1000 North La Brea Avenue Project

Draft Environmental Impact Report

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prepared by

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Table of Contents

Tables

Figures

Appendices

Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AEC	Advantage Environmental Consultant
AFY	Acre-Feet per Year
APN	Assessor Parcel Numbers
AQMP	Air Quality Management Plan
AST	Aboveground Storage Tank
AVTA	Antelope Valley Transit Authority
BCE	Before Common Era
BC-EWMP	Ballona Creek Enhanced Watershed Management Plan
BC-WMG	Ballona Creek Watershed Management Group
BGS	Below Ground Surface
BMP	Best Management Practice
BTU	British Thermal Units
BWRP	City of Burbank's Water Reclamation Plant
°C	Celsius
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CAFÉ	Corporate Average Fuel Economy
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
CalOES	California Office of Emergency Services
CalOSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CalRecycle	California Department of Resources, Recycling, and Recovery
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CE	Common Era

CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CH_4	Methane
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CREED LA	Coalition for Responsible Equitable Economic Development
CR	Commercial Regional Center
CRHR	California Register of Historical Resources
CSTDM	California Statewide Travel Demand Model
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	Cubic Yards
C2	Neighborhood Commercial
dB	Decibels
dBA	A-weighted decibels
DNL	Day-Night Average Level
DCTWRP	City of Los Angeles' Donald C. Tillman Water Reclamation Plant
DOF	Department of Finance
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DTSC-SL	DTSC-Modified Screening Levels
DWR	California Department of Water Resources
EIA	Energy Information Administration
EIR	Environmental Impact Report
ELWRF	West Basin's Edward C. Little Water Recycling Facility
ESL	Environmental Screening Levels
EV	Electric Vehicle
EVSE	Electric Vehicle Supply Equipment
°F	Fahrenheit

FAR	Floor Area Ratio
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
Geocon	Geocon West, Inc.
GHG	Greenhouse Gas
GSP	Groundwater Sustainability Plan
GWh	Gigawatt-Hours
GWP	Global Warming Potentials
HCM	Historic-Cultural Monument
HERO	Human and Ecological Risk Office
HFCs	Hydrofluorocarbons
HHRA	Human Health Risk Assessment
HP	Horsepower
HPC	Historic Preservation Commission
HSC	Health and Safey Code
HVAC	Heating, Ventilation, and Air Conditioning
Hz	Hertz
LADWP	Los Angeles Department of Water and Power
kW	Kilowatt
LA	Los Angeles
LACSD	Los Angeles County Sheriff's Department
LAFCD	Los Angeles County Fire Department
LACFCD	Los Angeles County Flood Control District
LASAN	City of Los Angeles Sanitation and Environment
LED	Light-Emitting Diode
L_{eq}	Equivalent Noise Level
L_{dn}	Day-Night Average Level
LID	Low Impact Development
L_{max}	Maximum Noise Level
L_{min}	Minimum Noise Level
LOS	Level of Service
LST	Less than Significant Thresholds
LT	Long Ter
LU	Land Use and Urban
I-10	Interstate 10

I-405	Interstate 405
IPCC	Intergovernmental Panel on Climate Change
IRC	Infrastructure, Resources, and Conservation
ITE	Institute of Transportation Engineers
M1	Limited Industrial
MR1	Restricted Industrial
MCL	Maximum Contaminant Levels
Metro	Los Angeles Metropolitan Transportation Authority
MLD	Most Likely Descendant
MPG	Miles Per Gallon
MPH	Miles Per Hour
MPOs	Metropolitan Planning Organizations
MMT	Million Metric Tons
MT	Metric Tons
MS4	Municipal Separate Storm Sewer System
MW	Megawatts
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic and Safety Administration
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO_X	Nitrogen Oxides
N_2O	Nitrous Oxides
NOP	Notice of Preparation
NOC	Notice of Completion
NMA	Neighborhood Mobility Area
NPES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWLs	Natural and Working Lands
O_3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	California Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead

PDF	Project Design Feature
PCE	Tetrachloroethene
PFCs	Perfluorocarbons
PDA	Priority Development Area
PGA	Priority Growth Area
$PM_{2.5}$	Particle Matter with 2.5 microns in diameter
PM_{10}	Particle Matter with 10 microns in diameter
PPM	Parts Per Million
PRC	Public Resources Code
PV	Photo-voltaic
RCA	Record Corporation of America
RCM	Regulatory Compliance Measure
RCRA	Resource Conservation and Recovery Act
RECs	Recognized Environmental Conditions
ROC	Reactive Organic Compounds
RMS	Root Mean Squared
RSL	Regional Screening Levels
RTP	Regional Transportation Plan
RWQCB	Regional water Quality Control Board
SAF Plan	State Alternative Fuels Plan
SAFE Rule	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF	Square Feet
SF_6	Hexafluoride
SGMP	Soil and Groundwater Management Plan
SHMP	State of California Multi-Hazard Mitigation Plan
SLF	Sacred Lands File
SIP	State Implementation Plan
SO_2	Sulfur Dioxide

SoCalGas	Southern California Gas
SRA	Source Receptor Area
ST	Short Term
STAL	Short-Term Action Level
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCE	Trichloroethene
TIWRP	City of Los Angeles' Terminal Island Water Reclamation Plant
TMDL	Total Maximum Daily Load
TPA	Transit Priority Area
TPH	Total Petroleum Hydrocarbons
TPHd	TPH in the diesel range
UFC	Uniform Fire Code
ULARA Judgment	City of Los Angeles v. City of San Fernando, et. al.
USEPA	United States Environmental Protection Agency
$\mu g/m^3$	Microgram Per Cubic Meter
US-101	U.S. Route 101
US	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USDOT	U.S. Department of Transportation
USC	United States Code
USGS	United States Geological Survey
UST	Underground Storage Tank
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WEAP	Workers Environmental Awareness Program
WDR	Waste Discharge Requirement
WHMC	West Hollywood Municipal Code

Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed 1000 North La Brea Project (hereafter referred to as "proposed project" or "project") pursuant to the California Environmental Quality Act (CEQA). In accordance with *CEQA Guidelines* Section 15123, this section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

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Project Description

The following is a summary of the full project description, which can be found in Section 2, *Project Description*, of this EIR.

Project Location and Existing Site Characteristics

The project site is located at 1000, 1014, 1020, and 1028 North La Brea Avenue on the northeast corner of the North La Brea Avenue and Romaine Street intersection in the City of West Hollywood. The site encompasses 43,316 square feet (sf), or approximately 0.99 acre, and consists of three contiguous parcels: Assessor Parcel Numbers (APNs) 5531-014-015, -016, and -017. The site is in an urban area characterized by a mix of commercial and industrial uses and is accessible from Santa Monica Boulevard, North La Brea Avenue, Romaine Street, and North Sycamore Avenue. The site is also regionally accessible from U.S. Route 101 (US-101), located approximately 1.5 miles northeast of the project site; and Interstate 10 (I-10), located approximately 3.7 miles south of the project site.

The project site was recently developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue owned and operated by CEMEX (i.e., the Hollywood Ready-Mix Concrete Plant). The concrete batch plant consisted of a 634-sf two-story office building, an industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation of the concrete batch plant included the production and shipment of ready-mix concrete. To clear the site prior to expiration of their lease by December 2024, CEMEX pursued a Demolition Permit to disassemble and remove its concrete batch plant equipment (i.e., plant structure/machinery, water tanks) and

demolish its office building down to its foundation without any ground disturbance. Demolition of the office building was also separately processed by City of Los Angeles at the time of preparation of this EIR due to the office building's location spanning both City of West Hollywood and City of Los Angeles jurisdictions. As of January 2025, CEMEX completed this work regardless of approval and implementation of the proposed project. Notwithstanding, to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way. There are currently three driveways associated with the former CEMEX concrete batch plant and another two driveways associated with the vacant warehouse building for a total of five existing driveways along North La Brea Avenue. There are no driveways at the project site along Romaine Street.

Project Characteristics

The project involves the demolition of on-site buildings and structures and removal of two mature trees for the construction and operation of a new 34-story (approximately 352-foot-tall) mixed-use residential and commercial building with 514 apartment units and 30,000 sf of commercial/retail use on the ground floor. Approximately 27,976 sf of common open space and 32,420 sf of private open space would be provided throughout the building. Apart from the 30,000 sf commercial/retail space, the ground floor would include an entry plaza open to the public, a café outdoor seating area, and a residential lobby with associated leasing office and mailroom. Floors two through six would consist of a parking garage with 521 parking spaces and 394 bicycle parking stalls for residents and their guests. The project would also provide an additional 153 parking spaces across two levels in a subterranean parking garage for the proposed commercial uses and for overflow residential parking. The project would provide a total of 674 parking spaces. Floors seven through 34 would include the 514 apartment units, proposed as 128 affordable and workforce units and 386 market rate units. In addition to apartment units, floor seven would include two outdoor gardens with programmed recreation and seating areas, as well as an indoor gathering area for residents within one of the gardens; floor 17 would include a fitness center, lounge/recreation room, and outdoor garden with seating areas; floor 18 would include additional amenity areas such as a yoga room, library, and outdoor swimming pool with a pool deck and firepit; and floor 19 would include an outdoor garden with seating areas. The rooftop would include an outdoor garden with seating areas, mechanical space including a solar photovoltaic (PV) system, and a rooftop emergency helipad structure. These roof level improvements would exceed the finished 352-foot height of the building by an additional 25 feet. The project would also integrate up to seven billboards proposed to be a combination of static and/or full motion video with varied dimensions throughout all facades of the building. Table ES-1 on the following page provides a summary of the project characteristics whereas project site plans are included in Appendix A.

Table ES-1 Project Characteristics

Site Area	**43,316 sf/0.99-acre**
Floor to-Area Ratio	**9.85**
FAR Floor Area	426,656 sf
Gross Floor Area (FAR and Non-FAR)	781,808 sf
Project Components	
Residential	
Studio apartments	179 apartments
1-bedroom apartments	247 apartments
2-bedroom apartments	88 apartments
Total	**514 apartments**
Commercial/Retail	**30,000 sf**
Open Space	
Public Open Space	27,976 sf
Private Open Space	32,420 sf
Total	**60,396 sf**
Height	
Aboveground	34 stories 352 feet to roof 377 feet to helipad
Subterranean	12 feet below ground surface for Parking Level 1 22 feet below ground surface for Parking Level 2 32 feet below ground surface for the building foundation
Parking Spaces	
Standard	491 spaces
Compact	35 spaces
Tandem	148 spaces
Total	**674 spaces (including 90 spaces for commercial/retail use)**
Bicycle Stalls	
Short-Term	133 stalls
Long-Term	261 stalls
Total	**394 stalls**

FAR = floor to area ratio, sf = square feet

ACCESS AND PARKING

The project would include a subterranean parking garage with two floors providing 153 parking spaces for the proposed commercial uses and overflow residential parking. The total depth of the subterranean structure is approximately 30 feet. The project would provide an additional 521 parking spaces for residents and their guests in a separate aboveground parking garage between floors two through six.

The project would reduce the number of driveways on North La Brea Avenue from five driveways to only one located at the northwest corner of the site. Commercial patron vehicles would enter and exit the subterranean parking garage via the driveway at the ground floor along North La Brea

Avenue. Furthermore, the project proposes installing two new adjacent driveways along Romaine Street at the southeast corner of the site. Resident vehicles would enter and exit the aboveground parking garage via a driveway at the ground floor along Romaine Street. The other driveway along Romaine Street would provide access to respective on-site loading areas for the residential and commercial/retail components. The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points. Pedestrians would access the project via the sidewalks along North La Brea Avenue and Romaine Street.

ARCHITECTURAL DESIGN FEATURES

The proposed 34-story building would be designed to look like a vertical L-shaped building with wall recesses and cut-outs. The project would incorporate unevenly layered floors, which would allow for assorted balcony placements and other overhanging areas such as for outdoor gardens. The materials palette includes, but is not limited, to wood look metal mullions, metal panels, frosted and clear glazed windows, wood finish metal canopy, tile, and glass railings as decorative elements. The exterior color palette for the proposed building would be comprised of various neutral, earth-toned colors, including shades of blue, gray, and brown.

The project would include exterior lighting on the building, in the entry plaza and in outdoor common areas for both safety and wayfinding purposes. Accent lighting to highlight landscaping and signage would also be incorporated throughout. Exterior lighting would be appropriately shielded in accordance with the West Hollywood Municipal Code (WHMC), including but not limited to, Section 19.20.100 regulating outdoor lighting and Sections 19.34.040 and G-34.250 regulating sign illumination.

PROJECT SIGNAGE

The project would also integrate up to seven off-site billboards with varied dimensions throughout all facades of the building and with a combination of static and/or full motion video. The project would integrate 29,465 sf of advertising area, including 22,745 sf of illumination area. Any digital light-emitting diode (LED) full motion video billboard would have a maximum brightness of 600 nits, where a “nit” is a unit of measurement that relates to the brightness level of visible light (luminance) within a specific area. Other building signage would include but not be limited to residential identity and wayfinding signage and future commercial identity signage by future tenant(s), both visible from the public right-of-way. As discussed under Architectural Design Features, exterior lighting would be implemented consistently with WHMC Section 19.20.100 regulating outdoor lighting and Sections 19.34.040 and G-34.250 regulating sign illumination. Furthermore, WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards.

LANDSCAPING

Drought-tolerant landscape would be integrated throughout the building. The project would maintain the two existing street trees along North La Brea Avenue and include the planting of additional trees and shrubs along the North La Brea Avenue and Romaine Street rights-of-way. The entry plaza along the site’s frontage at North La Brea Avenue would include drought-tolerant trees and shrubs, raised and painted metal planters, and hard-piped irrigated planter pots. Similarly, the outdoor gardens on floors seven, 17, 19, and the rooftop of the proposed building would include variations of planters, flexible natural lawn area, artificial turf for pets, and drought-tolerant trees and shrubs. The project would provide 27,976 sf of landscaping, including common open space.

GREEN BUILDING FEATURES

The residential portion of the project would be 100 percent electric and would not utilize natural gas. However, the non-residential commercial/retail portion of the project could potentially utilize natural gas for heating and cooling systems for the limited retail program. The proposed project's overall building design would incorporate several sustainability elements to meet the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations and West Hollywood Green Building Ordinance (i.e., WHMC Section 19.20.060). These elements would include, but not be limited to energy efficient lighting and mechanical systems, energy-star appliances, high efficiency plumbing and other water fixtures, drought-tolerant landscaping and biofiltration planters, installed electric vehicle (EV) charging stations, demolition and construction waste diversion, low impact development planters, a solar PV system, post tensioned concrete slabs to minimize volume, low emission glazing, reduced southern glazing exposure, landscaped green roofs, daylit corridors, and electric metering only for residential units.

UTILITIES AND PUBLIC SERVICES

The City of West Hollywood facilitates residential and commercial solid waste services in contract with Athens Services, stormwater services in cooperation with the Los Angeles County Flood Control District, and wastewater services via City-owned local sewers and Los Angeles County Sanitation Districts sewer lines. The Los Angeles Department of Water and Power provides water to the eastern portion of West Hollywood (i.e., the project site). Southern California Edison supplies electricity and the Southern California Gas Company provides natural gas to the City of West Hollywood. Furthermore, telecommunication providers within the project area include AT&T, Frontier, and Hughesnet. Fire protection and emergency medical services are provided by the Los Angeles County Fire Department for the City of West Hollywood, whereas police protection services are provided by the Los Angeles County Sheriff's Department. Additional municipal services such as public education services and public library services are provided by the Los Angeles Unified School District and Los Angeles County Library, respectively.

CONSTRUCTION

Construction of the proposed project is expected to occur over approximately 32 months, proposed to commence in October 2025 and end by June 2028[1]. The project would involve the demolition of on-site buildings and structures and removal of two mature trees. As previously noted, disassembly and demolition of concrete batch plant equipment and office building have already occurred regardless of implementation of the proposed project. Therefore, project conditions prior to implementation of the proposed project would consist of the warehouse building remaining as the only on-site structure. However, for a conservative analysis of project impacts, the analysis in this EIR also includes the early demolition and removal of these buildings and structures as being part of the proposed project.

Construction of the subterranean parking garage would involve the excavation of 49,050 cubic yards (cy) of soil and a maximum excavation depth of up to 32-feet below ground surface (bgs). The project applicant is assuming a 15 percent expansion of excavated soil and, therefore, anticipates the export of 56,407 cy of soil from the site to United Rock Products Pit #2 located approximately 36 miles from the site at 1245 East Arrow Highway in the City of Irwindale.

[1] The construction schedule of the project is subject to adjustment pending final project approval.

Due to the anticipated depth of groundwater (i.e., up to 20 feet bgs) and the anticipated depth of excavation (i.e., 32 feet bgs), groundwater dewatering would be required during excavation activities. As discussed in Section 4.7, *Hazards and Hazardous Materials*, of this EIR, underlying soils and groundwater at the project site are currently contaminated; therefore, as part of Mitigation Measure HAZ-1, project construction shall include Regulatory agency oversight (e.g., Department of Toxic Substances and Control, State Water Resources Control Board, or Los Angeles County Fire Department). Moreover, dewatering activities are anticipated to involve on-site treatment of contaminated groundwater and subsequent discharge as is common and standard practice.

Construction activity would occur between the hours of 8:00 AM and 7:00 PM Monday through Saturday with no construction activity on Sunday and major holidays in accordance with the WHMC Section 9.08.050(d). The project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. While the precise location of construction staging and construction employee parking would be determined as part of the preparation of the Construction Traffic Management Plan, to be finalized prior to permit issuance, it is conservatively assumed that these activities would take place off-site within a half-mile radius of the project site.

OPERATION

The proposed commercial/retail space would operate between the hours of 7:00 AM. and 10:00 PM. The outdoor gardens would be open to residents between the hours of 8:00 AM and 10:00 PM. The proposed rooftop helipad would not be utilized as part of daily on-site operations but would be available 24/7 for emergencies. Cooling towers and boilers would be located on the roof with in-unit heat pumps. An on-site service vault for transformers and related equipment would be located underground. The proposed building would also contain a diesel emergency generator.

PROJECT DESIGN FEATURE

The following project design feature (PDF), PDF AQ-1 (Tier 4 Construction Equipment) would be incorporated as part of the project during construction activities.

PDF AQ-1 Tier 4 Construction Equipment

Heavy-duty diesel-powered construction equipment greater than 50 horsepower will be equipped with Tier 4 Final diesel engines. Equipment engines will be maintained in good condition and in proper tune pursuant to manufacturer's specifications.

REGULATORY COMPLIANCE MEASURE

The following regulatory compliance measure (RCM), RCM BIO-1 (Nesting Birds) would be implemented in compliance with the California Department of Fish and Game Code and the Migratory Bird Treaty Act and prior to project construction to avoid potential impacts to nesting birds within the project site during construction activities.

RCM BIO-1 Nesting Birds

To avoid disturbance of nesting and special-status birds, project activities, including but not limited to vegetation removal, ground disturbance, and construction and demolition, shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, a pre-construction nesting bird survey shall be conducted by a qualified City-approved biologist no more than seven days prior to initiation of all ground disturbance and vegetation removal activities within all suitable nesting habitat located within the project site. If no nesting birds are found, construction may be initiated without impacts to nesting birds. If active nests are found, the biologist shall determine a suitable buffer where no construction activities would occur. The distance shall be determined by the biologist based on the species of bird to ensure that no direct or indirect impacts would occur. An avoidance buffer shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during all project construction activities. The biologist shall monitor the nesting activity during construction to verify that the buffer was adequately placed, and that breeding is not compromised by construction. The buffer shall remain in place while the nest is active. No ground-disturbing activities shall occur inside this buffer until the biologist has determined activities can be resumed.

Project Objectives

The proposed project would achieve the following objectives:

1. Maximize the provision of multi-family dwelling units and commercial uses in West Hollywood, including a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels.
2. Maximize high density housing opportunities in a high-quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and vehicle miles traveled.
3. Redevelop and improve the visual character of the project site with an architecturally significant development that is compatible in use and design with the area's urban character.
4. Replace an incompatible, outmoded industrial manufacturing plant with a mixed-use residential community to reduce potential hazards to the community.
5. Develop a mixed-use residential building with an active street-level identity within an increasingly walkable urban center to contribute to the public realm and improve the pedestrian experience.
6. Contribute to the economic base of the City and expand the City's fiscal budget by concentrating residential density within a commercial core to spur economic activity and substantially increase sales and property tax revenue.
7. Employ transit-oriented development and smart growth principles by providing high density housing near multimodal transportation networks including the Metro Bus Priority Lane along La Brea Avenue, future Metro Rail Santa Monica/La Brea station, cycling lanes, and pedestrian walkways.
8. To incorporate sustainable building design practices that comply with the City's Green Building Program in order to improve building performance, minimize energy consumption, and promote greater health and wellness.

