amending the SSP. Furthermore, it would be expected that if development of the Project were to occur at an alternative site within a similar urban environment, the significant and unavoidable impacts of

the Project would also occur and could potentially be more severe depending on the proximity of sensitive uses. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

- **Alternatives that Reuse Existing Car Dealership:** The City looked for alternatives that would reduce the Project's significant and unavoidable construction noise impact. However, as demonstrated in Table 4.4-5, within Section 4.4, *Noise*, of the RDEIR, the greatest construction noise impacts would occur during construction, which would remain significant even with implementation of mitigation measures, which require temporary noise barriers be installed to protect the nearest sensitive receptors, in addition to enclosures around equipment. Since there is no feasible way to mitigate the significant construction noise impacts and still allow for construction of a new building on the Project Site, the only way to prevent it is to avoid demolition altogether. Therefore, alternatives were considered that would reuse the existing structure and only involve interior improvements.
  - The City considered reusing the buildings onsite for car dealership use by another tenant (the previous dealership closed permanently in May 2021). However, the previous owner sold the Project Site due to constraints of using the Site as a dealership that result in competitive disadvantages compared to the surrounding areas. The Project Site cannot support onsite inventory, and thus cars may be shown by appointment only. Nor can the Project Site support maintenance for modern vehicles as it cannot service electric vehicles (EV). A car dealership that does not support EV inventory or service also interferes with the City's climate goals that incentive sustainable modes of transportation including a shift to EVs.
  - The City also considered adaptive reuse of the structures on the Project Site. However, the existing structure on the Project Site is sized and configured specifically for a car dealership that would need significant remodeling, including retrofitting to make the building comply with existing codes, to convert to a different use. Given the existing structures limitations, including the cost in retrofitting, any reasonable user of the Project Site would elect to demolish the building.

Ultimately, neither of these options would meet the Project objectives or the City's objectives for the Project Site per the SSP, which are intimately tied to the concept of activating this section of the Sunset Strip with vibrant land uses and creating a landmark building at the Project Site to serve as a gateway to the City.

5.4 Alternatives Analysis Format

Consistent with the CEQA Guidelines Section 15126.6(d), each alternative was assessed at a level of detail necessary to determine if the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative was evaluated to determine whether the Project's basic objectives, identified in Chapter 2.0, *Project Description*, of this RDEIR, would be significantly attained by the alternative. The evaluation of each of the alternatives follows the process described below:

1. An alternative's net environmental impacts for each environmental issue area (analyzed in Chapter 4.0, *Environmental Impact Analysis,* of this RDEIR) was determined assuming that the alternative would implement the same Project design features and mitigation measures identified in Chapter 4.0, *Environmental Impact Analysis*.

2. The post-mitigation significant and non-significant environmental impacts of an alternative and the Project were compared for each environmental issue area as follows:
   a. Less: If the net impact of an alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact was determined to be "less."
   b. Greater: If the net impact of an alternative would clearly be more adverse or less beneficial than the Project, the comparative impact was determined to be "greater."
   c. Similar: Where the impact of an alternative and Project would be roughly equivalent, the comparative impact was determined to be "similar."
3. The comparison of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

Table 5-1, below, provides a summary comparison of each of the alternatives' ability to meet the goals and objectives of the Project.

Table 5-1 Comparison of Alternatives and Their Ability to Meet Project Objectives

Project Objective	Project	No Project Alternative	No Digital Signage Alternative	Modified Land Use Alternative	Aboveground Parking Alternative
1. Redevelop the Project Site in accordance with the goals of the SSP for Area 8, including the provision of office space for anchor businesses and creative industries.	Objective Fully Met	Objective Not Met	Objective Partially Met	Objective Fully Met	Objective Fully Met
2. Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.	Objective Fully Met	Objective Not Met	Objective Partially Met	Objective Fully Met	Objective Fully Met
3. Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.	Objective Fully Met	Objective Not Met	Objective Fully Met	Objective Not Met	Objective Not Met
4. Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.	Objective Fully Met	Objective Not Met	Objective Fully Met	Objective Fully Met	Objective Fully Met
5. Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Fully Met	Objective Fully Met
6. Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.	Objective Fully Met	Objective Not Met	Objective Fully Met	Objective Fully Met	Objective Fully Met

Source: Rincon, 2025.

5.5 Analysis of Alternative 1 – No Project Alternative

5.5.1 Description of the Alternative

In accordance with the CEQA Guidelines, Alternative 1 for a development Project on an identifiable property consists of the circumstances under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain circumstances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for the purposes of this analysis Alternative 1 assumes that the Project would not be constructed. The former automotive dealership closed in May 2021. In this alternative, the auto dealership buildings would remain onsite and the Project Site would not be redeveloped.

5.5.2 Environmental Impacts

5.5.2.1 Aesthetics

Scenic Vistas

Under Alternative 1, the existing buildings would remain and the Project would not be developed. Thus, Alternative 1 would not result in an increase in height or massing of onsite structures, and existing views of, and across, the Project Site would remain the same. Therefore, Alternative 1 would not have the potential to obstruct a scenic vista, and no impacts to scenic vistas would occur. Thus, impacts related to scenic vistas would be similar to the less than significant impacts of the Project.

Visual Character

Construction

Under Alternative 1, no construction activities would occur; therefore, no changes in the visual character of the site would result. Therefore, there would be no potential for the construction activities to affect the visual character of the area on a short-term or long-term basis under Alternative 1. There would also be no potential impacts from conflicts with zoning and other regulations governing scenic quality. Impacts to such regulations would be less under Alternative 1 than the Project's less than significant impacts.

Operation

Alternative 1 would maintain the existing building and surface parking on the Project Site. However, unlike the Project, Alternative 1 would not advance the City's planning objectives governing scenic quality. Alternative 1 would not redevelop the Project Site with an office building of "distinctive landmark" quality that serves as a "visual termination at the western end of Sunset Boulevard as called for by the SSP. Accordingly, although Alternative 1 would result in less than significant impacts related to visual character, they would be greater than the Project's less than significant impacts.

Shading

Alternative 1 would not create or cast new shadows on surrounding sensitive uses since new buildings would not be constructed on the Project Site. Therefore, no shading impacts would occur

under Alternative 1. Thus, shading impacts under Alternative 1 would be less than the Project's less than significant impacts.

Light and Glare

Construction

Alternative 1 would not involve any demolition or construction activities. Therefore, Alternative 1 would not introduce light sources or potential glare associated with construction equipment. Thus, light and glare impacts during construction under Alternative 1 would be less than the Project's less than significant impacts.

Operation

Artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Streetlights and traffic on local streets also contribute to the ambient light levels in the area. Alternative 1 would not alter the existing uses on the site, introduce any new sources of light or glare, or otherwise increase the amount of activity occurring onsite. Therefore, Alternative 1 would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less than the Project's less than significant impacts.

5.5.2.2 Air Quality

Construction

Regional Emissions

Alternative 1 would not involve demolition of the existing car dealership or construction of the proposed office building. Therefore, this alternative would not result in any construction emissions from construction traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Construction-related regional air quality impacts would not occur. Therefore, no construction-related air quality impacts would occur under Alternative 1, and impacts would be less than the Project's less than significant impacts.

Localized Emissions

Alternative 1 would not result in any construction emissions, which could potentially expose emissions to nearby sensitive receptors, and construction-related localized air quality impacts would not occur. Impacts of Alternative 1 related to localized air quality impacts would be less than the Project's less than significant impacts.

Toxic Air Contaminants

Since construction activities would not occur, Alternative 1 would not generate diesel particulate emissions during construction that contain toxic air contaminants (TACs) and would not expose sensitive receptors to TACs. Therefore, no impacts associated with the release of TACs would occur under Alternative 1. Thus, TAC-related impacts under Alternative 1 would be less that the Project's less than significant impacts.

Operation

Regional Emissions

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing auto dealership . Therefore, no operational impacts on regional air quality emissions would occur under Alternative 1. Thus, regional air pollutant emission impacts under Alternative 1 would be less than the Project's less than significant impacts.

Toxic Air Contaminants

As analyzed in Section 4.2, *Air Quality*, of the RDEIR, the Project would result in some TAC emissions during operation, primarily from mobile sources. Since Alternative 1 would not result in new development or increase the intensity of the existing uses, no new increase in mobile source emissions would occur. No operational TAC emissions impacts would occur under Alternative 1, and such impacts would be less than the Project's less than significant impacts.

5.5.2.3 Biological Resources

Alternative 1 would not remove any vegetation, including existing shrubs and trees, or existing buildings. No new buildings would be constructed that may impact plant and/or wildlife species. Alternative 1 would not cause indirect impacts on nesting birds from increased noise, vibration, and dust during construction and would not impact migratory non-game breeding birds. Therefore, this alternative would have no impact on biological resources without mitigation and impacts would be less when compared to the Project, which would be less than significant after mitigation.

5.5.2.4 Cultural Resources

Archaeological Resources

Under Alternative 1, no demolition, grading, or other earthwork activities that could potentially affect subsurface archaeological resources would occur. Therefore, impacts to archaeological resources would not occur under Alternative 1 without the need for mitigation, and impacts would be less compared to those of the Project, which are less than significant after mitigation.

Historical Resources

Since this alternative would include no demolition or new construction and the auto dealership would have no change in operations, there would be no impact on historical resources. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be similar to those of the Project, which would not adversely impact historical resources.

5.5.2.5 Energy

Energy Use

Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate short-term energy demand during construction, and construction-related impacts to

energy would not occur. Thus, short-term construction impacts under Alternative 1 would be less when compared to the less than significant impacts of the Project.

Operation

Alternative 1 would not alter the existing land uses and would not increase the long-term energy demand. Therefore, long-term operational impacts under Alternative 1 would be less when compared to the less than significant impacts of the Project.

5.5.2.6 Geology and Soils

Geology and Soils

Alternative 1 would not involve soil disturbance or grading and would not result in erosion or soil. The potential for seismically-induced ground settlement, liquefaction, lateral spreading, expansive soils, and landslides would remain as they are described under Existing Conditions in Section 4.6, *Geology and Soils*, of the Original Draft EIR (Original DEIR) and in the Geotechnical Investigation (Appendix N of Original DEIR) because those are the baseline conditions of the Project Site. Therefore, Alternative 1 would not cause or accelerate geologic hazards related to fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, or expansive soils, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. No impacts related to geology and soils would occur under Alternative 1, and impacts would be less when compared to the less than significant impacts of the Project.

Paleontological Resources

Alternative 1 would not require demolition, construction or soil disturbance, and therefore it would not cause potential impacts to paleontological resources due to construction. Alternative 1 would have no impact to paleontological resources without mitigation and impacts would be less when compared to the Project, which would have less than significant impacts after mitigation**.**

5.5.2.7 Greenhouse Gas Emissions

Since Alternative 1 would not involve demolition or new construction, and existing onsite buildings would remain vacant, no new greenhouse gas (GHG) emissions would be generated and new impacts beyond existing conditions associated with global climate change would not occur. Therefore, this alternative would have no impact related to GHG emissions. Therefore, impacts associated with GHG emissions under Alternative 1 would be less when compared to the less than significant impacts of the Project.

