8228-8240, THE HARPER PROJECT

INITIAL STUDY

SEPTEMBER 2022

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8228-8240 SUNSET, THE HARPER PROJECT

Initial Study

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1.0 INTRODUCTION

The 8228-8240 Sunset Boulevard, The Harper Project (herein referred to as the "Project" or "The Harper Project") proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project in the Eastern Gateway of the Sunset Strip, integrating a digital billboard display wrapping around the highly visible southeast corner of Sunset Boulevard and North Harper Avenue, located above a floating open-air courtyard with landscaping and outdoor dining; refer to Section 2.0 Project Description. Following a preliminary review of the proposed Project, the City of West Hollywood (City) has determined the Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA).

1.1 Statutory Authority and Requirements

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21177) and pursuant to California Code of Regulations Section 15063, the City of West Hollywood, acting in the capacity of Lead Agency under CEQA, is required to undertake the preparation of an Initial Study to determine if the proposed Project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that mitigation cannot reduce the impact to a less than significant level for any aspect of the proposed Project, then the Lead Agency must prepare an Environmental Impact Report (EIR) to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the Project, as proposed, may cause a significant effect on the environment, the Lead Agency may prepare a Negative Declaration (ND). If the Lead Agency finds that there is evidence of a significant impact, but the impact can be reduced through mitigation, the Lead Agency may prepare a Mitigated Negative Declaration (MND). Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such significant environmental impacts may occur (PRC Section 21080(c)).

Pursuant to CEQA Guidelines Section 15063(c), the purposes of an Initial Study are to:

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR, MND or a ND;
2. Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
3. Assist in the preparation of an EIR, if one is required, by;
    a. Focusing the EIR on the effects determined to be significant,
    b. Identifying the effects determined not to be significant,
    c. Explaining the reasons for determining that potentially significant effects would not be significant, and
    d. Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environment effects.
4. Facilitate environmental assessment early in the design of a project;

5. Provide documentation of the factual basis for the finding in a MND or ND that a project will not have a significant effect on the environment;
6. Eliminate unnecessary EIRs; and
7. Determine whether a previously prepared EIR could be used with the project.

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the proposed Project. The resulting environmental documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

Pursuant to CEQA Guidelines Section 15063, the City of West Hollywood has prepared this Initial Study to determine if the proposed Project could have the potential to cause a significant adverse effect on the environment.

1.2 Purpose

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 Incorporation by Reference

The following documents were utilized during preparation of this Initial Study and are incorporated herein by reference. These documents are available for review online via the City's website.

West Hollywood General Plan 2035 (General Plan). In 2011, the City adopted a comprehensive update to its 1988 General Plan. The General Plan provides a future vision, policies, and proposed actions to guide decisionmakers, staff members, project developers, businesses, and residents in West Hollywood. For City staff, the General Plan acts as a reference guide in evaluating projects, structuring City programs, and deciding whether to pursue new opportunities. City officials use the General Plan as the basis for decision-making and to guide the development of new policies, ordinances, programs, initiatives and capital expenditures. The General Plan informs and is implemented by the City's various ordinances, specific plans, programs, and ongoing activities. It sets overall City policy and priorities for how to use and manage its physical, social, and economic resources. Each chapter of the General Plan contains goals and policies to guide decision making. The goals and policies of the General Plan chapters are supported by the Implementation Chapter. This chapter lists specific implementation actions for the policies set forth within

individual elements of this General Plan. The General Plan is comprised of the following mandatory and optional Chapters (i.e., Elements):

- Governance
- Land Use and Urban Form (contains land use designations and map)
- Historic Preservation
- Economic Development
- Mobility
- Human Services
- Parks and Recreation
- Infrastructure, Resources, and Conservation
- Safety and Noise
- Housing

City of West Hollywood Climate Action Plan (CAP). The CAP was adopted in 2011 as an implementation measure of the General Plan. The CAP is designed to address climate change and reduce the community's greenhouse gas (GHG) emissions at the local level and recommends a series of actions to reduce the City's contributions to global climate change by reducing GHG emissions.

Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan State Clearinghouse #2009091124 (General Plan FEIR). The General Plan FEIR provides a program-level assessment of the general environmental impacts resulting from the development of land uses and implementation of policies established within the General Plan as part of the CEQA process. Potential development capacity was projected for buildout of the General Plan. This buildout scenario is analyzed throughout the EIR. More specifically, the expected buildout of land uses by 2035 pursuant to the General Plan could result in an increase of 4,274 dwelling units and approximately 2,613,128 square feet of nonresidential building floor area over existing conditions. Based on a population of 1.6 persons per household, an increase of approximately 6,834 persons in West Hollywood could occur by 2035. The General Plan FEIR concluded that potential impacts associated with the General Plan would be less than significant or less than significant with the implementation of mitigation for all environmental topical areas with the exception of the following:

- Air Quality – compliance with South Coast Air Quality Management District Air Quality Management Plan; construction related emissions; operational emissions;
- Traffic – intersection level of service, congestion management program level of service;
- Global Climate Change – construction related GHG emissions; operations related GHG emissions; conflicts with applicable plans, polices, or regulations; and
- Public Services and Utilities – water supply.

City of West Hollywood Municipal Code (Municipal Code). The Municipal Code consists of all the regulatory, penal, and administrative ordinances of the City of West Hollywood. It is the method the City uses to implement control of land uses in accordance with the General Plan goals and policies. The *City of West Hollywood Zoning Ordinance* (Zoning Ordinance), Title 19 of the Municipal Code, carries out the policies of the General Plan by classifying and regulating the uses of land and structures within the City. The Zoning Ordinance is adopted to protect and to promote the public health, safety, and general welfare.

City of West Hollywood Sunset Specific Plan (Sunset Specific Plan). The Sunset Specific Plan was adopted in 1996, and amendments were made through January 1, 2019. The Sunset Specific Plan provides a framework for development of Sunset Boulevard and adjacent land uses within the City of West Hollywood. The Sunset Specific Plan is a form-based plan with urban design standards, density strategies, cultural resource guidelines, and land use and development regulations that allow expanded development in certain "target" areas. The Plan divides Sunset Boulevard into eight geographic sections, with corresponding development standards and policies. Each geographic section is further divided into sites using letters of the alphabet. The Project site is located within Geographic Area 1: Eastern Gateway and site B or Geographic Area 1-B. The intent of the Plan is to ensure that the Strip remains as a vital district for businesses, residents, and tourists.

2.0 PROJECT DESCRIPTION

2.1 Project Location

8240 Sunset Associates, LP and 8228 Associates, LP (Owners) are proposing the 8228-8240 Sunset, The Harper Project (herein referred to as the "Project" or "The Harper Project"), which is located in the City of West Hollywood; refer to Exhibit 2-1, *Regional Vicinity*. The City of West Hollywood is comprised of 1.9 square miles in the Los Angeles Metropolitan Area. The City is located within the County of Los Angeles, approximately 7.5 miles northwest of downtown Los Angeles. Regional access to the site is provided via U.S. Route 101 (U.S. 101) located approximately 2.2-miles to the northeast of the Project site. Local access is provided via major north-south and east-west oriented roads including Sunset Boulevard, which forms the northern boundary of the Project site; Santa Monica Boulevard, located approximately 0.45 miles south of the Project site; La Cienega Boulevard, located approximately 0.51 miles southwest of the Project site; and Crescent Heights Boulevard, located approximately 0.14 miles east of the Project site.

The Project site is comprised of approximately 0.88 acres located at 8228 through 8240 Sunset Boulevard, on the south side of Sunset Boulevard, east of North Harper Avenue, and west of Havenhurst Drive; refer to Exhibit 2-2, *Project Location*.

2.2 Existing Setting

The Project site is located on the Sunset Strip, which is a highly urbanized area within the City of West Hollywood, and an internationally known corridor, historically recognized for its entertainment uses, hotels, restaurants, and billboards. It contains a mix of low- and high-rise buildings, most of which directly front onto Sunset Boulevard. A high level of pedestrian activity and "urban village" ambience results from the types of uses, siting of the structures on the sidewalks, and design characteristics on the street level that invite pedestrian observation and use. The Sunset Strip is also known for its wide array of large and colorful billboards and tall wall signs.

ON-SITE LAND USES

The approximately 0.88-acre Project site is comprised of two parcels (APNs 5554-018-020, and -23) currently developed with a 13,083-square-foot, four-story office building (three-stories fronting Sunset Boulevard) at 8228 Sunset Boulevard and a 12,818-square-foot, two-story office building with a commercial parking lot in the rear at 8240 Sunset Boulevard. The office building at 8228 Sunset Boulevard was originally constructed in 1927 as a multi-family residence and is now utilized as commercial offices. There are two existing billboards on the Project site. The first billboard is a double-sided billboard located on the roof of the existing office building at 8228 Sunset Boulevard. The second billboard is a single-faced billboard mounted on a pole structure in front of the 8240 Sunset Boulevard office building. The Project site is currently accessed from two curb cuts on Sunset Boulevard and a driveway on North Harper Avenue.

GENERAL PLAN AND ZONING

According to the West Hollywood General Plan 2035 Land Use Map (Land Use Element Figure 3-4), the Project site is designated Sunset Specific Plan (SSP) and a portion of Parcel 2 is designated Residential Multi-Family High Density (R4B); refer to Exhibit 2-3, *Existing General Plan Land Uses*. The Sunset Specific Plan designation provides implementation of the Sunset Specific Plan. The High-Density Residential designation provides for the retention, maintenance, and continued development of a wide range of high-

density multi-family housing, including apartments and condominiums. The designations sub-category of R4B allows for residential buildings that are up to four stories and 45 feet.

The City of West Hollywood Zoning Map identifies the zoning for two of the parcels as Sunset Specific Plan (SSP) and a portion of one of the parcels as Residential, Multi-Family High-Density (R4B) with a Parking Overlay (-PK) districts; refer to Table 2-1, *Existing General Plan Land Use and Zoning* and Exhibit 2-4, *Existing Zoning*.

Table 2-1
Existing General Plan Land Use and Zoning

Parcel	Assessor Parcel Number (APN)	Square Feet	General Plan Land Use	Zoning
1	5554-018-020	7,360	Sunset Specific Plan	SSP Sunset Specific Plan
2	5554-018-023	30,439	Sunset Specific Plan and Residential Multi-Family High Density (R4B)	SSP Sunset Specific Plan and R4B-PK Residential, Multi-Family High-Density/ Parking Overlay District

The Sunset Specific Plan zoning district identifies the areas along Sunset Boulevard which are included within the Sunset Specific Plan. The R4 zoning district provides for the development of a wide range of high-density multi-family housing, including apartments and condominiums. The standards of the R4 zoning district are intended to ensure that new high-density residential projects are compatible with the scale and character of existing high-density residential neighborhoods. The R4 zoning district is consistent with the R4A, R4B, and R4B-C residential land use designations of the General Plan. The Parking Overlay zoning district is intended to identify sites within residential zoning districts where nonresidential parking lots and parking structures may be established or maintained. Where the Parking Overlay district is applied to a primary residential zoning district, nonresidential parking facilities (including parking structures) are allowed in addition to any land use normally allowed in the primary zoning district.

SUNSET SPECIFIC PLAN

The Sunset Specific Plan was adopted in 1996, with amendments through January 1, 2019, as a framework to preserve the eclectic character of Sunset Boulevard, manage and direct growth, and promote responsible development. The portion of the street in the City of West Hollywood known as “The Strip” extends for a length of approximately 1.2 miles, bordered by the City of Beverly Hills to the west and the City of Los Angeles to the east. It serves as both a major traffic artery connecting Downtown to the Westside and as a community shopping district for West Hollywood residents. It is a major traffic thoroughfare for the Los Angeles region, so the landscape is dominated by the automobile. As a result, billboards have become a major urban design feature of Sunset Boulevard.

The Specific Plan is designed as a specific response to the particular urban conditions of the Boulevard and it includes policies, standards, and guidelines which promote and preserve the unique qualities of the street. Urban design standards, density strategies, cultural resource guidelines, and land-use and development regulations encourage responsible development along Sunset Boulevard. The Sunset Specific Plan distributes the total allowable increase in development among eight specific geographic areas along the Sunset Strip. Density increases for each area are assigned based on the current and

anticipated character of development envisioned for the Specific Plan area. A portion of the Project site is located within Site 1B of the Eastern Gateway of the Sunset Strip.

SURROUNDING USES

The Project site is surrounded by a mix of industrial, open space, and commercial land uses:

- North – The Project site is bounded by Sunset Boulevard to the north. North of Sunset Boulevard is the Chateau Marmont, a Los Angeles Historic-Cultural Monument, in addition to commercial uses zoned Sunset Boulevard Specific Plan (SSP).
- East – Directly east of the Project site are commercial uses, including a one-story restaurant to the northeast of the site, zoned SSP and multi-family residential uses zoned R4A, as well as the boundary between the cities of West Hollywood and Los Angeles. Also located east of the Project site is the Andalusia Apartments, a Los Angeles Historic-Cultural Monument.
- South – Directly south of the Project site are two- and three- story multi-family residences zoned R4B and R4A. Approximately 0.07 miles south of the Project site is the northern boundary of the Harper Historic District.
- West – The Project site is bounded by North Harper Avenue to the west and Sunset Boulevard to the northwest. West of North Harper Avenue and Sunset Boulevard are commercial uses zoned SSP.

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Legend

Project Location

County Boundary

8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-1. Regional Vicinity

Sources: CalAtlas; Los Angeles County. Map date: October 17, 2021.