Required Approvals

The proposed project would require the following permits for development of the proposed project:

- **Demolition Permit** to allow the removal of the existing, on-site buildings and structures
- **Development Permit** to allow the development of a 34-story, approximately 426,000 sf mixed-use development with 514 apartments and 30,000 sf of commercial/retail use
- **Administrative Permit** to allow outdoor dining, lounge terraces, and the pool deck
- **Sign Permit** to allow the installation of up to seven off-site signs (billboards)
- **Development Agreement** to establish vested rights and defined terms for the development of the mixed-use development in exchange for public benefits
- **Zoning Map Amendment** to create an overlay to the existing CR zoning district for the Development Agreement
- **Other discretionary and ministerial permits** that may be necessary to implement the project

Approvals from other agencies may also be required and those known at this time are listed as follows:

- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System Permit; Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval
- Los Angeles Regional Water Quality Control Board – Applicant must submit a Notice of Intent to discharge groundwater during construction and to comply with the General Permit
- Department of Toxic Substances Control – Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval
- Los Angeles County Fire Department – Plan approval; Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval in lieu of oversight by the Department of Toxic Substances Control
- Los Angeles County Sheriff's Department – Plan approval
- Utility providers – Utility connection permits

Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines alternatives to the proposed project. The purpose of developing potential alternatives is to identify other actions that could be taken to feasibly accomplish project objectives while reducing or avoiding potentially significant environmental impacts caused by the project. Included in this analysis are the following three alternatives, including the CEQA-required "no project" alternative, which involve changes to the proposed project that may reduce the project-related environmental impacts as identified in this EIR.

- Alternative 1: No Project
- Alternative 2: Commercial Base Density
- Alternative 3: Mixed-Use Base Density

Based on the alternatives analysis, Alternative 3 (Mixed-Use Base Density Alternative) was determined to be the environmentally superior alternative. The following is a summary of the full alternatives analysis, which can be found in Section 6, *Alternatives*, of this EIR.

Alternative 1 (No Project Alternative) assumes that the vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue and the foundation of the two-story office building at 1000 and 1014 North La Brea Boulevard associated with the former CEMEX concrete batch plant would remain without any additional site modifications. Because disassembly and demolition of equipment and the office building would have occurred regardless of approval and implementation of the proposed project, this alternative assumes that actual "no project" conditions would consist of the warehouse building remaining as the only on-site structure.

Although the No Project Alternative would result in less impacts across all analyzed environmental issue areas compared to the proposed project, it would not fulfill any of the project objectives because it would not redevelop and improve the visual character of the project site by replacing an incompatible and outmoded industrial use with a mixed-use building. The No Project Alternative would not provide a range of affordable and market rate housing units to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks, nor would it contribute to the economic base of the city by concentrating residential density with serving commercial uses within a larger commercial core.

Alternative 2 (Commercial Base Density Alternative) would involve the demolition of on-site buildings and structures and removal of two mature trees, similar to the proposed project. However, the Commercial Base Density Alternative proposes to construct a two-story, 51,700-sf commercial building with one subterranean parking level with 91 vehicle parking spaces. This alternative would not include any of the currently proposed billboards as part of the project. Under Alternative 2, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Because Alternative 2 is designed to be compliant with the base zoning and development regulations for strict commercial use, it would also not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project.

Due to the substantial decrease in excavation activities, building height/size, and overall building density, the Commercial Base Density Alternative would result in less than impacts related to air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, public services, transportation-circulation, tribal cultural resources, and utilities and service systems compared to the proposed project. Of note, because Alternative 2 would be a base density-compliant development, it would not require a Development Agreement or Zoning Map Amendment and impacts related to land use and planning would also be less than the proposed project. Nonetheless, since this alternative would still require excavation for one subterranean parking level, it would still include implementation of all the same mitigation measures identified for the proposed project to reduce impacts related to cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. However, Alternative 2 would not fulfill all project objectives because it would only consist of a commercial building and it would not include a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks. Of the identified project objectives, Alternative 2 would only meet Objective 8 since it would still replace existing uses with a building compliant with the City's Green Building Ordinance (i.e., WHMC Section 19.20.060).

Alternative 3 (Mixed-Use Base Density Alternative) would involve the demolition of on-site buildings and structures and removal of two mature trees, similar to the proposed project. However, the Mixed-use Base Density Alternative proposes to construct a seven-story, 141,450-sf mixed-use building consisting of 184 residential units and 13,000 sf of commercial/retail use. Of the 184 residential units, 20 percent of units would be affordable units consisting of 28 units for very low-income households and nine units for moderate-income households. The remaining 147 units would be market rate units. This alternative would include one subterranean parking level and two above-ground parking levels with 250 parking spaces. This alternative would also not include any of the currently proposed billboards as part of the project. Under Alternative 3, the mixed-use building would be 285,206 sf less and 302 feet shorter than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Because Alternative 3 is designed to be compliant with the base zoning and development regulations for a mixed-use development, it would not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project.

Similar to Alternative 2, due to the substantial decrease in excavation activities, building height/size, and overall building density, the Mixed-Use Base Density Alternative would result in less than impacts related to air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, public services, transportation-circulation, tribal cultural resources, and utilities and service systems compared to the proposed project. Because Alternative 3 would also be a base density-compliant development, it would similarly not require a Development Agreement or Zoning Map Amendment and impacts related to land use and planning would also be less than the proposed project. However, since this alternative would still require excavation for one subterranean parking level, it would still include implementation of all the same mitigation measures identified for the proposed project to reduce impacts related to cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. Nonetheless, the Mixed-Use Base Density Alternative would fulfill the same project objectives, albeit to a lesser degree than the proposed project, because it would still consist of a mixed-use building that would include a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks.

Because the No Project Alternative would lessen or altogether avoid project impacts, the No Project Alternative would be the environmentally superior alternative. However, if the “No Project” Alternative is the environmentally superior alternative, *CEQA Guidelines* Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project’s basic objectives be chosen as the environmentally superior alternative among the other alternatives. Therefore, because Alternative 3 would consistently reduce all analyzed environmental impacts while maintaining consistency with all eight of the project objectives, it is the environmentally superior alternative.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Summaries of and responses to comments on the Notice of Preparation for the EIR and input received at the November 30, 2023 EIR scoping meeting for the project are included in Section 1, *Introduction*, of this EIR.

Issues to be Resolved

Of note, during the recent October 7th, 2024 City Council Regular Meeting, City Council directed City staff to explore and subsequently draft a zone text amendment to codify policy in the WHMC that would permit off-site signage outside of Sunset Boulevard in commercial zones on Santa Monica Boulevard, Fairfax Avenue, and La Brea Avenue when off-site signage is associated with mixed-use developments providing a higher percentage of affordable units (West Hollywood 2024). Although this direction is in its preliminary stages and additional details are not known at this time, the project (i.e., a mixed-use development providing 128 affordable and workforce units along North La Brea Boulevard) currently exhibits a general consistency with the type of developments that would be targeted under this prospective zone text amendment.

Issues Not Studied in Detail in the EIR

As indicated in the Initial Study (Appendix B) and summarized in Section 1, *Introduction*, of this EIR, the project was found to not result in significant environmental impacts related to several issue areas included in the Appendix G environmental checklist. These include several issues related to aesthetics, agriculture and forestry resources, air quality, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and wildfire, which are summarized in Table 1-2 of Section 1, *Introduction*, of this EIR.

Table ES-2 on the following pages summarizes the environmental impacts of the proposed project and any identified mitigation measures in Section 4, *Environmental Impact Analysis*, of this EIR.

Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Table ES-2 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Although distinct from mitigation measures, the project's RCM and PDF are also listed to emphasize existing regulations that the project would comply with and critical components already included as part of the project design. Impacts are categorized as follows:

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

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. The proposed project involves the development of a 34-story mixed-use building that would alter views from higher vantage points in the project area and city. However, the city does not have any designated scenic vistas and the project would not adversely affect scenic public views of the Hollywood Hills and Los Angeles Basin.	None required	No impact (per Senate Bill 743)
Impact AES-2. Development of the proposed project would alter the visual character of the project site; however, as a mixed-use project in an urban area, the project's urban form and uses would be consistent with surrounding development and the goals and policies in the City's General Plan related to aesthetics, and the project would not conflict with applicable zoning and regulations regarding scenic quality.	None required	No impact (per Senate Bill 743)
Impact AES-3. Development of the proposed project would introduce new sources of light and glare on the project site; however, these sources would be typical of development surrounding the site and the project would comply with the policies and regulations in the City's General Plan and Zoning Ordinance related to signage, lighting, and illumination.	None required	No impact (per Senate Bill 743)
Air Quality		
Impact AQ-1. The project's contribution to population, housing, and employment growth in the city would be within SCAG growth forecasts and the project would not generate criteria pollutant emissions in exceedance of the applicable SCAQMD thresholds. Therefore, the project would not conflict with implementation of the AQMP and impacts would be less than significant.	None required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact AQ-2. Construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under the applicable federal or State standards. Impacts would be less than significant.	None required	Less than Significant
Impact AQ-3. Construction and operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations (e.g., TACs). Impacts would be less than significant.	None required	Less than Significant
Cultural Resources		
Impact CR-1. The proposed project would not cause a substantial adverse change in the significance of historical resources pursuant to Section 15064.5. Impacts would be less than significant.	None required	Less than Significant
Impact CR-2. Although the proposed project would not cause a substantial adverse change in the significance of a known archaeological resources pursuant to Section 15064.5, construction of the proposed project would involve ground-disturbing activities that may have the potential to unearth or adversely impact previously unidentified archaeological resources. Impacts would be less than significant with mitigation.	**Mitigation Measure CUL-1 Workers Environmental Awareness Program Training** Prior to the start of ground-disturbing construction activities, all construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of construction activities. A recording of a basic power point presentation shall be prepared and presented by a qualified archaeologist to inform all personnel working on the project about the archaeological sensitivity of the area. The recording shall be presented by the project applicant and/or subsequent responsible parties to all construction personnel throughout all phases of project construction who have not previously attended the training for the project. The purpose of the Workers Environmental Awareness Program training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call Qualified Archaeologist and if appropriate, tribal representative. The necessity of training attendance shall be stated on all construction plans and a record of attendance via a sign-in sheet shall be maintained as part of the mitigation and monitoring reporting program.	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
	Mitigation Measure CUL-2 Retention of an On-Call Qualified Archaeologist Prior to ground-disturbance activities, the project applicant and/or subsequent responsible parties shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (NPS 1983)[2] (Qualified Archaeologist), to prepare and provide the Workers Environmental Awareness Program training as outlined under CUL-1 and to respond to any inadvertent discoveries identified for the duration of construction activities. The Qualified Archaeologist should possess experience and familiarity with historic-period and prehistoric archaeological resources in the region. **Mitigation Measure CUL-3 Inadvertent Discovery of Archaeological Resources** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop and the Qualified Archaeologist shall be contacted immediately. The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist shall evaluate the significance of the find and determine whether or not additional study is warranted. Work on the other portions of the project outside of the buffered area of the discovery may continue during this assessment period. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to resources of an archaeological nature. Depending upon the significance of the find under CEQA (14 California Code of Regulations 15064.5[f]; Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. For resources that are Native American in origin, the City, along with the Qualified Archaeologist, shall coordinate with the Kizh Nation on appropriate treatment.	
Impact CR-3. Construction of the proposed project would involve ground-disturbing activities that may have potential to unearth or adversely impact previously unidentified human remains. Impacts would be less than significant with mitigation.	**Mitigation Measure CUL-4 Inadvertent Discovery of Human Remains** In accordance with California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e), if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC that shall notify those persons	Less than Significant with Mitigation

[2] National Park Service (NPS). 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. https://www.nps.gov/history/local-law/arch_stnds_0.htm.

Impact	Mitigation Measure(s)	Residual Impact
	believed to be the most likely descendant (MLD). The MLD will be afforded an opportunity to inspect the find and make recommendations, in consultation with the property owner and lead agency, for the treatment and disposition of the identified human remains. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after being granted access to the project site to examine the remains, the landowner, working with the lead agency, will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.	
Energy		
Impact E-1. Neither construction nor operation of the proposed project would result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.	None required	Less than Significant
Impact E-2. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur.	None required	No Impact
Geology and Soils		
Impact GEO-1. Although the proposed project would not be subject to adverse effects from rupture of a known fault, the project would be exposed to seismic ground shaking. However, the project would not increase the potential for hazards associated with seismic ground shaking, and compliance with applicable building regulations and incorporation of geotechnical design features provided by the project-specific Geotechnical Investigation would reduce potential impacts related to seismic ground shaking to less than significant with mitigation.	**Mitigation Measure GEO-1 Geotechnical Investigation Recommendations** The project applicant and contractor shall follow all recommended geotechnical design features, including (but not limited to) those related to dewatering, grading, foundation construction, floor slab design, included in Sections 8.5 through 8.28 of the Geotechnical Investigation, Proposed Mixed-Use High-Rise Development, 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California prepared by Geocon West, Inc, dated May 10, 2023 and any subsequent analysis. Prior to the issuance of grading and building permits, the City's Building and Safety Division shall review and approve the detailed construction plans or report documenting compliance with recommended geotechnical design features to ensure the project implements the measures included in the Geotechnical Investigation.	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
Impact GEO-2. Development of the proposed project would occur on a site with expansive soils; however, due to the depth of excavation associated with project construction, the project would not be subject to adverse effects from these soils. Moreover, compliance with applicable building regulations and incorporation of geotechnical design features provided by the project-specific Geotechnical Investigation would reduce potential impacts related to the high groundwater table and other unstable soils to less than significant with mitigation.	**Mitigation Measure GEO-1**	Less than Significant with Mitigation
Impact GEO-3. Construction of the proposed project would involve ground-disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified paleontological resources. Impacts would be less than significant with mitigation.	**Mitigation Measure GEO-2 Paleontological Resources Monitoring and Mitigation** **Qualified Professional Paleontologist.** Prior to excavation, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) (SVP 2010)[3]. The Qualified Professional Paleontologist shall draft a Paleontological Resources Mitigation and Monitoring Plan, which shall direct all mitigation measures related to paleontological resources. **Paleontological Worker Environmental Awareness Program.** Prior to the start of ground-disturbing construction activities, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. A recording of a basic power point presentation shall be prepared and presented by the Qualified Professional Paleontologist to inform all personnel working on the project about the archaeological sensitivity of the area. The recording shall be presented by the project applicant and/or subsequent responsible parties to all construction personnel throughout all phases of project construction who have not previously attended the training for the project. The necessity of training attendance shall be stated on all construction plans and a record of attendance via a sign-in sheet shall be maintained as part of the mitigation and monitoring reporting program. **Paleontological Monitoring.** A full-time paleontological monitor shall be present onsite to observe ground-disturbing construction activities (e.g., grading, excavating, trenching) that impact native soils (i.e., undisturbed, non-fill sediments). Paleontological monitoring shall be conducted by a paleontological monitor with experience with	Less than Significant with Mitigation

[3] Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

Impact	Mitigation Measure(s)	Residual Impact
	collection and salvage of paleontological resources and who meets the minimum standards of the SVP for a Paleontological Resources Monitor (SVP 2010). The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, the following shall be completed: ▪ **Fossil Salvage.** The paleontological monitor shall salvage (i.e., excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. After the fossil(s) is (are) salvaged, construction activity may resume. ▪ **Fossil Preparation and Curation**. Fossils shall be identified to the lowest (i.e., most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Professional Paleontologist. ▪ **Final Paleontological Mitigation Report.** Upon completion of ground-disturbing construction activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City of West Hollywood and, if fossil curation occurs, the designated scientific institution.	

Impact	Mitigation Measure(s)	Residual Impact
Greenhouse Gas Emissions		
Impact GHG-1. The proposed project would be consistent with the policies included in the 2022 Scoping Plan for the purpose of reducing GHG emissions, as well as other applicable measures in SCAG's 2024-2050 RTP/SCS and the City's CAAP and General Plan. Construction and operation of the proposed project would also not generate GHG emissions that would, either directly or indirectly, have a significant impact on the environment. Therefore, impacts would be less than significant.	None required	Less than Significant
Hazards and Hazardous Materials		
Impact HAZ-1. Construction and operation of the proposed project could involve the use, storage, disposal or transportation of hazardous materials. Furthermore, the project site has the potential to contain lead-based paint, asbestos-containing materials, and polychlorinated biphenyls due to the age of on-site structures. However, compliance with federal, State, and local regulations would result in less than significant impacts.	None required	Less than Significant
Impact HAZ-2. Although the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, there are known hazardous material impacts to soil, soil vapor, and groundwater at the project site. Compliance with applicable regulations and mitigation measures for potential soil, soil vapor, and/or groundwater impacts at the project site would minimize hazards from the proposed project. Impacts would be less than significant with mitigation.	**Mitigation Measure HAZ-1 Regulatory Agency Oversight** Prior to issuance of a grading permit, the project applicant shall enter into a voluntary oversight agreement with the California Department of Toxic Substances Control (DTSC), Los Angeles Regional Water Quality Control Board (RWQCB), or Los Angeles County Fire Department (LACFD) (regulatory Agency) to provide regulatory oversight of identified releases at the project site. The regulatory Agency shall be utilized for agency oversight of assessment and remediation of the project site at least through completion of construction activities. Prior to commencement of construction and grading activities at the project site, the project applicant shall submit the following documents to the selected oversight agency: ▪ Current development plan (e.g., architectural drawings and project description) and any modifications to the development plan ▪ All environmental assessment documents completed for the project site, including the Phase I and II Environmental Site Assessments listed in the Initial Study and EIR for the proposed project ▪ All future environmental documents completed for the project site	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
	Upon submittal of the previously listed information, and in accordance with the regulatory Agency's voluntary oversight agreement, the regulatory Agency may require actions such as: development of subsurface investigation workplans; completion of additional soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and off-site disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. Subsurface soil, soil vapor, and groundwater investigations, if required, shall be conducted in accordance with a sampling plan that shall be reviewed and approved by the regulatory Agency. The regulatory Agency approval documents shall also be submitted to and reviewed by the City prior to issuing grading permits. **Mitigation Measure HAZ-2 Soil and Groundwater Management Plan** Prior to commencement of demolition and construction/grading activities at the project site, the project applicant shall retain a qualified environmental consultant (PG or PE) to prepare a Soil and Groundwater Management Plan (SGMP) for the project site. The SMGP shall address: 1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil or groundwater with solvent or chemical odors) if such soils or impacted wastes are encountered, and 2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction phase. The plan must establish engineering controls and soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs. ▪ Proper disposal procedures of contaminated materials. ▪ Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities. ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. ▪ The health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. The City shall review the SGMP and have the authority to propose and include modifications prior to submittal to the	

Impact	Mitigation Measure(s)	Residual Impact
	regulatory Agency, which shall be the same Agency that the project applicant enters into a voluntary oversight agreement with per Mitigation Measure HAZ-1. The regulatory Agency shall review and approve the SGMP prior to construction (demolition and grading) activities at the project site. The City shall review the final SGMP prior to issuance of grading permits. The project applicant shall implement the SGMP during demolition, grading, and construction at the project site. **Mitigation Measure HAZ-3 Sub-slab Vapor Mitigation System** Where soil vapor is known and is identified to be present at chemical concentrations exceeding regulatory screening thresholds for sub-slab/soil vapor intrusion, the project applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a vapor mitigation system design for the proposed project in accordance with adopted regulations. The plan shall include, but is not limited to: ▪ Design specifications ▪ Material specifications ▪ Installation requirements ▪ Monitoring requirements The regulatory Agency shall review and approve the Sub-slab Vapor Mitigation System Design prior to construction. Engineering measures or institutional controls shall be submitted to the City's Planning and Development Services Department prior to the issuance of any grading or building permits. The project applicant and/or contractor shall incorporate a sub-slab vapor barrier during construction, the implementation of which shall prevent the potential for soil vapor volatile organic compounds (VOCs) from migrating to indoor air. **Mitigation Measure HAZ-4 Groundwater Disposal** If disposal of contaminated groundwater (decontamination water, purge water, dewatering, or underground structures [groundwater leakage into the final structure]) is generated during construction of the project, the Los Angeles Regional Water Quality Control Board (RWQCB) or the City West Hollywood Department of Public Works shall be consulted to determine if the treated groundwater can be disposed through one of their waste discharge permit options. Los Angeles RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities. The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern and shall therefore be developed in consultation with the City and the applicable regulatory agency.	