5.5.2.8 Hazards and Hazardous Materials

Alternative 1 would not involve demolition, grading, or other construction activities. Therefore, this alternative would not have the potential to uncover subsurface hazards. This alternative would not use or release hazardous materials, or generate hazardous waste, during construction. Construction impacts of this alternative would be less than those of the Project.

This alternative would involve potential re-operation of the existing automotive dealership involving use, storage, and disposal of hazardous materials. While the future tenants of the proposed office building are unknown, it is expected that the office uses in the Project would use less hazardous

materials than an automotive dealership would use. Even though the existing buildings would not be demolished, asbestos containing materials (ACMs) and lead based paint (LBP) could still be disturbed through potential re-operation under this alternative. Therefore, impacts under Alternative 1 would be similar to, but potentially more than, the less than significant impacts of the Project related to the accidental release of hazardous materials.

Additionally, since Alternative 1 would not result in any changes to the current operation or configuration of the Project Site, no impacts would occur to the current emergency response or evacuation plans for the Project Site. Therefore, impacts under Alternative 1 would be less than those of the Project, which are less than significant after mitigation.

5.5.2.9 Hydrology and Water Quality

Alternative 1 would avoid all new development on the Project Site. No new impervious surfaces would be created, and existing site conditions would remain unchanged. Therefore, this alternative would not alter runoff patterns or storm drainage capacity compared to existing conditions.

Because no construction would occur, this alternative would not result in construction-related hydrology and water quality impacts. Similarly, no long-term operation changes to the Project Site would occur, and existing hydrology and water quality conditions would be maintained. Therefore, no impacts would occur under this alternative related to hydrology and water quality and impacts would be less than the Project's less than significant impacts.

5.5.2.10 Land Use and Planning

Alternative 1 would not involve new development. Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing auto dealership. No land use approvals or permits would be required. However, unlike the Project, Alternative 1 would not advance the City's planning objectives that promote the development of the Project Site with an office building of "distinctive landmark" quality that serves as a "visual termination at the western end of Sunset Boulevard. Accordingly, although Alternative 1 would result in less than significant land use and planning impacts, they would be greater than the Project's less than significant impacts.

5.5.2.11 Noise

Construction

No construction activities would occur under Alternative 1. Therefore, no construction-related noise or vibration would be generated onsite or offsite. Therefore, no onsite or offsite noise or vibration impacts would occur during construction under Alternative 1, and impacts would be less when compared to the short-term impacts of the Project, which would be significant and unavoidable for construction noise and vibration after mitigation.

Operation

Alternative 1 would not develop new uses, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the site or vicinity. Therefore, no impacts associated with operational noise would occur under Alternative 1, and long-term impacts would be less when compared to the less than significant impacts of the Project.

5.5.2.12 Transportation

Construction

Alternative 1 would not include demolition or the development of any new buildings onsite. Therefore, Alternative 1 would not generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. Thus, no construction-related traffic impacts would occur under Alternative 1. In addition, since construction activities would not occur under Alternative 1, there would be no potential for access and safety, bus/transit, and on-street parking impacts during construction. Overall, no short-term construction-related traffic impacts would occur under Alternative 1, and such impacts would be less when compared to those of the Project, which would be less than significant after mitigation.

Operation

Since Alternative 1 would not develop new or additional land uses, operation of Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation. Therefore, no impacts would occur with respect to operational traffic, including VMT; intersection levels of service; the regional transportation system; neighborhood intrusion; access and circulation; and bicycle, pedestrian, and vehicular safety. Impacts under Alternative 1 would be less when compared to those of the Project, which would be less than significant after mitigation.

5.5.2.13 Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. No impacts to tribal cultural resources would occur, and impacts would be less when compared to those of the Project, which would be less than significant after mitigation.

5.5.2.14 Utilities and Service Systems, Electricity and Telecommunications

Under Alternative 1, no new development would occur. As such, this alternative would not result in increased demand for electricity or telecommunications services beyond existing conditions. As Alternative 1 would not increase utility demand, it would not necessitate the construction or redevelopment of off-site electrical or telecommunications infrastructure. Therefore, impacts related to electricity and telecommunications under Alternative 1 would be less than the Project's less than significant impacts.

5.5.3 Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable construction noise and vibration impacts and would eliminate the need for mitigation related to biological, archeological, paleontological and tribal resources, and emergency access. However, the Project would have beneficial visual character and land use impacts associated with a newly constructed landmark building that utilizes high-quality materials, is designed to activate the Sunset Strip and meets the goals and policies of the General Plan and the SSP; in addition, beneficial impacts associated with the elimination of the existing operations, which utilize hazardous materials on a regular basis. Impacts associated with the remaining environmental issues would be less than those of the Project

when compared. Overall, the impacts of Alternative 1 would be considerably reduced compared to those of the Project.

5.5.4 Relationship of the Alternative to Project Objectives

Under Alternative 1, no new development would occur. Therefore, this alternative would not meet any of the Project's objectives. Specifically, this alterative would not:

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.
- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

Overall, Alternative 1 would reduce many of the potential impacts of the Project but would not meet any of the Project's objectives.

5.6 Analysis of Alternative 2 – No Digital Signage Alternative

5.6.1 Description of the Alternative

This alternative is identical to the Project except that it omits the digital signage on the exterior of the proposed building to help potentially reduce light and glare impacts. Despite impacts associated with the digital signage being less than significant, this alternative was included to address public comments about the Project digital signage.

5.6.2 Environmental Impacts

5.6.2.1 Aesthetics

Scenic Vistas

Under Alternative 2, construction would involve development of the same five-story office building with the same massing, height, and uses as the Project, excluding the digital signage, which does not exceed the height of the roof. Therefore, Alternative 2 would have similar impacts related to scenic vistas as the Project, which are less than significant.

Visual Character

Construction

Under Alternative 2, construction would involve development of the same five-story office building with the same massing, height, and uses as the Project, excluding the digital signage. As such, short-term aesthetic impacts during construction, such as temporary visual disruption from equipment, scaffolding, and material staging, would be similar to those of the Project. The Project may involve intermittent testing and installation of digital signage components, which would not occur under this alternative. However, these activities are temporary and minor in nature. Alternative 2, like the Project, would not conflict with zoning and other regulations governing scenic quality. Therefore, construction-related impacts to visual character under Alternative 2 would be less than significant, similar to the less than significant impacts of the Project.

Operation

Alternative 2 would result in the same building form and architectural design as the Project, but without the full-motion animated billboards proposed on the northeast and northwest façades. Alternative 2, like the Project, would not conflict with zoning and other regulations governing scenic quality. Moreover, as described in Section 4.1, *Aesthetics*, of the RDEIR, the digital signage is a key visual feature of the Project, contributing to the building's landmark quality and aligning with the SSP goals for Area 8, which encourage iconic signage and creative design elements at the western gateway to West Hollywood. Without the digital signage, the building would retain its architectural quality but would not achieve the same level of visual prominence or alignment with the SSP's vision for a dynamic, visually engaging gateway site. Therefore, Alternative 2's operational impacts to visual character would be greater than the Project's less than significant impacts but would remain less than significant.

Shading

Alternative 2 would result in the same building massing and height as the Project. As such, shade and shadow effects on adjacent properties would be identical to those of the Project. The digital signage would not extend above the building's roofline and would not contribute additional shading. Therefore, shading impacts under Alternative 2 would be similar to those of the Project and would remain less than significant.

Light and Glare

Alternative 2 would include all of the types and numbers of lights included in the Project, except for the digital signage.

Construction

Construction activities under Alternative 2 would be similar in duration and intensity to those of the Project. The Project may involve testing of digital signage components, which would not occur under this alternative. However, light and glare impacts during construction would be similar to those of the Project and would remain less than significant.

Operation

Alternative 2 would omit the digital signage, which is the primary source of nighttime light and potential glare in the Project. As such, operational light and glare impacts under Alternative 2 would be reduced when compared to the Project. The building would still include standard exterior lighting consistent with City requirements but would not include illuminated signage. Therefore, operational light and glare impacts under Alternative 2 would be less when compared to those of the Project and would remain less than significant.

5.6.2.2 Air Quality

Construction

Regional Emissions

Under Alternative 2, the digital signage would not be built. This would eliminate emissions from the equipment used for building the signage (e.g., cranes, lifts). However, the digital signage construction would represent a fraction of the Project's total construction emissions, which are evaluated based on maximum daily emissions and well below the applicable SCAQMD regional thresholds as seen in Table 4.2-6, within Section 4.2, *Air Quality*, of the RDEIR. Therefore, construction-related regional air quality impacts under Alternative 2 would be similar to the Project and would remain less than significant.

Localized Emissions

Similar to regional emissions, localized emissions are evaluated based on maximum onsite daily emissions. As seen in Table 4.2-8, within Section 4.2, *Air Quality*, of the RDEIR, the Project's peak onsite emissions are well below the applicable SCAQMD Localized Significance Thresholds for a one-acre site with sensitive receptors located 25 meters away (the nearest multi-family residences are approximately 20 feet south of the site). The digital signage construction would contribute only a small fraction of these emissions. Therefore, this alternative would result in similar localized construction impacts as the Project, which are less than significant.

Toxic Air Contaminants

Construction of the digital signage would involve limited use of diesel-powered equipment (e.g., cranes), contributing to diesel particulate matter (DPM) emissions. Removing the digital signage would slightly reduce DPM emissions, and the cancer and HI risk. Therefore, TAC impacts under Alternative 2 would be similar to the less than significant impacts of the Project.

Operation

Regional Emissions

The digital signage is not expected to directly generate any air pollutant emissions; therefore, Project operations would result in similar air quality impacts to the Project as seen in Table 4.2-7, within Section 4.2, *Air Quality*, of the RDEIR, which are less than significant.

Toxic Air Contaminants

The digital signage would not emit TACs. The only operational TAC source in the Project is the 200-kW diesel emergency generator, which would still be included under Alternative 2. The generator

would operate intermittently and be subject to SCAQMD permitting. Therefore, TAC impacts under Alternative 2 would be similar to the less than significant impacts of the Project.

5.6.2.3 Biological Resources

Alternative 2 would involve the same ground disturbance, tree removal, and demolition that the Project would. Thus, impacts of Alternative 2 on biological resources would be similar to those of the Project, which would be less than significant after mitigation.

5.6.2.4 Cultural Resources

Archaeological Resources

Alternative 2 would involve the same ground disturbance as the Project and thus would have similar potential impacts on archaeological resources, which would be less than significant after mitigation.

Historical Resources

No historical resources were identified on the Project Site. Alternative 2 would have similar impacts to the Project, which has no impacts to historical resources.

5.6.2.5 Energy

Energy Use

Construction

Construction energy requirements were not modeled separately for the digital signage. However, its removal under Alternative 2 would eliminate the need for specialized equipment such as cranes and lifts used for installation, resulting in a minor reduction in diesel fuel consumption. The equipment required to construct the digital signage would account for only a small portion of the Project's estimated energy consumption (see Table 4.5-1, within Section 4.5, *Energy*, of the RDEIR), so its removal would not substantially change the overall construction energy demand. Therefore, construction-related energy impacts under Alternative 2 would be similar to the Project's less than significant impacts.