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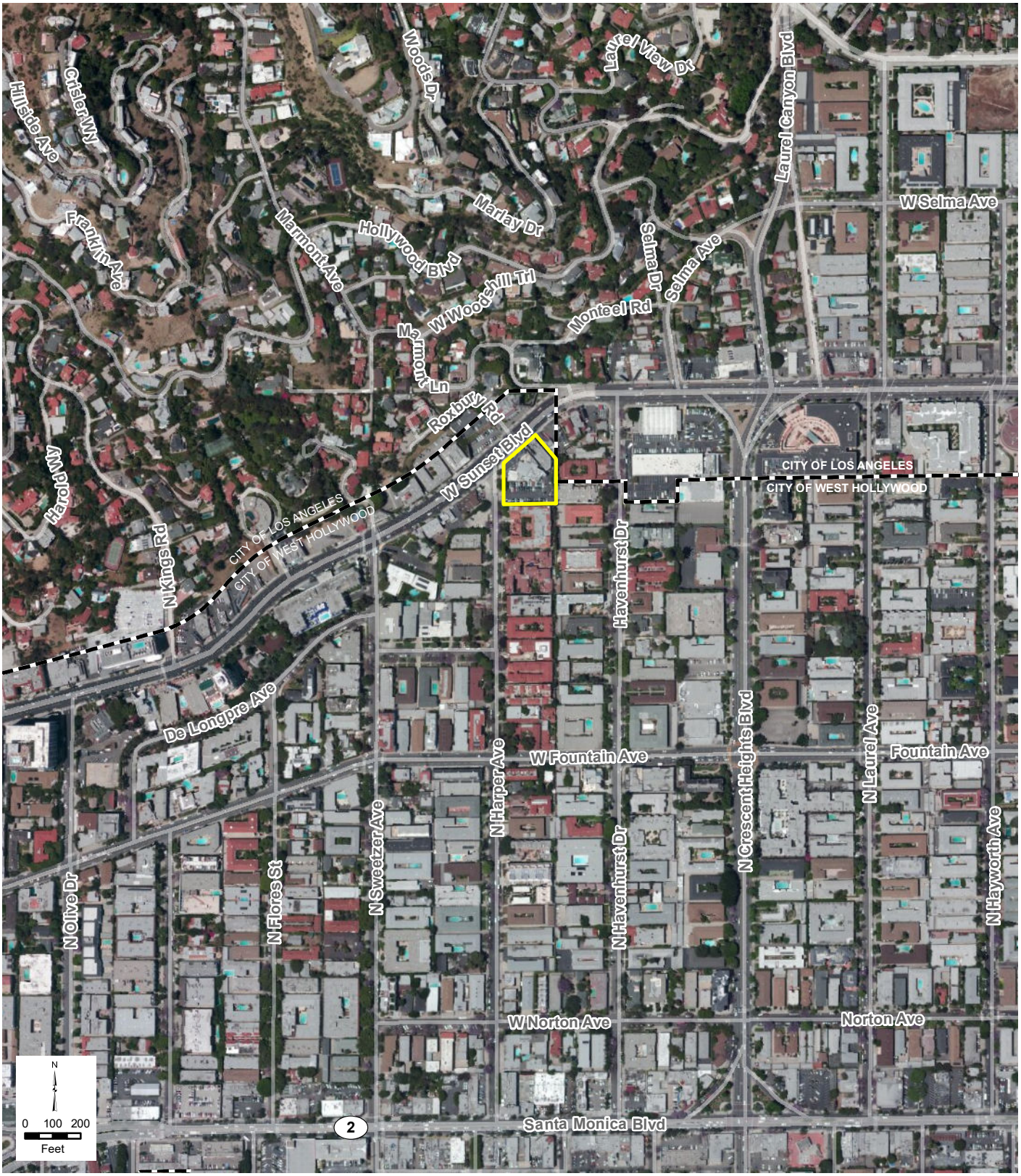

Legend

- Project Boundary
- City Boundary

8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-2. Project Location

Sources: Los Angeles County; ArcGIS Online Clarity Imagery Service. Map date: October 17, 2021.

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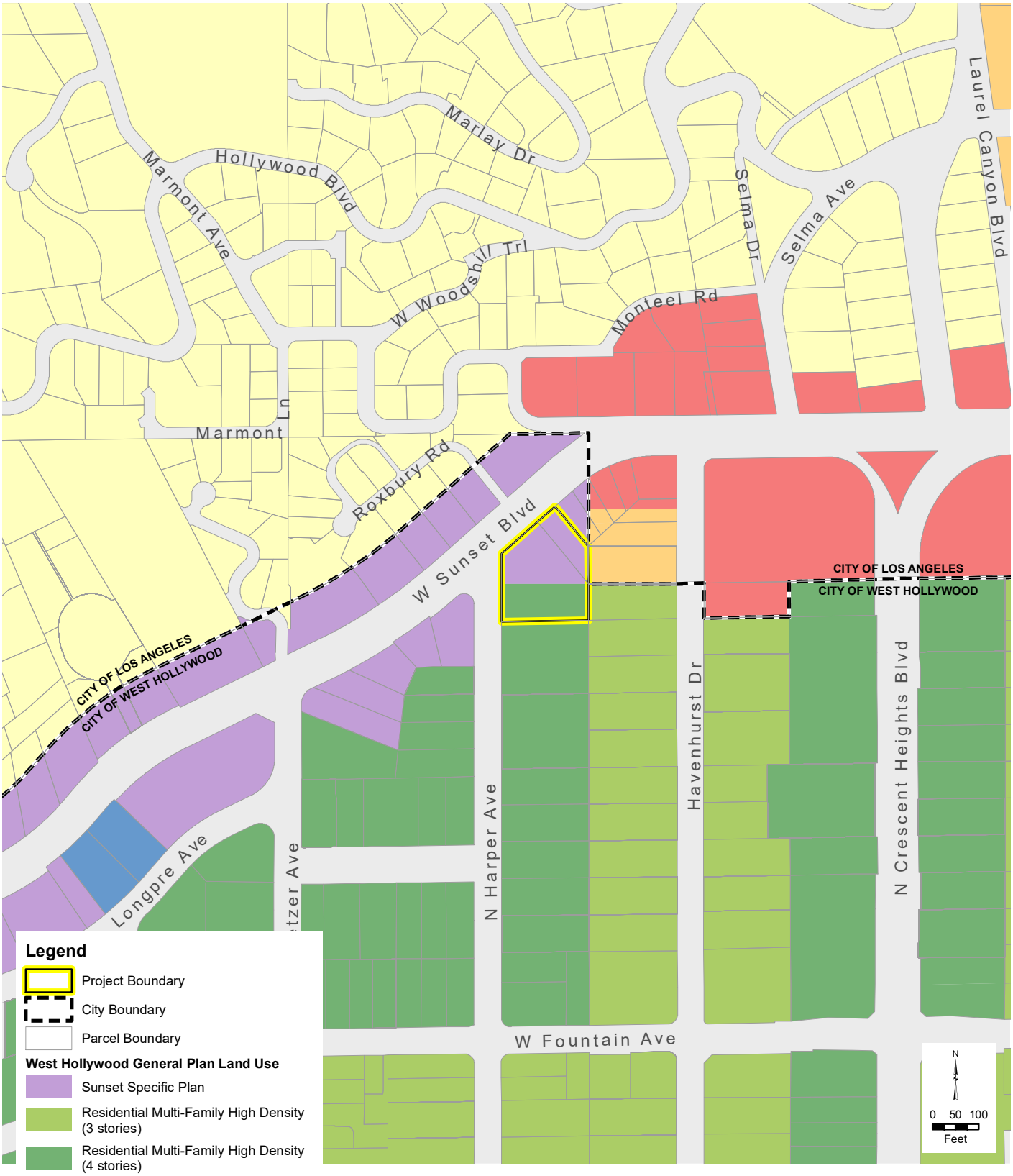

8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-3. Existing General Plan Land Uses

Sources: City of West Hollywood General PlanLand Use Map 2010; Los Angeles Open Data; Los Angeles County GIS. Map date: October 17, 2021.

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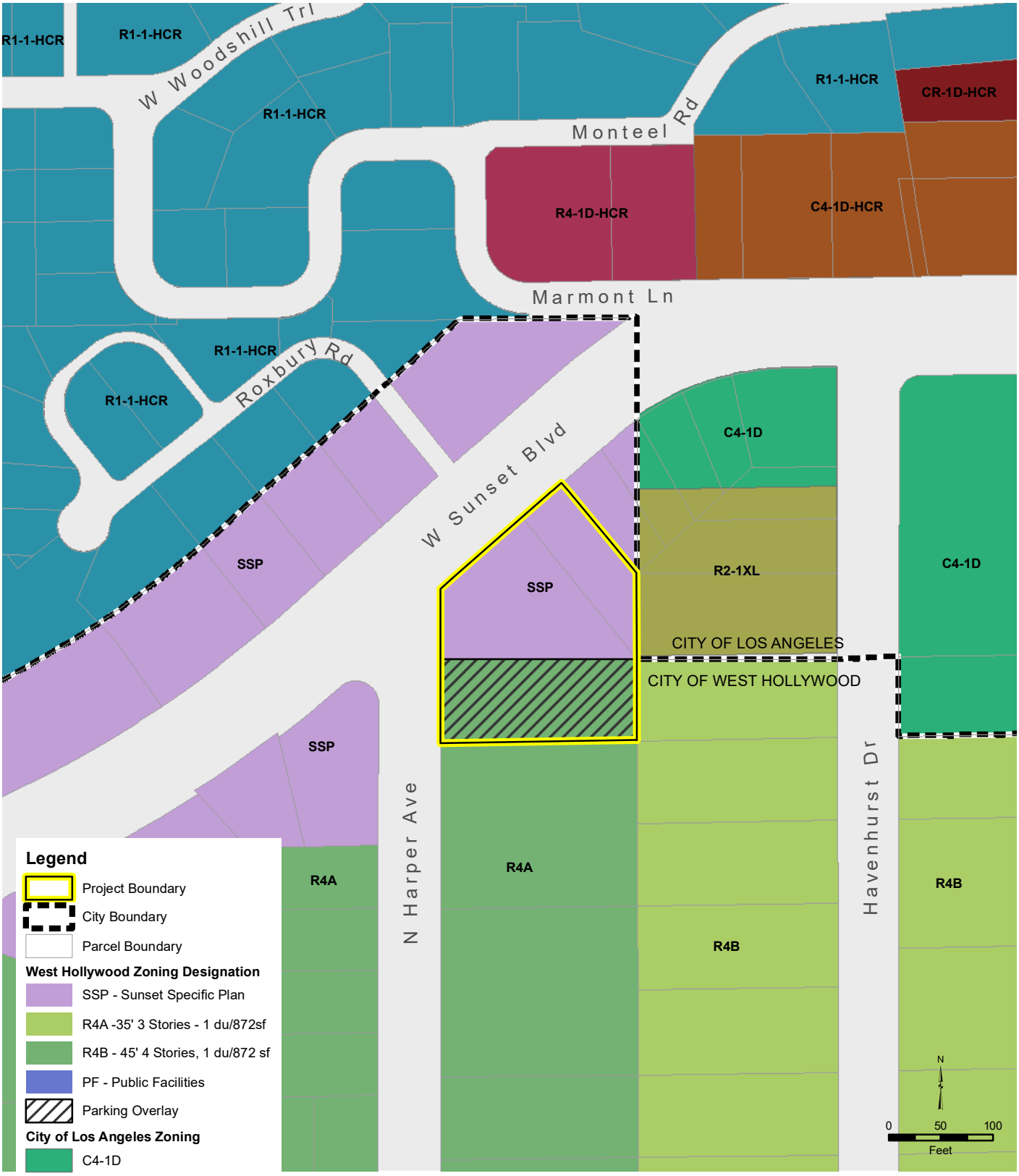

8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-4. Existing Zoning

Sources: City of West Hollywood Zoning Map, August 7, 2018; City of Los Angeles GeoHub, Zoning Polygons, April 21, 2021; Los Angeles County GIS. Map date: October 17, 2021.

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2.3 Proposed Project

The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project in the Eastern Gateway of the Sunset Strip, integrating a digital billboard display wrapping around the highly visible southeast corner of Sunset Boulevard and North Harper Avenue, located above a floating open-air courtyard with landscaping and outdoor dining.

The Harper Project would include a mixed-use hotel, commercial and residential structure with subterranean parking, including 167 hotel rooms, 45 residential units, restaurants, retail, commercial uses, and other ancillary hotel and residential amenities. Table 2-2, *Proposed Development Summary*, summarizes the proposed Project development. Exhibit 2-5, *Proposed Site Plan*, shows the proposed site plan for the Project.

Table 2-2
Proposed Development Summary

Use	Square Footage	Number
Residential Uses		
Apartments Total	*66,307*	*45 units*
Two Bedroom Units		12 units
One Bedroom Units		33 units
Residential Open Space Total	*7,400*	
Common Open Space	3,140	
Private Open Space	4,260	
Commercial Uses		
Hotel	*103,652*	*167 rooms*
Hotel Spa	2,272	
Hotel Gym	1,478	
Pool Deck	5,486	
Restaurants	6,741	
Bakery	900	
8th Floor Outside Seating	1,213	
9th Floor Meeting Area	1,282	
TOTAL	**169,959**	

The Harper Project is designed to give the appearance of three separate but integrated structures within the site. The Project would be comprised of twelve levels, which would include two subterranean parking levels (basement levels B1 and B2), a lower ground level for vehicular circulation, a ground level with restaurants and commercial uses, and eight floors of hotel and residential uses, with a maximum height of approximately 111 feet and eight inches. The south building would primarily include the residential units and rooftop pool on the eighth floor, with commercial uses on the ground floor, and the central and east buildings would include the hotel and commercial uses. Wireless antennas and equipment would be located on the roof.

RESIDENTIAL USES

The Harper Project would include 45 one- and two-bedroom residential units, comprised of nine low-income affordable units and 36 market rate units. Each residential unit would have a private balcony. Residents would have access to the hotel pool and amenities. Additionally, the Project would include long-term bicycle parking and storage for residents. On the eastern side of the courtyard will be private open space for the residents of the Project. Horizontal shading devices for bedrooms on the south facing elevation of the residential building will be provided. Most units will have at least two faces of exposure to ensure daylighting and cross ventilation.

HOTEL

The 167-room hotel would include a gym and spa for the use of the hotel guests and residential tenants. In addition, the hotel would include approximately 3,121 square feet of lobby, meeting rooms, and service areas. The proposed Project includes rooftop amenities, including a pool, indoor/outdoor cafe dining and seating, private and public open space courtyard, and lounge and garden areas available to residents and hotel guests with views of the surrounding area.

COMMERCIAL USES

A full-service restaurant and separate neighborhood bakery would be located along Sunset Boulevard, integrated into the main outdoor plaza entrance to the Project. The ground floor of the Project would include approximately 5,371 square feet of indoor and 1,370 square feet of outdoor dining split between a street front more casual indoor/outdoor restaurant and a more formal indoor/outdoor restaurant and bar situated adjacent to the open-air interior courtyard. The eighth-floor rooftop would include approximately 1,444 square feet of indoor seating and 1,213 square feet of outdoor seating as well as food and beverage service for the pool area. The rooftop indoor/outdoor seating area would have a fully retractable roof/awning. The outdoor rooftop seating and deck areas would be surrounded by a solid eight-foot glass wall and extensive landscaping to contain sound. The ninth floor would contain 1,282 square feet of meeting area.

ARCHITECTURE AND DESIGN

The Harper Project is modern in style and as discussed above, would give the appearance of three separate but integrated structures within the site to reduce massing. The Project would include curved glass gateway elements, in addition to a floating corner street front courtyard with outdoor seating open to the Sunset Boulevard streetscape with an interior open-air courtyard and oculus open to the sky. The Project would incorporate landscape and greenery to create an organic appearance. The main hotel structure would float above the street level, both on Sunset Boulevard and North Harper Avenue, with both expansive openings and glass walls. Exhibits 2-6a and 2-6b, *Project Renderings*, show the renderings for the proposed Harper Project.