Impact	Mitigation Measure(s)	Residual Impact
Hydrology and Water Quality		
Impact HYD-1. The proposed project would disturb on-site contaminated soils during construction and increase on-site development density/intensity with potential to degrade water quality. However, compliance with existing laws and regulations that govern project construction and operation, as well as implementation of BMPs, safety requirements, and mitigation measures for potential groundwater impacts at the project site would minimize potential water quality impacts. Impacts would be less than significant with mitigation.	**Mitigation Measure GEO-1** and **Mitigation Measures HAZ-1 through HAZ-4**	Less than Significant with Mitigation
Impact HYD-2. During construction, groundwater dewatering would be temporary, and upon operation, the project would be designed to resist hydrostatic forces in lieu of installation of a permanent dewatering system and would not result in a substantial change in impervious surfaces when compared to existing conditions. The project would not substantially decrease groundwater supplies or interfere with groundwater recharge and impacts would be less than significant.	None required	Less than Significant
Impact HYD-3. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.	None required	Less than Significant
Land Use and Planning		
Impact LU-1. The proposed project is consistent with SCAG's 2020-2045 RTP/SCS and 2024-2050 RFP/SCS, applicable land use and planning goals and policies of the City's General Plan, and the City's Zoning Ordnance upon approval of the project's Zoning Map Amendment. Therefore, the proposed project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.	None required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Noise		
Impact NOI-1. Construction of the project would temporarily increase noise levels in the project site vicinity; however, noise levels would not exceed FTA thresholds. Furthermore, operation of the project would not include permanent noise sources that would exceed standards established by the City. Therefore, impacts would be less than significant.	None required	Less than Significant
Impact NOI-2. Project construction would intermittently generate groundborne vibration on a site which may affect sensitive receivers near the project site but would not create excessive levels of vibration that could cause structural damage, disturb sleep at nearby sensitive residential receivers, or interfere with operation of the sensitive receivers. Impacts would be less than significant.	None required	Less than Significant
Public Services		
Impact PS-1. The proposed project would incrementally increase demands on fire protection services; however, despite the growth associated with the project, it would not create the need for new or expanded fire protection facilities to maintain the LACFD's performance objectives. Impacts would be less than significant.	None required	Less than Significant
Impact PS-2. The proposed project would incrementally increase demands on police protection services; however, despite the growth associated with the project, it would not create the need for new or expanded fire protection facilities to maintain the LACSD's performance objectives. Impacts would be less than significant.	None required	Less than Significant
Transportation-Circulation		
Impact TRA-1. The proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, or bicycle and pedestrian facilities. Impacts would be less than significant.	None required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact TRA-2. The proposed project would meet criteria outlined in *CEQA Guidelines* Section 15064.3, subdivision (b), and impacts related to VMT would be less than significant.	None required	Less than Significant
Impact TRA-3. The project would not substantially increase hazards due to a geometric design feature or incompatible use. Impacts would be less than significant	None required	Less than Significant
Tribal Cultural Resources		
Impact TCR-1. Construction of the proposed project would involve ground-disturbing activities that may have potential to unearth or adversely impact previously unidentified tribal cultural resources listed or eligible for listing in the CRHR, or other local register of historical resources. Impacts would be less than significant with mitigation.	**Mitigation Measures CUL-1 through CUL-3** and **Mitigation Measure TCR-1 Retention of a Native American Monitor and Native American Monitoring** Prior to the commencement of ground disturbing activities, the project applicant and/or subsequent responsible parties shall retain a Native American/Tribal monitor/entity from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe) to monitor all ground-disturbing activities within native sediments (generally those at a depth of 3 feet below ground surface or greater). A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground disturbing activities. Ground disturbing activities shall include, but are not limited to, grading, excavation, trenching, boring/drilling, potholing, augering, and tree or foundation removal. A look-ahead construction schedule shall be provided to the Kizh Nation each week prior to work being performed, to provide guidance on when work will occur within native sediments. The schedule shall include, at a minimum, all planned construction activities involving ground disturbance, including location and the nature of the work, and depths of ground disturbance scheduled for the week. The Native American monitor shall be responsible for completing monitoring logs on the days that they are on-site and monitoring ground disturbing activities within native soils. The monitoring logs will include descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations and depths of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Copies of the monitoring logs shall be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground disturbing activities and phases that may involve ground disturbing activities within native soils on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project applicant/lead agency that no future, planned construction	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
	activity and/or development/construction phase at the project site possesses the potential to impact resources that may potentially be tribal cultural resources. **Mitigation Measure TCR-2 Inadvertent Discovery of Tribal Cultural Resources** In the event suspected tribal cultural resources are discovered during ground disturbing construction activities, all work shall cease within 50 feet of the find, or another distance, agreed to between the Kizh Nation and the City, based on the project area and nature of the find and shall not resume until the potential tribal cultural resource has been assessed in accordance with CUL-3 between the City, Qualified Archaeologist, and the Kizh Nation. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact qualifies as a tribal cultural resource, appropriate treatment shall be developed by the City in coordination with the Qualified Archaeologist, and the Kizh Nation.	
Impact TCR-2. Although no tribal cultural resources have been identified by California Native American tribes as part of AB 52 notification and consultation processes, construction of the proposed project would involve ground-disturbing activities that may have potential to unearth or adversely impact previously unidentified tribal cultural resources. Impacts would be less than significant with mitigation.	**Mitigation Measures CUL-1 through CUL-3** and **Mitigation Measures TCR-1 and TCR-2**	Less than Significant with Mitigation
Utilities and Service Systems		
Impact UTIL-1. The proposed project would not require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. The proposed project would be adequately served by existing facilities to meet the project's projected demands. Impacts would be less than significant.	None required	Less than Significant
Impact UTIL-2. There are sufficient water supplies available to serve the proposed project during normal-, single-dry, and multiple-dry year conditions. Impacts would be less than significant.	None required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact UTIL-3. The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, would not impair the attainment of solid waste reduction goals, and would comply with federal, State, and local statutes and regulations related to solid waste. Impacts would be less than significant.	None required	Less than Significant
Project Design Feature		
PDF AQ-1Tier 4 Construction Equipment Heavy-duty diesel-powered construction equipment greater than 50 horsepower will be equipped with Tier 4 Final diesel engines. Equipment engines will be maintained in good condition and in proper tune pursuant to manufacturer's specifications.		
Regulatory Compliance Measure		
RCM BIO-1 Nesting Birds To avoid disturbance of nesting and special-status birds, project activities, including but not limited to vegetation removal, ground disturbance, and construction and demolition, shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, a pre-construction nesting bird survey shall be conducted by a qualified City-approved biologist no more than seven days prior to initiation of all ground disturbance and vegetation removal activities within all suitable nesting habitat located within the project site. If no nesting birds are found, construction may be initiated without impacts to nesting birds. If active nests are found, the biologist shall determine a suitable buffer where no construction activities would occur. The distance shall be determined by the biologist based on the species of bird to ensure that no direct or indirect impacts would occur. An avoidance buffer shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during all project construction activities. The biologist shall monitor the nesting activity during construction to verify that the buffer was adequately placed, and that breeding is not compromised by construction. The buffer shall remain in place while the nest is active. No ground-disturbing activities shall occur inside this buffer until the biologist has determined activities can be resumed.		

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1 Introduction

This document is an Environmental Impact Report (EIR) for a proposed mixed-use residential and commercial building located at 1000, 1014, 1020, and 1028 North La Brea Avenue in the City of West Hollywood, Los Angeles County. The proposed 1000 North La Brea Avenue Project (hereafter referred to as the "proposed project" or "project") would be constructed on a site that consists of three contiguous parcels totaling 0.99 acre. At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX (i.e., the Hollywood Ready-Mix Concrete Plant). The concrete batch plant consisted of a 634-square-foot (sf) two-story office building, industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation off the concrete batch plant included the production and shipment of ready-mix concrete. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the City of West Hollywood allowing the disassembly and removal of its concrete batch plant equipment (i.e., plant structure/machinery, water tanks) and demolition of its office building down to its foundation without any ground disturbance or excavation. Demolition of the office building was also separately permitted by the City of Los Angeles due to the office building's location spanning both City of West Hollywood and City of Los Angeles jurisdictions. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation (NOP) for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these structures as being part of the proposed project. The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue.

The project involves the demolition of on-site buildings and structures and the removal of two mature trees for the construction and operation of a new 34-story (approximately 352-foot-tall) mixed-use residential and commercial building with 514 apartment units and 30,000 sf of commercial/retail use on the ground floor. The project would provide a parking garage with 521 parking spaces and 394 bicycle parking stalls for residents and their guests between floors two through six of the proposed building. The project would also provide an additional 153 parking spaces across two levels in a subterranean parking garage for the proposed commercial uses and for overflow residential parking. Floors seven through 34 would include the 514 apartment units, proposed as 128 affordable and workforce units and 386 market-rate units. The project would also provide outdoor gardens, indoor gathering areas, a fitness center, a lounge/recreation room, a yoga room, a library, and an outdoor swimming pool with a pool deck and firepit interspersed throughout the building. The rooftop would include an outdoor garden with seating areas, mechanical space including a solar photo-voltaic (PV) system, and a rooftop emergency helipad structure. The project would also integrate up to seven billboards proposed to be a combination of static and/or full motion video, with varied dimensions throughout all facades of the building. The proposed project is described in detail in Section 2, *Project Description*, and project site plans are included in Appendix A.

This section discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant by the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 Environmental Impact Report Background

The City of West Hollywood distributed the NOP for this EIR for a 30-day public review period starting on November 23, 2023 and ending on December 23, 2023. In addition, the City held a virtual EIR Scoping Meeting via Zoom on November 30, 2023. The meeting, held between 6:00 PM to 7:00 PM, was aimed at providing information about the proposed project to members of public agencies, interested stakeholders, and residents/community members. Based on feedback from the public regarding the timing of the public review period, the City distributed a revised NOP on December 21, 2023 extending the public review period by an additional 20 days from December 23, 2023 to January 12, 2024. The City received letters from 13 individuals, agencies, and organizations in response to the NOP during the public review period, as well as various verbal comments from one individual during the EIR Scoping Meeting. The NOPs are included in Appendix B of this EIR, along with the public comment received for the NOPs. The Initial Study that was prepared for the project is also included in Appendix B of this EIR. Table 1-1 summarizes the content of the letters and verbal comments received during the public review period and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter/Topic	Comment/Request	How and Where It Was Addressed
Agency Comments		
California Department of Transportation (Caltrans)	Recommendations for vehicle miles traveled (VMT) analysis.	These comments are addressed in the Transportation Impact Study prepared for the project (Appendix J), and in Section 4.12, *Transportation/Circulation*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
	Recommendations for truck route coordination with Caltrans, coverage of construction trucks to avoid debris spillage, and limiting construction traffic to off-peak periods.	
	Requests a Construction Management Plan and that oversized transport vehicles obtain a Caltrans transportation permit.	
City of Beverly Hills	Recommends that the EIR integrate comprehensive visual simulations illustrating the potential effects on scenic vistas.	Comments are addressed in Section 4.1, *Aesthetics,* to the extent they are relevant to the environmental analysis and/or the requirement to consider such impacts.
	Requests more information on how the proposed billboards will influence the immediate surroundings from different viewpoints.	
	Requests that the EIR consider and recommend necessary upgrades or transportation improvements, contemplate the potential regional implications of increased traffic resulting from the project (e.g., spillover effects on Beverly Hills).	Comments are addressed in the Transportation Impact Study prepared for the project (Appendix J), and in Section 4.12, *Transportation/Circulation*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.

Commenter/Topic	Comment/Request	How and Where It Was Addressed
	Requests that the EIR examine the impact on other infrastructure and public services, including water supply, sewage systems, and emergency services.	Comments are addressed in the Water Supply Assessment prepared for the project (Appendix H), and in Section 4.11, *Public Services*, and Section 4.14, *Utilities and Service Systems*, to the extent they are relevant to the environmental analyses, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
Department of Toxic Substances Control (DTSC)	Recommends the proposed project enter DTSC's Standard Voluntary Agreement program.	Comments are addressed in Section 4.7, *Hazards and Hazardous Materials,* to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
	Recommends that surveys be conducted for the presence of lead-based paints and asbestos containing materials and that removal of such substances be conducted in compliance with California environmental regulations and policies.	
	Recommends all imported soil and fill material be tested to ensure contaminants of concern are within approved screening levels for the proposed project.	
Los Angeles County Fire Department (LACFD)	Confirms that fire protection serving the area appears adequate for the proposed project.	Comments are addressed in Section 4.11, *Public Services*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
	Requests that the project comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.	
	Requests that impacts related to erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archaeological and cultural Resources, and the County Oak Tree Ordinance be addressed.	Comments are addressed in Section 4.3, *Cultural Resources*, and Section 4.8, *Hydrology and Water Quality*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives. Impacts related to biological resources and wildfire hazards are addressed in the Initial Study (Appendix B) and summarized in Section 1.4, *Issues Not Studied in Detail in the EIR,* of this section.
Los Angeles County Sanitation Districts (Districts)	Requests that a six-inch diameter or smaller direct connection to a Districts' trunk sewer receive a Trunk Sewer Connection Permit issued by the Districts, and an eight-inch diameter or larger direct connection to a Districts' trunk sewer include submittal of a Sewer Plans for review and approval by the Districts.	Comments are addressed in Section 4.14, *Utilities and Service Systems*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
	Recommendations for more information regarding wastewater generation factors, sewerage service, connection fee application procedure and fees.	

Commenter/Topic	Comment/Request	How and Where It Was Addressed
Native American Heritage Commission (NAHC)	Recommendations for tribal and cultural resource impacts, including Senate Bill 18 and Assembly Bill 52 requirements and mitigation measures.	Comments are addressed in Section 4.3, *Cultural Resources* and Section 4.13, *Tribal Cultural Resources*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
Organization Comments		
Coalition for Responsible Equitable Economic Development (CREED LA)	Requests a complete analysis of all identified impacts, imposition of all feasible mitigation, and study of a reasonable range of alternatives that include less parking.	Comments are addressed throughout Section 4, *Environmental Impact Analysis*, and Section 6, *Alternatives*.
	Recommends that a mobile source health risk assessment be performed if a project includes diesel-fueled vehicular trips.	Comments are addressed in Section 4.2, *Air Quality,* to the extent they are relevant to the environmental analysis and/or the requirement to consider such impacts.
	Requests that the City adopt quantitative greenhouse gas (GHG) emissions thresholds and provide discussion on the project applicant's plan to offset the project's GHG emissions.	Regarding adoption of quantitative GHG emissions thresholds, the comment is noted for the record; however, does not constitute a comment under CEQA regarding the proposed project. Information regarding the project's impacts related to GHG emissions are included in Section 4.6, *Greenhouse Gas Emissions,* to the extent they are relevant to the environmental analysis and/or the requirement to consider such impacts.
	Requests that the EIR address potential air quality, GHG, and traffic impacts associated with the excess parking.	The proposed project would not provide more parking than required by the WHMC. Additionally, analysis of parking impacts is not required under CEQA and therefore, effects associated with parking are not addressed in the EIR. Nonetheless, impacts related to air quality, GHG, and traffic are included in Section 4.2, *Air Quality,* Section 4.6, *Greenhouse Gas Emissions,* and Section 4.12, *Transportation/Circulation*.
	Requests that the City provide all sources and referenced materials when the EIR is made available for public review.	References and other supporting and/or technical documentation cited in the EIR are listed in Section 7, *References*, or are included as appendices to the EIR. References or documentation not included as an appendix are available upon request.
Public Comments		
Aesthetics	Project is too tall at 34 stories for the corridor and out of scale with the neighborhood.	This comment is noted for the record but does not constitute a comment under CEQA. As discussed in the Initial Study, because the project is considered a mixed-use project on an infill site within a Transit Priority Area (TPA), aesthetic impacts of the project cannot be considered significant pursuant to Public Resources Code (PRC) Section 21099(d). Nonetheless, select issues related to aesthetics are further addressed in Section 4.1 *Aesthetics,* of the EIR.
	The design of the building is "too rectangular."	

Commenter/Topic	Comment/Request	How and Where It Was Addressed
Alternatives	Requests that one of the alternatives considered be one that is consistent with the existing zoning and applicable City codes.	This comment is addressed in Section 6, *Alternatives*, of the EIR, which includes an analysis of two code-consistent alternatives.
Cultural Resources	Inquires as to whether a "good faith effort" can be made to document the demolition of the current on-site buildings and structures given they are among the oldest in West Hollywood.	These comments are addressed in the Cultural Resources Technical Report prepared for the project (Appendix D), and in Section 4.3, *Cultural Resources,* of the EIR.
	Request that a full cultural resources assessment be prepared for the project site.	
Cumulative Impacts	Inquires as to what the cumulative impacts of the project are.	Comments are addressed in the cumulative impact analyses throughout Section 4, *Environmental Impact Analysis*.
Parking	Requests that the project provide at least one parking space per bedroom.	These comments are noted for the record; however, analysis of parking impacts is not required under CEQA.
	Requests that the project increase parking to at least 1,000 vehicle spaces.	
	The proposed 394 bicycle stalls are too many and will remain unused.	
Transportation	Inquires about traffic from the project, and potential mitigation.	Comments are addressed in the Transportation Impact Study prepared for the project (Appendix J), and in Section 4.12, *Transportation/Circulation*, to the extent they are relevant to the environmental analysis, applicable threshold of significance, and/or the requirement to consider feasible mitigation measures and alternatives.
Water Supply	Requests that the project build grey water filtration and re-use water in the building.	These comments are addressed in the Water Supply Assessment prepared for the project (Appendix H), and in Section 4.14, *Utilities and Service Systems,* of the EIR.
	Inquires as to how much groundwater will be pumped during construction related to the required dewatering.	This comment is addressed in Section 2, *Project Description*, of the EIR.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary review and approval of the City of West Hollywood Planning Commission and City Council. Therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines*, the purpose of this EIR is to serve as an informational document that:

> […] will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

> This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

This EIR is to serve as an informational document for the public and City of West Hollywood decision makers. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final EIR and approval of the proposed project.

1.3 Scope and Content

This EIR addresses impacts identified by the Initial Study (Appendix B) to be potentially significant. Of the 20 issue areas included in Appendix G environmental checklist of the *CEQA Guidelines*, 13 were found to include potentially significant impacts and have been further analyzed in the EIR:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

In addition to these issue areas, Aesthetics is also addressed further in the EIR. However, as discussed in the Initial Study, because the project is considered a mixed-use project on an infill site within a TPA, aesthetic impacts of the project cannot be considered significant pursuant to PRC Section 21099(d). Nonetheless, select issues related to aesthetics are further addressed in the EIR for additional information.

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs, adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References.*

Section 6, *Alternatives*, was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed and discusses other alternatives that were considered but rejected as infeasible. The alternatives evaluated include the CEQA-required "No Project" alternative and two additional alternative development scenarios for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. The *CEQA Guidelines* provide the standard of adequacy on which this document is based. Section 15151 of the *CEQA Guidelines* state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is

reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Issues Not Studied in Detail in the EIR

Table 1-2 summarizes issue areas from the Appendix G environmental checklist of the *CEQA Guidelines* that were addressed in the Initial Study (Appendix B). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of these issue areas.