Operation

As shown in Table 4.5-2, within Section 4.5, *Energy*, of the RDEIR, the digital signage is estimated to consume 463,550 kWh/yr, which represents approximately 23 percent of the Project's total annual electricity use of 2,050,683 kWh. Therefore, Alternative 2 would reduce total operational electricity consumption to 1,587,133 kWh/yr. This reduction would decrease the Project's demand on Southern California Edison's grid, which is forecasted to supply 102,905 GWh in 2027. Even with the digital signage, the Project's electricity demand represents less than one hundredth of a percent of Southern California Edison's supply. Similar to the Project, Alternative 2 would comply with applicable energy efficiency and renewable energy requirements, including the California Energy Code (Title 24), CALGreen standards, and the City of West Hollywood Climate Action Plan. Both the Project and this alternative would incorporate sustainability features such as efficient lighting, water-conserving fixtures, and photovoltaic panels. Nonetheless, Alternative 2 would reduce operational energy demand, and impacts would be less than the Project's less than significant impacts.

5.6.2.6 Geology and Soils

Geologic Hazards and Soil Suitability

Alternative 2 would include the same ground disturbance and construction as the Project. Therefore, impacts of Alternative 2 regarding seismic hazards and hazards arising from unstable soils would be the same as for the Project, which would be less than significant. The proposed building under this alternative would also be constructed in accordance with the recommendations of the geotechnical report and all applicable California Building Code (CBC) requirements, ensuring proper foundation design and soil stability measures. Impacts related to geologic hazards and soil suitability under Alternative 2 would be similar to the Project, which are less than significant.

Paleontological Resources

Alternative 2 would involve the same extent of ground disturbance as the Project. Consequently, its potential impacts on paleontological resources would be similar to those of the Project. As with the Project, implementation of Mitigation Measure PAL-1 would reduce these impacts to less than significant.

5.6.2.7 Greenhouse Gas Emissions

Construction

GHG emissions from building the digital signage were not modeled separately from the rest of the Project; however, as shown in Table 4.3-3, within Section 4.3, *Greenhouse Gas Emissions*, of the RDEIR, construction emissions for the Project total 1,215 metric tons (MT) of $_2$, amortized over 30 years to 41 MT CO_2e/yr[1]. Eliminating the digital signage would slightly reduce construction emissions because fewer materials and equipment (e.g., cranes) would be needed. Given this reduction would be minor, Alternative 2's GHG impacts during construction would be similar to the Project's less than significant impacts.

Operation

Operational GHG emissions for the Project total 1,199 MT of CO_2e/yr, as shown in Table 4.3-4, within Section 4.3, *Greenhouse Gas Emissions,* of the RDEIR. These emissions include contributions from mobile sources, such as vehicle trips, energy use, water and wastewater, solid waste, refrigerants, and stationary sources. When amortized construction emissions (41 MT CO_2e/yr) are added, the combined annual emissions equal 1,240 MT CO_2e/yr.

As shown on Table 4.5-2, within Section 4.5, *Energy*, of the RDEIR, the digital signage is estimated to consume 463,550 kWh annually, which represents approximately 23 percent of the Project's total electricity use (2,050,683 kWh/yr). Using the Southern California Edison emission factor applied in CalEEMod, as described in Section 4.3, *Greenhouse Gas Emissions*, of the RDEIR, approximately 0.000284 MT CO_2e per kWh, this electricity demand corresponds to:

463,550 kWh/yr×0.000284 MT CO_2e/kWh ≈ 132 MT CO_2e/yr

Therefore, eliminating the digital signage under Alternative 2 would reduce annual GHG emissions by approximately 132 MT CO_2e, lowering total annual emissions from 1,240 MT CO_2e/yr to about 1,108 MT CO_2e/yr, which is a reduction of roughly 11 percent. This reduction would further align

[1] Metric tons of carbon dioxide equivalent emitted per year

with the City's Climate Action and Adaptation Plan and the State Scoping Plan goals. Therefore, Alternative 2's GHG impacts during operation would be less than the Project's already less than significant impacts.

5.6.2.8 Hazards and Hazardous Materials

Alternative 2 would consist of the same demolition, construction, and building operation as the Project would, except construction and operation of the digital signage. Construction activities would be primarily confined to the Project Site and would only include minor offsite improvements in the surrounding streets. Similar to the Project, this alternative would include preparation and implementation of a Construction Traffic Management Plan (CTMP) as required by City through a Condition of Approval, including a street closure plan detailing how vehicle traffic, including bus traffic, pedestrian traffic, and bicycle traffic would flow during temporary street closures during construction. The plan would also specify the locations of on- and off-street parking during construction and maintain emergency access at all times. Neither Alternative 2 nor the Project would adversely impact emergency response planning or emergency evacuation with implementation of a CTMP. During operation, the Project would implement Mitigation Measure TRA-1, which requires wayfinding signage at the Cory Avenue driveway to ensure adequate emergency access and circulation.

Alternative 2 would involve the same demolition, ground disturbance, and construction effort that the Project would, except for construction of the digital signage. The auto dealership building, due to its age, may contain ACMs and LBP. Same as under the Project, these would be managed and disposed of in accordance with applicable federal, State, and local regulations during demolition and construction under Alternative 2. Impacts of Alternative 2 regarding hazardous materials would be similar when compared to the Project, which would be less than significant with mitigation.

5.6.2.9 Hydrology and Water Quality

Alternative 2 would be identical to the Project except that it omits the digital signage on the exterior of the building to reduce light and glare impacts. This alternative would involve the same development footprint and construction of the same amount of impervious area as the Project. Therefore, impacts on runoff and storm drainage capacity would be similar to those of the Project.

Construction under Alternative 2 would require the same effort as the Project and would generate the same types and amounts of construction-related pollutants. Similarly, operation of this alternative would generate the same pollutants as the Project operation. Eliminating the digital signage would not affect hydrology or water quality because the signage does not influence impervious surface area, drainage patterns, or pollutant generation. Therefore, impacts of this alternative on hydrology and water quality would be similar to the Project's less than significant impacts.

5.6.2.10 Land Use and Planning

Land Use Consistency

Alternative 2 would develop an office building with the same size and uses as the Project would with the exception of the proposed signage. However, the digital signage is a key visual feature of the Project, contributing to the building's landmark quality and aligning with the SSP goals for Area 8, which encourage iconic signage and creative design elements at the western gateway to West Hollywood. Without the digital signage, the building would retain its architectural quality but would

not achieve the same level of visual prominence or alignment with the SSP's vision for a dynamic, visually engaging gateway site. Therefore, Alternative 2's land use consistency impacts would be greater than the Project's less than significant impacts but would remain less than significant.

5.6.2.11 Noise

Construction

Alternative 2 would consist of the same demolition and construction as the Project would, except construction of the digital signage on the side of the buildings would not occur. Construction activities would be primarily confined to the Project Site and would only include minor offsite improvements in the surrounding streets, as necessary. When compared to the Project, construction related noise would be almost identical to that of the Project but could involve a slightly shorter construction timeline. However, nighttime construction activities would be proposed for the development of the structure, similar to the Project. Construction noise and vibration impacts (both daytime and nighttime) would be similar to those of the Project, which would be significant and unavoidable even with implementation of Mitigation Measures NOI-1 and NOI-2, which would require the use of temporary noise barriers and maintenance of a smooth road surface along the alley during construction.

Operation

Alternative 2 would consist of the same operational activities, except for the digital signage, which is not associated with any noise. With that, Alternative 2 would produce similar noise as that of the Project. All potential impacts under Alternative 2 would be less than significant and similar to those of the Project.

5.6.2.12 Transportation

Construction

Alternative 2 would consist of the same demolition, construction, and building operation as the Project would, except construction and operation of the digital signage. Similar to the Project, construction activities would be primarily confined to the Project Site and would only include minor offsite improvements in the surrounding streets. Both the Project and Alternative 2 would include preparation and implementation of a CTMP as required by City, including a street closure plan detailing how vehicle traffic, including bus traffic, pedestrian traffic, and bicycle traffic would flow during temporary street closures during construction. The plan would also specify the locations of on- and off-street parking during construction and maintain emergency access at all times. Construction traffic impacts of Alternative 2 would be similar to those of the Project, which would be less than significant.

Operation

Operation of Alternative 2 respecting trip generation would be the same as that of the Project. As shown in Section 4.6, *Transportation*, of the RDEIR, the Project is estimated to generate approximately 1,172 daily trips, including 127 AM peak-hour trips and 125 PM peak-hour trips. Because Alternative 2 would not change the mix of land uses or square footage, trip generation under Alternative 2 would remain the same as the Project.

The City of West Hollywood considers development projects within high quality transit areas to have less than significant impacts on VMT when none of the exclusionary criteria apply. The Project Site is located within a high-quality transit area and Alternative 2, like the Project, would not be subject to the exclusionary criteria, as described in Section 4.6, *Transportation*, of this RDEIR. Therefore, Alternative 2 would also have a less than significant VMT impact, similar to the Project.

Emergency access during operation would also remain adequate with implementation of Mitigation Measure TRA-1, which requires wayfinding signage at the Cory Avenue driveway to maintain clear access near the intersection at Corey Avenue and Sunset Boulevard. Therefore, emergency access impacts under Alternative 2 would be similar to the Project and impacts on emergency access would be less than significant with mitigation.

5.6.2.13 Tribal Cultural Resources

Alternative 2 would involve the same area of ground disturbance that the Project would and thus would have similar potential impacts on tribal cultural resources, which would be less than significant after mitigation.

5.6.2.14 Utilities and Service Systems, Electricity and Telecommunications

Alternative 2 would omit the digital signage but otherwise include the same building size, uses, and operational characteristics as the Project. Therefore, utility demands under Alternative 2 would be similar to those of the Project, with minor reductions in electricity use and associated impacts. Alternative 2, like the Project, would not require new or expanded utility infrastructure. Accordingly, all impacts to utility and service systems delivery to the respective service areas would be similar to the Project's less than significant impacts.

Water Supply and Infrastructure

Alternative 2 would generate the same water demand as the Project as the digital signage would not require water for operation. As shown in Section 4.14, *Utilities and Services*, of the Original DEIR, the Project's net increase in average daily water demand is approximately 9,600 gallons per day, and Los Angeles Department of Water and Power has confirmed adequate supply capacity during normal, single-dry-year, and multiple-dry-year conditions. Alternative 2 would not require new or expanded water treatment or conveyance facilities and would also have a less than significant impact, similar to the Project.

Wastewater Treatment and Conveyance

Wastewater generation under Alternative 2 would be the same as the Project as the operation of the digital signage would not produce wastewater. As described in Section 4.14, *Utilities and Services*, of the Original DEIR, the Hyperion Treatment Plant (HTP) and associated conveyance infrastructure have sufficient capacity to accommodate the demand of the Project. Therefore, Alternative 2 would not require new or expanded wastewater facilities, and impacts would remain less than significant, similar to the Project.

Stormwater Drainage

Alternative 2 would involve the same building footprint and impervious surface area as the Project. Therefore, stormwater runoff volumes and drainage system requirements would be identical to the

Project. Alternative 2 would include the same onsite drainage and stormwater harvesting system described in Section 4.14, *Utilities and Services*, of the Original DEIR, and impacts would remain less than significant, similar to the Project.