As described above, a full-service restaurant and separate neighborhood bakery would occupy most of the street frontage along Sunset Boulevard and would be integrated into the main outdoor plaza entrance to the Project. Outdoor seating would extend the length of the Project site along Sunset Boulevard in a series of landscaped terraces. Below the corner digital display area, there would be a pedestrian level café, indoor and outdoor seating areas, and arts engagement. The primary feature of this area is a dedicated art wall mural. The courtyard landscaping will create differentiated seating arrangements for

different types of socializing through incorporating landscaped berms, built-in seating and hedges to create separate zones. Approximately 4,582 square feet of landscaped lawn will be provided as a public amenity in the courtyard.

SIGNAGE

The Harper Project would include four signs integrated into the Project's design to promote the new Project and emphasize the site as a gateway into the Sunset Strip and the City of West Hollywood. Three of these signs would include off-site signage.

The proposed broad curved volume of the Harper Project would include a digital billboard off-site sign composed of graphic vertical LED strips. The digital billboard display would wrap around the highly visible southeast corner of Sunset Boulevard and North Harper Avenue and include feathered accent fixtures designed as a floating scrim which responds to the rhythm and curvature of the Project. The light and media of the sign would be programmed to enhance the entire façade as a cohesive whole engineered to avoid glare. The balcony edges and curtainwall mullions of the Harper Project would serve as grid lines to connect the design of the proposed signage to the light and media elements with the material and proportions of the building at an elevated scale, refer to Exhibits 2-6a and 2-6b.

The two existing billboards on the Project site would be replaced with a two-sided horizontal billboard on the rooftop of the east building and a two-sided vertical billboard between the east and central buildings, refer to Exhibits 2-6a and 2-6b. The rooftop sign would be visible driving in both directions on Sunset Boulevard. The vertical billboard would feature off-site signage on its west face and on-site signage on its east face. An additional vertical on-site sign would be located on portion of the Project fronting Harper Avenue. It would be visible driving southbound on Harper Avenue and eastbound on Sunset Boulevard.

Architecturally integrated media walls at the ground floor level would be visible from the building exterior. The ground floor art mural wall would create an opportunity for ongoing curation of culturally relevant artwork.

CIRCULATION

Vehicles would enter the Project site from North Harper Avenue via a 20-foot driveway located at the southwest corner of the Project site. The two existing driveways on Sunset Boulevard would be closed and new curbs would be constructed.

Interior pick up and drop off areas and valet parking would be utilized to eliminate vehicle back up onto North Harper Avenue. Hotel and commercial parking would be valet operated; guests would enter through the main driveway to a vehicular round about. On-site loading zones would be provided for trucks accessing the Project site. Residential parking would be fully separated from commercial parking with direct elevator access reserved only for residents and their guests. Residents would travel along the eastern perimeter of the Project site to enter the residential parking level and self-park. Residential guests may also have the option of valet parking their vehicle, refer to Exhibit 2-7, *Vehicle Access Diagrams* and Exhibit 2-8, *Ground Level Circulation Plan*.

Pedestrian access to the Project site would be provided via two pedestrian access points off of Sunset Boulevard and one pedestrian access point off of North Harper Avenue. The existing curb ramps on Sunset Boulevard and Harper Avenue would be removed and new compliant ramps would be constructed at the

pedestrian crossing. The existing signal pole on Sunset Boulevard would be protected in place and a compliant push button control would be provided at the crosswalk ramp.

PARKING

The Project would include 172 subterranean parking spaces incorporating an electronic stacked parking system. Residential parking would be fully separated from hotel and commercial parking; refer to Table 2-3, *Proposed Parking Summary* and Exhibit 2-7.

The Project would include bike racks, lockers, and shower facilities to support hotel, retail, residential, and community bicyclists. The Harper Project would provide 12 short-term and 23 long-term bicycle parking spaces for the residential uses and 20 short-term and 13 long-term spaces for the commercial uses.

Table 2-3
Proposed Parking Summary

Parking Space Type	Parking Spaces Provided	Parking Dimensions (Minimum)
Residential Parking		
Standard	32	9 feet by 18 feet
Accessible Standard	1	9 feet by 18 feet
Accessible Van	2	14 feet by 19 feet
Tandem	22	9 feet by 18 feet
Residential Subtotal	**57**	-
EV Ready	6	-
EV Capable	51	-
Commercial Parking		
Standard	12	9 feet by 18 feet
Compact	7	8 feet 6 inches by 15 feet
Compact Stacked	20	7 feet 5.5 inches by 17 feet
Standard Stacked	70	7 feet 10.5 inches by 19 feet 1 inch
Accessible Standard	4	9 feet by 18 feet
Accessible Van	2	14 feet by 19 feet
Commercial Subtotal	**115**	-
EV Ready	12	-
EV Capable	12	-
TOTAL PARKING	**172**	
Total EV Ready	18	
Total EV Capable	63	

LANDSCAPING AND FENCING

Landscaping, walls, and fencing are proposed to be provided within and around the Project site. The existing wall, trees, and hedgerow along the southern boundary of the Project site would be protected in place.

Existing trees adjacent to North Harper Avenue and Sunset Boulevard would either be protected in place or removed and relocated; new trees would also be provided. A decorative fence or wall is proposed along the eastern property line. A low wall would be located along North Harper Avenue and along the driveway entrance for the Project. Decorative paving would be located along the pedestrian pathways and plaza areas. Exhibit 2-9, *Landscape Plan Ground Level*, and Exhibit 2-10, *8th Floor Landscape Plan*, show the proposed landscape plans for the Harper Project.

LIGHTING

A combination of recessed lighting, linear lights, bollard lights, and wall mounted light fixtures would be used to provide lighting throughout the exterior of the Harper Project. The bollard and wall mounted light fixtures used for the Project would all be dark sky compliant. Bollard lights would line the outdoor walking paths on the Project site. A combination of recessed and linear lights would provide illumination on the private balconies of both the residences and hotel rooms. Recessed lights would be used to provide lighting for the covered public and common outdoor spaces on the ground floor and 8th floor pool deck. Exhibit 2-11, *Lighting Diagrams*, show the proposed lighting plan for the Harper Project.

UTILITIES

Stormwater

Stormwater runoff from the Project site would be captured on-site by a series of roof drains and area drains routed to a settling chamber. A drywell system would be installed to infiltrate runoff into the soil. Overflow from the drywell would be pumped to the surface and released through sidewalk curb drains on Harper Avenue.

Water and Wastewater

Wastewater infrastructure would be constructed to serve the proposed development. On-site wastewater infrastructure would connect to the existing 8-inch sewer main located in Harper Avenue for conveyance and treatment.

Dry Utilities

Dry utilities, including electricity, natural gas, and telephone lines currently serve the Project site and surrounding area. The Project would install the necessary infrastructure on-site to serve the proposed Project, which would connect to existing infrastructure for service.

SUSTAINABILITY FEATURES

Available roof area would be used for solar panels, which would contribute to power the Project's signage and offset the Harper Project's overall energy use and the Project would commit to the Clean Power Alliance 100 percent renewable energy option for the life of the Project. Sustainable building materials would be used for the interior and exterior finishes and the Project would utilize recycled content for many aspects of the construction. Additionally, the Project would utilize passive design strategies such as

shaded and high-performance glass. The Project proposes to be all-electric except for the commercial kitchens on the site.

Water efficient fixtures beyond applicable standards would be installed where appropriate. The landscaping throughout the Harper Project would be drip irrigated with the water collected and continually re-used, supplemented with the collection of rainwater. The oculus, which is a building opening which extends from the ground level to the auto drop off area a floor below, would increase air flow and light and would enable additional landscaping.

GENERAL PLAN AMENDMENT, ZONE CHANGE, SPECIFIC PLAN AMENDMENT, AND DEVELOPMENT AGREEMENT

The Project proposes a General Plan Amendment (GPA) to change the General Plan land use designation for the portion of Parcel 2 that is currently designated Residential Multi-Family High Density to Sunset Specific Plan (SSP). The Project proposes a Zone Change to change the zoning district of a portion of Parcel 2 from R4B-PK Residential, Multi-Family High-Density/Parking Overlay District to SSP. The Project proposes a Specific Plan Amendment of the Sunset Specific Plan to include all of Parcel 2 in the Specific Plan area.

The Sunset Specific Plan grants broad authority to the City to approve Alternative Proposals with revised design and development standards and guidelines for the proposed Project located within the Eastern Gateway Site 1-B that are consistent with the purposes and intent of the development requirements that would otherwise apply.

Approval of an Alternative Proposal for the new integrated Site 1-B, would incorporate the proposed amendments to the SSP, General Plan, and Zoning Map, and include a Development Agreement between the Applicant and the City. The Alternative Proposal would incorporate the following modifications of and variances from the design and development requirements applicable to Site 1-B of the SSP and the R-4B site with the overall intent of delivering a landmark entry project to the Eastern gateway of the Sunset Strip. Objective 4 for the Eastern Gateway Area of the Sunset Specific Plan encourages development of an anchor tenants by permitting additional height and density on at least one site of the properties in the Eastern Gateway. The Alternative Proposal is intended to be such a project.

FAR; Density – Proposed Maximum FAR of 4.16

The existing zoning in the SSP allows a base 1.5 FAR on the Project site, with a 0.5 FAR density bonus if residential is added to the site, which would allow for a baseline 2.0 FAR. The proposed FAR under the Alternative Proposal would be 4.16 FAR for the entire site.

Height

In accordance with Zoning Code Section 19.20.080, the heights of the proposed Project were calculated using the Sloping Site Method set forth in the Zoning Code. The proposed maximum height of the Harper Project would be approximately 111 feet and eight inches. Current zoning allows a base height of 45 feet (SSP, p. 161). If the R-4B parcel would have remained residential, a height bonus of up to 10 feet would have been allowed within that parcel (Zoning Code Section 19.22.050(E)(2)(f). Objectives 1 and 4 on page 160 of the SSP for this Eastern Gateway site, highly encourage development of a distinctive anchor architectural landmark project with additional height and density in this area to mark the entry to the Sunset Strip. The Harper Project proposes to be that anchor landmark project.

Below is a summary of the proposed height of the Harper Project in each of the two parcels and to what extent the proposed height exceeds what is allowed under the baseline SSP and Zoning Code:

- Parcel 1: Proposed height is approximately 50.9 feet above baseline height set forth in the SSP;
- Parcel 2: Proposed height is approximately 62 feet above baselines height set forth in SSP; and
- Parcel 2: Proposed height is approximately 62.8 feet above baseline Zoning Code for the R4-B zoning district.

Additionally, the rear lot line residential envelope measured from any required side yard, a minimum horizontal distance equal to one foot for each two feet by which the structure, or portion thereof, exceeds the maximum height of 35 feet. The height of the proposed building for Parcel 1 is 32 feet over the side lot envelope.

Setbacks

For the portion of Parcel 2 located in the R4-B zoning district, the required east side setback is 10 feet (next to residential, five feet for first two-stories plus one foot for every additional story). Balconies are allowed to project into the street and interior side yard setback a maximum of two feet. The proposed Project balconies would project six feet and four inches into the street and interior side yard setback. There are no east-facing balconies projecting into the setback along the eastern boundary of the Project site.

Private Residential Open Space

Per Zoning Code Section 19.36.280(2)(a), 2,000 square feet of common open space is the minimum required and the Project would provide 3,140 square feet of common open space. The Zoning Code requires a minimum of 5,400 square feet of private open space for this type of project and the Project proposes 4,260 square feet of private open space. Per the Zoning Code, private open space may be transferred to and provided as common open space area, provided that at least 50 percent of the units each provide a minimum of 50 square feet of private open space, which has a minimum dimension of five feet in each direction. In compliance with the Zoning Code, 1,140 square feet of private open space would be transferred to common open space.

The Zoning Code requires at least 1,200 square feet of common open space at grade level. Of the 3,140 square feet of common open space provided, not including the 5,486 square feet of shared common open space on the pool deck, 1,100 square feet of the open space would be provided at grade or on the first level.

Parking Stall Dimensions

The City requires the following dimensions for parking stalls:

- Standard: 8 feet 6 inches by 18 feet;
- Standard next to walls, columns, or other vertical obstructions: 9 feet by 18 feet;
- Compact: 8 feet 6 inches by 15 feet; and
- Compact next to walls, columns, or other vertical obstructions: 9 feet by 15 feet.

The Project deviates from the City required parking stall dimensions for the automated stacker parking spaces. The following dimensions are the recommended parking dimensions from the stacker manufacturer:

- Standard stacked: 7 feet and 10.5 inches by 19 feet and 1 inch; and
- Compact stacked: 7 feet and 5.5 inches by 17 feet.

Width of Driveway

The Project would provide 26-foot-wide driveways throughout, except a 24 foot 10-inch-wide drive aisle on Basement Level B1.

CONDITIONAL USE PERMIT AND ADMINISTRATIVE PERMIT

The proposed hotel use is allowed within the SSP zoning district with a Conditional Use Permit (CUP) to support the proposed 167 room hotel use, including, but not limited to, guestrooms, lounges, meeting rooms, private dining, rooftop pool deck, and outdoor courtyard and terraces, and indoor and outdoor lounges, meeting/conference areas, and garden areas, per Section 19.10.030 of the West Hollywood Zoning Code (Zoning Code).

On-site beverage service for the public restaurants, bars and outdoor dining areas with live music are allowed uses within the SSP zoning district with an Administrative Permit (AP), per Chapter 19.10 of the Zoning Code. The hotel and restaurants propose to operate with sales, service, and consumption of a full range of alcoholic beverages from 8:00 a.m. to 2:00 a.m. daily, which would allow three meals a day and evening food and alcohol service to hotel guests and the public, seven days a week, if demand supports it.

The proposed outdoor dining and seating areas on the ground floor and rooftop areas and outdoor lounges and garden areas are allowed uses within the SSP zoning district with an AP.

SIGN PERMIT

The Project requires approval of a sign permit to allow for the following signs:

- Wrap around digital signage on the corner of Sunset Boulevard and North Harper Avenue;
- Replacement two-sided horizontal billboard on the rooftop of the east building; and
- Replacement two-sided vertical billboard between east and central buildings.

VESTING TENTATIVE TRACT MAP FOR CONDOMINIUM PURPOSES

The Project requires approval of a Vesting Tentative Tract Map (VTTM) for subdivision and condominium purposes. The proposed VTTM would create one ground lot and four airspace lots which are oriented to project levels and uses. Airspace lots are designated as airspace lots two through five. Airspace lots two and three encompass the majority of the Property including subterranean and above ground levels. Airspace Lot 4 coincides with ground level and second floor uses. Airspace Lot 5 carves out proposed signage.

PROJECT CONSTRUCTION AND PHASING

Construction of the proposed Project would occur over approximately 30 months, commencing June 2023. The first phase of construction would include demolition and site preparation activities, which would occur over approximately one month. Demolition activities would include removal of the two existing office buildings, totaling 40,901 square feet, and the asphalt parking lot on the Project site. Tree and brush removal would also occur during this time. Grading activities would occur over approximately five months followed by approximately 24 months of building construction.