Table 1-2 Issues Not Studied in the EIR

Issue Area	Initial Study Findings
Aesthetics	There are no state scenic highways in the vicinity of the project site. The closest Eligible State Scenic Highway is State Route 1 (Pacific Coast Highway) approximately 10 miles southwest of the project site. Further, the City's General Plan does not identify any scenic routes or corridors within the city. Therefore, the project would have no impact to scenic resources within a state scenic highway.
Agricultural Resources	The project site is within an urbanized area of West Hollywood that lacks agricultural lands or forests. As such, the project would have no impact with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, no conflicts with agricultural zoning or Williamson Act contracts would occur, the project would not convert forest land to non-forest use and would not convert farmland to a non-agricultural use.
Air Quality	Construction activities associated with the proposed project could generate odorous emissions from diesel exhaust generated by construction equipment. However, due to the temporary nature of such emissions and the highly diffusive properties of diesel exhaust, nearby receptors would not be substantially affected by diesel exhaust odors associated with project construction and impacts related to odors during construction would be less than significant. Moreover, commercial/retail uses and residential uses are not listed or identified as land uses associated with odor complaints by the California Air Resources Board that require analysis of odor impacts. Substantial objectionable odors are normally associated with the operation of uses such as agriculture, wastewater treatment, industrial facilities, or landfills. Impacts related to odors during operation would be less than significant.
Biological Resources	The project site is within an urbanized area and no threatened, endangered or rare species or their habitats; locally designated species; locally designated natural communities; wetland habitats; or wildlife corridors are known to exist on the site and no impact would occur.
	As discussed in Section 2, *Project Description*, project plans include Regulatory Compliance Measure (RCM) BIO-1 (Nesting Birds) to reduce potential impacts to on-site nesting birds to a less than significant level by requiring the provision of buffers from any identified active bird nests during construction. With adherence to RCM BIO-1, impacts related to nesting birds would be less than significant.
	As part of project construction, two mature on-site trees would be removed east of the existing warehouse. Removal of the two on-site trees would not be subject to replacement requirements on a 1:1 ratio in accordance with the West Hollywood Municipal Code (WHMC) Section 11.36.040. Additionally, the project would include the planting of additional trees and shrubs along the North La Brea Avenue and Romain Street rights-of-way. Impacts related to local biological resource policies or other regulations and ordinances governing tree preservation would be less than significant.
Geology and Soils	The project site is not located in a liquefaction hazard zone. Furthermore, the site is underlain by Pleistocene-aged alluvial sediments that are typically not prone to liquefaction. Therefore, impacts related to liquefaction would be less than significant.
	The project site gently slopes to the southwest and the site topography is relatively level; therefore, the probability for a seismically induced landslide occurring on-site on in the project area is low due to the general lack of elevation difference across or adjacent to the site. Impacts related to landslides would therefore be less than significant.

Issue Area	Initial Study Findings
	The project site is currently fully developed; however, temporary construction related erosion has the potential to occur during project development, particularly during demolition, site preparation, and grading activities. Nonetheless, erosion impacts can be prevented or mitigated, and construction activity would be required to comply with WHMC Section 15.56.090 which includes a project-specific Low Impact Development Plan (LID Plan) that would mitigate erosion and guide proper management of stormwater during construction. Therefore, impacts associated with site-specific erosion would be less than significant.
	The project site is fully served by municipal utilities, including sewer, and would not use septic tanks or alternative wastewater disposal systems. No impact would occur.
Hazards and Hazardous Materials	The project site is not located within an airport land use plan, or within two miles of a public or private airstrip. The closest airport is the Santa Monica Airport located approximately seven miles southwest of the project site. While the site would be subject to temporary and intermittent noise from aircraft overflights, the site is not within the airport's Runway Protection Zone or area of influence and would not be affected by hazards from aircraft operations. No impact would occur.
	The proposed project is developed in an urban area in West Hollywood. While the project site has vehicular access, the proposed project may result in an intensification of development on the project site, and increased traffic in an already traffic congested area. Nonetheless, the LACFD would review the proposed plans to ensure compliance with State and local codes, as they pertain to fire and life safety, and the project would be required to comply with applicable California Fire Code requirements such that the project would not interfere with existing emergency evacuation plans or emergency response plans in the area. Impacts would be less than significant.
	The project site is in an urbanized area and not adjacent to wildlands or in a wildland hazard area. Therefore, no impact related to wildland fires would occur.
Hydrology and Water Quality	The project site does not contain any natural drainage features such as streams or rivers and is comprised of impermeable surfaces. The project would not involve altering the course of streams or rivers, nor would it substantially modify the existing drainage patterns to the extent that it could cause flooding or redirection of floodwaters. Upon project completion, the project site would maintain a similar level of impervious surfaces and runoff volume as the existing conditions. Therefore, the operation of the project would not lead to significant erosion or siltation on- or off-site. Furthermore, during the construction phase of the project, the proposed project would adhere to the regulations specified in WHMC Sections 15.56.090 and 15.56.095 which includes a project-specific LID Plan that aligns with the City's National Pollutant Discharge Elimination System (NPDES) permit. Consequently, through strict compliance with the LID Plan, NPDES Permit requirements, and relevant City grading regulations, the construction of the project would not significantly disrupt drainage patterns, causing substantial erosion, siltation, or polluted runoff either on or off-site. Impacts would be less than significant.
	The project site is not located in flood hazard area nor is it near any dams, levees, or other major bodies of water that could produce seiche impacts at the project site. The project site is located approximately 10.5 miles from the Pacific Ocean and is not inside the boundaries of any regional tsunami impact areas. No impact related to project inundation would occur.
Land Use and Planning	The project would not divide existing public spaces or extend beyond the project site boundaries. In addition, the project would utilize existing roadways and not necessitate any permanent closures of streets or sidewalks. There would be no separation of land use types or disruption of access between different areas due to the project. As a result, the project would not physically divide an established community and no impact would occur.
Mineral Resources	The project site is an urbanized area that is not suitable or used for mineral resource extraction. There are no mineral resource zones present in the City of West Hollywood. Therefore, the proposed project would have no impact upon mineral resources.

Issue Area	Initial Study Findings
Noise	The project site is not in an area covered by an airport land use plan, or within two miles of any public or private airport. The closest airport is the Santa Monica Airport located approximately seven miles southwest of the project site. While the site would be subject to temporary and intermittent noise from aircraft overflights, the site is not within the airport's noise contours or area of influence and would not be affected by substantial noise or other hazards from aircraft operations. No impact would occur.
Population and Housing	Population and employment growth generated by the project would be within Southern California Association of Governments (SCAG) growth forecasts for West Hollywood. Because no exceedance of the population forecast would occur, development of the proposed project would not directly or indirectly induce substantial population growth and impacts would be less than significant.
	The project site is currently occupied with a warehouse building and a concrete batch plant. The project site does not include any existing residences; therefore, the proposed project would not displace any existing housing or persons and no impact would occur.
Public Services	Based on the remaining capacities of the schools within the project site's service area, the new students generated by the project would be accommodated within the existing assigned public schools and the project would not result in the need for new or physically altered schools. In addition, payment of development fees pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998) is considered full mitigation for the project's impacts under CEQA and no additional mitigation is required. Potential impacts to schools would be less than significant.
	The project would provide approximately 60,396 sf of recreational amenities and outdoor spaces (i.e., garden, lounge areas, gym facilities, yoga room, swimming pool) for residents. In addition, the project site is approximately 0.3 mile east of Poinsettia Recreation Center, which provides grassy areas, a playground, baseball field, basketball courts, tennis courts, and a dog park. The project applicant would also be required to pay public open space development fees established by the City as mentioned in WHMC Chapter 19.64. Moreover, the project applicant will pursue compliance with the City's Urban Art Program, which provides a mechanism to integrate free and accessible art into the City. Therefore, impacts would be less than significant.
	A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the project site, necessitating a new or physically altered facilities, the construction of which would have significant physical impacts on the environment. However, implementation of the proposed project would result in a net increase of 756 residents on the project site, which would be within SCAG growth forecasts. The City would continue to accommodate the needs of the residents; therefore, impacts would be less than significant.
Recreation	The project would provide approximately 60,396 sf of recreational amenities and outdoor spaces (i.e., garden, lounge areas, gym facilities, yoga room, swimming pool) for residents. In addition, the project site is approximately 0.3 mile east of Poinsettia Recreation Center, which provides grassy areas, a playground, baseball field, basketball courts, tennis courts, and a dog park. Furthermore, the project applicant would be required to pay a public open space development fees established by the City per WHMC Chapter 19.64. Therefore, development of the proposed project would not result in substantial deterioration of existing parks or recreational facilities and impacts would be less than significant.
Wildfire	The project site is in an urban area of the City of West Hollywood and not within a State Responsibility Area or a Very High Fire Hazard Severity Zone. The proposed project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. In addition, the project site is developed with utilities and roadway infrastructure that would not require the installation of associated infrastructure that would exacerbate wildfire risk. Impacts would be less than significant.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of West Hollywood is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the California Department of Transportation (Caltrans), which manages the state's highways system; the Department of Toxic Substances Control (DTSC), which regulates the handling of hazardous waste and toxic substances in California; Los Angeles County Fire Department (LACFD), which reviews remediation plans for on-site contamination; the Los Angeles County Sanitation Districts (Districts), which regulates wastewater treatment and water recycling plants in the region; the Los Angeles Regional Water Quality Control Board, which regulates water quality in the region; and the South Coast Air Quality Management District, which regulates air quality in the region. Caltrans, DTSC, LACFD, and Districts submitted comments on the Initial Study (Appendix B). The EIR will also be submitted to these agencies for review and comment.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

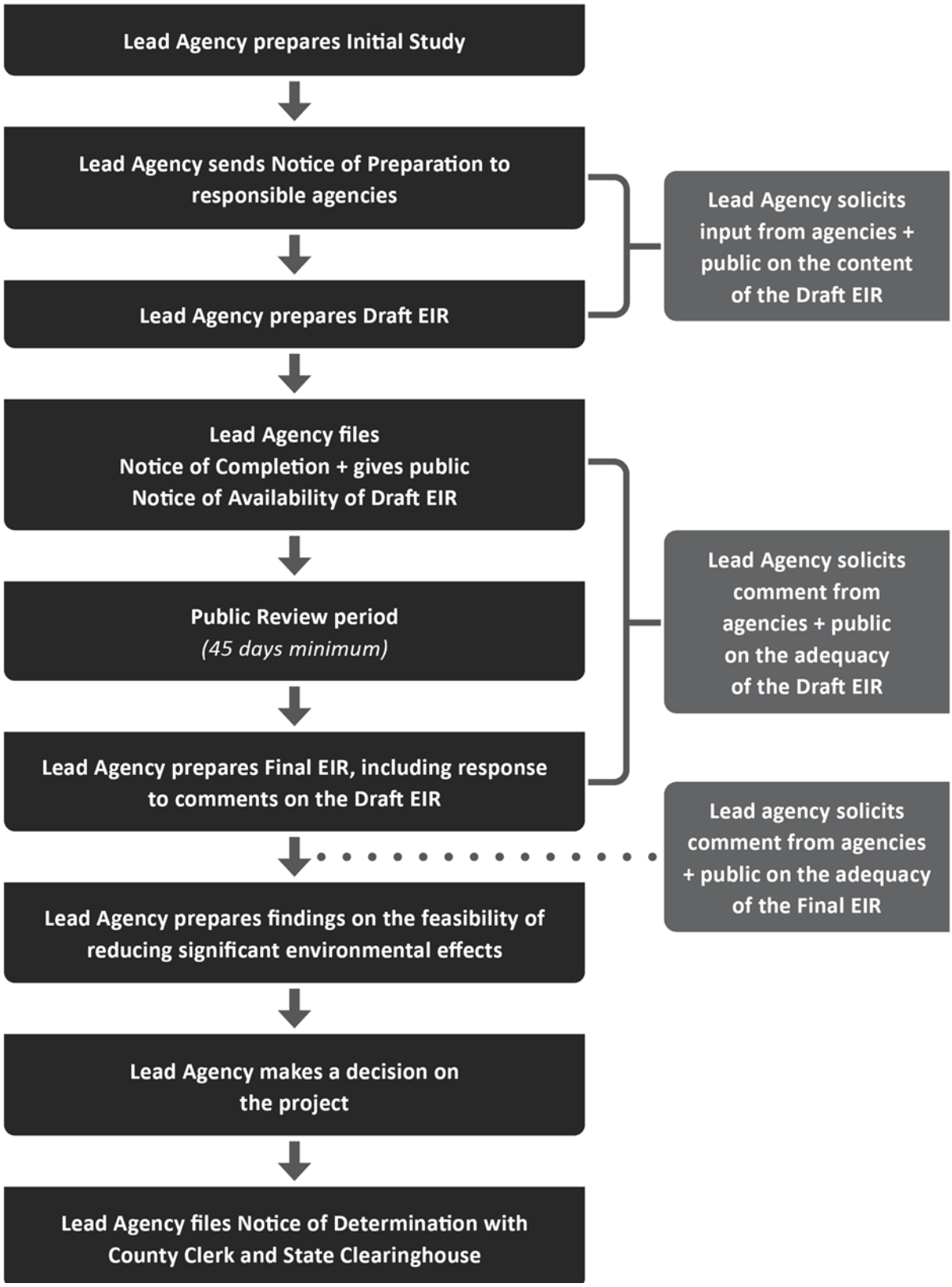
1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized herein and illustrated in Figure 1-1 as follows. The steps are presented in sequential order.

1. **Notice of Preparation and Initial Study.** After deciding that an EIR is required, the lead agency (City of West Hollywood) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; PRC Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** The lead agency must file a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (PRC Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (PRC Section 21091).

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** The lead agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk and State Clearinghouse. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

1014 North La Brea Owner, LLC
4700 Wilshire Boulevard
Los Angeles, California 90010
(323) 860-1808

2.2 Lead Agency Contact Person

Antonio Castillo, Senior Planner
City of West Hollywood, Community Development Department
8300 Santa Monica Boulevard
West Hollywood, California 90069
(323) 848-6854

2.3 Project Location

The project site is located at 1000, 1014, 1020, and 1028 North La Brea Avenue on the northeast corner of the North La Brea Avenue and Romaine Street intersection in the City of West Hollywood. The site encompasses 43,316 square feet (sf), or approximately 0.99 acre, and consists of three contiguous parcels: Assessor Parcel Numbers (APNs) 5531-014-015, -016, and -017. The site is in an urban area characterized by a mix of commercial and industrial uses and is accessible from Santa Monica Boulevard, North La Brea Avenue, Romaine Street, and North Sycamore Avenue. The site is also regionally accessible from U.S. Route 101 (US-101), located approximately 1.5 miles northeast of the project site; and Interstate 10 (I-10), located approximately 3.7 miles south of the project site. Figure 2-1 and Figure 2-2 on the following pages show the location of the site in the region and in its neighborhood context.

2.4 Existing Site Characteristics

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX (i.e., the Hollywood Ready-Mix Concrete Plant). The concrete batch plant consisted of a 634-sf two-story office building, an industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation of the concrete batch plant included the production and shipment of ready-mix concrete. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the City of West Hollywood allowing the disassembly and removal of its concrete batch plant equipment (i.e., plant structure/machinery, water tanks) and demolition of its office building down to its foundation without any ground disturbance or

excavation. Demolition of the office building was also separately permitted by the City of Los Angeles due to the office building's location spanning both City of West Hollywood and City of Los Angeles jurisdictions. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way. There are currently three driveways associated with the former CEMEX concrete batch plant and another two driveways associated with the vacant warehouse building for a total of five existing driveways along North La Brea Avenue. There are no driveways at the project site along Romaine Street.

Figure 2-2 on the following pages show the site in its neighborhood context, along with site characteristics. Since the work conducted under the Demolition Permit is a recent change to the site, the aerial view of the site shown in Figure 2-2 depicts the concrete batch plant equipment and office building in their respective conditions prior to their disassembly, removal, and demolition. Furthermore, Figure 2-3 through Figure 2-6 on the following pages provide photos of the existing uses on the site, including the CEMEX concrete batch plant as it existed and operated prior to execution of the Demolition Permit as well as the remaining vacant warehouse building.

Figure 2-1 Regional Location

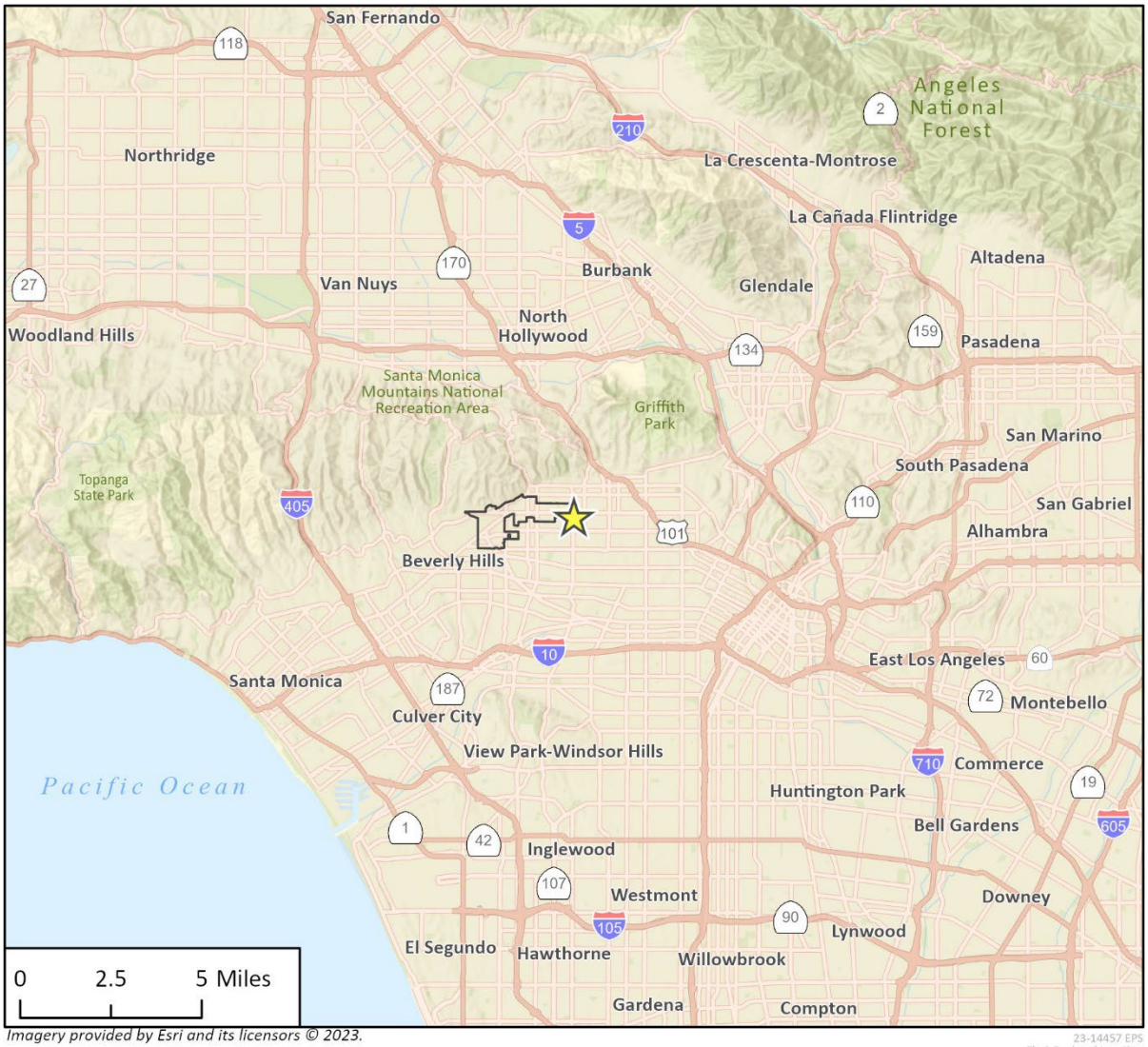


Figure 2-2 Project Site Location

Imagery provided by Microsoft Bing and its licensors © 2023.

23-14457 EPS
Fig 2 Project Location

Figure 2-3 View of the Project Site from North La Brea Avenue looking Northeast

Figure 2-4 View of the Former CEMEX Concrete Batch Plant from North La Brea Avenue

Figure 2-5 View of the Former CEMEX Concrete Batch Plant from Romaine Street

Figure 2-6 View of the On-Site Warehouse Building from North La Brea Avenue

2.4.1 Current Land Use Designation and Zoning

The project site has a General Plan land use designation Commercial, Regional Center (CR) with a Mixed-Use Incentive Overlay. According to the West Hollywood General Plan Land Use and Urban Form Element, the CR land use designation is intended to create high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. The Mixed-Use Incentive Overlay zone is intended to focus residential mixed-use projects in high priority nodes, focused on commercial corridors and including locations with high transit levels of service and major intersections (West Hollywood 2011).

The site is zoned Commercial, Regional Center (CR), as defined by the City's Zoning Ordinance and consistent with the CR land use designation of the General Plan. According to the City's Zoning Ordinance, the CR zone identifies areas that are principal commercial activity centers. Uses permitted in the CR zone include a wide range of low- to high-intensity commercial uses to serve local and regional market areas.