Solid Waste

Construction and operational solid waste generation under Alternative 2 would be similar to the Project because the digital signage represents only a minor component of construction materials and would not generate operational waste. Compliance with CALGreen requirements for construction waste diversion would also apply to this alternative. Thus, impacts would be less than significant, similar to the Project.

Electricity and Telecommunications

Alternative 2 would reduce electricity demand when compared to the Project since the digital signage would not operate. As shown in Section 4.5, *Energy*, of the RDEIR, the digital signage accounts for approximately 463,550 kWh annually, or about 23 percent of the Project's total electricity use, as discussed in Section 4.5, *Energy*. Although eliminating the digital signage would reduce annual electricity consumption, neither the Project nor this alternative would require relocation or construction of new or expanded facilities. Therefore, impacts would also be less than significant, similar to the Project.

Natural Gas

Development of the Project and Alternative 2 would be the construction of all-electric buildings and neither this alternative nor the Project would require natural gas service. No impact would occur, similar to the Project.

5.6.3 Comparison of Alternative 2 to the Project

Alternative 2 would reduce potential impacts of the Project regarding light and glare and energy but would not eliminate the need for any of the mitigation measures required by the Project (related to biological, archeological, paleontological and tribal resources, and emergency access) nor would it reduce any of the Project's significant and unavoidable impacts. However, Alternative 2 would have greater impacts related to visual character and land use than the Project because the digital signage contributes to the building's landmark quality, aligning with the SSP goals for Area 8, which encourage iconic signage and creative design elements at the western gateway to West Hollywood. Without the digital signage, the building would retain its architectural quality but would not achieve the same level of visual prominence or alignment with the SSP's vision for a dynamic, visually engaging gateway site. As discussed above, impacts related to implementation of Alternative 2 otherwise would be similar to those of the Project.

5.6.4 Relationship of the Alternative to Project Objectives

Under Alternative 2, the following objectives would be wholly met:

- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.

However, removing the digital signage would mute the public's initial impressions, making the building a more conventional commercial development Project, limiting the Project's ability to fully implement the SSP's vision for the Project Site. Under this alternative, the following objective would be partially met:

- Redevelop the Project Site in accordance with the goals of the SSP for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.

Alternative 2 would not meet the following objective:

- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.

5.7 Analysis of Alternative 3 – Modified Land Use Alternative

5.7.1 Description of the Alternative

This alternative consists of changing the high turnover restaurant on the first floor to retail use for the purpose of reducing trip generation, as shown in Table 5-2. All other aspects of design, construction, and operation of this alternative would be the same as for the Project including land uses, intensity, and the digital signage.

Note that while this alternative would reduce trip generation compared to the Project, vehicle parking would be the same as the Project, 86 spaces, proposed in three underground parking levels.

Table 5-2 Modified Land Use Alternative Trip Generation

Scenario/Land Use	Square Feet	Trip Generation/KSF	Trip Generation
Project	See Section 4.6, *Transportation, of the RDEIR*		1,172
Less High Turnover Restaurant	-7,892	103.75	-819
Plus Retail	+7,892	54.45	+430
Total, Modified Land Use Alternative			**783**
Net Reduction			389
Percent Net Reduction			33%

Source: LLG, 2025; Rincon 2025.

5.7.2 Environmental Impacts

5.7.2.1 Aesthetics

Alternative 3 would not change the height, massing, or appearance of the building exterior, including the design and overall operation of the digital signage. This alternative would involve slight changes to Project signage, as the high turnover restaurant would be replaced by retail use, which could create a very minor aesthetic change to the proposed identification lingo. The change in signage would not alter the impacts from Project implementation to the overall visual character and light and glare when compared to those impacts of the Project.

Impacts to scenic vistas from visual character alterations and lighting and glare changes for the redevelopment of the Project site related to Alternative 3 would be similar to the Project and would be less than significant.

5.7.2.2 Air Quality

Construction

Regional Emissions

Alternative 3 would not change the total development area and building envelope, construction emissions would be the same as those of the Project. As depicted in Table 4.2-6, within Section 4.2, *Air Quality*, of the RDEIR, the Project's emissions are well below SCAQMD thresholds. Thus, because Alternative 3 involves the same construction activities and schedule emissions are the same as the Project, Alternative 3's construction-related regional air quality impacts would be similar to the Project's less than significant impacts.

Localized Emissions

Similar to regional emissions, localized emissions are evaluated based on maximum onsite daily emissions. As seen in Table 4.2-8, within Section 4.2, *Air Quality*, of the RDEIR, these emissions are well below the applicable SCAQMD Localized Significance Thresholds for a one-acre site with sensitive receptors located 25 meters away (the nearest multi-family residences are approximately 20 feet south of the site). Alternative 3 would have the same onsite emissions because the construction effort does not change. Therefore, Alternative 3 would result in similar localized construction impacts to the Project and would remain less than significant.

Toxic Air Contaminants

Construction TAC emissions would be similar to the Project. Alternative 3 would not alter construction equipment or duration in a way that changes the results of the Health Risk Assessment, which demonstrates the Project would result in less than significant TAC impacts. Therefore, TAC impacts under Alternative 3 would remain less than significant and similar to that of the Project.

Operation

Regional Emissions

Alternative 3 would reduce daily vehicle trips from 1,172 under the Project to 783 trips, which is a net reduction of 389 trips or approximately 33 percent, as shown in Table 5-2. Based on Table 4.2-7,

within Section 4.2, *Air Quality,* of the RDEIR, this reduction in trip generation would decrease mobile source emissions by roughly the same percentage.

Area and stationary source emissions would remain unchanged. Total operational emissions would remain well below SCAQMD thresholds, 55 lbs/day for VOC and NOx; 550 lbs/day for CO. Therefore, regional operational air quality impacts under Alternative 3 would be less than significant and lower than those under the Project.

Toxic Air Contaminants

Operational TAC emissions are primarily from mobile sources and the emergency generator. With an 18 percent reduction in VMT, TAC emissions from mobile sources would decrease proportionally. The emergency generator would remain unchanged and subject to SCAQMD permitting. Therefore, TAC impacts under Alternative 3 would be less than significant, and less than those of the Project.

5.7.2.3 Biological Resources

Under Alternative 3 the same development footprint as the Project and would also result in less than significant impacts to biological resources after mitigation, similar to the Project.

5.7.2.4 Cultural Resources

This alternative would involve the same development footprint and excavation depth as the Project and would also require mitigation to reduce potential impacts to historical and archaeological resources and human remains. Similar to the Project, such impacts under this alternative would be less than significant after mitigation.

5.7.2.5 Energy

Energy Use

Construction

Construction energy requirements to implement Alternative 3 would be the same as the Project because the overall building envelope and area of disturbance and construction schedule would not change. Alternative 3 would not alter the quantities of fuel and electricity shown in Table 4.5-1, of Section 4.5, *Energy*, of the RDEIR. Therefore, construction-related energy impacts under Alternative 3 would be similar to the Project and would remain less than significant.

Operation

As shown in Table 4.5-2, within Section 4.5, *Energy*, of the RDEIR, the Project's total annual electricity use is estimated at 2,050,683 kWh, which includes 476,033 kWh for the high turnover restaurant. Under Alternative 3, the high turnover restaurant would be replaced with retail, which uses less energy. According to the U.S. Energy Information Administration, food service buildings average approximately 0.08 kWh/sf per year, compared to 0.02 kWh/sf per year for retail, approximately four times higher energy intensity (EIA, 2023). Therefore, total electricity use under Alternative 3 would be approximately 1,931,675 kWh/yr, a reduction of about 6 percent compared to the Project.

Alternative 3 would also reduce trip generation by approximately 33 percent, as shown in Table 5-4, thereby reducing transportation fuel use in comparison to the Project. As described in Section 4.5, *Energy*, of the RDEIR, the Project would require transportation fuels of approximately 97,738 gallons of gasoline fuel and 16,545 gallons of diesel fuel annually; under Alternative 3, consumption of transportation fuels would be reduced by approximately 32,254 gallons of gasoline fuel and 5,460 gallons of diesel.

This reduction in electric use would also decrease the overall Project demand on Southern California Edison's electric grid, which is forecasted to supply 102,905 GWh in 2027. Even with the Project, electricity demand represents less than one hundredth of a percent of SCE's Projected supply. Additionally, similar to the Project, Alternative 3 would comply with applicable energy efficiency and renewable energy requirements, including the California Energy Code (Title 24), CALGreen standards, and the City of West Hollywood Climate Action Plan. Both the Project and Alternative 3 would incorporate the same sustainability features such as efficient lighting, water-conserving fixtures, and photovoltaic panels. Overall, Alternative 3's operational energy impacts would be less than the Project's less than significant impacts.

5.7.2.6 Geology and Soils

Geologic Hazards and Soil Suitability

Alternative 3 would include the same area of ground disturbance and construction methods as the Project. Therefore, similar to the Project, impacts related to seismic hazards and hazards arising from unstable soils would be the same for Alternative 3, as the Project, less than significant. Similar to the Project, the proposed building under this alternative would also be constructed in accordance with the recommendations of the geotechnical report and all applicable CBC regulatory requirements, ensuring proper foundation design and soil stability measures are included with the building design. Alternative 3 impacts related to geologic hazards and soil suitability would be less than significant, similar to the Project.

Paleontological Resources

Alternative 3 would include the same ground disturbance areas and excavation depths as the Project. In order to reduce potential paleontological impacts related to ground disturbance activities, Alternative 3 would also be required to implement Mitigation Measure PAL-1, and similar to the Project potential impacts would be less than significant.

5.7.2.7 Greenhouse Gas Emissions

Construction

GHG emissions from construction of Alternative 3 would be the same as those of the Project since the development footprint, excavation depth, and construction schedule would not change. Therefore, construction-related GHG impacts under Alternative 3 would be less than significant, similar to the Project.

Operation

As shown in Section 4.3, *Greenhouse Gas Emissions*, in Table 4.3-4, operational GHG emissions for the Project total 1,199 MT of CO_2e/yr. When amortized over 30 years, construction emissions (41 MT CO_2e/yr) are added, the combined annual emissions equal 1,240 MT CO_2e/yr.