2.4 Discretionary Actions

The City of West Hollywood, as the Lead Agency, has discretionary authority over the proposed Project. The Project would be subject to various City permits and approvals, including, but not limited to:

- Development Agreement;
- Development Permit;
- General Plan Amendment;
- Zone Change;
- Specific Plan Amendment;
- Conditional Use Permit;
- Administrative Permit;
- Demolition Permit;
- Vesting Tentative Tract Map for Condominium Purposes; and
- Sign Permit.

The Project would also require administrative approvals from the City for issuance of grading, building, and occupancy permits, after approval of the above approvals.

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8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-5. Proposed Site Plan

Source: AXIS/GFA, 6/3/2022
Map date: August 10, 2022.



8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-6a. Project Renderings

Source:AXIS/GFA, 6/16/2022.
Map date: August 10, 2022.





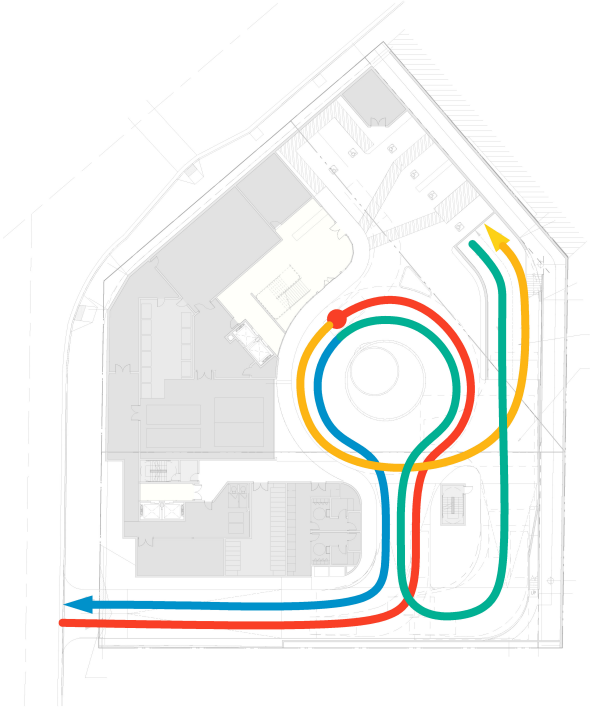


8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-6b. Project Renderings

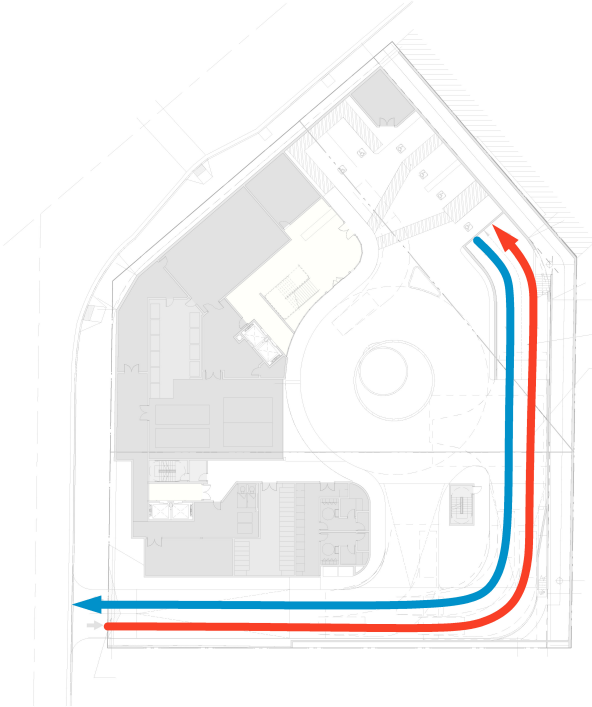
Source: AXIS/GFA, 6/16/2022.
Map date: August 10, 2022.

HOTEL RETAIL ACCESS (W/VALET)



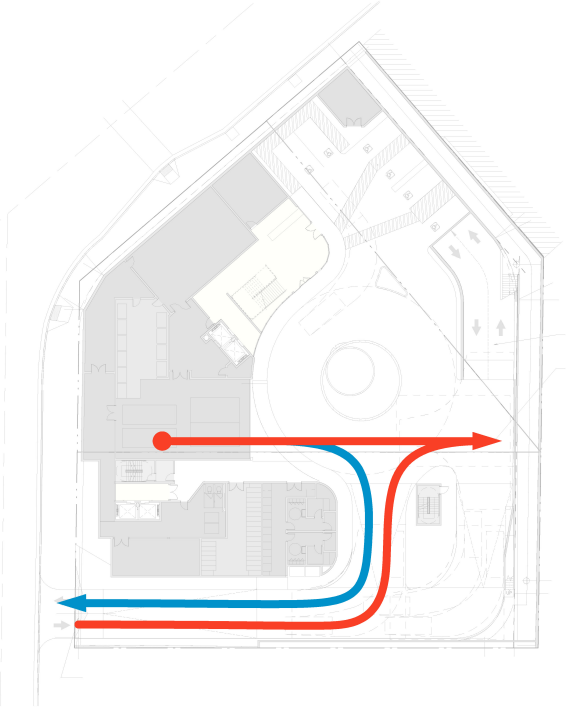
GUEST ENTER
GUEST EXIT
VALET PARK
VALET RETURN

RESIDENTIAL ACCESS



RESIDENTS ENTER
RESIDENTS EXIT

LOADING / TRASH ACCESS

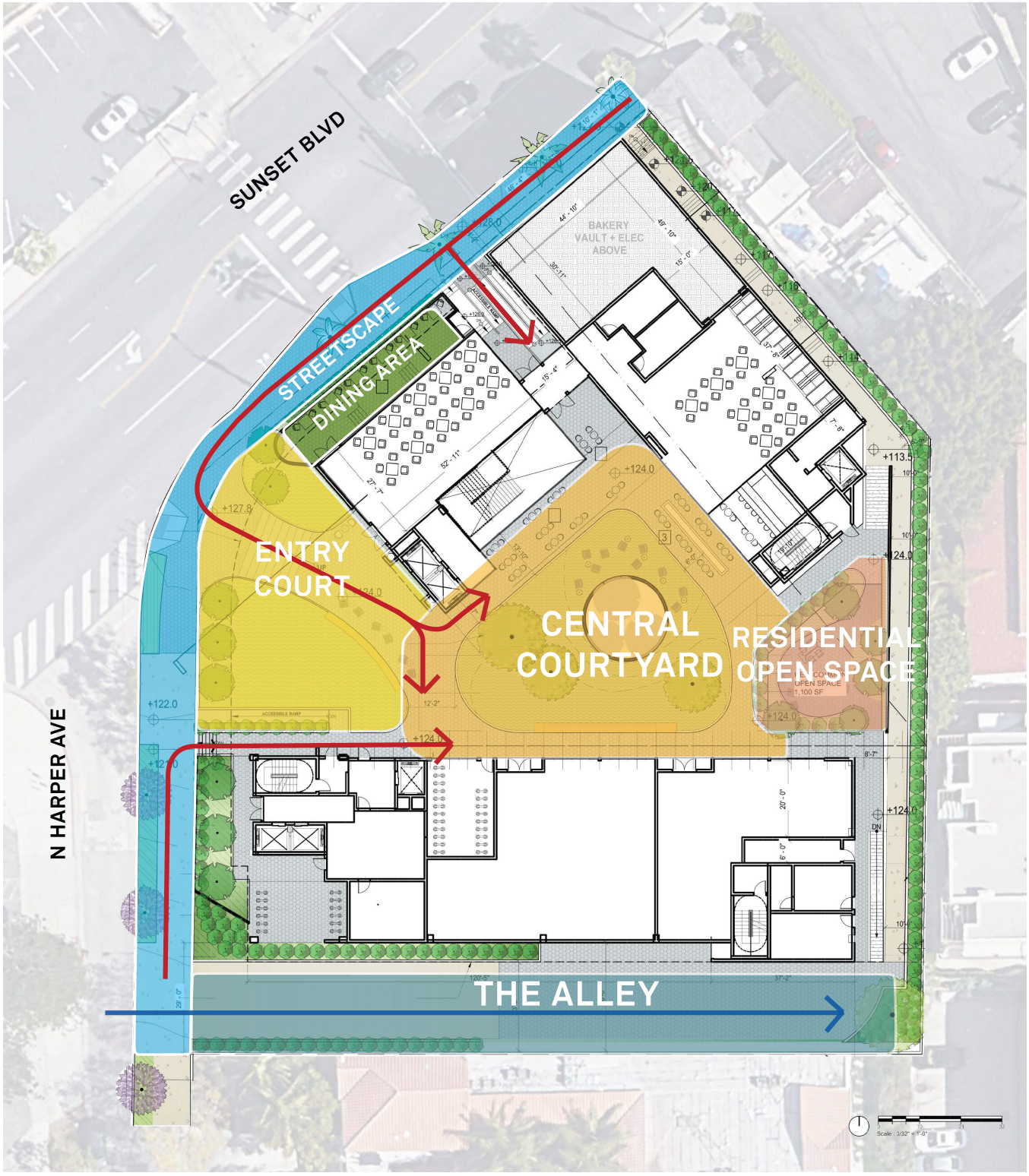


TRUCK ENTER
TRUCK EXIT

8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-7. Vehicle Access Diagrams

Source: AXIS/GFA, 6/16/2022.
Map date: August 10, 2022.



8228-8240 SUNSET, THE HARPER PROJECT

PEDESTRIAN CIRCULATION

VEHICULAR ENTRY

Exhibit 2-8. Ground Level Circulation Plan

Source: AXIS/GFA.
Map date: August 10, 2022.

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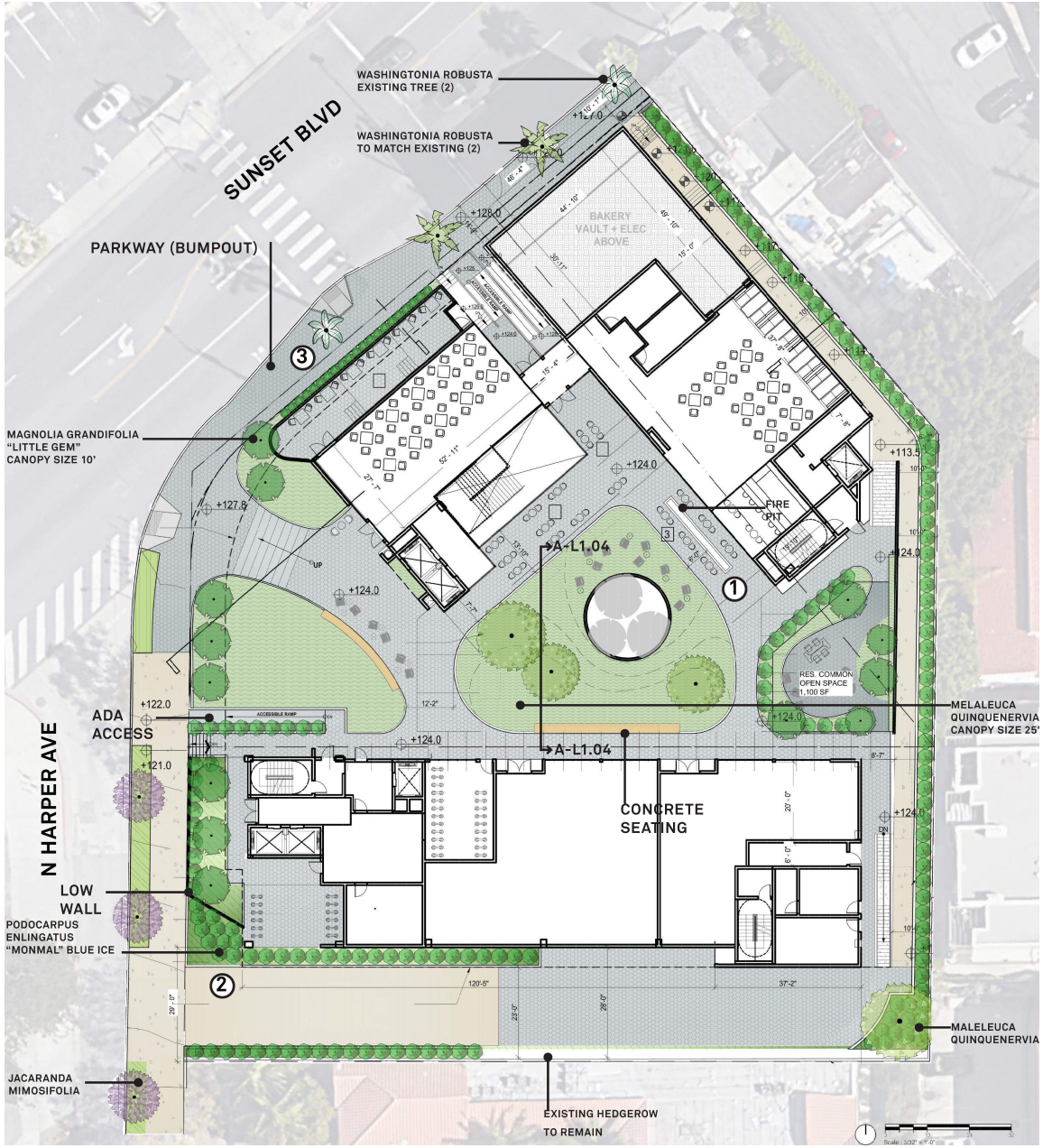
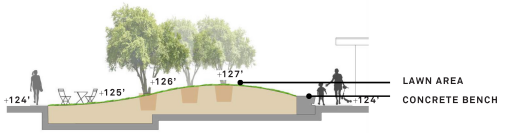
LANDSCAPE PLAN



PLANTING CONCEPT



CROSS-SECTION A-A



8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-9. Landscape Plan Ground Level

Source: AXIS/GFA.
Map date: August 10, 2022.

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8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-10. 8th Floor Landscape Plan

Source: AXIS/GFA
Map date: August 10, 2022.