2.4.2 Surrounding Land Uses

The project site is in an urban area characterized by a mix of commercial and industrial uses. The site's eastern and southern boundaries border the Hollywood neighborhood of the City of Los Angeles. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant to the east; Romaine Street, warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses and the West Hollywood Gateway shopping center to the west. Figure 2-2 shows the location of the site in its neighborhood context.

Similar to the project site, the commercial uses and parking lot to the north and the West Hollywood Gateway shopping center to the west are zoned CR and have a General Plan land use designation CR with a Mixed-Use Incentive Overlay (West Hollywood 2011). Within City of Los Angeles jurisdiction, the commercial uses, remainder of the former CEMEX concrete batch plant, warehouse and residential uses to the east and south share a General Plan land use designation Limited Manufacturing. However, the commercial uses and the remainder of the former CEMEX concrete batch plant to the east are zoned Restricted Industrial (MR1), and the warehouse, commercial, and residential uses to the south are zoned Limited Industrial (M1) and Neighborhood Commercial (C2 and RAS4) (Los Angeles, N.d.).

2.5 Project Characteristics

The project involves the demolition of on-site buildings and structures and removal of two mature trees for the construction and operation of a new 34-story (approximately 352-foot-tall) mixed-use residential and commercial building with 514 apartment units and 30,000 sf of commercial/retail use on the ground floor. Approximately 27,976 sf of common open space and 32,420 sf of private open space would be provided throughout the building. Apart from the 30,000-sf commercial/retail space, the ground floor would include an entry plaza open to the public, a café outdoor seating area, and a residential lobby with associated leasing office and mailroom. Floors two through six would consist of a parking garage with 521 parking spaces and 394 bicycle parking stalls for residents and their guests. The project would also provide an additional 153 parking spaces across two levels in a subterranean parking garage for the proposed commercial uses and for overflow residential parking. The project would provide a total of 674 parking spaces. Floors seven through

34 would include the 514 apartment units, proposed as 128 affordable and workforce units and 386 market rate units. In addition to apartment units, floor seven would include two outdoor gardens with programmed recreation and seating areas, as well as an indoor gathering area for residents within one of the gardens; floor 17 would include a fitness center, lounge/recreation room, and outdoor garden with seating areas; floor 18 would include additional amenity areas such as a yoga room, library, and outdoor swimming pool with a pool deck and firepit; and floor 19 would include an outdoor garden with seating areas. The rooftop would include an outdoor garden with seating areas, mechanical space including a solar photovoltaic (PV) system, and a rooftop emergency helipad structure. These roof level improvements would exceed the finished 352-foot height of the building by an additional 25 feet. The project would also integrate up to seven billboards proposed to be a combination of static and/or full motion video, with varied dimensions throughout all facades of the building. The following Table 2-1 provides a summary of the project characteristics whereas project site plans are included in Appendix A.

Table 2-1 Project Characteristics

Site Area	**43,316 sf/0.99 acre**
Floor-to-Area Ratio	**9.85**
FAR Floor Area	426,656 sf
Gross Floor Area (FAR and Non-FAR)	781,808 sf
Project Components	
Residential	
Studio apartments	179 apartments
1-bedroom apartments	247 apartments
2-bedroom apartments	88 apartments
Total	**514 apartments**
Commercial/Retail	**30,000 sf**
Open Space	
Public Open Space	27,976 sf
Private Open Space	32,420 sf
Total	**60,396 sf**
Height	
Aboveground	34 stories 352 feet to roof 377 feet to helipad
Subterranean	12 feet below ground surface for Parking Level 1 22 feet below ground surface for Parking Level 2 32 feet below ground surface for the building foundation
Parking Spaces	
Standard	491 spaces
Compact	35 spaces
Tandem	148 spaces
Total	**674 spaces (including 90 spaces for commercial/retail use)**

Site Area	43,316 sf/0.99 acre
Bicycle Stalls	
Short-Term	133 stalls
Long-Term	261 stalls
Total	**394 stalls**

FAR = floor-to-area ratio; sf = square feet

Figure 2-7 through Figure 2-12 on the following pages show the project site plan, project elevations, various simulations of the project showing different views, and the locations of the proposed billboards.

2.5.1 Access and Parking

The project would include a subterranean parking garage with two floors providing 153 parking spaces for the proposed commercial uses and overflow residential parking. The total depth of the subterranean structure is approximately 30 feet. The project would provide an additional 521 parking spaces for residents and their guests in a separate aboveground parking garage between floors two through six.

As shown in Figure 2-7, the parking garages would have separate access points. The project would reduce the number of driveways on North La Brea Avenue from five driveways to only one located at the northwest corner of the site. Commercial patron vehicles would enter and exit the subterranean parking garage via the driveway at the ground floor along North La Brea Avenue. Furthermore, the project proposes installing two new adjacent driveways along Romaine Street at the southeast corner of the site. Resident vehicles would enter and exit the aboveground parking garage via a driveway at the ground floor along Romaine Street. The other driveway along Romaine Street would provide access to respective on-site loading areas for the residential and commercial/retail components. The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points. Pedestrians would access the project via the sidewalks along North La Brea Avenue and Romaine Street.

2.5.2 Architectural Design Features

The proposed 34-story building would be designed to look like a vertical L-shaped building with wall recesses and cut-outs. As shown in Figure 2-8 through Figure 2-10 the project would incorporate unevenly layered floors, which would allow for assorted balcony placements and other overhanging areas such as for outdoor gardens. The materials palette includes, but is not limited, to wood look metal mullions, metal panels, frosted and clear glazed windows, wood finish metal canopy, tile, and glass railings as decorative elements. The exterior color palette for the proposed building would be comprised of various neutral, earth-toned colors, including shades of blue, gray, and brown..

The project would include exterior lighting on the building, in the entry plaza and in outdoor common areas for both safety and wayfinding purposes. Accent lighting to highlight landscaping and signage would also be incorporated throughout. Exterior lighting would be appropriately shielded in accordance with the West Hollywood Municipal Code (WHMC), including, but not limited to, Section 19.20.100 regulating outdoor lighting and Sections 19.34.040 and G-34.250 regulating sign illumination.

2.5.3 Project Signage

As shown in Figure 2-12, the project would also integrate up to seven off-site billboards with varied dimensions throughout all facades of the building and with a combination of static and/or full motion video. The project would integrate up to 29,465 sf of advertising area, including 22,745 sf of illumination area. Any digital light-emitting diode (LED) full motion video billboard would have a maximum brightness of 600 nits, where a "nit" is a unit of measurement that relates to the brightness level of visible light (luminance) within a specific area. Other building signage would include but not be limited to residential identity and wayfinding signage and future commercial identity signage by future tenant(s), both visible from the public right-of-way. As discussed under Section 2.5.2, *Architectural Design Features*, of this section, exterior lighting would be implemented consistently with WHMC Section 19.20.100 regulating outdoor lighting and Sections 19.34.040 and G-34.250 regulating sign illumination. Furthermore, WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards.

Of note, during the October 7th, 2024 City Council Regular Meeting, City Council directed City staff to explore and subsequently draft a zone text amendment to codify policy in the WHMC that would permit off-site signage outside of Sunset Boulevard in commercial zones on Santa Monica Boulevard, Fairfax Avenue, and La Brea Avenue when off-site signage is associated with mixed-use developments providing a higher percentage of affordable units (West Hollywood 2024). Although this direction is in its preliminary stages and additional details are not known at this time, the project (i.e., a mixed-use development providing 128 affordable and workforce units along North La Brea Boulevard) currently exhibits a general consistency with the type of developments that would be targeted under this prospective zone text amendment.

Figure 2-7 Project Site Plan – Ground Floor

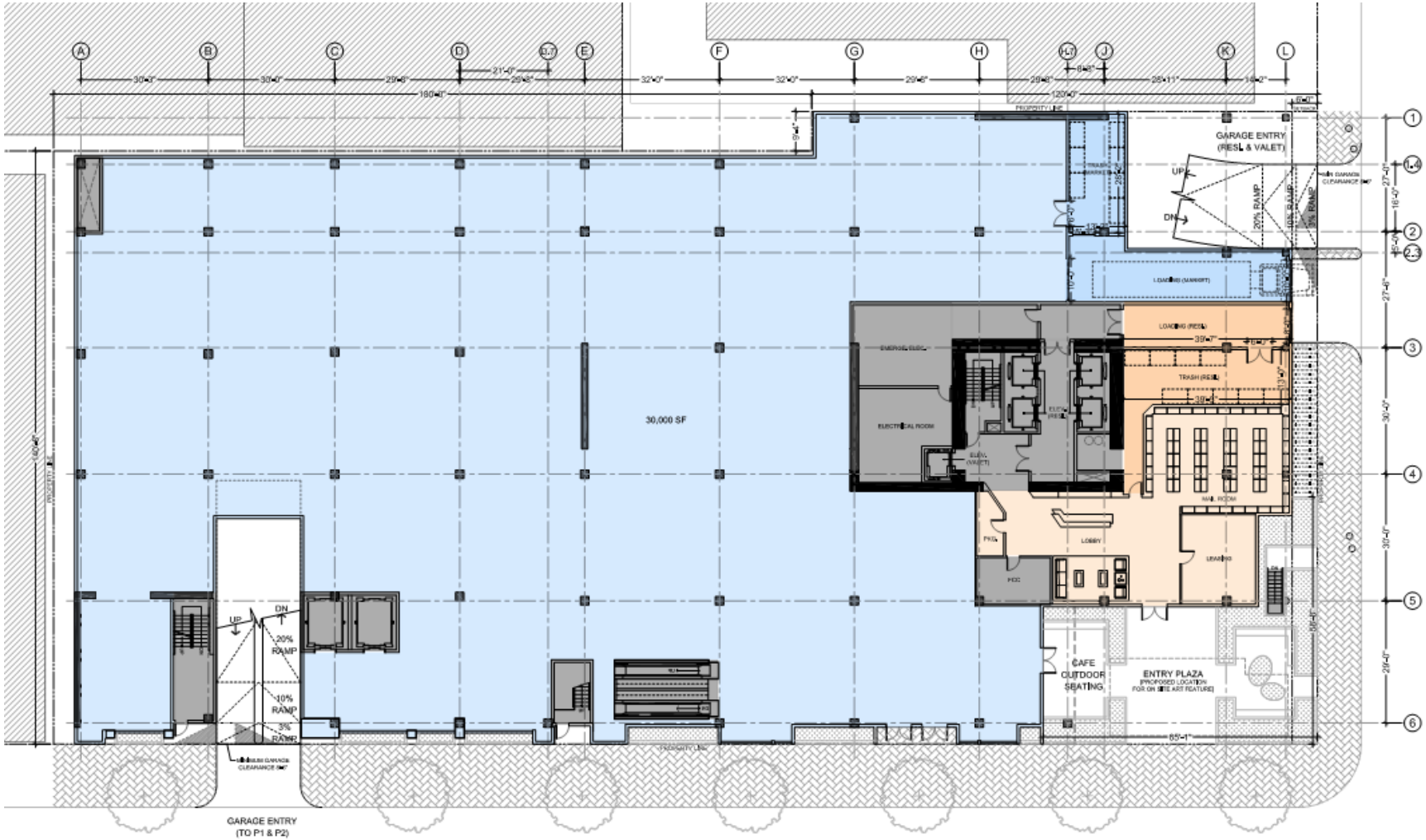
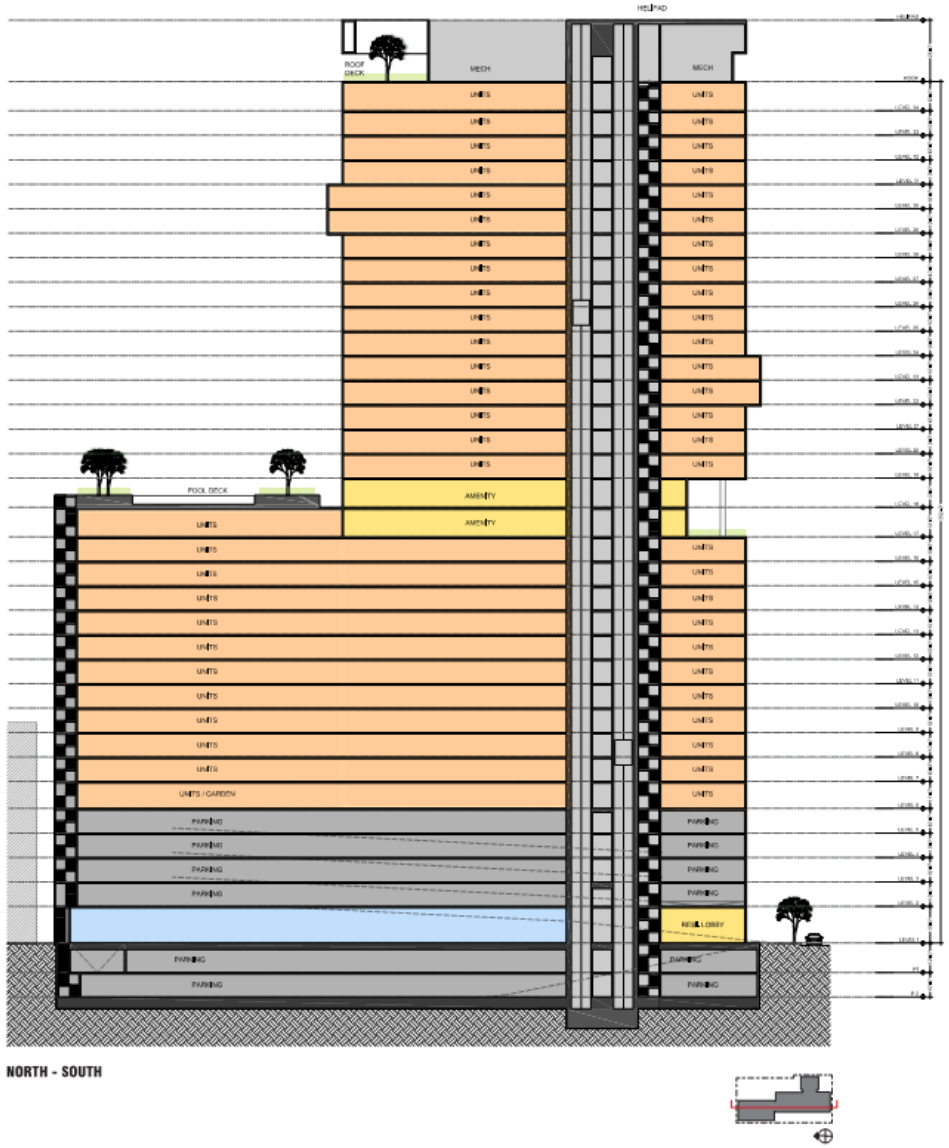


Figure 2-8 Project Site Plan – Elevations



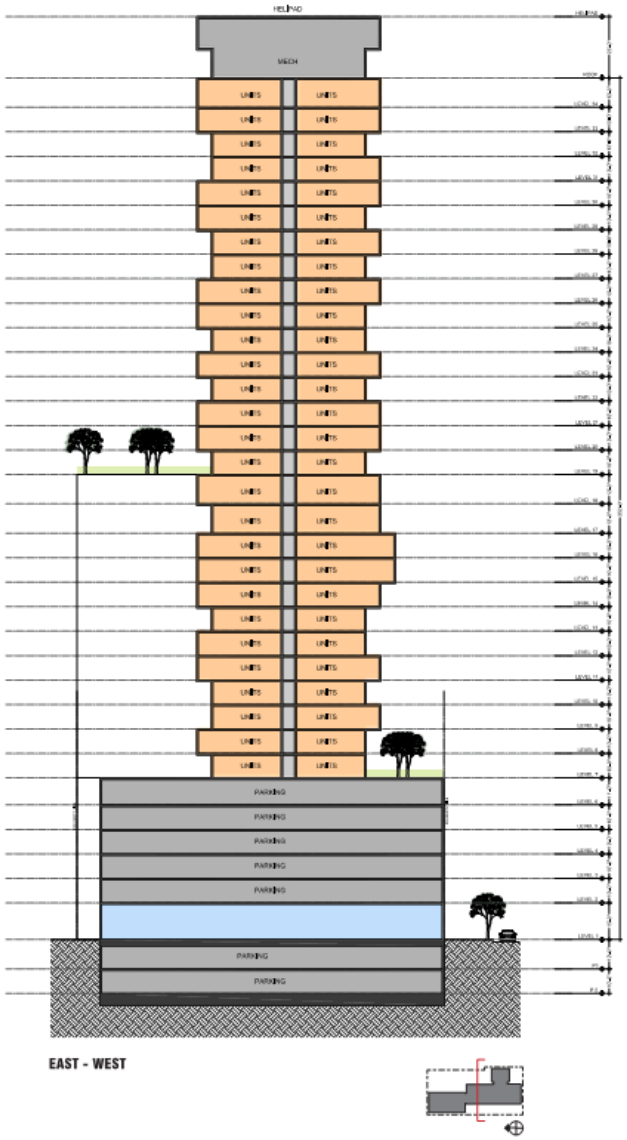


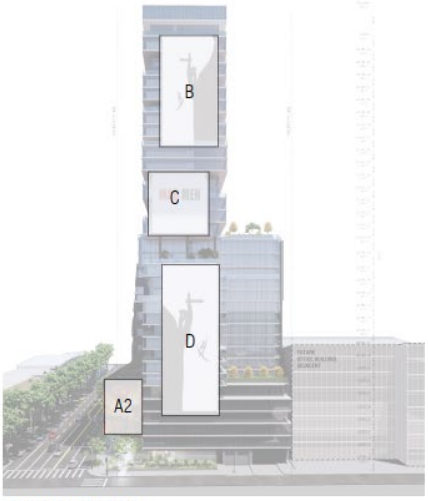
Figure 2-9 Simulation of Proposed Mixed-Use Building Looking Northeast

Figure 2-10 Simulation of Proposed Mixed-Use Building Looking East

Figure 2-11 Simulation of Proposed Ground Floor Entry along North La Brea Avenue

Figure 2-12 Project Off-Site Signage (Billboards)

LA BREA AVE
BILLBOARD A1 [ANGLED BILLBOARD] 140'-0" X 48'-0"

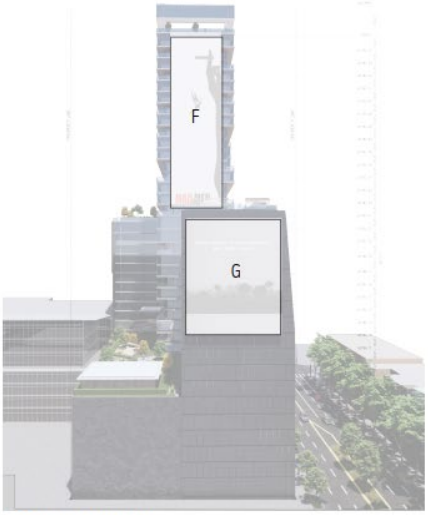


ROMAINE STREET
BILLBOARD A2 [ANGLED BILLBOARD] 40'-0" X 48'-0"

BILLBOARD B	45'-0" X 90'-0"
BILLBOARD C	45'-0" X 50'-0"
BILLBOARD D	45'-0" X 120'-0"

EAST ELEVATION

BILLBOARD E	45'-0" X 50'-0"



NORTH ELEVATION

BILLBOARD F	45'-0" X 153'-0"
BILLBOARD G	60'-0" X 70'-0"

2.5.4 Landscaping

Drought-tolerant landscape would be integrated throughout the building. The project would maintain the two existing street trees along North La Brea Avenue and include the planting of additional trees and shrubs along the North La Brea Avenue and Romaine Street rights-of-way. The entry plaza along the site's frontage at North La Brea Avenue would include drought-tolerant trees and shrubs, raised and painted metal planters, and hard-piped irrigated planter pots. Similarly, the outdoor gardens on floors seven, 17, 19, and the rooftop of the proposed building would include variations of planters, flexible natural lawn area, artificial turf for pets, and drought-tolerant trees and shrubs. The project would provide 27,976 sf of landscaping, including common open space.

2.5.5 Green Building Features

The residential portion of the project would be 100 percent electric and would not utilize natural gas. However, the non-residential commercial/retail portion of the project could potentially utilize natural gas for heating and cooling systems for the limited retail program. The proposed project's overall building design would incorporate several sustainability elements to meet the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations and the West Hollywood Green Building Ordinance (i.e., WHMC Section 19.20.060). These elements would include, but not be limited to energy efficient lighting and mechanical systems, energy-star appliances, high efficiency plumbing and other water fixtures, drought-tolerant landscaping and biofiltration planters, installed electric vehicle (EV) charging stations, demolition and construction waste diversion, low impact development planters, a solar PV system, post tensioned concrete slabs to minimize volume, low emission glazing, reduced southern glazing exposure, landscaped green roofs, daylit corridors, and electric metering only for residential units.