Under Alternative 3, high turnover restaurant would be replaced with retail uses, which would slightly reduce electricity use, and trip generation would decrease by approximately 33 percent, reducing mobile source emissions proportionally. Mobile sources account for 783 MT CO_2e/yr for the Project. Applying a 33 percent reduction, mobile source emissions would be reduced to approximately 524 MT CO_2e/yr:

$$783 \times (1-0.33) \approx 524 \text{ MT } CO_2e/yr$$

As described in Subsection 5.7.2.5, *Energy, e*nergy-related emissions (324 MT CO_2e/yr) would decrease slightly because retail uses has less electrical demands than a high turnover restaurant use, as the high turnover restaurant use has an energy use approximately four times higher than retail. As described in Section 4.3, *Greenhouse Gas Emissions*, of the RDEIR, the proposed restaurant accounts for approximately 476,033 kWh/yr of electricity use. Using the Southern California Edison emission factor applied in CalEEMod, as described in Section 4.3, *Greenhouse Gas Emissions*, of the RDEIR, approximately 0.000284 MT CO_2e per kWh, this electricity demand corresponds to:

$$476{,}033 \text{ kWh} \times 0.0003 \approx 143 \text{ MT } CO_2e/yr$$

Assuming retail uses one-quarter of this amount:

$$143 \times 0.25 \approx 36 \text{ MT } CO_2e/yr$$

Therefore, Energy emissions would decrease from 324 MT CO_2e/yr to approximately:

$$324 - 143 + 36 \approx 217 \text{ MT } CO_2e/yr$$

Other sources (area, water, waste, refrigerants, stationary) would remain similar at 91 MT CO_2e/yr. Therefore, operational emissions under Alternative 3 would total:

$$524 + 217 + 91 \approx 832 \text{ MT } CO_2e/yr$$

Adding amortized construction emissions (41 MT CO_2e/yr) results in combined annual emissions of approximately 873 MT CO_2e/yr. This represents a reduction of roughly 367 MT CO_2e/yr, or about 30 percent lower than the Project.

This reduction would further align the Project with the City's Climate Action and Adaptation Plan and the SSP goals and would maintain that consistency. Therefore, Alternative 3's GHG impacts during operation would be less than the Project's less than significant impacts.

5.7.2.8 Hazards and Hazardous Materials

Alternative 3 would consist of the same demolition, construction, and building operational activities as the Project. Construction activities for both the Project and Alternative 3 would be primarily confined to the Project Site and would only include minor off-site improvements in the surrounding streets. Both the Project and this alternative would include preparation and implementation of a CTMP, as required by the City via a Condition of Approval for the Project, including a street closure plan detailing how vehicle traffic, including bus traffic, pedestrian traffic, and bicycle traffic would flow during temporary street closures during construction. The plan would also specify the locations of on- and off-street parking during construction and maintain emergency access at all times. Neither Alternative 3 nor the Project would adversely impact emergency response planning or emergency evacuation with implementation of City requirements. Additionally, during operational

activities, Mitigation Measure TRA-1, would be implemented, requiring wayfinding signage at the Cory Avenue driveway near Sunset Boulevard to ensure adequate emergency access and circulation.

Alternative 3 would involve the same demolition, ground disturbance, and construction effort as the Project. Fluorescent lights, which may contain polychlorinated biphenyls, were observed in the auto dealership onsite during the Phase I ESA (Appendix I of the Original DEIR). In addition, the auto dealership building, due to its age, may contain ACMs and LBP. Same as under the Project, these would be overseen and disposed of in accordance with applicable federal, State, and local regulations during demolition and construction under Alternative 3. Impacts of Alternative 3 regarding hazardous materials would be similar to those of the Project, which are less than significant with mitigation.

5.7.2.9 Hydrology and Water Quality

Alternative 3 would involve the same development footprint and construction of the same amount of impervious area as the Project. Therefore, impacts of this alternative on runoff and storm drainage capacity would be similar when compared to the Project.

Construction of this alternative would involve the same effort as the Project and, thus, would generate the same pollutants. Operation of this alternative would generate the same pollutants as the Project operation, as well. Impacts of this alternative to hydrology and water quality would be less than significant, and similar to the Project.

5.7.2.10 Land Use and Planning

Alternative 3 would also be required to conform with the City of West Hollywood's General Plan, Zoning Code, and SSP requirements, similar to the Project. Similar to the Project, land use impacts would be less than significant under this alternative.

5.7.2.11 Noise

Construction

Alternative 3 would consist of the same demolition and construction as the Project, since the internal land use would not create a differing construction noise impact when compared. Modifying the proposed land use of the ground floor under this alternative would not reduce potential daytime or nighttime construction noise impacts. Construction noise impacts would be similar to those of the Project, which would be significant and unavoidable even with implementation of Mitigation Measure NOI-1, which would require the use of temporary noise barriers during construction.

Operation

Alternative 3 would consist of the same building operation as the Project, which is minor when compared to the overall operational activities of the Project. With that, operational activities would be primarily confined to the Project Site and would produce similar noise as that of the Project. All potential impacts under Alternative 3 would be less than significant and similar to those of the Project.

5.7.2.12 Transportation

Construction

Alternative 3 would consist of the same demolition, construction, and building operation as the Project, except that the high turnover restaurant uses would be replaced with a retail component. Construction activities for both the Project and Alternative 3 would be primarily confined to the Project Site and would only include minor off-site improvements in the surrounding streets. Similar to the Project, Alternative 3 would include preparation and implementation of a CTMP as required by the City, including a street closure plan detailing how vehicle traffic, including bus traffic, pedestrian traffic, and bicycle traffic would flow during temporary street closures during construction. The plan would also specify the locations of on- and off-street parking during construction and maintain emergency access at all times. Construction traffic impacts of Alternative 3 would be similar to those of the Project, which would be less than significant.

Operation

Operation of Alternative 3 would differ from the Project because replacing the high turnover restaurant with retail would reduce trip generation. As shown in Table 5-2, operation of Alternative 3 would generate 33 percent fewer vehicle trips than the Project. VMT impacts of Alternative 3 would be less than significant, as would be those of the Project, which is estimated to generate 1,172 daily trips, including 127 AM peak-hour trips and 125 PM peak-hour trips. Applying this reduction, Alternative 3 would generate approximately 783 daily trips.

The City considers development Projects within high-quality transit areas, and to which none of five exclusionary criteria apply, to have less than significant impacts on VMT. Since Alternative 3 would maintain the same overall building square footage and remain within a high-quality transit area, and because none of the five exclusionary criteria apply, Alternative 3 would also be presumed to have a less than significant VMT impact. Due to the reduction in VMT, this alternative would have less VMT impacts when compared to the Project.

Emergency access during operation would also remain adequate with implementation of Mitigation Measure TRA-1, which requires wayfinding signage at the Cory Avenue driveway to maintain clear access near the intersection. Therefore, emergency access would be less than significant with mitigation under Alternative 3, which is similar to the impacts of the Project.

5.7.2.13 Tribal Cultural Resources

Alternative 3 would involve the same development footprint and excavation depth as the Project. Therefore, impacts to tribal cultural resources would be the similar to the Project's less than significant impacts with mitigation.

5.7.2.14 Utilities and Service Systems, Electricity and Telecommunications

Alternative 3 would replace the proposed high turnover restaurant on the first floor with a retail use but would otherwise include the same building size and operational characteristics as the Project. Therefore, utility demands under Alternative 3 would be similar to those of the Project, with minor reductions in water and wastewater generation due to the change from food service to retail use.

All impacts would remain less than significant, and Alternative 3 would not require new or expanded utility infrastructure.

Water Supply and Infrastructure

Retail uses generally have lower water demand than food service establishments. High turnover restaurants are reasonably expected to use more water than a retail store because of activities such as food preparation, dishwashing, cleaning, and higher restroom use. Therefore, replacing the proposed high turnover restaurant uses with retail, as proposed under Alternative 3, would reduce overall water demand when compared to the Project.

LADWP has confirmed adequate water supply capacity during normal, single-dry-year, and multiple-dry-year conditions for the Project. Similar to the Project, Alternative 3 would not require new or expanded water treatment or conveyance facilities, and impacts would be less than the Project's less than significant impacts.

Wastewater Treatment and Conveyance

Wastewater generation is closely related to water use. Food service establishments typically produce more wastewater than retail uses because of activities like dishwashing, cleaning, and food preparation. Therefore, replacing the high turnover restaurant with retail would reasonably be expected to reduce overall wastewater generation for the Project. The HTP and associated conveyance infrastructure has sufficient capacity to accommodate wastewater from the Project. As such, Alternative 3 would require less wastewater treatment and conveyance due to the replacement of the high turnover restaurant with a retail store and would not exceed capacity of the HTP. Alternative 3 would not require new or expanded wastewater facilities, and impacts would be less than the Project's less than significant impacts.

Stormwater Drainage

Alternative 3 would involve the same building footprint and impervious surface area as the Project. Therefore, stormwater runoff volumes and drainage system requirements would be the same. Similar to the Project, Alternative 3 would include onsite drainage and stormwater harvesting systems, as described in Section 4.14, *Utilities and Service Systems*, of the Original DEIR. With that, potential impacts would remain less than significant, similar to the Project.

Solid Waste

Operational solid waste generation under Alternative 3 would reasonably be expected to be lower than the Project because food service establishments, such as high turnover restaurants, typically produce more waste than retail uses. Restaurants generate waste from food preparation, packaging, and disposable service items, whereas retail stores primarily generate waste from packaging and occasionally discarded merchandise. Construction waste compliance with CALGreen requirements for waste diversion would apply regardless of the use. Alternative 3 would not require new or expanded solid waste facilities, and impacts would be less than the Project's less than significant impacts.

Electricity and Telecommunications

Electricity demand under Alternative 3 would be less than the Project since the change from a high turnover restaurant to retail would reduce building energy use overall. As shown in Table 4.5-2,

within Section 4.4, Energy, of the RDEIR, the Project's total annual electricity use is estimated at 2,050,683 kWh, which includes 476,033 kWh for the high turnover restaurant. Under Alternative 3, the high turnover restaurant would be replaced with retail, which uses less energy. According to the U.S. Energy Information Administration, food service buildings average approximately 0.08 kWh/sf per year, compared to 0.02 kWh/sf per year for retail, indicating that food service uses have about four times higher energy intensity (EIA, 2023). Based on this ratio, total electricity use under Alternative 3 would be approximately 1,931,675 kWh annually, a reduction of about 6 percent when compared to the Project. Southern California Edison has adequate capacity to serve both the Project and Alternative 3, and impacts would be less than significant. Alternative 3 would not require new or expanded electricity and telecommunication facilities, and impacts would remain less than significant, similar to the Project.

Natural Gas

Both the Project and Alternative 3 would be all-electric buildings; therefore, neither this alternative or the Project would require natural gas service. No impact would occur and impacts would be similar.

5.7.3 Comparison of Alternative to the Project

Alternative 3, when compared to the Project, would reduce multiple operational impacts including air quality, energy, GHG emissions, and VMT impacts, but would not eliminate the need to implement mitigation related to biological, archeological, paleontological and tribal resources, and emergency access. All other impacts of Alternative 3 would be similar to those of the Project. No impacts of this alternative would be greater than those of the Project.

5.7.4 Relationship of the Alternative to Project Objectives

Under Alternative 3, the following objectives for the Project would be fully met:

- Redevelop the Project Site in accordance with the goals of the SSP for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

The following objectives would not be met, as the high turnover restaurant in the Project would better activate the area with uses that contribute to a vibrant pedestrian environment and to nighttime activity, and would better cater to the needs of area office workers than the retail use under Alternative 3.

- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.

5.8 Analysis of Alternative 4 – Aboveground Parking Alternative

5.8.1 Description of the Alternative

This alternative consists of replacing the proposed high turnover restaurant, office, and BOH/MEP uses on the first and second floors of the Project with a two-level parking structure and eliminating the need for any subterranean parking. This alternative would reduce trip generation, as shown in Table 5-3, below, due to a reduction in land uses that were proposed on the first and second levels of the Project. Office, restroom, and MEP spaces would be provided on levels 3, 4, 5, and the roof with a total of 32,652 square-feet of office space. As demonstrated below, even without the excavation required for the Project's subterranean parking, the Project's significant and unavoidable impacts would not be reduced to a less than significant level.