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8228-8240 SUNSET, THE HARPER PROJECT

Exhibit 2-11. Lighting Diagrams

WEST ELEVATION LIGHTING



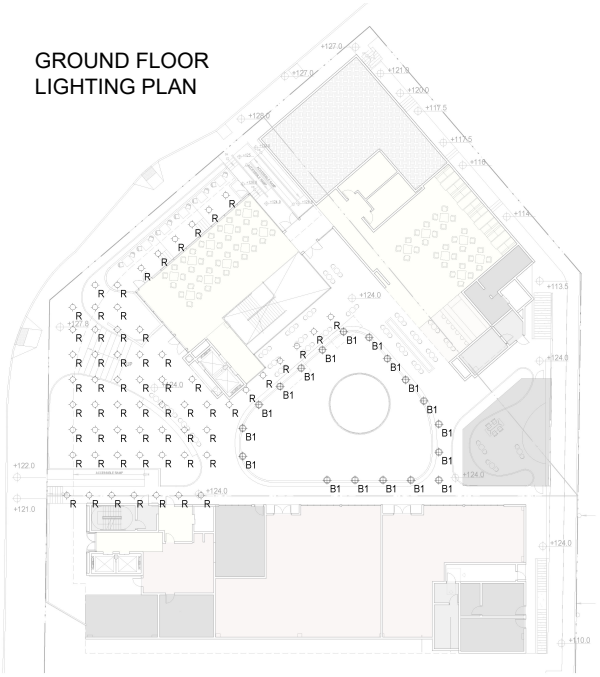
NORTHWEST ELEVATION LIGHTING



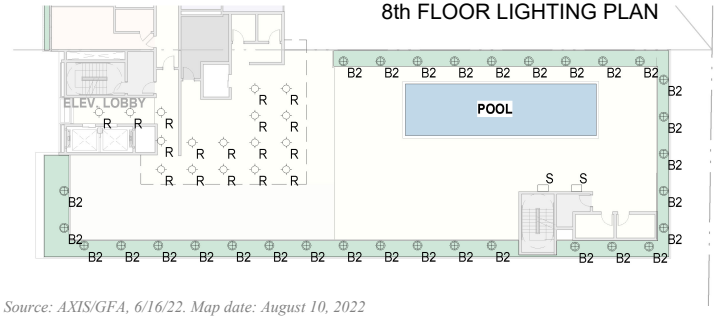
6th FLOOR
LIGHTING PLAN,
TYP.



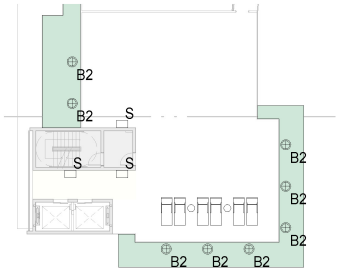
GROUND FLOOR
LIGHTING PLAN



8th FLOOR LIGHTING PLAN



ROOF
PLAN
LIGHTING





R - Recessed Light

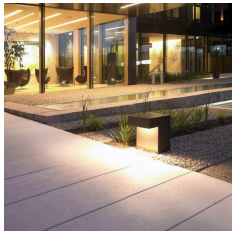




L -Linear Light

LED

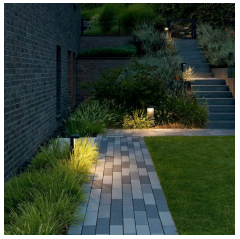




B1 - Bollard Light

Dark Sky Compliant





B2 - Bollard Light

Dark Sky Compliant





S - Wall Mounted Light

Dark Sky Compliant



Source: AXIS/GFA, 6/16/22. Map date: August 10, 2022

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3.0 ENVIRONMENTAL CHECKLIST FORM

BACKGROUND

1. Project Title: 8228-8240 Sunset Boulevard, The Harper Project
2. Lead Agency Name and Address: City of West Hollywood Planning and Development Services Department 8300 Santa Monica Boulevard West Hollywood, California 90069
3. Contact Person and Phone Number Antonio Castillo, Senior Planner City of West Hollywood, Current and Historic Preservation Planning Division, Planning and Development Services Department ACastillo@weho.org, 323.848.6854
4. Project Location: The Project site is comprised of approximately 0.88 acres located at 8228 through 8240 Sunset Boulevard, south of Sunset Boulevard, east of North Harper Avenue, and west of Havenhurst Drive.
5. Project Sponsor's Name and Address: 8240 Sunset Associates, LP and 8228 Associates, LP 8228 Sunset Boulevard, Ste. 211, West Hollywood, CA 90046
6. General Plan Designation: Sunset Specific Plan and Residential, Multi-Family High Density
7. Zoning: SSP Sunset Specific Plan and R4B Residential Multi-Family High Density with a Parking Overlay (PK)
8. Description of the Proposed Project: Refer to Section 2.3.
9. Surrounding Land Uses and Setting: Refer to Section 2.2.
10. Other public agencies whose approval is required: Refer to Section 2.4.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? Refer to Section 4.18. As part of the environmental review process, the City would conduct outreach to local tribes to understand the potential for tribal cultural resources to occur within the Project site and surrounding area.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

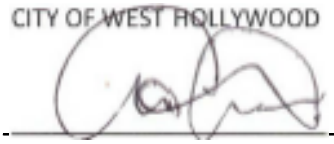
The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages.

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

DETERMINATION

On the basis of this initial evaluation:

	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
X	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.



08/26/2022

Antonio Castillo
Senior Planner

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

The environmental analysis in this section is patterned after CEQA Guidelines Appendix G. An explanation is provided for all responses. The responses consider the whole action involved, including on- and off-site project level and cumulative, indirect and direct, and short-term construction and long-term operational impacts. The evaluation of potential impacts also identifies the significance criteria or threshold, if any, used to evaluate each impact question. If applicable, mitigation measures are identified to avoid or reduce the impact to less than significant. There are four possible responses to each question:

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the project.

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4.0 ENVIRONMENTAL ANALYSIS

4.1 Aesthetics

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

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 transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" as an area within 0.5 mile of a major transit stop. PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC 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 transit priority area. PRC Section 21099(a) defines an "infill site" as 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.

The proposed Project would be a mixed-use residential project located on an infill site within a transit priority area that meets the criteria set forth in Section 21099(d)(1). The Project is considered to be mixed-use residential project because it would include residential and commercial uses. The Project site is considered an infill site because the Project area is highly urbanized and the site has been developed with

commercial uses since the 1920s. The Project is within a transit priority area as mapped by the Southern California Association of Governments (SCAG). As the proposed Project is considered a mixed-use project on an infill site within a transit priority area, aesthetic impacts of the Project cannot be considered significant, pursuant to PRC Section 21099(d). Although the aesthetic impacts associated with the Project would not be considered significant, an evaluation of aesthetics relative to public views, visual character, and shade and shadow will be addressed in the EIR for informational purposes only.

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

No Impact. There are no officially designated scenic vistas identified in the West Hollywood 2035 General Plan. However, the City offers views of the Hollywood Hills to the north and the Los Angeles Basin to the south. As described in the Sunset Specific Plan, public views of the Hollywood Hills and the Los Angeles Basin are available from the Sunset Strip through open spaces between buildings that provide unobstructed views from the ground to the sky ("view corridors"), from open plazas or patios accessible from the street level that provide expansive views ("view terraces"), and from openings through buildings that provide a clear view from street level ("view portals"). Preservation of public views is encouraged by the Sunset Specific Plan, and enhancement of views through incorporation of view corridors, view terraces, or view portals into the design of new development is required at 13 specified sites along the Sunset Strip, the nearest of which is located approximately 60 feet north of the Project site (specifically, at the property located on the northwest corner of Roxbury Road and Sunset Boulevard). Although preservation of views would be encouraged, the Project would not interfere with or be subject to the development of required view corridors, view terraces, or view portals as defined in the Sunset Specific Plan. The EIR will address the Project's consistency with goals identified in the Sunset Specific Plan related to public view preservation and enhancement.

The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project in the Eastern Gateway of the Sunset Strip, integrating a digital billboard display wrapping around the highly visible southeast corner of Sunset Boulevard and North Harper Avenue, located above a floating open-air courtyard with landscaping and outdoor dining. Public views within the Project area include views of the Hollywood Hills and the Los Angeles Basin, which are intermittently visible from the Project site and surrounding area. Public views of the Hollywood Hills and the Los Angeles Basin are limited depending upon the vantage point by the existing topography, development within the area, and trees that occur along the roadways. The Project would replace two lower scale office buildings with a multi-story mixed-use development that would alter the existing public views within the vicinity of the Project site. Although pursuant to PRC Section 21099, the impact would not be considered significant, for informational purposes, the EIR will address the changes in public views that would occur as a result of the proposed Project.

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

No Impact. The Project site is in an urbanized area that does not contain scenic resources, such as trees and rock outcroppings. There are no designated state scenic highways or eligible State Scenic Highways in the City of West Hollywood (City of West Hollywood 2010). The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of Route 210 and the City of La Cañada Flintridge (Caltrans 2021). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 14 miles northwest of the

Project site. Due to this distance, the Project site is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources within a State Scenic Highway would occur as a result of the proposed Project, and this topic will not be further discussed in the EIR.

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

No Impact. The Project site is located on the Sunset Strip, which is a highly urbanized area within the City of West Hollywood, and an internationally known corridor, historically recognized for its entertainment uses, restaurants, and billboards. The Project site is surrounded by commercial and residential uses and bounded by North Harper Avenue to the west and Sunset Boulevard to the north and northwest.

North of Sunset Boulevard is the Chateau Marmont, a Los Angeles Historic-Cultural Monument, in addition to commercial uses zoned Sunset Specific Plan (SSP). Directly east of the Project site are commercial uses, including a one-story restaurant to the northeast of the site, zoned SSP and multi-family residential uses zoned R4A, as well as the boundary between the cities of West Hollywood and Los Angeles. Also located east of the Project site is the Andalusia Apartments, a Los Angeles Historic-Cultural Monument. Directly south of the Project site are two- and three- story multi-family residences zoned R4B and R4A. Approximately 0.07 miles south of the Project site is the northern boundary of the Harper Historic District. West of North Harper Avenue and Sunset Boulevard are commercial uses zoned SSP.

The existing Project site is comprised of two parcels (APN 5554-018-020 and 5554-018-023) and designated SSP with a portion of Parcel APN 5554-018-023 designated Residential Multi-Family High Density (R4B) with a Parking Overlay (PK). The SSP designation provides implementation of the Sunset Specific Plan. The High-Density Residential designation provides for the retention, maintenance, and continued development of a wide range of high-density multi-family housing, including apartments and condominiums. The Project proposes a General Plan Amendment (GPA) to change the General Plan land use designation for a portion of Parcel 2 from R4B to SSP; a Zone Change to change the zoning district of a portion of Parcel 2 from R4B-PK Residential, Multi-Family High-Density/Parking Overlay District to SSP; and a Specific Plan Amendment of the Sunset Specific Plan to include the entire Project site in the Specific Plan area. The Project would also require approval of a Conditional Use Permit, an Administrative Permit, sign permits, and a Vesting Tentative Tract Map.

The SSP grants broad authority to the City to approve alternative proposals with revised design and development standards and guidelines for the proposed Project located within the Eastern Gateway Site 1-B that are consistent with the purposes and intent of the development requirements that would otherwise apply. Approval of an Alternative Proposal for the proposed integrated Site 1-B, would incorporate the proposed amendments to the SSP, General Plan, and Zoning Map, and include a Development Agreement between the Applicant and the City. The Alternative Proposal would incorporate modifications of and variances from the design and development requirements applicable to Site 1-B of the SSP and the R-4B site with the overall intent of providing a landmark entry Project to the Eastern gateway of the Sunset Strip. Implementation of the proposed modification of and variances from the design development requirements could affect the scenic quality of the site and its surroundings. Although pursuant to PRC Section 21099, the impact would not be considered significant, for informational purposes, the EIR will address the Project's potential to affect 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?

No Impact. The Project site is located on the Sunset Strip, which is a highly urbanized area with high levels of existing lighting. Existing light sources within the Project area include lighting associated with existing commercial and residential uses surrounding the area; billboard lighting; and street lighting and headlights from vehicles along Sunset Boulevard and North Harper Avenue. The primary source of daytime glare on the Project site is the sun's reflection from metallic and glass surfaces within the surrounding area.

Light impacts are typically associated with the use of artificial light during the evening and nighttime hours and when light spillover, typically defined as unwanted illumination from light fixtures on adjacent properties, occurs. Glare is generally a daytime occurrence caused by reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials that may interfere with the safe operation of motor vehicles on adjacent streets. Daytime glare is more common in urban areas, typically emanating from mid- to high-rise buildings with exterior facades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions. Sensitive uses (i.e., residential uses) could be impacted by light and glare. Sensitive uses within close proximity to the Project site include residential uses immediately to the east and south of the Project site, and hotel and residential uses to the north across Sunset Boulevard. Project-related lighting would be seen from uses within the Project site and adjacent uses. Because of the size of the proposed Project and the digital signage that would be incorporated into the design, there would be new levels of lighting on the Project site compared to existing site conditions. In addition, glass windows on the exterior facades of these structures could reflect light and add new sources of glare.

The Project would be subject to compliance with all applicable City requirements related to lighting and glare. The City has established development standards and design guidelines that regulate the design of outdoor lighting and signs. Specifically, the West Hollywood Municipal Code (WHMC) Article 19-3, *Site Planning and General Development Standards*, requires outdoor lighting to be designed to prevent glare, light trespass, and sky glow, and sign illumination to be designed to avoid negative impacts on surrounding rights-of-way and properties. The Sunset Specific Plan also contains development standards and design guidelines, including billboard design standards and guidelines to encourage lighting to mark the entrance to the Eastern Gateway, while avoiding glare and other negative impacts on hillside residences. The Project would be reviewed for compliance with City requirements related to lighting and glare, as described above. Compliance with City requirements would ensure that Project implementation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to PRC Section 21099, no impact would occur and further analysis is not warranted.

4.2 Agriculture and Forestry Resources

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

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

No Impact. The Project site is located within an urbanized area and is currently developed with two office buildings and a commercial parking lot. The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program. Further, the Project site and surrounding areas are located in a highly urbanized area that is already disturbed. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site is comprised of two parcels (APN 5554-018-020 and 5554-018-023) and is zoned SSP Sunset Specific Plan (SSP), with a portion of Parcel APN 5554-018-023 zoned R4B-PK Residential, Multi-Family High-Density/Parking Overlay District (R4B-PK). The site is currently developed with two office buildings and a commercial parking lot. The Project site is not being used for any agricultural purposes, nor is the site under a Williamson Act contract. Further, there are no properties within the surrounding area under agricultural production. Therefore, the Project would not conflict with existing zoning for agricultural use or conflict with a Williamson Act contact. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site is currently zoned SSP and R4B-PK and is not zoned for forest land, timberland, or for timberland production. According to the General Plan, no forest land, timberland, or timberland zoned Timberland Production occurs within the City. The Project site is fully developed within an urbanized area and no forest land, timberland, or timberland production areas are located within or adjacent to the Project site. Thus, the proposed Project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. As described above, no forest land is located within the Project site or surrounding area. The Project site is fully developed within an urbanized area. Thus, the proposed Project would not result in the loss of forest land or conversion of forest land into non-forest use. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. As described above, no farmland or forest land is located within the Project site or surrounding area. The Project site is fully developed within an urbanized area. Thus, the proposed Project would not result conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

4.3 Air Quality

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

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

Potentially Significant Impact. The City is located within the South Coast Air Basin (SCAB), which is within the jurisdictional boundary of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB. The AQMP is a regional and multi-agency effort aimed at reducing air pollutant emissions and achieving State and national air quality standards. The proposed Project is subject to the SCAQMD's AQMP. Construction and operational activities associated with the Project could result in an increase in air pollutant emissions by increasing the intensity of development at the Project site, which has the potential to conflict with the AQMP. Therefore, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. Project construction activities would generate short-term emissions of criteria air pollutants resulting from site grading, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. The criteria pollutants of primary concern within the Project site would include ozone-precursor pollutants (i.e., Reactive Organic Gases [ROG] and NO_x) and PM_{10} and $PM_{2.5}$. The Project's long-term operational activities would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (electricity and/or natural gas).