2.5.6 Utilities and Public Services

The City of West Hollywood facilitates residential and commercial solid waste services in contract with Athens Services, stormwater services in cooperation with the Los Angeles County Flood Control District, and wastewater services via City-owned local sewers and Los Angeles County Sanitation Districts sewer lines. The Los Angeles Department of Water and Power provides water to the eastern portion of West Hollywood (i.e., the project site). Southern California Edison supplies electricity and the Southern California Gas Company provides natural gas to the City of West Hollywood. Furthermore, telecommunication providers within the project area include AT&T, Frontier, and Hughesnet. Fire protection and emergency medical services are provided by the Los Angeles County Fire Department for the City of West Hollywood. Fire Station 8 is the nearest fire station to the project site and is located at 7643 Santa Monica Boulevard, approximately 0.75 mile west from the site. The Los Angeles County Sheriff's Department provides police protection services for the City of West Hollywood. The West Hollywood Sheriff's Station is located at 780 North San Vicente Boulevard approximately 2.3 miles west from the project site. Additional municipal services such as public education services and public library services are provided by the Los Angeles Unified School District and Los Angeles County Library, respectively.

2.5.7 Construction

Construction of the proposed project is expected to occur over approximately 32 months, proposed to commence in October 2025 and end by June 2028.[1] The project involves the demolition of on-site

[1] The construction schedule of the project is subject to adjustment pending final project approval.

buildings and structures and removal of two mature trees. As previously discussed under Section 2.4, *Existing Site Characteristics*, of this section, disassembly and demolition of concrete batch plant equipment and office building have already occurred regardless of implementation of the proposed project. Therefore, project conditions prior to implementation of the proposed project would consist of the warehouse building remaining as the only on-site structure. However, for a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

Construction of the subterranean parking garage would involve the excavation of 49,050 cubic yards (cy) of soil and a maximum excavation depth of up to 32-feet below ground surface (bgs). The project applicant is assuming a 15 percent expansion of excavated soil and, therefore, anticipates the export of 56,407 cy of soil from the site to United Rock Products Pit #2 located approximately 36 miles from the site at 1245 East Arrow Highway in the City of Irwindale.

Due to the anticipated depth of groundwater (i.e., up to 20 feet bgs) and the anticipated depth of excavation (i.e., 32 feet bgs), groundwater dewatering would be required during excavation activities.[2] As discussed in Section 4.7, *Hazards and Hazardous Materials*, of this EIR, underlying soils and groundwater at the project site are currently contaminated; therefore, as part of Mitigation Measure HAZ-1, project construction shall include Regulatory agency oversight (e.g., Department of Toxic Substances and Control, State Water Resources Control Board, or Los Angeles County Fire Department). Moreover, dewatering activities are anticipated to involve on-site treatment of contaminated groundwater and subsequent discharge as is common and standard practice.

Construction activity would occur between the hours of 8:00 AM and 7:00 PM Monday through Saturday with no construction activity on Sunday and major holidays in accordance with the WHMC Section 9.08.050(d). The project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. While the precise location of construction staging and construction employee parking would be determined as part of the preparation of the Construction Traffic Management Plan, to be finalized prior to permit issuance, it is conservatively assumed that these activities would take place off-site within a half-mile radius of the project site.

2.5.8 Operation

The proposed commercial/retail space would operate between the hours of 7:00 AM. and 10:00 PM. The outdoor gardens would be open to residents between the hours of 8:00 AM and 10:00 PM. The proposed rooftop helipad would not be utilized as part of daily on-site operations but would be available 24/7 for emergencies. Cooling towers and boilers would be located on the roof with in-unit heat pumps. An on-site service vault for transformers and related equipment would be located underground. The proposed building would also contain a diesel emergency generator.

[2] Dewatering involves the removal (via pump) of stormwater that has collected in a work area or, more likely in this case, of groundwater that is encountered during construction activities and must be removed to complete construction; the removed water is treated as needed, then discharged in accordance with National Pollutant Discharge Elimination System requirements or reused in the construction process, depending on water quality characteristics.

2.5.9 Project Design Feature

The following project design feature (PDF), PDF AQ-1 (Tier 4 Construction Equipment) would be incorporated as part of the project during construction activities.

PDF AQ-1 Tier 4 Construction Equipment

Heavy-duty diesel-powered construction equipment greater than 50 horsepower will be equipped with Tier 4 Final diesel engines. Equipment engines will be maintained in good condition and in proper tune pursuant to manufacturer's specifications.

2.5.10 Regulatory Compliance Measure

The following regulatory compliance measure (RCM), RCM BIO-1 (Nesting Birds) would be implemented in compliance with the California Department of Fish and Game Code and the Migratory Bird Treaty Act and prior to project construction to avoid potential impacts to nesting birds within the project site during construction activities.

RCM BIO-1 Nesting Birds

To avoid disturbance of nesting and special-status birds, project activities, including but not limited to vegetation removal, ground disturbance, and construction and demolition, shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, a pre-construction nesting bird survey shall be conducted by a qualified City-approved biologist no more than seven days prior to initiation of all ground disturbance and vegetation removal activities within all suitable nesting habitat located within the project site. If no nesting birds are found, construction may be initiated without impacts to nesting birds. If active nests are found, the biologist shall determine a suitable buffer where no construction activities would occur. The distance shall be determined by the biologist based on the species of bird to ensure that no direct or indirect impacts would occur. An avoidance buffer shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during all project construction activities. The biologist shall monitor the nesting activity during construction to verify that the buffer was adequately placed, and that breeding is not compromised by construction. The buffer shall remain in place while the nest is active. No ground-disturbing activities shall occur inside this buffer until the biologist has determined activities can be resumed.

2.6 Project Objectives

The proposed project would achieve the following objectives:

1. Maximize the provision of multi-family dwelling units and commercial uses in West Hollywood, including a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels.
2. Maximize high density housing opportunities in a high-quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and vehicle miles traveled.
3. Redevelop and improve the visual character of the project site with an architecturally significant development that is compatible in use and design with the area's urban character.

4. Replace an incompatible, outmoded industrial manufacturing plant with a mixed-use residential community to reduce potential hazards to the community.
5. Develop a mixed-use residential building with an active street-level identity within an increasingly walkable urban center to contribute to the public realm and improve the pedestrian experience.
6. Contribute to the economic base of the City and expand the City's fiscal budget by concentrating residential density within a commercial core to spur economic activity and substantially increase sales and property tax revenue.
7. Employ transit-oriented development and smart growth principles by providing high density housing near multimodal transportation networks including the Metro Bus Priority Lane along La Brea Avenue, future Metro Rail Santa Monica/La Brea station, cycling lanes, and pedestrian walkways.[3]
8. To incorporate sustainable building design practices that comply with the City's Green Building Program in order to improve building performance, minimize energy consumption, and promote greater health and wellness.

2.7 Required Approvals

The proposed project would require the following permits for development of the proposed project:

- **Demolition Permit** to allow the removal of the existing, on-site buildings and structures
- **Development Permit** to allow the development of a 34-story, approximately 426,000 sf mixed-use development with 514 apartments and 30,000 sf of commercial/retail use
- **Administrative Permit** to allow outdoor dining, lounge terraces, and the pool deck
- **Sign Permit** to allow the installation of seven off-site signs (billboards)
- **Development Agreement** to establish vested rights and defined terms for the development of the mixed-use development in exchange for public benefits
- **Zoning Map Amendment** to create an overlay to the existing CR zoning district for the Development Agreement
- **Other discretionary and ministerial permits** that may be necessary to implement the project.

Approvals from other agencies may also be required and those known at this time are listed as follows:

- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System Permit; Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval
- Los Angeles Regional Water Quality Control Board – Applicant must submit a Notice of Intent to discharge groundwater during construction and to comply with the General Permit

[3] According to the United States Environmental Protection Agency, "smart growth" refers to a range of development and conservation strategies that help protect human health and the natural environment and make communities more attractive, economically stronger, and more socially diverse. These strategies include mixed land uses; compact building design; a range of housing opportunities and choices; walkable neighborhoods; distinctive, attractive communities with a strong sense of place; preservation of open space, farmland, natural beauty, and critical environmental areas; development directed towards existing communities; a variety of transportation choices; predictable, fair, and cost effective development decisions; and community and stakeholder collaboration in development decisions.

- Department of Toxic Substances Control – Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval
- Los Angeles County Fire Department – Plan approval; Potential agency oversight of assessment and remediation of the project site through completion of construction activities and subsequent remediation plan approval in lieu of oversight by the Department of Toxic Substances Control
- Los Angeles County Sheriff's Department – Plan approval
- Utility providers – Utility connection permits

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3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is in the City of West Hollywood, an urbanized city of the greater Los Angeles region located approximately seven miles inland from the coast of the Pacific Ocean. Figure 2-1 in Section 2, *Project Description*, shows the location of the project site in the region and its location within city boundaries. Incorporated in 1984, West Hollywood encompasses approximately 1.9 square miles immediately east of the City of Beverly Hills and west of the neighborhood of Hollywood in the City of Los Angeles. West Hollywood is almost entirely developed and is characterized by a dense, compact urban form with small lots, a mix of land uses, and a walkable street grid.

The city is connected by a series of east-west and north-south arterial roadways that provide vehicular access to the city. Major east-west thoroughfares include Sunset Boulevard, Santa Monica Boulevard, and Fountain Avenue. Major north-south thoroughfares include Doheny Drive, La Cienega Boulevard, Fairfax Avenue, and La Brea Avenue. The nearest freeways are U.S. Route 101 (US-101), located approximately 1.5 miles northeast of the project site; Interstate 10 (I-10), located approximately 3.7 miles south of the project site; and Interstate 405 (I-405), located approximately 6.5 miles west of the project site.

The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Although air quality in the area has steadily improved in recent years, the Los Angeles region remains a nonattainment area for ozone (urban smog).

3.2 Project Site Setting

The project site is located at 1000, 1014, 1020, and 1028 North La Brea Avenue on the northeast corner of the North La Brea Avenue and Romaine Street intersection in West Hollywood. The site encompasses approximately 43,316 square feet (sf), or 0.99-acre, and consists of three contiguous parcels: Assessor Parcel Numbers (APNs) 5531-014-015, -016, and -017. At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. The concrete batch plant consisted of a 634-sf two-story office building, industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation of the concrete batch plant included the production and shipment of ready-mix concrete. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the City of West Hollywood allowing the disassembly and removal of its concrete batch plant equipment (i.e., plant structure/machinery, water tanks) and demolition of its office building down to its foundation without any ground disturbance or excavation. Demolition of the office building was also separately permitted by the City of Los Angeles due to the office building's location spanning both City of West Hollywood and City of Los Angeles jurisdictions. Between September 2024 and December 2024 and

preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work.

Of note, CEMEX ceasing operations and the disassembly and removal of its concrete batch plant equipment and demolition of its office building would occur approximately one year in advance of the remaining construction associated with the project regardless of whether the proposed project is approved and implemented. However, to ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of project construction and includes these activities in the project modeling assessing construction impacts.

The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way. There are currently three driveways associated with the former CEMEX concrete batch plant and another two driveways associated with the vacant warehouse building for a total of five existing driveways along North La Brea Avenue. There are no driveways at the project site along Romaine Street.

The project site has a General Plan land use designation Commercial, Regional Center (CR) with a Mixed-Use Incentive Overlay (West Hollywood 2011). The site is zoned Commercial, Regional Center (CR), as defined by the City's Zoning Ordinance and consistent with the CR land use designation of the General Plan. Figure 2-2 in Section 2, *Project Description*, shows the location of the project site in its neighborhood context, and Figures 2-3 through 2-6 in Section 2, *Project Description*, provide photos of the existing uses on the project site.

As shown in Figure 2-2, the project site is in an urban area characterized by a mix of commercial and industrial uses. The site's eastern and southern boundaries border the Hollywood neighborhood of the City of Los Angeles. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant in the City of Los Angeles to the east; Romaine Street, warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses and the West Hollywood Gateway shopping center to the west. Similar to the project site, the commercial uses and parking lot to the north and the West Hollywood Gateway shopping center to the west are zoned CR and have a General Plan land use designation CR with a Mixed-Use Incentive Overlay (West Hollywood 2011). Within City of Los Angeles jurisdiction, the commercial uses, remainder of the former CEMEX concrete batch plant, warehouse and residential uses to the east and south share a General Plan land use designation Limited Manufacturing. However, the commercial uses and the remainder of the former CEMEX concrete batch plant to the east are zoned Restricted Industrial (MR1), and the warehouse, commercial, and residential uses to the south are zoned Limited Industrial (M1) and Neighborhood Commercial (C2 and RAS4) (Los Angeles, n.d.).

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby

projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. For the cumulative impact analyses included in this EIR, other planned and pending projects within a one-mile radius of the project site are considered as projects with potential to contribute to cumulative effects when combined with the proposed project. These projects are identified in Table 3-1 on the following page. Based on the City of West Hollywood InfoMap database, there are currently eight projects within a one-mile radius of the project site, six of which are within a 0.5-mile radius of the project site (West Hollywood 2024). However, since the project site is also located adjacent to the City of Los Angeles, the cumulative impact analyses in this EIR also consider planned and pending projects in Los Angeles. Based on the City of Los Angeles Bi-Weekly Entitlement Case Filings Map, an online and regularly updated interactive map displaying discretionary entitlement case filings received by Los Angeles City Planning, there are currently 10 projects within an approximate one-mile radius of the site, three of which are within a 0.5-mile radius of the project site (Los Angeles 2024). Of these projects, the nearest to the proposed project include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) in the City of West Hollywood, and a seven-story office and retail project at 1011 North Sycamore Street in the City of Los Angeles (abutting the project site to the east). Although these projects are all considered cumulative projects, only select projects are considered in the cumulative analyses included in Section 4, *Environmental Impact Analysis,* based on the geographic scope unique to each cumulative impact.

Table 3-1 Cumulative Projects List

Number	Location	Distance from Project Site	Description/Proposed Project
City of West Hollywood [1]			
1	1040 North La Brea Avenue	Adjacent to northern boundary of the project site	7-Story mixed-use (hotel/restaurant) building
2	1134 North La Brea Avenue	0.20-Mile	7-Story mixed-use building
3	1253 North Detroit Street	0.37-Mile	2-Story building for two ADUs
4	1237 North Formosa Avenue	0.37-Mile	17-Unit condominium building over one level of subterranean parking
5	1041 North Martel Avenue	0.47-Mile	Residential building (30,174 sf)
6	904 Stanley Avenue	0.47-Mile	5-Unit, 3-Story multi-family building
7	1114 North Gardner Street	0.54-Mile	2 ADUs over existing detached garage
8	1027 Spaulding Avenue	0.82-Mile	5-Unit, 3-Story multi-family building
City of Los Angeles [2]			
1	1011 North Sycamore Avenue	Adjacent to eastern boundary of the project site	7-Story mixed-use (office/retail) building
2	849 North Detroit Street	0.20-Mile	4, 3-Story small lot homes
3	848 North Fuller Avenue	0.39-Mile	25-Unit apartment building.
4	956 North Sewald Street	0.62-Mile	Commercial storage facility
5	6800 West Sunset Boulevard	0.63-Mile	384-Unit mixed-use building
6	1431 North Vista Street	0.73-Mile	4-Story affordable housing building
7	1033 North Cole Avenue	0.76-Mile	1-Story commercial building
8	7441 West Sunset Boulevard	0.81-Mile	7-Story, 123-unit mixed-use building
9	1200 North Vine Street	1.03-Miles	7-Story mixed-use building
10	1360 North Vine Street	1.07-Miles	429 units, grocery store, and 6 bungalows

ADU = accessory dwelling unit; sf = square feet

[1] Cumulative project details were sourced from the City of West Hollywood's InfoMap Database from June 2024

[2] Cumulative project details were sourced from the Los Angeles City Planning Case Reports and Mapping Database from June 2024

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the proposed project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* Section 15382:

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

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

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

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

The *Executive Summary* of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Aesthetics

This section addresses the existing environmental and regulatory setting as it relates to aesthetics and analyzes potential aesthetic changes associated with the proposed project. The Initial Study (Appendix B) concluded that the project would have no impact related to damaging scenic resources along a State scenic highway. Therefore, the discussion in this section describes the existing visual setting of the city, the existing visual character of the site and public views into and through the project site, and whether development associated with the proposed project would affect surrounding land uses due to changes to scenic vistas, visual character, public views or scenic quality, and the introduction of new significant sources of light or glare.

Of note, Senate Bill (SB) 743 streamlines CEQA review for projects located within transit priority areas (TPA). Pursuant to SB 743, "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." The project site is a mixed-use residential project located on an infill site within a TPA, and therefore, the project would not result in significant aesthetics impacts. Accordingly, the analysis in this section is provided for informational purposes.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

4.1.1 Setting

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

Visual Resources and Urban Character of the City

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

vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than private views, which can only be seen from vantage points located on private property.

Local viewsheds are in the northern upper portion of West Hollywood and are defined by the hillside areas (e.g., Hollywood Hills in the City of Los Angeles) that lie further north of the city. Scenic public views within the city are generally of the Hollywood Hills and are visible throughout the city. Public views of the Los Angeles Basin and buildings in downtown Los Angeles to the south of the city are generally not visible at street level but are visible from higher vantage points throughout the city. Of note, the project site is located along the eastern boundary of West Hollywood adjacent to the City of Los Angeles to the east, and similar to the City of West Hollywood, the City of Los Angeles General Plan Conservation Element identifies the urban skyline and valley mountain range to be scenic resources, with the addition of the Pacific Ocean and other water bodies (Los Angeles 2001).

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

Visual Urban Character of the Project Site Vicinity

The project site is in an urban area characterized by a mix of commercial and industrial uses. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the CEMEX concrete batch plant to the east; Romaine Street and warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses and the West Hollywood Gateway shopping center to the west. Figure 2-2 in Section 2, *Project Description*, shows the location of the site in its neighborhood context. The visual character of the urban area is diverse as the surrounding buildings have varying architectural styles, massing, and one- to eight-story heights. Figure 4.1-1 through Figure 4.1-4 on the following pages provide photos of the existing visual character surrounding the project site.

Current sources of light and glare in the project site vicinity result from the existing building and signage on-site, adjacent commercial and industrial developments, and from vehicles on roadways, particularly North La Brea Avenue. Types of existing lighting include interior and exterior building lighting, streetlights and signals, automobile headlights, and reflection of light from windows and other reflective surfaces on parked and passing vehicles, as well as from adjacent buildings and structures. The primary sources of glare in the project site vicinity are from windows on commercial and industrial developments surrounding the project site and from windows, headlights, and taillights of passing and parked vehicles along streets surrounding the project site.

Figure 4.1-1 View of the Santa Monica Boulevard and La Brea Avenue Intersection

Figure 4.1-2 View of La Brea Avenue and Commercial Uses North and West of the Site

Figure 4.1-3 View of Sycamore Avenue and Office/Commercial Uses East of the Site

Figure 4.1-4 View of Romaine Street and Office/Commercial Uses South of the Site

Visual Urban Character of the Project Site

The project site was developed with a concrete batch plant (i.e., the Hollywood Ready-Mix Concrete Plant owned and operated by CEMEX), which consisted of a 634-square-foot (sf) two-story office building, an industrial plant structure/machinery, water tanks, metal grating, and surface parking. The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way. Figure 2-3 through Figure 2-6 of Section 2, *Project Description*, provide photos of the existing visual character of the project site.

Located in a developed urban area, the project site is regularly exposed to high levels of glare during the daytime and high levels of light during the evening hours. The primary sources of daytime and nighttime light at the project site include external building and structure lighting, street lighting, and headlights from vehicles passing the site. The primary source of glare at the project site is the sun's reflection from metallic and glass surfaces. The on-site warehouse building also emits glare from the sun's reflection on its windows. Overall, the level of light and glare on the project site is typical of a site with commercial land uses.

Additional details of the visual character of the buildings and structures associated with the project site provided herein are referenced from the Cultural Resources Technical Report included as Appendix D to the EIR and further discussed in Section 4.3, *Cultural Resources*.