Table 5-3 Aboveground Parking Alternative Trip Generation

Scenario/Land Use	Square Feet	Trip Generation/KSF	Trip Generation
Project	52,999	See Section 4.6, *Transportation, of the RDEIR*	1,172
Aboveground Parking Alternative: office use	32,652	7.83	256
Net Reduction	20,347		916
Percent Net Reduction	38 percent		78 percent

Source: LLG, 2025; Rincon 2025

5.8.2 Environmental Impacts

5.8.2.1 Aesthetics

Alternative 4 would not change the overall height or massing of the building exterior, including the design and operation of the digital signage. However, this alternative would involve minor changes to Project signage, as it would omit the high turnover restaurant uses. In particular, this alternative would change the appearance of the first and second levels of the building exterior when compared to the mixed uses under the Project. But this change would be very minor and would be similar to the potential aesthetic impacts of the Project, which are less than significant.

Therefore, impacts under Alternative 4 to scenic vistas, visual character of the Project Site and surroundings, and light and glare would be less than significant and similar to the Project.

5.8.2.2 Air Quality

Construction

Regional Emissions

Alternative 4 would substantially reduce construction effort compared to the Project because it eliminates excavation and construction of three underground parking levels. This change would reduce the duration and intensity of grading and hauling activities, which are major contributors to construction emissions. However, construction would still involve demolition of the existing auto

dealership, Project Site preparation, and building construction for the above ground portions of the structure.

As shown in Table 4.2-6, within Section 4.2, *Air Quality*, of this RDEIR, the Project's maximum daily emissions are well below SCAQMD's regional thresholds. Because Alternative 4 would involve less excavation and hauling, its emissions would be lower than those of the Project. Therefore, construction-related regional air quality impacts under Alternative 4 would remain less than significant and would be less when compared to the Project.

Localized Emissions

Similar to regional emissions, localized emissions are evaluated based on maximum onsite daily emissions. As seen in Table 4.2-8, within Section 4.2, *Air Quality*, of this RDEIR, the Project's peak onsite emissions would be well below SCAQMD's thresholds.

Alternative 4 would reduce onsite emissions because it omits excavation and underground parking construction, but the primary building construction effort remains similar. Therefore, localized construction impacts under Alternative 4 would remain less than significant and would be less than those of the Project.

Toxic Air Contaminants

Construction of Alternative 4 would generate DPM emissions from heavy-duty equipment, similar to the Project but at reduced levels due to less excavation and hauling. Because Alternative 4 reduces construction intensity, TAC impacts would be less when compared to the Project and would remain less than significant overall.

Operation

Regional Emissions

This alternative would reduce trip generation by approximately 78 percent compared to the Project, 256 daily trips versus 1,172, as shown in Table 5-3, above. Based on Table 4.2-7, within Section 4.2, *Air Quality,* of this RDEIR, this reduction in trip generation would decrease mobile source emissions by roughly the same percentage. Area and stationary source emissions would remain unchanged when compared to the Project. Total operational emissions would remain well below SCAQMD thresholds under this alternative. Overall, operational emissions under Alternative 4 would be substantially less than those of the Project and would remain less than significant.

Toxic Air Contaminants

Operational TAC emissions would primarily originate from mobile sources and the emergency generator. With an approximately 78 percent reduction in VMT, TAC emissions from mobile sources would decrease proportionally. The emergency generator would remain unchanged and subject to SCAQMD permitting requirements. Therefore, TAC impacts under Alternative 4 would be less than significant and substantially lower than those of the Project.

5.8.2.3 Biological Resources

The Alternative 4 would involve the same development footprint as the Project. Overall, potential impacts to biological resources would be less than significant under Alternative 4 and similar when compared to the less than significant impacts of the Project with mitigation.

5.8.2.4 Cultural Resources

This alternative would involve the same development footprint as the Project. However, the excavation depth for this alternative would be substantially reduced, as this alternative would not involve construction of underground parking. Excavation would be limited to potential utilities trenches and foundations. With that said, no significant cultural resources were identified on or above the ground surface during the cultural resources investigation of the Project Site. However, mitigation measures are proposed to help reduce potential impacts or inadvertent discoveries of cultural resources in and around the Project Site during construction activities regardless of excavation depth.

Similar to the conclusion identified for the Project, potential impacts to cultural resources would be less than significant with mitigation. However, impacts of this alternative to archaeological resources and human remains that may be buried in Project Site soils would be considerably less when compared the Project due to total depth of grading.

5.8.2.5 Energy

Energy Use

Construction

Construction energy requirements for Alternative 4 would be lower than those of the Project because this alternative eliminates excavation and construction of three underground parking levels, which are among the most energy-intensive phases. By omitting deep excavation and soil export, Alternative 4 would substantially reduce diesel fuel consumption associated with heavy-duty equipment and haul trucks. Gasoline use for worker commutes would likely be reduced as well since overall construction duration would be reduced. Additionally, the reduction in equipment operation and hauling would result in a meaningful decrease in total construction energy demand. Therefore, construction-related energy impacts under Alternative 4 would be less than significant and less when compared to the impacts under the Project.

Operation

This alternative replaces office and high turnover restaurant uses on the first and second floors with aboveground parking, which requires minimal energy for lighting and ventilation compared to conditioned office and retail spaces. Both the Project and Alternative 4 would be all-electric buildings; therefore, natural gas use is not included in this analysis. Operation of Alternative 4 would also reduce energy demand when compared to the Project.

As shown in Section 4.5, *Energy*, of the RDEIR, the Project's total annual electricity use is estimated at approximately 2,050,683 kWh. Under Alternative 4, the reduction in conditioned floor area and elimination of restaurant and retail spaces would significantly lower electricity consumption for HVAC, lighting, and plug loads. In addition, Alternative 4 would reduce trip generation by approximately 78 percent compared to the Project, which would proportionally decrease transportation fuel use. The Project would consume about 97,738 gallons of gasoline and 16,545 gallons of diesel annually; under Alternative 4, this would decrease to roughly 21,500 gallons of gasoline and 3,600 gallons of diesel.

Overall, operational energy demand under Alternative 4 would be less than significant but substantially lower than that of the Project. Similar to the Project, this alternative would comply with applicable energy efficiency and renewable energy requirements, including the California Energy Code (Title 24), CALGreen standards, and the City of West Hollywood Climate Action Plan. Alternative 4 would incorporate sustainability features such as efficient lighting, water-conserving fixtures, and photovoltaic panels. Therefore, impacts related to compliance with renewable energy and energy efficiency plans would be less than significant and less than the Project.

5.8.2.6 Geology and Soils

Geologic Hazards and Soil Suitability

Alternative 4 would include the same development footprint as the Project but would substantially reduce excavation because it eliminates construction of underground parking levels. The proposed building under this alternative would still be constructed in accordance with the recommendations of the geotechnical report and all applicable CBC requirements, ensuring proper foundation design and soil stability measures. Therefore, impacts related to seismic hazards, soil stability, and other geologic conditions would be less than significant and would be similar to the Project.

Paleontological Resources

Even though Alternative 4 would involve less excavation than the Project, the potential to encounter paleontological resources would still occur. In particular, implementation of Mitigation Measure PAL-1 would help reduce potential impacts to a less than significant level. Thus, impacts related to paleontological resources would be less than significant but less when compared to the Project.

5.8.2.7 Greenhouse Gas Emissions

Construction

Alternative 4 would involve less construction effort than the Project since it would reduce the overall construction size and eliminate certain features when compared to the Project. This reduction would decrease the amount of materials, equipment use, and haul trips, thereby lowering construction emissions. However, because construction emissions are amortized over 30 years, even a substantial reduction in construction emissions would have a minor effect on total annual emissions. Therefore, this potential impact would be less than significant and would be less when compared to the Project.

Operation

Under Alternative 4, the change in land use would reduce VMT by approximately 78 percent, which would proportionally reduce mobile source emissions. Mobile sources account for 783 MT CO_2e/yr for the Project. Applying a 78 percent reduction:

$$783 \times (1 - 0.78) \approx 172 \text{ MT } CO_2e/yr$$

Energy-related emissions (324 MT CO_2e/yr) would also decrease because Alternative 4 replaces office and retail spaces with aboveground parking, which requires minimal energy for lighting and ventilation compared to conditioned spaces. Based on the Project's modeled electricity use (984,115 kWh/yr for 45,107 sf of office), the reduced office space would use approximately:

32,652 × 984,115 / 45,107 ≈ 711,613 kWh/yr

Adding parking and digital canvas (590,535 kWh/year), total electricity use would be:

711,613 + 590,535 = 1,302,148 kWh/year

Using the emission conversion factor (0.000284 MT CO_2e/kWh), energy-related emissions would be:

1,302,148 × 0.000284 ≈ 370 MT CO_2e/year

Other sources (area, water, waste, refrigerants, stationary) currently total 91 MT CO_2e/year for the Project. These sources would also decline because Alternative 4 removes the restaurant and reduces office space. Assuming a conservative 50 percent reduction:

91 × 0.50 ≈ 46 MT CO_2e/year

Therefore, operational emissions under Alternative 4 would total:

172 + 370 + 46 ≈ 588 MT CO_2e/year

Adding amortized construction emissions (41 MT CO_2e/year) results in combined annual emissions of approximately 629 MT CO_2e/year, a reduction of roughly 611 MT CO_2e/year, or about 49 percent lower than the Project.

This reduction would further align this alternative with the City's Climate Action and Adaptation Plan and the SSP goals. Because CEQA significance for GHG emissions is determined by consistency with applicable GHG reduction plans and policies, and Alternative 4 would maintain that consistency. Alternative 4's GHG impacts would be less than significant and less than the Project.

5.8.2.8 Hazards and Hazardous Materials

Alternative 4 would involve the same demolition and general ground disturbance as the Project but would replace the office and restaurant uses on the first and second floors with a two-level aboveground parking structure. Construction activities would be primarily confined to the Project Site and would only include minor off-site improvements in the surrounding streets. This alternative would include preparation and implementation of a CTMP, as required by the City, including a street closure plan detailing how vehicle traffic, including bus traffic, pedestrian traffic, and bicycle traffic would flow during temporary street closures during construction. The plan would also specify the locations of on- and off-street parking during construction and maintain emergency access at all times. Alternative 4 would not adversely impact emergency response planning or emergency evacuation under the Project. During operation, this alternative would implement Mitigation Measure TRA-1, which requires wayfinding signage at the Cory Avenue driveway to ensure adequate emergency access and circulation and would not create a hazard.

Alternative 4 would involve similar demolition and general ground disturbance as the Project, but construction efforts would be reduced since the aboveground parking structure requires less interior buildout than office and restaurant spaces. Also, below ground construction would be removed as part of Alternative 4. Additionally, fluorescent lights, which may contain polychlorinated biphenyls, were observed in the auto dealership onsite during the Phase I Environmental Site Assessment (Appendix I of the Original DEIR). The auto dealership building, due to its age, may contain ACMs and LBP. These potential hazardous materials would be handled and disposed of in accordance with applicable federal, State, and local regulations during demolition and construction

under Alternative 4. Impacts of Alternative 4 regarding hazardous materials and accidental release would be less than significant with mitigation, similar to the Project.