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for Federal standards (SCAQMD 2017). The proposed Project would generate ozone-precursor pollutants (ROG and NO_x), PM_{10}, and PM_2. Further analysis will be required to determine the Project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The nearest sensitive receptors to the Project site are the residences located to the east and south of the Project site. The proposed Project would generate air pollutant emissions during construction activities and could expose sensitive receptors to pollutant concentrations. Additionally, the operational emissions associated with the Project could expose sensitive receptors to pollutant concentrations. Further analysis is required to determine whether air pollutant emissions resulting from the proposed Project would be substantial. Therefore, this issue will be further analyzed in the EIR.

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

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project proposes to develop a mixed-use hotel, restaurant, retail, and residential project, which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources and operational impacts would be less than significant.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also be required to comply with the SCAQMD Regulation XI, *Rule 1113 – Architectural Coating*, which would minimize odor impacts from ROG emissions during architectural coating. Any impacts to existing adjacent land uses would be short-term and are less than significant. This issue will not be further analyzed in the EIR.

4.4 Biological Resources

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

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

Less Than Significant Impact With Mitigation Incorporated. The Project site is located within an urbanized area and is currently developed with two office buildings and a commercial parking lot. The Project site does not contain habitat supportive of special status plant or wildlife species. The existing Project site is highly disturbed and located in a fully developed and urbanized area of the City. Ornamental landscaping including trees, grasses, and shrubs occurs within and along the perimeter of the Project site. The vegetation existing on site does not include special-status plants and would not be expected to serve as suitable habitat for special-status wildlife species.

According to the City's 2035 General Plan EIR, due to its urbanized nature, the City does not support sensitive vegetation or wildlife habitat; rather, the City supports an environment for nonnative terrestrial mammal species such as domesticated cats and dogs. Some native terrestrial mammal species such as the California ground squirrel and coyote may occur within the City, especially in those areas closest to the foothills of the Santa Monica Mountains. Generally, however, the numbers and kinds of mammals found within the City limits are low (City of West Hollywood 2010). There is the potential that ornamental vegetation within and adjacent to the Project site could providing potential nesting sites for birds that are protected under Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act. Development of the Project would require the removal of some ornamental vegetation on-site, including trees along the site's perimeter and landscaping within Project site. The existing trees on the southern border of the Project site would be protected in place. Additionally, two existing palm trees along Sunset Boulevard would be protected in place. Removal of existing trees and construction activities could cause disturbance to nesting or roosting of migratory birds on or adjacent to the Project site, should the trees be removed during nesting season. Construction could occur during the nesting season (generally from February 1 through August 31). Thus, there is potential for construction activities to negatively affect breeding or reproduction of protected nesting birds on or adjacent to the Project site. If Project construction activities occur between February 1 and August 31, the Project would be required to comply with Mitigation Measure BIO-1, which requires that a qualified biologist conduct a nesting bird survey no more than three days prior to ground disturbing or vegetation disturbing activities to confirm the presence or absence of nesting birds. If nesting birds are determined to be present, avoidance measures would be required to be implemented, such as establishing suitable buffers around any active nests. Compliance with Mitigation Measure BIO-1, the Migratory Bird Treaty Act, and the California Fish and Game Code by avoiding disturbance of active bird nests, would ensure that protected birds are not adversely affected during construction. During operation, the Project site and adjacent corridors would remain areas of high pedestrian and vehicular activity, consistent with existing conditions. Due to the highly developed nature of the Project area and upon required compliance with Mitigation Measure BIO-1, the Migratory Bird Treaty Act, and the California Fish and Game Code, impacts associated with nesting birds would be less than significant. For these reasons, special-status species are not expected to be adversely affected by the Project and this issue will not be further analyzed in the EIR.

BIO-1: In the event that Project construction or grading activities occur between February 1 and August 31, a qualified biologist shall conduct a nesting bird survey no more than three (3) days prior to commencement of construction activities to confirm the absence of protected nesting birds. If

active nesting of protected birds is observed within 100 feet of the designated construction area prior to construction, the biologist shall establish suitable buffers around the active nests (typically as much as 500 feet for raptors and 300 feet for non-raptors, subject to the recommendations of the qualified biologist), and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Prior to commencement of grading activities and issuance of any building permits, the City of West Hollywood shall verify that all Project grading and construction plans include specific documentation regarding the requirements of the Migratory Bird Treaty Act (MBTA), that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field with orange snow fencing.

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

No Impact. The Project site is currently developed and located within an urbanized area surrounded by commercial and residential uses. Ornamental landscaping including trees, grasses, and shrubs occurs within and along the perimeter of the Project site. No riparian habitat or other sensitive natural communities are located on the Project site or adjacent area (United States Fish & Wildlife Service 2021). The 2035 General Plan EIR further substantiates that there are no riparian or sensitive habitats known to occur in the City of West Hollywood. Therefore, Project implementation would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community. This issue will not be further analyzed in the EIR.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project site is located within an urbanized area and void of sensitive plants, wildlife, and habitats, including wetlands. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, the Project site does not contain any blue-line streams or wetland habitats. Therefore, Project implementation would not result in a substantial adverse effect on State or federally protected wetlands. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site is currently developed and located within an urbanized area surrounded by commercial and residential uses. There are no wetlands or waters within the Project site or surrounding area. Thus, the Project would not interfere with the movement of any native resident or migratory fish. Further, due to the urbanized nature and the lack of quality biological habitat within and immediately surrounding the Project site, the Project site does not function as a migratory wildlife corridor and

development of the proposed Project would not interfere with the movement of wildlife or impact wildlife corridors or native wildlife nursery sites. This issue will not be further analyzed in the EIR.

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

No Impact. WHMC Chapter 11.36, *Street Trees and Other Plants*, regulates the planting, care, and removal of trees and other plants in the streets and on other property under the control of the City. Further, the City has adopted the City of West Hollywood Heritage Tree Program for the purpose of identifying, promoting awareness, maintaining and protecting designated Heritage Trees located within the City (City of West Hollywood 2021a). There are no designated Heritage Trees located within or adjacent to the Project site (City of West Hollywood 2021c).

Ornamental landscaping including trees and shrubs occur within and along the perimeter of the Project site. Development of the Project would require the removal of some ornamental vegetation on-site, including two street trees along the western perimeter of the Project site. These trees would be replaced in accordance with WHMC Chapter 11.36. The two existing palm trees along Sunset Boulevard would be protected in place. A permit would be required from the Director of Public Works prior to removing the street trees. The Project would comply with all applicable permit requirements prior to the removal/planting of any trees located on public property. Therefore, Project implementation would not conflict with local policies or ordinances protecting trees or other biological resources. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site currently developed and is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (City of West Hollywood 2010; California Department of Fish and Wildlife 2019). Thus, the Project would not conflict with any of these plans and no impact would occur. This issue will not be further analyzed in the EIR.

4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	X			
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	X			
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	X			

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

Potentially Significant Impact. According to CEQA Guidelines Section 15064.5, a historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. A resource is considered historically significant if it meets at least one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- Associated with the lives of persons important to local, California or national history;
- Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The proposed Project would result in the removal of two existing structures (8228 West Sunset Boulevard and 8240 West Sunset Boulevard). The West Hollywood Historic Resources Survey describes 8228 West Sunset Boulevard as an office building constructed in 1927, and it is listed as a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation). The structure located at 8240 West Sunset Boulevard is described as a restaurant lounge/tavern built in 1938, and is also listed as a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation).

Although neither existing structure is listed in, or determined to be eligible in, the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation, the buildings will be further analyzed in the EIR to determine if they meet any other criteria that would result in either resource being considered historically significant. Additionally, historic resources, including the Chateau Marmont, Andalusia Apartments, and the North Harper Avenue Historic District, are located within the surrounding area. Therefore, the proposed Project's potential to cause a substantial change in the significance of a historical resource will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project site is currently developed and located within an urbanized area surrounded by commercial and residential uses. The Project site has been subjected to surface and subsurface modification from the construction of buildings, landscaping, and site use. However, ground disturbing activities associated with construction of the proposed Project, such as excavation for the subterranean parking has the potential to damage or destroy intact subsurface archaeological resources that may occur below the ground surface. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project site and surrounding area are developed, and there are no dedicated cemeteries within the Project site or adjacent area. While the potential for the proposed Project to disturb previously undiscovered human remains is unlikely, previously undiscovered human remains could be located within the Project site and could be disturbed by construction activities. Therefore, this issue will be further analyzed in the EIR.

4.6 Energy

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

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?

Potentially Significant Impact. The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. The proposed Project would use energy resources for the operation of the commercial and residential uses (e.g., electricity and natural gas), for on-road vehicle trips (e.g., gasoline and diesel fuel) generated by the Project (both during project construction and operation), and from off-road construction activities associated with the Project (e.g., diesel fuel). Project operation would also result in indirect energy consumption related to the supply, distribution, and treatment of water, wastewater, and solid waste. Each of these activities would require the use of energy resources. Further analysis is required to quantify the total anticipated energy use and to determine the potential environmental impacts resulting from the consumption of energy resources. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project would be required to comply with State and local plans related to energy use, including the City's Climate Action Plan. It is not anticipated that the Project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency; however, further analysis would occur within the EIR to assess the potential for the Project to conflict with or obstruct renewable energy or energy efficiency plans.

4.7 Geology and Soils

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	X			
2) Strong seismic ground shaking?	X			
3) Seismic-related ground failure, including liquefaction?	X			
4) Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?	X			
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	X			
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	X			
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

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

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

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

Potentially Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project site is located within an Alquist-Priolo Earthquake Fault Zone associated with the Hollywood Fault (California Geologic Survey 2014). Project construction and operation would not increase the potential for fault rupture; however, because the Project site is located within an Alquist-Priolo Earthquake Fault Zone, this issue will be further analyzed in the EIR.

2) Strong seismic ground shaking?

Potentially Significant Impact. According to the City of West Hollywood 2035 General Plan EIR, the Project site is located within the City of West Hollywood Fault Precaution Zone (FP-1), and the approximate surface trace of an active subsidiary splay of the Hollywood Fault runs through or near the Project site. Additionally, the Project site is located in a seismically active area of Southern California that has historically been affected by moderate to occasionally high levels of ground motion. As a result, it is likely the Project site has and would continue to experience ground shaking from nearby fault zones, as well as some background shaking from other seismically active areas of the southern California region. Project construction and operation would not increase the potential for earthquakes to occur; however, due to the location of the Project site within the City of West Hollywood Fault Precaution Zone, FP-1 and proximity to the Hollywood Fault, this issue will be further analyzed in the EIR.

3) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. Engineering research of soil liquefaction potential indicates that generally three basic factors must exist concurrently in order for liquefaction to occur. These factors include:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions.
- A relatively loose silty and/or sandy soil.

- A relatively shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that will allow positive pore pressure generation.

The City's General Plan Safety and Noise Element identifies the Project site as being located outside of a liquefaction hazard zone; however, a liquefaction hazard zone is identified adjacent to the Project site, along Sunset Boulevard. Project construction and operation is not anticipated to increase the potential for liquefaction to occur; however, due to the location of the Project site within close proximity to a designated liquefaction hazard zone, this issue will be further analyzed in the EIR.

Mitigation Measures: No mitigation measures are required.

4) Landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. Geologic hazards associated with landsliding are not anticipated, as the Project site is not located within an area identified by the California Geologic Survey as having potential for seismic slope instability (California Geologic Survey 2014). Further, the Project site is not located within an area susceptible to earthquake-induced landsliding, as identified in the City's 2035 General Plan Safety and Noise Element. The Project does not propose any improvements or modifications to Hollywood Hills. There are no known landslides near the Project site. The Project site gently slopes approximately 18 feet from Sunset Boulevard in the southwesterly direction. The geotechnical engineering investigation conducted for the Project site indicates the Project site is mapped outside the areas identified as having the potential for earthquake-induced landslides and the probability of earthquake-induced landslides at the site to be considered small (Ralph Stone and Company, Inc., 2019). As such, implementation of the Project would not directly or indirectly result in potential substantial adverse effects related to landslides. No impacts would occur. This issue will not be further analyzed in the EIR.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact. Construction activities associated with the Project such as grading could expose soils to potential short-term erosion by wind and water. The Project would be required to comply with WHMC Section 15.56.090, *Requirements for Industrial/Commercial and Construction Activities*, which include conditions and requirements established by the City related to the reduction or elimination of stormwater runoff containing sediment, construction materials, or other pollutants from a construction site during construction of the Project. However, in order to analyze and account for site-specific erosion potential, a site-specific geologic report would be required. Therefore, this issue will be further analyzed in the EIR.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact. Refer to Responses 4.7(a)(3) and (a)(4) regarding the potential for liquefaction and landslides, respectively. Lateral spreading is the horizontal movement or spreading of soil toward an open face. Lateral spreading may occur when soils liquefy during an earthquake event, and the liquefied soils with overlying soils move laterally to unconfined spaces. Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is

caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Based on the Project site's potential for liquefaction, this issue will be further analyzed in the EIR.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking (when dry) or swelling (when wet). The Project would be required to comply with California Building Code seismic design standards, including requirements related to hazards involving potentially expansive soils. Implementation of the Project is not anticipated to increase the potential for expansive soils to create substantial direct or indirect risks to life or property. However, in order to further analyze on-site soils for expansion potential, a site-specific geologic report will be prepared. Therefore, this issue will be further analyzed in the EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project site is currently served by the City's sewer system. The proposed Project would continue to be served by the existing waste water system and does not propose the use of septic tanks or alternative waste water disposal systems. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. A significant paleontological resource is considered to be of scientific interest if it is a rare or previously unknown species, it is of high quality and well-preserved, it preserves a previously unknown anatomical or other characteristic, provides new information about the history of life on earth, or has an identified educational or recreational value.

As discussed, the site is currently developed and located within an urbanized area surrounded by commercial and residential uses. The Project site has been subjected to surface and subsurface modification from construction of buildings, landscaping, and use. Any significant paleontological resource or unique geologic feature within the Project site has likely been previously disturbed. However, there is the potential for discovery of paleontological or unique geologic features during ground-disturbing activities. Therefore, this issue will be further analyzed in the EIR.