1000 and 1014 North La Brea Avenue

The property at 1000 and 1014 North La Brea Avenue was developed with a concrete batch plant that centered on a vertical concrete mill, located at the site's southwest corner. A towering steel structure, the mill consisted of a series of hoppers suspended above a central concrete mixer. The hoppers, and through them the mixer, were fed cement and aggregate from nearby stockpiles via conveyors on the north and south sides of the mill. The mixer was suspended above a passage in which truck mixers were loaded with processed, yet still plastic, concrete. Vehicular access to the mixer and stockpiles was made via low concrete ramps, while a stairway and catwalk allowed pedestrian access to some upper features of the mill.

Attached to the southeast of the mill structure was an approximately 634-sf two-story office building featuring a utilitarian design aesthetic. It had a rectangular plan, concrete foundation, and flat precast concrete roof with a moderate overhang on all four sides. Its exterior was exposed structural concrete blocks. First-story entrances faced the raised loading dock on the east elevation. One entrance featured a sliding wood door, while the door type at the other entrance could not be determined due to limited access. An upper-story entrance faced north, where a concrete and steel exterior staircase accessed a glazed wood-panel door. Windows included paired steel casements punctuating the exterior of both stories.

At the northeast corner of the site was the open-frame shelter. It was a simple, utilitarian structure, consisting of a steel-pole frame and a corrugated metal roof that sheltered a concrete-paved area.

A concrete-masonry-unit wall traces the site's street-facing west, east, and south boundaries. Access is controlled by chain-link gates that front all three streets bordering the project site. Security and safety features include stretches of barbed wire, steel grilles, and convex mirrors. Figure 2-3 through Figure 2-5 of Section 2, *Project Description*, provide photos of the property at 1000 and 1014 North La Brea Avenue, including the CEMEX concrete batch plant as it existed and operated prior to execution of the Demolition Permit.

1020 and 1028 North La Brea Avenue

The property at 1020 and 1028 North La Brea Avenue is developed with a two-story industrial warehouse constructed with elements of the Late Moderne style of architecture. The warehouse is rectangular in plan with a raised concrete foundation and capped with a warehouse roof with monitor. Its exterior consists of structural reinforced concrete and stack-bond-brick veneer on the front-facing west elevation, and exposed structural brick on the south elevation. Key elements related to Late Moderne-style architecture are the horizontal overall emphasis, band of steel casement windows, stack-bond brick accents, and lack of ornament. Alterations to the warehouse include the addition of the transom grille and related door surround, installation of security gates at all four entrances, and likely replacement doors at the southernmost entrance. Figure 2-6 of Section 2, *Project Description*, provides a photo of the property at 1020 and 1028 North La Brea Avenue.

4.1.2 Regulatory Setting

State Regulations

Senate Bill 743

In September 2013, the Governor of California signed SB 743 into law. This bill streamlines CEQA review for projects located within a TPA. Pursuant to SB 743 (Public Resources Code Section [PRC] Section 21099[d][1]), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" as an area within 0.5 mile of a major transit stop. PRC Section 21064.3 defines a "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 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 TPA. According to PRC Section 21099(a), an "infill site" includes a lot located within an urban area that has been previously developed.

Local Regulations

West Hollywood General Plan 2035

The Land Use and Urban Form Chapter of the City's General Plan provides planning goals and policies related to land use and development patterns and is the primary means for guiding the urban form in West Hollywood. According to the Land Use and Urban Form Chapter, the site's land use designation and zoning is Commercial, Regional Center (CR) with a Mixed-Use Incentive Overlay. The CR land use designation is intended to create high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. The project site is also located in the Santa Monica/La Brea Transit District commercial sub-area, in which La Brea Avenue's intersection with Santa Monica Boulevard operates as the primary eastern gateway to the city (West Hollywood 2011). A more detailed discussion of the Land Use and Urban Form Chapter, the site's land use designation, and the Santa Monica/La Brea Transit District sub-area is included in Section 4.9, *Land Use and Planning*.

Goals and policies of the General Plan Land Use and Urban Form Chapter that relate to aesthetics and apply to the project include the following (West Hollywood 2011):

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

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

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

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

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

> **Policy LU-16.1:** Consider aesthetics, size, location, lighting, and siting in the evaluation of offsite signage.
>
> **Policy LU-16.2:** Design and locate offsite signage to minimize its impact on: adjacent properties, the public right of way, cultural resources, creation of shade and shadow, and potential conflict with the development of adjacent properties.
>
> **Policy LU-16.3:** Consider impacts to surrounding neighborhoods when evaluating off-site signage.
>
> **Policy LU-16.4:** Design offsite signage in new developments in concert with the architectural lighting, landscape, and public art program of the development.
>
> **Policy LU-16.8:** Carefully integrate offsite signage into new development so that the building and not the sign is the primary use of the land.

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

> **Policy LU-17.1:** Prohibit the use of roof signs, pole signs, and flashing and animated signs, except as part of a Creative Sign Program.
>
> **Policy LU-17.2:** Rely on size, placement, location, and numeric limits for on-site signs that properly integrate into overall site development, avoiding undue proliferation of signage and preventing signs from dominating or overpowering buildings.
>
> **Policy LU-17.3:** Allow imaginative signage that is a positive contribution to its surroundings through the use of Creative Sign Permits, and in the execution of Comprehensive Sign Programs.
>
> **Policy LU-17.4:** Encourage signage that is designed for pedestrians, especially where there is discretionary authority such as Creative Signs and Comprehensive Sign Programs.

West Hollywood Municipal Code

Title 19, Zoning Ordinance, of the West Hollywood Municipal Code (WHMC) establishes the City's various zoning districts and special planning areas. According to the City's Zoning Map, the site is zoned Commercial, Regional Center (CR) which is consistent with the site's CR land use designation. Per WHMC Section 19.10.020, the CR zone identifies areas that are principal commercial activity

centers. Uses permitted in the CR zone include a wide range of low- to high-intensity commercial uses to serve local and regional market areas. Existing and proposed zoning in the project area is further discussed in Section 4.9, *Land Use and Planning*.

WHMC Article 19-3, Site Planning and General Development Standards, provides the City's development standards related to visual quality, including management of the aesthetic character (e.g., building heights, lot coverage, setbacks, landscaping, and signage) and light and glare levels. Specifically, WHMC Section 19.20.100 regulates outdoor lighting, including security lighting, and WHMC Sections 19.34.040 and G-34.250 regulate sign illumination. These development standards and design guidelines provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including maximum heights of lighting fixtures; design, installation, and maintenance of lighting fixtures; standards for new development and remodeling; lighting for parking areas; and sign illumination. Furthermore, WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards in the city that emphasize public benefit, city image, and economic stimulation in the city. Development projects in the city are required to adhere to these requirements and standards.

4.1.3 Impact Analysis

The assessment of aesthetics involves qualitative analysis that is inherently subjective in nature. Different viewers react to aesthetic conditions differently. The impact analysis in this section analyzes the proposed project against existing visual resources in the city and the urban character of the project site vicinity, evaluating the nature of the anticipated change. However, as discussed under *State Regulations* of this section and pursuant to SB 743 (PRC Section 21099[d][1]), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment."

The project includes construction of a mixed-use residential and commercial building located on a commercial-zoned infill site within a TPA that meets the criteria set forth in Section 21099(d)(1). The project is on an infill site because the project area is in a highly urbanized area with surrounding development and the site has been developed with a warehouse building (circa 1947) and a concrete batch plant (circa 1962). The project is within a TPA because the nearest "major transit stop" (as defined under PRC Section 21064.3) is located within 0.5 mile at the intersection of Santa Monica Boulevard and North La Brea Avenue San Vicente Boulevard and Santa Monica Boulevard. This transit stop is served by two Los Angeles Metropolitan Transportation Authority (Metro) bus routes (i.e., Metro Routes 212 and 4), and an Antelope Valley Transit Authority (AVTA) bus route (i.e., Bus Route 786). Service intervals for both Metro routes at this intersection are approximately between six minutes to 12 minutes during morning and afternoon peak commute periods (Metro 2023). This intersection is also served by City shuttles, including the Cityline Local Cedars-Sinai (westbound), the Cityline Commuter Hollywood/Highland (eastbound) and the Cityline Commuter West Hollywood (westbound). This intersection is also served by the City's trolley service, The PickUp, which runs eastbound and westbound along Santa Monica Boulevard. Furthermore, the project is within a TPA as mapped by the Southern California Association of Governments (SCAG) (SCAG 2022).

Because the proposed project is considered a mixed-use project on an infill site within a TPA, aesthetic impacts of the project cannot be considered significant, pursuant to PRC Section 21099(d). Therefore, this analysis is only provided to inform the public and decision-makers of the potential aesthetic changes associated with the proposed project.

Methodology

The analysis in this section evaluates the existing regulatory framework and determines its applicability for the project. The baseline conditions and analyses were based on review of various readily available data in public records, including local planning documents. The determination that the project would or would not result in "substantial" or “adverse effects” concerning aesthetic conditions and resources considers the relevant policies and regulations established by State, local, and regional agencies, and the project’s compliance with such policies and regulations. In determining how project implementation would result in aesthetic changes to the existing project site and project site vicinity conditions, this analysis considers the *CEQA Guidelines*, Appendix G thresholds, described as follows.

Significance Thresholds

In a standard application of the Appendix G of the *CEQA Guidelines* and the thresholds of significance relevant to aesthetics therein, the proposed project would have a significant impact with respect to aesthetics if it would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources in a designated State scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. Create new sources of light or glare that would adversely affect day or nighttime views.

The Initial Study (Appendix B) concluded that the project would have no impact related to checklist item (2) on account of there being no State scenic highways or scenic routes/corridors in the vicinity of the project site. Therefore, this analysis focuses on checklist items (1), (3), and (4), which are further addressed from the Initial Study for additional information.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 THE PROPOSED PROJECT INVOLVES THE DEVELOPMENT OF A 34-STORY MIXED-USE BUILDING THAT WOULD ALTER VIEWS FROM HIGHER VANTAGE POINTS IN THE PROJECT AREA AND CITY. HOWEVER, THE CITY DOES NOT HAVE ANY DESIGNATED SCENIC VISTAS AND THE PROJECT WOULD NOT ADVERSELY AFFECT SCENIC PUBLIC VIEWS OF THE HOLLYWOOD HILLS AND LOS ANGELES BASIN.

As described under *Visual Resources and Urban Character of the City* of this section, the City’s General Plan does not identify any designated scenic vistas in West Hollywood. However, scenic public views within the city are generally of the Hollywood Hills, which lie approximately one mile north of the project site and are visible from various vantage points throughout the West Hollywood as well as from the cities of Beverly Hills and Los Angeles. Other scenic public views of the Los Angeles Basin (including buildings in downtown Los Angeles) are generally not visible at street level in West Hollywood due to topography, existing trees, and massing/height of surrounding development, but are generally visible from higher vantage points throughout the city such as those from topmost stories or rooftop spaces of other development.

Comments received from the City of Beverly Hills in response to the Notice of Preparation for the project communicated Beverly Hills' concern with potential effects from the project on Beverly Hills' visual resources, which are identified as its network of landscaping and scenic vistas according to their General Plan Open Space Element (Beverly Hills 2010). However, the project site is located along West Hollywood's easternmost boundary approximately 2.3 miles east from the nearest location in Beverly Hills. Therefore, at this distance and given the topography and massing/height of surrounding development, the project would not have any influence on Beverly Hills' visual resources.

Moreover, despite the project site's proximity to the City of Los Angeles, the Los Angeles General Plan doesn't identify designated scenic vistas other than general views of the urban skyline and valley mountain range similar to West Hollywood, with the addition of the Pacific Ocean and other water bodies (Los Angeles 2001). However, public views of water bodies (including the Pacific Ocean) are also not typically visible throughout most Los Angeles due to topography and existing development.

The proposed project involves construction of a 34-story (352-foot-tall) mixed-use residential and commercial building with 514 apartment units and 30,000 sf of commercial/retail space on the ground floor. The project would be designed to look like a vertical L-shaped building with wall recesses. As shown in Figure 2-8 and Figure 2-8 in Section 2, *Project Description*, these unevenly layered floors would allow for assorted balcony placements and other overhanging areas and help break up and soften the visual impact of the building's massing from street level and higher vantage points.

Although the project would develop a 34-story building on the project site, views of the Hollywood Hills and Los Angeles Basin from higher vantage points in the city would continue to depict a highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. Moreover, such views from higher vantage points would primarily be those from private spaces and residences. There are no scenic public views of the Hollywood Hills, the Los Angeles Basin, or water bodies such as the Pacific Ocean currently visible from the streets or sidewalks around the project site due to topography and surrounding multi-story development. As shown in Figure 4.1-5 and Figure 4.1-6 on the following pages, which depict how a pedestrian or motorist at ground level would view the site from North La Brea Avenue and Romaine Street, public views of hillside areas and of the Los Angeles Basin would not be affected by the proposed project.

Development of the proposed project would alter views of the project site and in the project site vicinity as compared to existing conditions; however, the project would not adversely affect any designated scenic vistas nor affect scenic public views.

Mitigation Measures

Mitigation measures would not be required.

Figure 4.1-5 View of La Brea Avenue Looking Toward Site – Existing and Proposed

Figure 4.1-6 View of Romaine Street Looking Toward Site – Existing and Proposed

ROMAINE STREET - LOOKING TOWARD SITE - EXISTING

ROMAINE STREET - LOOKING TOWARD SITE - PROPOSED

Threshold 3:	Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-2 DEVELOPMENT OF THE PROPOSED PROJECT WOULD ALTER THE VISUAL CHARACTER OF THE PROJECT SITE; HOWEVER, AS A MIXED-USE PROJECT IN AN URBAN AREA, THE PROJECT'S URBAN FORM AND USES WOULD BE CONSISTENT WITH SURROUNDING DEVELOPMENT AND THE GOALS AND POLICIES IN THE CITY'S GENERAL PLAN RELATED TO AESTHETICS, AND THE PROJECT WOULD NOT CONFLICT WITH APPLICABLE ZONING AND REGULATIONS REGARDING SCENIC QUALITY.

The project site is in an urban area characterized by a mix of commercial and industrial uses. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant to the east; Romaine Street and warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses and the West Hollywood Gateway shopping center to the west. The visual character of the area is diverse as the surrounding buildings have varying architectural styles, massing, and one- to eight-story heights. As discussed under Impact AES-1, the project would not adversely affect any designated scenic vistas nor affect scenic public views in the project site vicinity.

According to the Land Use and Urban Form Chapter and City's Zoning Ordinance, the site's CR land use designation and zoning are intended to create low-to high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. By comparison, the proposed project is a high-density, infill development project involving the construction of a 34-story mixed-use residential and commercial building with up to seven off-site billboards with varied dimensions. Although the project would increase the massing and intensity of development on the project site compared to existing conditions and alter the site's current visual character, the building would be consistent with the site's land use designation and designed to look like a vertical L-shaped building with wall recesses. The project's unevenly layered floors would allow for assorted balcony placements and other overhanging areas and help reduce the visual impact of the building's massing.

As discussed in Section 4.9, *Land Use and Planning*, the proposed project would be consistent with the applicable goals and policies in the City's General Plan Land Use and Urban Form Chapter. A detailed consistency analysis between the proposed project and Land Use and Urban Form Chapter is provided in Table 4.9-4. Specific to visual resources and scenic quality, the project would be consistent with Goal LU-1, Goal LU-5, Goal LU-16, and Goal LU-17 as the project would maintain an urban form and land use pattern that enhances quality of life; include a high-level quality of architecture and site design; include off-site signage that supports public benefit and stimulates the local economy; and provide on-site signage that are properly integrated into the building's facades.

The proposed project would also be implemented in accordance with the Development Agreement and WHCM Article 19-3, which provides development standards related to visual quality, including management of the aesthetic character in relation to project signage and light and glare levels. Of note, the maximum number billboards included in the project (i.e., up to seven) would consist of a combination of static and/or full motion video billboards with varied dimensions throughout all facades of the building, as (shown in Figure 2-12 of Section 2, *Project Description*). Although the City does not have explicit regulations governing scenic quality, development standards and design guidelines in WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 provide

requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including maximum heights of lighting fixtures; design, installation, and maintenance of lighting fixtures; standards for new development and remodeling; lighting for parking areas; and sign illumination. Furthermore, WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards in the city (consistent with the City's offsite signage policies referenced by Policies LU-16-1 through LU-16-8 of the General Plan Land Use and Urban Form Chapter) that emphasize public benefit, city image, and economic stimulation in the city.

Through compliance with existing City policies and the Zoning Ordinance, and through standard City design review for architectural and landscape elements and approval of the Development Agreement, the project would not conflict with local zoning standards and regulations governing scenic quality.

Mitigation Measures

Mitigation measures would not be required.

Threshold 4:	Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-3 DEVELOPMENT OF THE PROPOSED PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE ON THE PROJECT SITE; HOWEVER, THESE SOURCES WOULD BE TYPICAL OF DEVELOPMENT SURROUNDING THE SITE AND THE PROJECT WOULD COMPLY WITH THE POLICIES AND REGULATIONS IN THE CITY'S GENERAL PLAN AND ZONING ORDINANCE RELATED TO SIGNAGE, LIGHTING, AND ILLUMINATION.

The project site is in an urban developed area that already experiences urban lighting and glare. The primary sources of daytime and nighttime light at the project site and surrounding development include building and structure lighting, street lighting, and headlights from vehicles both driving by as well as entering and exiting individual properties. The primary source of glare at the project site and surrounding development is the sun's reflection from metallic and glass surfaces. Overall, the level of existing light and glare at the project site and project site vicinity is typical of commercial and industrial land uses.

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

At project operation, the windows and building materials proposed on the exterior elevations of the proposed 34-story (352-foot-tall) mixed-use building would create new sources of daytime, evening, and nighttime light and daytime glare when compared to existing conditions. For instance, portions of the exterior façade on the podium levels and upper levels would include floor-to-ceiling glass windows that would increase all-day lighting and reflected sunlight during certain times of the day. In addition, because the overall building size would increase to 34 stories compared to the existing on-site buildings on-site, these windows would be located at heights greater than existing development. However, the windows would be interspersed with non-reflective exterior materials

and landscaping as described above to help reduce the potential incidents of reflected light or glare from the proposed building. Furthermore, as windows on higher floors would be those associated with the proposed residential units and other interior spaces associated with the residential component, it is reasonable to anticipate that window shades or other coverings would be implemented and used by the majority of project residents to abate exterior-to-interior lighting and provide privacy throughout the day, which would also abate interior-to-exterior lighting during nighttime hours.

In addition to windows and building materials, the overall quantity of on-site lighting from the proposed building would increase from the illumination of the proposed billboards, particularly in the evening and nighttime hours. As discussed in Section 2, *Project Description*, the project would integrate up to 29,465 sf of advertising area, including 22,745 sf of illumination area. Any digital light-emitting diode (LED) full motion video billboard would have a maximum brightness of 600 nits, which is equivalent to the light emitted from 600 candles in an area of one square meter (Make Use Of 2022).[1] For displays located in direct sunlight or other bright outdoor settings, it is typical and recommended in the industry to have a display with a brightness level of 500 nits or more to combat glare and provide clear visibility even in direct sunlight (GoBuzzle 2024). As such, the proposed brightness of any full motion video billboard would be appropriate for its intended use and setting. Moreover, as discussed under Impact AES-2, development standards and design guidelines in WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including maximum heights of lighting fixtures; design, installation, and maintenance of lighting fixtures; standards for new development and remodeling; lighting for parking areas; and sign illumination. In addition, WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards in the city (consistent with the City's offsite signage policies referenced by Policies LU-16-1 through LU-16-8 of the General Plan Land Use and Urban Form Chapter) that emphasize public benefit, city image, and economic stimulation in the city.

Furthermore, during the October 7th, 2024 City Council Regular Meeting, City Council directed City staff to explore and subsequently draft a zone text amendment to codify policy in the WHMC that would permit off-site signage outside of Sunset Boulevard in commercial zones on Santa Monica Boulevard, Fairfax Avenue, and La Brea Avenue when off-site signage is associated with mixed-use developments providing a higher percentage of affordable units (West Hollywood 2024). Although this direction is in its preliminary stages and additional details are not known at this time, the project (i.e., a mixed-use development providing 128 affordable and workforce units along North La Brea Boulevard) currently exhibits a general consistency with the type of developments that would be targeted under this prospective zone text amendment.