5.8.2.9 Hydrology and Water Quality

In short, Alternative 4 would involve the same development footprint and overall construction of a similar impervious area as the Project. Therefore, impacts of this alternative to hydrology and runoff would be less than significant and similar to that of the Project.

As stated earlier, construction of this alternative would involve less effort than the Project and would introduce fewer pollutants to water quality when compared. Also, operation of this alternative would generate reduced pollutants when compared to the Project due to the reduction in land use intensity, albeit negligible. Overall, Alternative 4 impacts to hydrology and water quality would be less than significant and similar to the Project.

5.8.2.10 Land Use and Planning

Alternative 4 would conform with City of West Hollywood General Plan, Zoning Code, and SSP requirements. Accordingly, Alternative 4's impacts would be less than significant for this alternative and similar to the Project.

5.8.2.11 Noise

Construction

Alternative 4 would consist of demolition and construction activities that are similar to the Project but eliminates excavation and construction of three underground parking levels and would involve a slightly altered construction timeline due to the reduction in grading depth and preparation. However, daytime and nighttime construction activities would similarly be proposed for the development of the structure. Estimated unmitigated and mitigated daytime construction noise levels are presented in Table 5-4 and Table 5-5, respectively. Estimated unmitigated and mitigated nighttime construction noise levels are presented in Table 5-6 and Table 5-7, respectively. Note that all mitigated noise levels include the estimated noise reduction from implementation of Mitigation Measure NOI-1.

Table 5-4 Unmitigated Daytime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase (Alternative 4)

	Construction Noise Level (dBA L_{eq} [8-hour])			
Construction Phase	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast	Nearest Residential Property to North	Sierra Towers Condominium Complex to Northwest
Distance (feet)	**55**	**90**	**260**	**590**
Demolition[1]	82	78	69	62
Site Preparation[2]	85	80	71	64
Grading[3]	83	79	70	62
Building Construction[4]	81	77	68	61
Paving[5]	84	79	70	63
Architectural Coating[6]	83	78	69	62

Construction Phase	Construction Noise Level (dBA L_{eq} [8-hour])			
	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast	Nearest Residential Property to North	Sierra Towers Condominium Complex to Northwest
Ambient Noise Level[7]	62	62	62	64
Noise Threshold[8]	72	72	72	74

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] Demolition phase was evaluated assuming simultaneous operation of one excavator, front-end loader, and forklift.

[2] Site preparation phase was evaluated assuming simultaneous operation of one excavator, grader, and trencher.

[3] Grading phase was evaluated assuming simultaneous operation of one front-end loader, roller, and trencher.

[4] Building construction phase was evaluated assuming simultaneous operation of one crane, trencher, and welder/torch.

[5] Paving phase was evaluated assuming simultaneous operation of one forklift, paver, and pressure washer.

[6] Architectural coating phase was evaluated assuming simultaneous operation of one dump truck, forklift, and pressure washer.

[7] During the noise measurements, the lowest hourly daytime noise level at the nearest single-family residential property to the south, multi-family residential property to the southeast, and residential property to the north were measured to be 62 dBA L_{eq}, while the lowest hourly daytime noise level at the Sierra Towers Condominium Complex to the northwest was measured to be 64 dBA L_{eq}.

[8] Ambient noise levels plus 10 dBA.

[9] Bolded noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

Table 5-5 Mitigated Daytime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase (Alternative 4)

Construction Phase	Construction Noise Level (dBA L_{eq} [8-hour])[1]		
	Nearest Single-Family Residential Property to South	Nearest Multi-Family Residential Property to Southeast (First Floor of Building)	Nearest Multi-Family Residential Property to Southeast (Upper Floors of Building)
Distance (feet)	**55**	**90**	**90**
Demolition[2]	70	66	**78**
Site Preparation[3]	71	68	**80**
Grading[4]	69	65	**77**
Building Construction[5]	68	64	**76**
Paving[6]	71	67	**79**
Architectural Coating[7]	70	66	**78**
Ambient Noise Level[8]	62	62	62
Noise Threshold[9]	72	72	72

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] All noise levels presented for each construction phase account for the noise reduction provided by implementation of Mitigation Measure NOI-1.

[2] Demolition phase was evaluated assuming simultaneous operation of one excavator, front-end loader, and forklift.

[3] Site preparation phase was evaluated assuming simultaneous operation of one excavator, grader, and trencher.

[4] Grading phase was evaluated assuming simultaneous operation of one front-end loader, roller, and trencher.

[5] Building construction phase was evaluated assuming simultaneous operation of one crane, trencher, and welder/torch.

[6] Paving phase was evaluated assuming simultaneous operation of one forklift, paver, and pressure washer.

[7] Architectural coating phase was evaluated assuming simultaneous operation of one dump truck, forklift, and pressure washer.

[8] During the noise measurements, the lowest hourly daytime noise level at the nearest single-family residential property to the south and multi-family residential property to the southeast was measured to be 62 dBA L_{eq}.

[9] Ambient noise levels plus 10 dBA.

[9] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

Table 5-6 Unmitigated Nighttime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase (Alternative 4)

	Construction Noise Level (dBA L_{eq} [8-hour])			
Construction Phase	**Nearest Single-Family Residential Property to South**	**Nearest Multi-Family Residential Property to Southeast**	**Nearest Residential Property to North**	**Sierra Towers Condominium Complex to Northwest**
Distance (feet)	**55**	**90**	**260**	**590**
Nighttime Construction[1]	82	78	69	62
Ambient Noise Level[2]	50	50	50	54
Noise Threshold[3]	60	60	60	64

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] Nighttime construction phase was evaluated assuming simultaneous operation of one concrete mixer truck, crane, and pump.

[2] During the noise measurements, the lowest hourly nighttime noise level at the nearest single-family residential property to the south, multi-family residential property to the southeast, and residential property to the north were measured to be 50 dBA L_{eq}, while the lowest hourly nighttime noise level at the Sierra Towers Condominium Complex to the northwest was measured to be 54 dBA L_{eq}.

[3] Ambient noise level plus 10 dBA.

[4] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

Table 5-7 Mitigated Nighttime Construction Noise Levels at Nearest Sensitive Receptors by Construction Phase (Alternative 4)

	Construction Noise Level (dBA L_{eq} [8-hour])[1]			
Construction Phase	**Nearest Single-Family Residential Property to South**	**Nearest Multi-Family Residential Property to Southeast (First Floor of Building)**	**Nearest Multi-Family Residential Property to Southeast (Upper Floors of Building)**	**Nearest Single-Family Residential Property to North**
Distance (feet)	**55**	**90**	**90**	**260**
Nighttime Construction	69	66	78	58
Ambient Noise Level[3]	50	50	50	50
Noise Threshold[4]	60	60	60	60

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

[1] All noise levels presented account for the noise reduction provided by implementation of Mitigation Measure NOI-1.

[2] Nighttime construction phase was evaluated assuming simultaneous operation of one concrete mixer truck, crane, and pump.

[3] During the noise measurements, the lowest hourly nighttime noise level at the nearest single-family residential property to the south, multi-family residential property to the southeast, and residential property to the north was measured to be 50 dBA L_{eq}.

[4] Ambient noise level plus 10 dBA.

[5] **Bolded** noise levels represent those exceeding the ambient noise level by 10 dBA or more.

See Appendix D for construction noise modeling results.

Daytime construction noise impacts upon upper floors of the nearest multi-family building located to the southeast would remain significant and unavoidable under this Alternative even with implementation of Mitigation Measure NOI-1, which would include the use of temporary noise

barriers. Similarly, nighttime construction noise impacts upon the nearest residential uses located to the south and southeast would remain significant and unavoidable even with implementation of Mitigation Measure NOI-1. While the construction period would be temporary, construction noise impacts associated with Alternative 4 would be similar to the Project

Operation

Operational activities would be primarily confined to the Project Site and would produce similar noise when compared to the Project. Alternative 4 would consist of the same building operation as the Project, which is minor when compared to the overall operational activities of the Project. However, it is expected that daily noise levels could increase when compared to the Project due to the above ground parking driveways and stalls. In particular, engine and tire noise is a possibility when parking is above grade. However, all potential impacts under Alternative 4 would be less than significant and similar to the Project.

5.8.2.12 Transportation

Construction

This alternative would substantially reduce the number of soil export haul trips, which are among the largest contributors to construction traffic. However, demolition, site preparation, and building construction would still occur, and similar types of construction equipment would be used. In short, Alternative 4 would involve less construction effort than the Project since it eliminates excavation and construction of three underground parking levels.

As with the Project, Alternative 4 would implement a CTMP as required by the City. The CTMP would include a street closure plan detailing how vehicle traffic, including bus, pedestrian, and bicycle traffic, would flow during temporary street closures, specify locations for on- and off-street parking during construction, and maintain emergency access at all times. With implementation of the CTMP, construction traffic impacts under Alternative 4 would be less than significant with mitigation but less when compared to the impacts identified under the Project.

Operation

Operation of Alternative 4 would differ from the Project because replacing the high turnover restaurant, office, and BOH/MEP uses on the first and second floors with a two-level aboveground parking structure would substantially reduce trip generation. As shown in Table 5-3, above, Alternative 4 would generate approximately 256 daily trips compared to 1,172 daily trips for the Project, a net reduction of 916 trips, or about 78 percent.

The City considers development Projects within high-quality transit areas, and to which none of five exclusionary criteria apply, to have less than significant impacts to VMT. Since Alternative 4 would maintain the same overall Project Site location within a high-quality transit area and none of the five exclusionary criteria apply, Alternative 4 would also be presumed to have a less than significant VMT impact. Impacts would be less than significant under this alternative would but the reduction in trip generation would decrease VMT when compared to the Project, so VMT impacts would be less.

Under Alternative 4, emergency access during operation would be less than significant with implementation of Mitigation Measure TRA-1, which requires wayfinding signage at the Cory Avenue driveway to maintain clear access near the intersection. Therefore, emergency access impacts would be considered similar to the Project.

5.8.2.13 Tribal Cultural Resources

This alternative would involve a very similar development footprint as the Project but would have a reduced overall excavation depth in terms of grading and construction. Nonetheless, potential tribal cultural resources impacts of this alternative would be less than significant with mitigation and would be less when compared to the Project.

5.8.2.14 *Utilities and Service Systems, Electricity and Telecommunications*

Alternative 4 would replace the high turnover restaurant, office, and BOH/MEP uses on the first and second floors with a two-level aboveground parking structure but would otherwise include similar operational characteristics as the Project for the remaining floors. Therefore, utility demands under Alternative 4 would be considerably lower than those of the Project due to the elimination of conditioned spaces and restaurant uses. However, like the Project, Alternative 4 would not require new or expanded utility infrastructure and impacts would be considered less than significant, similar to the Project.

Water Supply and Infrastructure

Restaurants and office spaces typically have higher water demand than parking facilities because of activities such as food preparation, dishwashing, cleaning, and restroom use. Assuming the same for this alternative, LADWP has confirmed adequate water supply capacity during normal, single-dry-year, and multiple-dry-year conditions.