4.8 Greenhouse Gas Emissions

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

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

Potentially Significant Impact. Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). The proposed Project would generate GHGs during the construction and operational phases. Further analysis is required to determine the Project-generated GHG emissions and their impact on the environment. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The City's adopted Climate Action Plan identifies community and municipal strategies to reduce GHG emissions. In addition, a number of State and regional plans have been adopted for the purpose of reducing GHG emissions. In order to evaluate the Project's consistency with applicable plans, policies, and/or regulations related to emissions of GHGs, this topic will be evaluated in the EIR.

4.9 Hazards and Hazardous Materials

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

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

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

Potentially Significant Impact. Project construction activities would involve the routine transport, use, or disposal of hazardous materials, such as petroleum-based fuels or hydraulic fluid used for construction equipment with the potential of accidental release. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. The Project would be required to adhere to regulations governing the transport, use, and disposal of hazardous materials, and significant impacts are not anticipated to occur. Project operations are not anticipated to involve the use or storage of hazardous substances other than limited quantities such as solvents, fertilizers, pesticides, and other materials used for regular maintenance of buildings and landscaping. The quantities of these materials would not typically be at an amount that would pose a significant hazard to the public or the environment.

The Project proposes to remove existing on-site structures built in the 1920s and 1930s, which may contain lead-based paint and asbestos. Removal of on-site structures would be required to comply with federal and State standards, including but not limited to, California *Health and Safety Code* Sections 17920.10 and 105256, which would ensure proper handling and disposal of the materials, if present. Although not anticipated to occur, impacts related to the release of hazardous materials into the environment could occur. This issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The closest schools to the Project site are Touro College Los Angeles and West Hollywood College Preparatory School (preschool through 12th grade), both located at 1317 North Crescent Heights Boulevard, approximately 0.2 miles from the Project site. As discussed in Responses 4.9(a) and 4.9(b), Project construction activities would involve the routine transport, use, or disposal of hazardous materials, such as petroleum-based fuels or hydraulic fluid used for construction equipment with the potential of accidental release. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law. Removal of on-site structures with the potential to contain ACMs or LBPs would be required to comply with Federal and State standards, including but not limited to, California *Health and Safety Code* Sections 17920.10 and 105256, which would ensure proper handling and disposal of the materials, if present. Nonetheless, this issue will be further analyzed in the EIR.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. Government Code Section 65962.5, commonly referred to as the "Cortese List," requires the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The Cortese List does not identify hazardous materials or waste sites on or adjacent to the Project site (DTSC 2021; RWQCB 2021). However, a site-specific hazardous materials database search will be presented in the EIR and will be used to determine whether the proposed Project could create a significant hazard to the public or the environment related to a hazardous materials site. This issue will be further analyzed in the EIR.

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

No Impact. The Project site in not located within an airport land use plan, nor is the Project site located within two miles of a public airport or public use airport. The closest public airports are the Hollywood Burbank Airport (Bob Hope Airport), located approximately 6.7 miles northwest of the Project site, and the Santa Monica Municipal Airport, located approximately 6.8 miles southwest of the Project site. The Project site is not located within an airport influence area within the Los Angeles County Airport Land Use Plan (2004). Thus, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. This issue will not be further analyzed in the EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. The Los Angeles County Fire Department provides fire and emergency response services to the City, including the Project site. According to the 2035 General Plan, the City is part of the Consolidated Fire Protection District of the County of Los Angeles, which also provides immediate access to the Urban Search and Rescue and HazMat teams, Air Operations, and other sophisticated resources. Further, the City maintains the West Hollywood Emergency Plan, which is an all-hazards preparedness, emergency evacuation, response and recovery plan. It addresses hazards including, but not limited to fires, earthquakes, flooding, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents. Emergency access routes, emergency contact lists, and public information regarding designated facilities and routes are regularly reviewed to ensure that up to date information is available to the City and the public in the event of an emergency.

Within the Project area, local access to the Project site is provided from Sunset Boulevard and North Harper Avenue, in addition to a private driveway located along North Harper Avenue at the southwest corner of the Project site. The existing driveway located along North Harper Avenue would be reconstructed, with 20-foot ingress/egress along North Harper Avenue leading to a vehicular round about. The two existing curb cuts on Sunset Boulevard would be closed and new curbs would be constructed. Prior to construction, proposed site plans would be required to undergo review by the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency response services. The proposed Project would also be required to comply with all applicable codes and ordinances for

emergency access. Therefore, operation of the Project would not impair implementation of or physically interfere an adopted emergency response plan or emergency evacuation plan. However, construction activities may result in traffic or queuing along Sunset Boulevard, North Harper Avenue, or other roadways within the area and could potentially impede emergency vehicles or impair an emergency evacuation plan. Therefore, this issue will be further analyzed in the EIR.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. According to the General Plan and CalFire Fire Hazard Severity Zone Maps, the Project site is not located within a Very High Fire Hazard Severity Zone; however, the Hollywood Hills, bordering the northwest section of the City and located approximately 200 feet from the Project site, are within a designated a Very High Fire Hazard Severity Zone. According to the City's 2035 General Plan Safety and Noise Element, the northern portion of the City contains Fire Hazard Severity Zones (City of West Hollywood 2011). The Project site is located in an area designated by the City of West Hollywood as having Moderate Fire Hazard potential. A fire in the Hollywood Hills could spread to the northern region of West Hollywood, including the Project site. However, the Project site is separated by urban uses, including numerous structures and Sunset Boulevard, a four-lane roadway. The Project site is not located adjacent to wildlands. Additionally, the Project site and surroundings are built out and no wildland vegetation is present onsite.

The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project does not propose any uses that would result in an increase in the exposure of people or structures to wildland fires. In the unlikely event of a fire emergency at the Project site due to wildland fires, the Los Angeles County Fire Department would provide fire protection services. Due to the urbanized nature of the area and the provision of nearby firefighting protection services, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. This is considered a less than significant impact, and this issue will not be further analyzed in the EIR.

4.10 Hydrology and Water Quality

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

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

Potentially Significant Impact. The Project site is currently developed with two office buildings and a commercial parking lot. The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. Soil disturbance would temporarily occur during Project construction due to grading activities. Disturbed soils would be susceptible to increased rates of erosion from wind and water and could produce polluted runoff or negatively affect stormwater drainage systems. However, construction activities would be required to comply with WHMC Section 15.56.090, which include conditions and requirements established by the City related to the reduction or elimination of stormwater runoff containing sediment, construction materials, or other pollutants from a construction site during construction of the Project. The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Multiple Separate Storm Sewer System (MS4) Permit issued by the Los Angeles Regional Water Quality Control Board, which would require preparation of a Local Stormwater Pollution Prevention Plan (SWPPP) and Wet Weather Erosion Control Plan, and implementation of Best Management Practices (BMPs). BMPs would be required to reduce polluted runoff from the Project site by retaining, treating, or infiltrating polluted runoff onsite. Additionally, the Project would be required to comply with WHMC Section 15.56.095, *Low Impact Development Plan (LID Plan) Requirements for New Development and Redevelopment Projects*, which would require the design and implementation of post-construction controls to mitigate storm water pollution. Compliance with regulations discussed above would reduce potential impacts to water quality and stormwater drainage systems; however, further analysis of the Project's impacts on surface and groundwater quality potential will be conducted in the EIR.

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

Potentially Significant Impact. The Project site is currently developed with two office buildings and a commercial parking lot. The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project would result in an intensification of uses at the site which could generate an increase in demand for potable water. Potable water within the Project site is provided by Los Angeles Department of Water and Power (LADWP) (City of West Hollywood 2021d). According to The LADWP 2020 Urban Water Management Plan, primary sources of water for the LADWP service area include the Los Angeles Aqueducts, local groundwater, and imported water supplied by the Metropolitan Water District. Further analysis of the sufficiency of existing and future water supplies of LADWP relative to Project demands will be conducted in the EIR.

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

1) Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The Project site is not located within close proximity to any streams or rivers and would not result in the alteration of the course of a river or stream. The Project site is located in an urban area and is developed with office uses and a surface parking lot. As discussed in Response 4.10(a),

the Project would be required to prepare a Local SWPPP and Wet Weather Erosion Control Plan, and construction activities associated with the Project would be required to comply with water quality BMPs and with the City's LID standards, ensuring that runoff from the site would be minimized to the extent feasible. Once completed, the Project site would consist of structures, landscaping, and pavement and would not consist of exposed soils. As such, the proposed Project would not result in substantial erosion or siltation on- or off-site. Impacts related to erosion and siltation resulting from the Project would be less than significant. This issue will not be further analyzed in the EIR.

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Potentially Significant Impact. The Project site is located in an urban area and is fully developed. As discussed in Response 4.10(a), construction activities associated with the Project would be required to comply with water quality BMPs and with the City's LID standards, ensuring that runoff from the site would be minimized to the extent feasible. Development of the Project could increase the rate or amount of surface runoff from the site. Therefore, the potential for the Project to result in flooding on- or offsite will be further analyzed in the EIR.

3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Potentially Significant Impact. The Project site is currently developed with two office buildings and a commercial parking lot. The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. As discussed in Response 4.10(a), construction activities associated with the Project would be required to comply with water quality BMPs and with the City's LID standards, ensuring that runoff from the site would be minimized to the extent feasible. The proposed Project would include capture and reuse systems or other approved BMPs in order to treat stormwater runoff. Although the Project is not anticipated to create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff, further analysis and details regarding stormwater drainage will be provided in the EIR.

4) Impede or redirect flood flows?

No Impact. The Project site is not located within close proximity to any streams or rivers and would not result in the alteration of the course of a river or stream. The Project site is located in an urban area and is fully developed. Additionally, according to the National Flood Insurance Program Flood Insurance Rate Map, the Project site is not located within a flood hazard zone (Federal Emergency Management Agency 2008). As such, the Project would not impede or redirect flood flows. No impacts associated with impeding or redirecting flood flows would occur. This issue will not be further analyzed in the EIR.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact. As described in Response 4.10(c)(4), the Project site is not located within a flood hazard zone. As such, flood-related hazards are not anticipated at the Project site. Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground

shaking. The Project site is approximately 9.6 miles inland of the Pacific Ocean. The Franklin Canyon Reservoir is located approximately 2.4 miles west of the Project site and the Hollywood Reservoir is located approximately 2.5 miles northeast. As a result, tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. Therefore, the proposed Project would result in no impacts associated with the release of pollutants due to project inundation. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. Soil disturbance would temporarily occur during Project construction due to grading activities. Disturbed soils would be susceptible to increased rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the Project site. As described in Response 4.10(a), the Project would be subject to compliance with the NPDES Permit issued by the Los Angeles Regional Water Quality Control Board, in addition to the WHMC requirements. Compliance would reduce the volume of sediment-laden runoff discharging from the site during construction activities.

As described in Response 4.10(b), potable water within the Project site is provided by LADWP, which sources a part of its water supply from local groundwater. Implementation of the Project would result in an increase in residents and permanent employees at the site which could generate an increase in demand for potable water beyond existing conditions. Further analysis of the sufficiency of existing and future water supplies of LADWP relative to Project demands, and its effects on local groundwater, will be conducted in the EIR.

4.11 Land Use and Planning

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

a) Would the project physically divide an established community?

No Impact. The approximately 0.88-acre Project site is comprised of two parcels (APNs 5554-018-020, and -23) currently developed with a 13,083 square foot, four-story office building at 8228 Sunset Boulevard and a 12,818 square foot, two-story office building with a commercial parking lot in the rear at 8240 Sunset Boulevard. The Project site is located within an urbanized area surrounded by a mix of residential and commercial land uses. Project implementation would not result in residential uses being removed or divided. The Project proposes to remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project would not involve any roadways or significant infrastructure systems that would physically divide the site or separate the site from surrounding uses. Thus, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The Project would require approval of a General Plan Amendment (GPA) to change the General Plan land use designation for a portion of Parcel 2 from Residential Multi-Family High Density to Sunset Specific Plan (SSP); a Zone Change to change the zoning district of a portion of Parcel 2 from R4B-PK Residential, Multi-Family High-Density/Parking Overlay District to SSP; and a Specific Plan Amendment of the Sunset Specific Plan to include the entirety of the Project site in the Specific Plan area. The Project would also require approval of a Conditional Use Permit, an Administrative Permit, sign permits, and a Vesting Tentative Tract Map. An analysis of the proposed Project's compliance with the applicable City land use regulations, General Plan Land Use Element policies, and the WHMC will be provided in the EIR.

4.12 Mineral Resources

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The State Mining and Geology Board (SMGB) establishes Mineral Resources Zones (MRZs) to designate lands that contain mineral deposits. The Project site is designated as MRZ-1 by the California Geological Survey (formally known as the California Division of Mines and Geology), indicating that available geologic information indicates there is no significant likelihood of significant mineral deposits (California Division of Mines and Geology 1979). Further, the City's 2035 General Plan EIR indicates that there are no designated mineral resources zones in the City (City of West Hollywood 2010). The Project site and surrounding area are not identified as MRZs and conversion of the existing office use into a mixed-use development, as proposed, would not result in the loss of availability of a known mineral resource considered of value to the region. No impact would occur, and this issue will not be further analyzed in the EIR.

4.13 Noise

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

a) 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?

Potentially Significant Impact. The proposed Project would increase development intensity at the Project site, and generate additional average daily trips (ADT) beyond existing conditions, which could expose nearby residents and other sensitive receptors to a permanent increase in levels of traffic noise. The proposed Project could generate temporary noise increases during construction and long-term increases in stationary noise associated with Project operations. Nearby noise sensitive receptors include residential uses immediately to the east and south of the Project site, and hotel and residential uses to the north across Sunset Boulevard. Implementation of the proposed Project could result in potentially significant impacts to ambient noise levels within the vicinity of the Project site. Therefore, further evaluation will be conducted in the EIR to determine potential construction and operational noise impacts at nearby noise-sensitive land uses.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The proposed Project could generate temporary groundborne vibration or groundborne noise increases during construction and long-term increases associated with Project operation. Further evaluation will be conducted in the EIR to determine potential construction and operational groundborne vibration and groundborne noise impacts at nearby sensitive land uses.

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

No Impact. The Project site in not located within an airport land use plan, nor is the Project site located within two miles of a public airport or public use airport. The closest public airports are the Hollywood Burbank Airport (Bob Hope Airport), located approximately 6.7 miles northwest of the Project site, and the Santa Monica Municipal Airport, located approximately 6.8 miles southwest of the Project site. The Project site is not located within an airport influence area within the Los Angeles County Airport Land Use Plan. Thus, the Project would not expose people residing or working on the Project area to excessive noise levels related to aircraft use. No impacts would occur and this issue will not be further analyzed in the EIR.

4.14 Population and Housing

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

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

Potentially Significant Impact. The Project site is located within an urbanized area and is currently developed with two office buildings and a commercial parking lot. The Project would remove existing on-site uses and develop a mixed-use hotel, restaurant, retail, and residential structure, including 167 hotel rooms and 45 residential units. These uses would lead to employment growth and residential growth that could induce population growth to the area. This is a potentially significant impact and will be further analyzed in the EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently occupied by office uses. Project implementation would not result in residential uses being removed. Removal of existing office uses would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur; this issue will not be further analyzed in the EIR.