Overall, by replacing the Project's proposed land uses with aboveground parking, Alternative 4 would significantly decrease overall water demand when compared to the Project. Thus, Alternative 4 would not require new or expanded water treatment or conveyance facilities, and impacts would be less than the Project's less than significant impacts.

Wastewater Treatment and Conveyance

As shown in Section 4.14, *Utilities and Service Systems*, of the Original DEIR, the Project's net increase in average daily wastewater generation is approximately 9,451 gallons per day. Wastewater generation is closely related to water use. Restaurant and office uses typically produce substantially more wastewater than parking facilities. Therefore, replacing these uses with aboveground parking would significantly reduce wastewater generation under Alternative 4 when compared to the Project. Similar to the Project, it is assumed that the HTP and associated conveyance infrastructure has sufficient capacity to accommodate wastewater from Alternative 4. Nonetheless, Alternative 4 would not require new or expanded water treatment or conveyance facilities, and impacts would be less than the Project's less than significant impacts.

Stormwater Drainage

Alternative 4 would involve the same building footprint and impervious surface area as the Project. Alternative 4 would also include the same onsite drainage and stormwater harvesting system described in Section 4.14, *Utilities and Service Systems*, in the Original DEIR, and stormwater runoff volumes and drainage system would be similar to the Project. Alternative 4 would not require new or expanded water treatment or conveyance facilities, and impacts would be less than significant, similar to the Project.

Solid Waste

Food service uses generate waste from food preparation, packaging, and disposable service items, whereas parking facilities generate minimal operational waste. Operational solid waste generation under Alternative 4 would be lower when compared to the Project since restaurants and office spaces typically produce more waste than parking facilities. Construction waste compliance with CALGreen requirements for waste diversion would apply regardless of the use. Overall, Alternative 4 would not require new or expanded solid waste facilities, and impacts would be less than Project's less than significant impacts.

Electricity and Telecommunications

As shown in Section 4.5, *Energy*, of the RDEIR, the Project's total annual electricity use is estimated at approximately 2,050,683 kWh. Under Alternative 4, the elimination of high turnover restaurant spaces and reduction in conditioned floor area would substantially lower electricity consumption. In particular, electricity demand under Alternative 4 would be lower than the Project since the change from conditioned office and restaurant spaces to aboveground parking would reduce building energy use for HVAC, lighting, and plug loads. Energy-related emissions would be reduced given that parking facilities require only minimal lighting and ventilation compared to conditioned spaces. Southern California Edison has adequate capacity to serve Alternative 4 and potential impacts would be less than significant but to a reduced level when compared to the Project.

Natural Gas

Both the Project and Alternative 4 would be all-electric buildings; therefore, this alternative and the Project would not require natural gas service. No impact would occur and all impacts would be similar to the Project.

5.8.3 Comparison of Alternative to the Project

Due to the elimination of subterranean parking levels and reduction in proposed uses, Alternative 3, compared to the Project, would reduce construction and operational air quality, energy, GHG, VMT and noise and vibration impacts, in addition to construction impacts associated with cultural, paleontological and tribal resources. However, Alternative 4 would not reduce the Project's significant and unavoidable construction noise and vibration impacts to less than significant, nor would it eliminate the need to implement mitigation related to biological, archeological, paleontological and tribal resources, and emergency access. All other impacts described above for Alternative 4 would be similar to those identified for the Project.

5.8.4 Relationship of the Alternative to Project Objectives

Under Alternative 4, the following objectives for the Project would be fully met:

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.

- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.
- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

The following objective would not be met, as the ground-floor high turnover restaurant uses are omitted from this alternative:

- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.

5.9 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that Alternative 1 is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this RDEIR, the range of feasible alternatives includes Alternative 1, Alternative 2, Alternative 3 and Alternative 4. Table 5-8, provides a summary of the description of alternatives and a comparison of the different Project components. Table 5-9, on provides a summary comparison, by environmental topic, of the Project impacts and the impacts of each of the alternatives. Table 5-1, Section 5.4, *Alternatives Analysis Format*, provides a summary comparison of each of the alternatives' ability to meet the objectives of the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this RDEIR, Alternative 1 would avoid all of the Project's significant environmental impacts, including 's significant and unavoidable construction noise impacts. Although Alternative 1 would reduce most of the Project's less than significant and less than significant with mitigation impacts it would not meet any of the Project's objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than Alternative 1, a comparative evaluation of the remaining alternatives indicates that Alternative 4 would be the Environmentally Superior Alternative. This alternative would reduce impacts in several areas, including energy use, greenhouse gas emissions, and transportation, without introducing any new or greater impacts compared to the Project.

Alternative 4 would fully meet four of the six objectives for the Project:

- Redevelop the Project Site in accordance with the goals of the Sunset Specific Plan (SSP) for Area 8, including the provision of office space for anchor businesses and creative industries.
- Utilize landscaping and architectural features to soften the building's edges, integrate with the surrounding neighborhood, and enhance visual character.
- Integrate digital signage in accordance with the Sunset Boulevard Arts and Advertising Program that contributes to the building's landmark quality and provides civic and artistic programming.

- Implement sustainability features that promote energy efficiency, water conservation, and improved indoor environmental quality.

Alternative 4 would partially meet the following Project objective: deleting the digital signage would make the building a less dramatic landmark.

- Develop a mixed-use building of landmark quality at the southeast corner of Sunset and Cory, serving as a gateway to West Hollywood, consistent with the specific SSP objectives for the Project Site.

Alternative 4 would not meet the following objective:

- Incorporate ground-floor restaurant uses that cater to the needs of area office workers and that contribute to a lively pedestrian environment and nighttime activity of the Sunset Strip consistent with the SSP goals and policies related to mixed uses.

Table 5-8 Summary of Alternatives

	Project	Alternative 1: No Project Alternative	Alternative 2: No Digital Signage Alternative	Alternative 3: Modified Land Use Alternative	Alternative 4: Aboveground Parking Alternative
Brief Description	The Project includes: the demolition of the automotive dealership onsite and development of a five-story office building that would include retail and restaurant uses on the first floor; 86 vehicle parking spaces in three underground parking levels; and a digital signage on the north, west, and northeast sides of the building.	This alternative would involve the continuation of existing conditions on the site; therefore, buildings would remain and no new buildings or uses would be constructed or demolished. The automotive dealership closed in May 2021, and the buildings from the former dealership are vacant.	This alternative would omit the digital signage on the building exterior; otherwise, the design, construction, and operation of this alternative would be the same as the Project.	This alternative would convert the high turnover restaurant on the first floor to retail use. Otherwise, the design, construction, and operation of this alternative, including the digital signage, would be the same as for the Project.	This alternative would delete the underground parking and replace the first two aboveground levels (food, beverage, retail, and office uses) with two levels of aboveground parking.
Existing Uses to Remain	None: the automotive dealership buildings would be demolished.	The automotive dealership buildings would remain and potential re-operation would occur.	The automotive dealership buildings would be demolished.	The automotive dealership buildings would be demolished.	The automotive dealership buildings would be demolished.
Proposed Land Uses and Square Feet	Office: 36,920 square feet on 2nd through 5th floors High turnover restaurant: 7,892 square feet on 1st floor Restrooms and back of house/mechanical, electrical, and plumbing: 8,187 square feet total on all floors.	The buildings on site are vacant.	Same as Project.	Office: 36,920 square feet on 2nd through 5th floors Retail: 7,892 square feet on 1st floor Restrooms and back of house/mechanical, electrical, and plumbing: 8,187 square feet total on all floors.	Office: on 3rd through 5th floors. Restrooms and BOH/MEP: on all floors
Number of parking spaces	86	The site consists of vacant buildings: not applicable	86	86	60

Table 5-9 Comparison Summary of Project Impacts and Alternatives Impacts

Environmental Topic	Project	Alternative 1: No Project/ No Action Alternative	Alternative 2: No Digital Signage Alternative	Alternative 3: Modified Land Use Alternative	Alternative 4: Aboveground Parking Alternative
Aesthetics					
Construction					
Scenic Vistas	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)	Similar (no impact)
Visual Character	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Shading	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Light and Glare	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Operation					
Scenic Vistas	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)	Similar (no impact)
Visual Character	LTS	Less (no impact)	More (LTS)	Similar (LTS)	Similar (LTS)
Shading	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Light and Glare	LTS	Less (no impact)	Less (LTS)	Similar (LTS)	Similar (LTS)
Air Quality					
Construction					
Regional Emissions	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Less (LTS)
Localized Emissions	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Less (LTS)
Toxic Air Contaminates	LTS	Less (no impact)	Similar (LTS)	Less (LTS)	Less (LTS)
Operation					
Regional Emissions	LTS	Less (no impact)	Similar (LTS)	Less (LTS)	Less (LTS)
Toxic Air Contaminates	LTS	Less (no impact)	Similar (LTS)	Less (LTS)	Less (LTS)
Biological Resources					
Construction	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)
Operation	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)	Similar (no impact)
Cultural Resources					
Archaeological Resources	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Less (LTS w/Mitigation)
Historic Resources	No impact	Similar (no impact)	Similar (no impact)	Similar (no impact)	Similar (no impact)
Energy					
Construction	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Less (LTS)
Operation	LTS	Less (no impact)	Less (LTS)	Less (LTS)	Less (LTS)
Geology and Soils					
Geology and Soils	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Paleontological Resources	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Less (LTS w/Mitigation)

Environmental Topic	Project	Alternative 1: No Project/ No Action Alternative	Alternative 2: No Digital Signage Alternative	Alternative 3: Modified Land Use Alternative	Alternative 4: Aboveground Parking Alternative
Greenhouse Gas Emissions					
Construction	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Less (LTS)
Operation	LTS	Less (no impact)	Less (LTS)	Less (LTS)	Less (LTS)
Hazards and Hazardous Materials					
Construction	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Less (LTS w/Mitigation)
Operation	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Less (LTS w/Mitigation)
Land Use and Planning					
Land Use Consistency	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Noise					
Construction	S/U w/Mitigation	Less (no impact)	Similar (S/U)	Similar (S/U)	Less (S/U)
Operation	S/U	Less (no impact)	Similar (S/U)	Similar (S/U)	Less (S/U)
Transportation/Traffic					
Construction	LTS w/Mitigation	Less (no impact)	Similar (LTS w/Mitigation)	Similar (LTS w/Mitigation)	Less (LTS w/Mitigation)
Operation					
Vehicle Miles Traveled	LTS	Less (no impact)	Similar (LTS)	Less (LTS)	Less (LTS)
Bicycle, Pedestrian, and Vehicular Safety	LT**S**	Less (no impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Tribal Cultural Resources					
Construction	LTS	Less (no impact)	Similar (LTS)	Similar (LTS)	Less (LTS)
Operation	No Impact	Less (no impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)

Source: Rincon, 2025.

Table Notes:

Similar= the alternative would have similar impacts as the Project

Less= the alternative would have a lesser impact than the Project

Greater= the alternative would have more of an impact than the Project

SU= Significant and Unavoidable Impact

LTS= Less than significant

LTS w/ Mit= Less than significant with mitigation

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