4.15 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?	X			
2) Police protection?	X			
3) Schools?	X			
4) Parks?			X	
5) Other public facilities?	X			

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

1) Fire protection?

Potentially Significant Impact. The Los Angeles County Fire Department provides fire and emergency response services to the City, including the Project site. There are two fire stations within West Hollywood: Fire Station 8, located at 7643 Santa Monica Boulevard, approximately 0.8 miles southeast of the Project site; and Fire Station 7, located at 864 San Vicente Boulevard, approximately 1.2 miles southwest of the Project site.

The Project proposes to remove existing on-site office uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project would be required to comply with the California Fire Code, as amended, in accordance with WHMC Section 14.04.010, *Adoption of Fire Code*, which would reduce potential impacts concerning fire protection services. However, the Project would result in an

intensification of uses at the site which could require additional fire protection services beyond existing conditions. This is a potentially significant impact and will be further analyzed in the EIR.

2) Police protection?

Potentially Significant Impact. The Los Angeles County Sheriff's Department provides law enforcement services to the City, including the Project site. Police Services for the City are located at 780 North San Vicente Boulevard, approximately 1.2 miles southeast from the Project site.

The Project would result in an intensification of uses at the site which could require additional police protection services beyond existing conditions. This is a potentially significant impact and will be further analyzed in the EIR.

3) Schools?

Potentially Significant Impact. The City is located within the Los Angeles Unified School District boundaries. The Project proposes to remove existing on-site office uses and develop a mixed-use project which includes residential uses. Student population growth associated with the Project could incrementally increase the demand on schools serving the Project site. This is a potentially significant impact and will be further analyzed in the EIR.

4) Parks?

Less Than Significant Impact. As discussed in Response 4.14(a), the Project would include a mixed-use hotel, restaurant, retail, and residential structure, including 167 hotel rooms and 45 residential units, which would lead to employment growth and residential growth that could induce population growth to the area. However, the Project would provide private and public open space and amenities to residents and hotel guests, which would at least partially offset impacts to parks facilities. Further, as stated in the City's 2035 Parks and Open Space Element, due to the City's size and absence of vacant, undeveloped properties for the development of new parks space, as well as the high land values in West Hollywood, the City is unlikely to significantly expand park property in the future. Refer to Response to 4.16(a) and (b) for a more detailed analysis. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities. This impact is considered less than significant and will not be further analyzed in the EIR.

5) Other public facilities?

Potentially Significant Impact. Los Angeles County provides library, cultural resource centers, and bookmobile services to over 3.4 million residents living in unincorporated areas and to residents in 49 of the 88 incorporated cities of Los Angeles County, including the City (Los Angeles County Library 2021). The West Hollywood Public Library, located at 625 San Vicente Boulevard, is approximately 1.4 miles southwest of the Project site.

The Project would result in an increase in residents and permanent employees at the site which could require additional public facilities services beyond existing conditions. This is a potentially significant impact and will be further analyzed in the EIR.

4.16 Recreation

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

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

Less Than Significant Impact. According to the City's General Plan Parks and Recreation Element, the City has six parks totaling 15.31 acres as of 2010, in addition to open spaces and community facilities used for recreation. Since then, the City has acquired new parkland, such as Laurel Avenue Park at 1343 Laurel Avenue, and expanded existing facilities (City of West Hollywood 2021e). The closest park is Havenhurst Park, located approximately 0.1 miles southeast of the Project site. Based on the 2021 population of 36,125 residents, there are approximately 0.42 acres of parkland per 1,000 residents (DOF 2021; City of West Hollywood 2011). The City's Parks and Open Space Background Report identifies that many cities throughout California use 3.0 acres of parkland per 1,000 residents as a benchmark for sufficient park space. The City's ratio of approximately 0.42 acres of parkland per 1,000 residents is well below this benchmark. As stated in the Parks and Open Space Background Report, due to the City's size and absence of vacant, undeveloped properties for the development of new parks space, as well as the high land values in West Hollywood, the City is unlikely to significantly expand park property to meet the benchmark (City of West Hollywood 2010). Therefore, it is anticipated that the City will remain below typical parkland acreage standards in the future. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, through innovative development agreements, and community gardens.

As discussed in Response 4.14(a), the Project proposes a mixed-use development, including 167 hotel rooms and 45 residential units, which would lead to employment and residential growth that could induce population growth to the area. Using the California Department of Finance (DOF) average household size of 1.52 persons for the City of West Hollywood, the proposed dwelling units are expected to accommodate approximately 69 residents (DOF 2021). As discussed in Section 2.3, *Proposed Project*, the Project would provide 3,140 square feet of common open space and 4,260 square feet of private open

space. In addition, the Project proposes rooftop amenities, including a pool, private and public open space courtyard, and lounge and garden areas available to residents and hotel guests. Further, the City and surrounding area host a wide variety of popular recreation and entertainment-oriented uses. It is expected that these would reduce the strain on neighborhood and regional parks or recreation facilities. Therefore, Project implementation would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. As discussed in Response 4.16(a), the Project would provide 3,140 square feet of common open space and 4,260 square feet of private open space. In addition, the Project proposes rooftop amenities, including a pool, private and public open space courtyard, and lounge and garden areas available to residents and hotel guests. All recreational facilities associated with the proposed Project would be developed on-site and are evaluated as part of the proposed Project. As described above, the Project would result in minor increases in demand on the City's recreational resources and is not expected to result in the need for expanded facilities or new facilities. Accordingly, impacts involving construction or expansion of recreational facilities would be less than significant. This issue will not be further analyzed in the EIR.

4.17 Transportation

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

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The Project proposes to remove existing on-site office uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project would generate additional pedestrian, public transit, and vehicle trips beyond existing conditions. Trips generated as a result of the proposed Project have the potential to conflict with programs, plans, ordinances, or policies addressing the circulation system. An analysis will be prepared to analyze potential conflicts with applicable plans and policies addressing the circulation system. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. CEQA Guidelines section 15064.3 establishes vehicle miles traveled (VMT) as the primary metric for evaluating transportation-related environmental impacts under CEQA. The Project proposes to remove existing on-site office uses and develop a mixed-use hotel, restaurant, retail, and residential project. An analysis will be prepared to determine if the proposed Project would be conflict or be inconsistent with CEQA Guidelines Section 15064.3 and the City's adopted VMT guidance. This issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project does not propose modifications to the adjacent roadways, such as sharp curves or dangerous intersections, and would not introduce incompatible uses, such as farm equipment. Local access to the Project site is provided by Sunset Boulevard and North Harper Avenue. The Project would close the two existing curb cuts on Sunset Boulevard and new curbs would be constructed. Vehicles would enter the Project site from North Harper Avenue via a 20-foot driveway located at the southwest corner of the Project site. This driveway would be designed to conform with design standards and would provide adequate sight distance for vehicles to see pedestrians. The proposed site access improvements would be subject to the City's traffic engineer and Los Angeles County Fire Department review and approval for compliance with applicable design and safety standards. However, as discussed in Response 4.17(a), the Project would generate additional vehicle trips beyond existing conditions. This could increase the amount of traffic turning from Sunset Boulevard onto North Harper Avenue, an unsignalized intersection. The potential for the Project to create a dangerous intersection will be further analyzed in the EIR.

d) Result in inadequate emergency access?

Potentially Significant Impact. Local access to the Project site is provided by Sunset Boulevard and North Harper Avenue. In the proposed condition, Project vehicles would enter the Project site from North Harper Avenue via a 20-foot driveway located at the southwest corner of the Project site. As discussed in Response 4.9(f), the Project would be required to comply with all applicable codes and ordinances for emergency access and would undergo review by the Los Angeles County Fire Department prior to construction. However, construction activities may result in traffic or queuing along Sunset Boulevard, North Harper Avenue, or other roadways within the area and could potentially impede emergency vehicles. Therefore, this impact will be further analyzed in the EIR.

4.18 Tribal Cultural Resources

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

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

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

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

Potentially Significant Impact. The Project site is currently developed and located within an urbanized area surrounded by commercial and residential uses. The Project site has been subjected to surface and subsurface modification from the construction of on-site buildings. However, there is the potential for inadvertent discovery of tribal cultural resources during ground-disturbing activities in the event any resources are located within the Project site. As part of the environmental review process, the City would conduct outreach to local tribes to understand the potential for tribal cultural resources to occur within the Project site and surrounding area. Therefore, this issue will be further analyzed in the EIR.

4.19 Utilities and Service Systems

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

a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. The Project site is currently developed with commercial uses. Water service is provided by LADWP and wastewater service is provided by Consolidated Sewer Maintenance District of Los Angeles County (CSMD) and administered by County of Los Angeles Department of Public Works (LADWP 2021; Los Angeles County Public Works 2021c). Water and wastewater services would continue to be provided to the Project. The Project would result in an intensification of uses at the site

which could require new or expanded water or wastewater services, which may require additional facilities. This issue will be further analyzed in the EIR.

Redevelopment of the Project site would be required to comply with Chapter 15.56 and Chapter 19.20.190 of the WHMC, which require stormwater runoff to be minimized to the extent practicable. Further, analysis of stormwater drainage will be conducted in the EIR.

The Project would result in an intensification of uses at the site which could require new or expanded electric power, natural gas, and telecommunications services, which may require additional facilities. This issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project would result in an intensification of uses at the site which could generate an increase in on-site water use. Further analysis of the sufficiency of existing water supplies relative to Project demands will be conducted in the EIR.

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

Potentially Significant Impact. Existing on-site uses generate wastewater requiring conveyance and treatment. The Project would result in an intensification of uses at the site, which could generate an increase in on-site wastewater volumes. Further analysis of the sufficiency of existing wastewater facilities relative to the Project's generation will be conducted in the EIR.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Potentially Significant Impact. The Project would result in an intensification of uses at the site which could generate an increase in solid waste and impact regional landfill capacity. Further analysis of the sufficiency of existing landfill capacity relative to the Project's solid waste generation will be conducted in the EIR.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact. Athens Services provides solid waste and recycling collection services to the City, including the Project site. Construction activities associated with the Project would generate solid waste requiring disposal. The Project would be required to comply with the City's construction and demolition requirements, which mandates 80 percent of all demolition and construction material be recycled. Therefore, the Project would meet the City's obligations under the California Integrated Waste Management Act of 1989 (AB 939) and the California Building Standards Code.

Because the Project would result in an intensification of uses at the site, operational activities associated with the Project would likely increase solid waste generation from the site. This has the potential to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. This issue will be further analyzed in the EIR.

4.20 Wildfire

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

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As discussed in Response 4.9(f), according to CalFire's Fire Hazard Severity Zone (FHSZ) maps, the City is not located within a FHSZ; however, the Hollywood Hills, bordering the northwest section of the City and located approximately 200 feet from the Project site, are classified as a Very High Fire Hazard Severity Zone (VHFHSZ). According to the City's 2035 General Plan Safety and Noise Element, the northern portion of the City contains Fire Hazard Severity Zones (City of West Hollywood 2011). The Project site is located in an area designated by the City of West Hollywood as having Moderate Fire Hazard potential. A fire in the Hollywood Hills could spread to the northern region of West Hollywood, including the Project site.

The Project would be reviewed and approved by the City and the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The Project would also be required to comply with all applicable codes and ordinances related to emergency access, including WHMC Chapter

9.70, Construction Management, which requires traffic control measures such as flag men and a haul route plan, as well as submittal of a construction schedule by dates and duration that would minimize the effects of construction on emergency access and response. Therefore, the Project would provide for emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is not located within a FHSZ; however, the Hollywood Hills, bordering the northwest section of the City and located approximately 200 feet from the Project site, are classified as a VHFHSZ. A fire in the Hollywood Hills could spread to the northern region of West Hollywood, including the Project site. However, the area surrounding Project site is urbanized and fully developed. Sunset Boulevard and commercial and residential uses separate the Project site from the VHFHSZ. Per the City's General Plan, the Project site and adjacent areas do not contain slopes having slope instability. Further, as described in Response 4.9(g), implementation of current local, State, and federal regulations; the policies of the General Plan; and the City's existing building code procedures would serve to reduce the potential impacts related to wildland fires in the City. Therefore, it is not anticipated that the proposed Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. This is considered a less than significant impact and will not be further analyzed in the EIR.

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

No Impact. The Project site is not located within a designated FHSZ; however, the Hollywood Hills, bordering the northwest section of the City, are classified as a VHFHSZ. The Project site is fully developed and located within an urbanized area, and the Project would connect to existing utilities. Further, Project would not require the installation or maintenance of roads, fuel breaks, power lines, or other utilities that would exacerbate fire risk. No impact would occur, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is not located within a FHSZ; however, the Hollywood Hills, bordering the northwest section of the City and located approximately 200 feet from the Project site, are classified as a VHFHSZ. According to the City's General Plan Safety and Noise Element, the northern portion of the City contains Fire Hazard Severity Zones. The Project site is located in an area of Moderate Fire Hazards. A fire in the Hollywood Hills could spread to the northern region of West Hollywood, including the Project site. However, the area surrounding Project site is urbanized and fully developed. Sunset Boulevard and commercial and residential uses separate the Project site from the VHFHSZ. Further, implementation of current local, State, and federal regulations; the policies of the General Plan; and the City's existing building code procedures would serve to reduce the potential impacts related to wildland fires in the City. Therefore, the Project would not expose people or structures to significant risks as a result

of runoff, post-fire slope instability, or drainage changes. This is considered a less than significant impact and will not be further analyzed in the EIR.

4.21 Mandatory Findings of Significance

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

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

Potentially Significant Impact. Based on this Initial Study, the Project is not expected to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or

wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, further cultural resource investigations are required and will be conducted in the EIR to determine any potential impacts that the proposed Project would have on important examples of the major periods of California history or prehistory. Therefore, this issue will be further analyzed in the EIR.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Potentially Significant Impact. As discussed throughout this Initial Study, the Project has the potential to result in significant environmental impacts requiring further analysis in the EIR for all environmental issue areas except for Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Recreation, and Wildfire. The potential for the Project to achieve short-term environmental goals to the disadvantage of long-term environmental goals will be analyzed in the EIR.

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project has potentially significant impacts requiring further analysis in the EIR for all environmental issue areas except for Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Recreation, and Wildfire. It is anticipated that compliance with the regulatory requirements and implementation of mitigation measures at the Project-level would reduce the potential for the incremental effects that would occur with construction and operation of the proposed Project relevant to the environmental topical areas discussed within this Initial Study. However, potential cumulative impacts resulting from Project construction or operations have the potential to be significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project has potentially significant impacts related to all environmental issue areas except for Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Recreation, and Wildfire. These impacts could have potentially adverse effects on human beings. As such, further analysis of these impacts will be provided in the EIR.

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