Headlights and taillights from vehicles entering and exiting the parking garage could also potentially shine onto adjacent development. Vehicles would access the residential and valet parking from a driveway located along Romaine Street at the southeast side of the project site and visitor parking from a driveway located on North La Brea Avenue at the northwest side of the project site. The project site is in an urban area along a commercial corridor that experiences a steady flow of traffic along North La Brea Avenue, and therefore, lighting associated with cars is already a daily occurrence in the project area. Moreover, land uses surrounding the project site include office and

[1] As discussed in Section 2, *Project Description*, a "nit" is a unit of measurement that relates to the brightness level of visible light (luminance) within a specific area.

commercial buildings, which would not be sensitive to an increase in lighting generated by the proposed project when compared to residential uses.

Light and glare sources associated with the proposed building would be similar to the surrounding development the project would comply with the policies and regulations in the City's General Plan and Zoning Ordinance related to signage, lighting, and illumination.

Mitigation Measures

Mitigation measures would not be required.

4.1.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*. Of note, the remaining planned and pending projects identified in Section 3, *Environmental Setting*, are located 0.20-mile and greater from the project site. Therefore, the seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east) would have the most potential to create a cumulative aesthetic effect when combined with the proposed project.

Although the city is largely built out, future development has the potential to alter the visual quality and character of the surrounding community through use of new architectural styles and designs as well as increased building heights. However, the City's General Plan does not identify any designated scenic vistas in the city. Similarly, the Los Angeles General Plan does not identify designated scenic vistas in Los Angeles other than general views of the urban skyline and valley mountain range, along with views the Pacific Ocean and other water bodies (Los Angeles 2001). Scenic public views of the Hollywood Hills, Los Angeles Basin, and water bodies (i.e., Pacific Ocean) are generally not visible at street level due to topography, existing trees, and massing/height of surrounding development, but are generally visible from higher vantage points such as those from topmost stories or rooftop spaces of other development (i.e., private spaces and residences).

With respect to adjacent planned and pending development to the north and east of the site, combined development would be visually cohesive and compatible given that they would also consist of a variety of mixed uses (i.e., a hotel and restaurant project at 1040 North La Brea Avenue to the north, an office and retail project at 1011 North Sycamore Street to the east) similar to the proposed project. Furthermore, considering that adjacent off-site development would both introduce seven-story buildings, these increased heights would serve to provide a visual segway to the 34-story proposed project when compared to existing one-story buildings north and no buildings east of the site.

While development in the city would continue to alter views at their respective sites when compared to existing conditions, such cumulative development would not adversely affect any designated scenic vistas nor affect scenic public views. With respect to applicable regulations governing scenic quality, light, and glare, all discretionary development projects in the city would be required to adhere to specific development standards in the City's General Plan and Zoning Ordinance designed to enhance the visual appeal of development and public views in the city. Potential impacts related to aesthetics would not be cumulatively considerable.

4.2 Air Quality

The section analyzes the potential air quality impacts of project construction and operation, including impacts to nearby sensitive receptors. As discussed in the Initial Study (see Appendix B), the proposed project would not generate significant odorous emissions during construction or operation of the project that would substantially affect nearby sensitive receptors. Specifically, this analysis focuses on the potential for impacts related to conflict with an applicable air quality plan, the increase of non-attainment criteria pollutants associated with the project, and the exposure of sensitive receptors to substantial pollutant concentrations. Construction and operational emissions associated with project implementation were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod results are included in Appendix C to this EIR.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of project construction and includes these activities in the project modeling assessing construction impacts.

4.2.1 Setting

Climate and Topography

The project site is in the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter (South Coast Air Quality Management District [SCAQMD] 1993). Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The SCAB is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. This usually mild weather pattern is occasionally interrupted by periods of extreme heat, winter storms, and Santa Ana winds.[1] The annual average temperature throughout the 6,645-square-mile SCAB ranges from low 60 to high 80 degrees Fahrenheit (°F) with little variance. With more oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

Contrasting the steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rainfall occurs between the months of November and April. Summer rainfall is

[1] The National Weather Service defines Santa Ana winds as "a weather condition in which strong, hot, dust-bearing winds descend to the Pacific Coast around Los Angeles from inland desert regions."

reduced to widely scattered thundershowers near the coast, with slightly heavier activity in the east and over the mountains.

Although the SCAB has a semiarid climate, the air closer to the Earth's surface is typically moist because of the presence of a shallow marine layer. Except for occasional periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog are frequent and low clouds known as high fog are characteristic climatic features, especially along the coast. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

Wind patterns across the SCAB are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation could occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, result in very strong, downslope Santa Ana winds. These winds normally continue for a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

In addition to the characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which air pollutants are mixed. These inversions are the marine inversion and the radiation inversion. The height of the base of the inversion at any given time is called the "mixing height." The combination of winds and inversions is a critical determinant leading to highly degraded air quality for the SCAB in the summer and generally good air quality in the winter.

In West Hollywood, the warmest months of the year are August and September, and the coldest month of the year is January. The annual average maximum temperature is 72.3°F, while the annual average minimum temperature is 53.3°F. Rainfall is concentrated in the winter months. Local climate conditions are summarized in Table 4.2-1, as follows, and are based on the nearest meteorological station located approximately five miles southwest of the project site in Culver City.

Table 4.2-1 Culver City Meteorological Station Climate Conditions

Temperature Condition	Amount
Average annual rainfall	13.15 inches
Annual average maximum temperature	72.3°F
Annual average minimum temperature	53.3°F
Warmest month	August
Coolest month	January
Annual mean temperature	62.8°F

°F = degrees Fahrenheit
Note: Averages are based on the period of record from 1935 to 2016 at the Culver City meteorological station, approximately five miles southwest of the project site.
Source: Western Regional Climate Center 2016

Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter with 10 microns in diameter or less (PM_{10}), particulate matter with 2.5 microns or less ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). Ozone (O_3) is considered a secondary criteria pollutant because it is created by atmospheric chemical and photochemical reactions between reactive organic compounds (ROC) and nitrogen oxides (NO_X). These pollutants can have adverse impacts on human health at certain levels of exposure. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants.

Ozone

Ozone (O_3) is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and ROC/volatile organic compounds (VOC).[2] ROC is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and NO_2. NO_X is formed during the combustion of fuels, while ROC is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high ROC and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (United States Environmental Protection Agency [USEPA] 2024a). Depending on the level of exposure, O_3 can cause coughing and a sore or scratch throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; and aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant found in high concentrations near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces throughout the year. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2024a).

[2] California Air Resources Board (CARB) defines VOC and ROC similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROC and VOC are considered comparable in terms of mass emissions, and the term ROC is used in this report.

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is a by-product of fuel combustion. The primary sources are motor vehicles and industrial boilers, and furnaces. The principal form of NO_X produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_X. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma, particularly children and the elderly, are generally at greater risk for the health effects of NO_2 (USEPA 2024a). NO_2 absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of O_3/smog and acid rain.

Sulfur Dioxide

Sulfur dioxide (SO_2) is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore and burning fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (USEPA 2024a).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2024a).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA 's regulatory efforts to remove lead from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in

the metals industries at least partly due to national emissions standards for hazardous air pollutants (USEPA 2013). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (USEPA 2024a).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TAC) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2024a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects that can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2024b).

Current Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the project site are documented by measurements made by the SCAQMD, the air pollution regulatory agency in the SCAB that maintains air quality monitoring stations which process ambient air quality measurements.

Pollutants of concern in the SCAB include O_3, PM_{10}, and $PM_{2.5}$. The closest air monitoring station to the project site that monitors ambient concentrations of these pollutants is the Los Angeles – North Main Street Monitoring Station (located approximately seven miles east of the site). Table 4.3-2 on the following page summarizes the annual air quality data from the Los Angeles – North Main Street Monitoring Station.

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65,

children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses considered more sensitive to air pollution than others due to the types of population groups present or activities involved are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools/daycare centers, and hospitals. There are no sensitive receptors located adjacent to the project site. Sensitive receptors nearest to the project site include multi-family residences located 310 feet to the south of the project site along North La Brea Avenue.

Table 4.3-2 Ambient Air Quality Data

Pollutant	2021	2022	2023
Ozone (ppm), Worst Hour	0.099	0.138	0.097
Number of days of state exceedances (>0.09 ppm)	1	1	1
Number of days of federal exceedances (>0.12 ppm)	0	1	0
Ozone (ppm), 8-Hour Average[1]	0.085	0.090	0.082
Number of days of state and federal exceedances (>0.07 ppm)	2	6	7
NO_2 (ppm), Worst Hour	0.078	0.075	0.064
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
PM_{10} ($\mu g/m^3$), Worst 24 Hours[1]	138.5	43.7	51.6
Number of days of state exceedances (>50 $\mu g/m^3$)	14	0	1
Number of days of federal exceedances (>150 $\mu g/m^3$)	0	0	0
$PM_{2.5}$ ($\mu g/m^3$), Worst 24 Hours	61.1	38.0	30.6
Number of days of federal exceedances (>35 $\mu g/m^3$)	13	0	0

ppm= parts per million, $\mu g/m^3$ = microgram per cubic meter, NO_2= nitrogen dioxide, PM_{10}= particulate matter with 10 microns in diameter or less, $PM_{2.5}$ = particulate matter with 2.5 microns in diameter or less

[1] State and national statistics may differ because State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

Source: CARB 2024b

4.2.2 Regulatory Setting

The federal and State governments have authority under the federal and State Clean Air Acts (CAA) to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. An air quality standard is defined as "the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harming public health" (CARB 2024c). The USEPA is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in California. Federal and State AAQS have been established for six criteria pollutants: O_3, CO, NO_2, SO_2, $PM_{10,}$ $PM_{2.5}$, and Pb. The AAQS are designed to protect those segments of the public most susceptible to respiratory distress, such as children under the age of 14, the elderly (over the age of 65), persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases (USEPA 2024c). In addition, California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards (CARB 2024d). The federal and State CAA are described in more detail below.

Federal Regulations

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

The primary NAAQS "in the judgment of the Administrator,[3] based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health," and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" (42 USC 7409[b][2]). The USEPA classifies specific geographic areas as either "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a state implementation plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. Table 4.3-3 lists the current federal and State standards for regulated pollutants.

Table 4.3-3 Federal and State Ambient Air Quality Standards

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

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

Source: CARB 2024d; USEPA 2024c

[3] The term "Administrator" means the Administrator of the United States EPA.

To derive the NAAQS, the USEPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (USEPA 2022c). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attaining a particular NAAQS, the lower the human health impact is from that pollutant (San Joaquin Valley Air Pollution Control District 2015). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2024c and 2024d). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (USEPA 2015).

State Regulations

California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health and Safety Code Section 39000 et seq.). Under the CCAA, the State has developed the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS. Table 4.3-3 lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either "attainment" or "non-attainment" areas for each pollutant, based on the comparison of measured data within the CAAQS.

Toxic Air Contaminants

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

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

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

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk.

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

State Implementation Plan

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

The 2022 SCAQMD Air Quality Management Plan (AQMP) is the SIP for the SCAB. The AQMP accommodates growth by projecting the growth in emissions based on different indicators. For example, population forecasts adopted by SCAB are used to forecast population-related emissions. Through the planning process, emissions growth is offset by basin-wide controls on stationary, area, and transportation sources of air pollution.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of the regulations adopted, amended or repealed by State agencies pursuant to the Administrative Procedure Act. They are compiled into titles and organized into divisions containing the regulations of State agencies. The following regulations are applicable to the proposed project:

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

Local Regulations

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency that has jurisdiction over Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that State and federal ambient air quality standards are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants,

inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationery and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The purpose of the AQMP is to set forth a comprehensive and integrated program that will lead the SCAB into compliance with the federal eight-hour O_3 standards, and to provide an update to the SCAQMD's commitments towards meeting the federal 24-hour $PM_{2.5}$ air quality standard. The AQMP incorporates the latest scientific and technological information and planning assumptions, including SCAG growth projections and updated emission inventory methodologies for various source categories (SCAQMD 2022).

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for local significance thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by the *CEQA Guidelines* and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process (SCAQMD 1993). The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAB is currently designated as a non-attainment area with respect to the State one-hour O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the national eight-hour O_3 and $PM_{2.5}$ standards. The SCAB is designated as attainment or unclassified for the remaining State and federal standards.

The following is a list of SCAQMD rules that are required of construction activities associated with the proposed project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the workday to remove soil from pavement.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

SCAG 2024-2050 RTP/SCS

On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, also known as Connect SoCal 2024). The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2020-2045 RTP/SCS and includes plan elements organized within the pillars of Mobility, Communities, Environment and Economy. The SCS implementation strategies include advancing the transition to clean transportation technologies, efficient, multimodal, and accessible transit networks, compact and mixed-use development patterns prioritizing walkability, urban greening, and transit-oriented development (SCAG 2024).

West Hollywood General Plan 2035

The Infrastructure, Resources, and Conservation Chapter of the City's General Plan contains goals and policies related to air quality and air pollutant emissions. The following policies are applicable to the proposed project (West Hollywood 2011):

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

Policy IRC-7.1: Seek to improve overall respiratory health for residents through regulation of stationary and mobile sources of air pollution, as feasible.

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

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

Policy IRC-7.4: Prohibit combustion or gasoline powered engines in leaf blowers.

Policy IRC-7.5: Discourage the use of equipment with two-stroke engines and publicize the benefits and importance of alternative technologies.

4.2.3 Impact Analysis

Methodology

Air pollutant emissions generated by project construction and operation were estimated using CalEEMod version 2022.1. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas emissions associated with both construction and operations from a variety of land use projects. CalEEMod allows for the use of standardized data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices C, D, and G (California Air Pollution Control Officers Association [CAPCOA] 2022). The analysis reflects the details of construction and operation of the proposed project as described in Section 2, *Project Description*. CalEEMod modeling outputs are included in Appendix C to this EIR.

Plan Comparison

The proposed project would be consistent with the SCAQMD's 2022 AQMP if it: (1) is consistent with the growth assumptions in the AQMP; and (2) does not increase the frequency or severity of an air quality standards violation or cause new air quality standards violations (SCAQMD 1993). Based on California Department of Finance (DOF) population and household estimates, the average household size in West Hollywood is 1.46 persons (California DOF 2024). Therefore, the proposed 514-unit project would result in a population increase of approximately 750 persons.[4] Using the SCAG Employment Density Report with rates specific to Los Angeles County, the forecasted number of project employees for the commercial/retail component of the proposed project would be approximately 59 employees (30,000 square feet [sf] divided by 511 sf per employee [Other Retail/Services land use category]) (SCAG 2001). For the residential component of the proposed project, the project applicant anticipates approximately 25 employees across property management, leasing, affordable housing specialists, maintenance, porting, and janitorial roles. As such, the project would staff an estimated 84 employees for operation of its commercial/retail and residential uses. This analysis conservatively assumes that all 84 employees from the project would be new additions to the existing labor pool in the region. Although SCAG's 2024-2050 RTP/SCS contains the most recent population and employment forecasts, the SCAQMD's 2022 AQMP utilizes growth forecasts contained in the SCAG 2020-2045 RTP/SCS. Therefore, this analysis utilizes the 2020-2045 RTP/SCS growth forecasts consistent with the 2022 AQMP.

Construction

Project construction would primarily generate temporary criteria pollutant emissions from construction equipment operation on-site and construction worker vehicle trips to and from the site. Construction of the proposed project was analyzed based on the land use types and square footage described in Section 2, *Project Description*, which includes a 34-story mixed-use residential and commercial building with enclosed parking and additional amenities. Construction of the proposed project was assumed to begin in October 2025 and end in June 2028. Existing structures

[4] As discussed in Section 5, *Other CEQA Required Discussions*, of this EIR, the Initial Study to this EIR was drafted prior to 2024 using available 2023 population and household data from the California DOF. The California DOF has since released information for the year 2024. Therefore, the same methodology used to evaluate population growth in the Initial Study is used with the most up-to-date information to compare the project's population to the applicable SCAG growth forecast.

on the project site to be demolished include a 634-sf office building, industrial plant structure and machinery, and a vacant 11,906-sf warehouse building. In addition, grading would involve export of approximately 56,407 cubic yards of excavated soil. It is assumed that the architectural coating phase would overlap with building construction for approximately 11 months. As noted in Section 2, *Project Description*, construction equipment would be diesel-powered and rated Tier 4 Final based on applicant provided information and project design feature (PDF) AQ-1. The project would be required to comply with applicable regulatory standards, such as SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating).

The proposed uses were assigned the following land uses based on the CalEEMod User Guide: residential uses were modeled as "Apartments – High Rise" and the commercial spaces were assumed as "Retail – Strip Mall." Enclosed parking and on-site non-asphalt surfaces such as landscaping were modeled as such.

Operation

In CalEEMod, operational sources of criteria pollutant emissions include area, energy, and mobile sources. The proposed project's operational sources are described below.

AREA SOURCES

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coatings, were calculated in CalEEMod and utilize standard emission rates from CARB, USEPA, and emission factor values provided by the local air district (CAPCOA 2022).

ENERGY SOURCES

Emissions from energy use that generate criteria pollutant emissions include natural gas use. As discussed in Section 2, *Project Description*, of this EIR, natural gas would only be potentially used for the non-residential commercial/retail portion of the project. Therefore, only CalEEMod default estimates for residential natural gas consumption were converted to full electricity use. The emissions factors for natural gas combustion are based on USEPA's AP-42 (Compilation of Air Pollutant Emissions Factors) and California Climate Action Registry General Reporting Protocol. Only GHG emissions are calculated from electricity usage because the energy is generated off-site and therefore may not be relevant for local and regional air quality conditions (see Section 4.6, *Greenhouse Gas Emissions*, of this EIR).

MOBILE SOURCES

Mobile source emissions are generated by the increase in vehicle miles traveled associated with operation of on-site development. Vehicle trip emissions attributable to the proposed project were based on calculations provided by Fehr & Peers for the proposed project using the Institute of Transportation Engineers (ITE), Trip Generation, 11th Edition, 2021. The trip generation rates in CalEEMod were adjusted to be consistent with the 2,033 daily net vehicle trips estimated by Fehr & Peers. In addition, because weekend trip rates and VMT were not provided by the transportation impact analysis, this analysis uses the same trip rates for weekdays and weekends.

STATIONARY SOURCES

Stationary source emissions would be generated by an approximately 1,500- to 1,750-kilowatt (kW) (2,000- to 2,350-horsepower) emergency diesel backup generator. This analysis conservatively assumes that the backup generator would be rated to 1,750 kW. The backup generator would

operate once each month for approximately one hour for maintenance and testing. Consistent with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), the backup generator would not exceed 50 hours of usage per year.

Health Risk

In order to evaluate the potential impacts of TACs emitted during construction of the proposed project, a Health Risk Assessment was conducted to quantify excess cancer risk to the nearest receptors. This assessment used site-specific air dispersion modeling to determine whether health risks presented to the nearest residents by construction of the proposed project exceed the SCAQMD health risk criteria. Potential health risks to nearby sensitive receptors from TAC emissions during project construction were analyzed in accordance with the SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1 and 212 and the OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (SCAQMD 2017; OEHHA 2015).

SCAQMD has health risk criteria for cancer risk and non-cancer risk (i.e., chronic and acute). Cancer risk is expressed as the incremental excess cancer risk, or the maximum number of new cancer cases that could occur in a population of one million people due to exposure to a cancer-causing substance. For example, a cancer risk of one in one million means that in a population of one million people, not more than one additional person would be expected to develop cancer as the result of the exposure to the substance causing that risk.

Potential acute health risks include severe symptoms that develop rapidly and lead quickly to a health crisis due to exposure to a harmful substance, whereas chronic health risks include health crises, such as lung inflammation, immune suppression, and immune sensitization, which develop due to exposure to low levels of a harmful substance over a long period of time.

Typically, cancer risk is analyzed over a specific exposure duration, such as the average residency (50-percentile) of nine years or high-end residency (95-percentile) of 30 years (OEHHA 2015). Thirty years is the exposure duration scenario recommended by the SCAQMD for residential receptors in Risk Assessment Procedures for Rules 1401, 1401.1, and 212 (SCAQMD 2017). The modeling assumptions and inputs associated with this assessment are available in Appendix C.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact with related to air quality if it would:

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

The Initial Study (see Appendix B) determined that the proposed project would have a less than significant impact related to checklist item (4) as the project would not generate significant odorous emissions during construction or operation that would substantially affect nearby sensitive receptors. Specifically, this analysis focuses on checklist items (1) through (3) for potential impacts related to conflict with an applicable air quality plan, the increase of non-attainment criteria

pollutants associated with the project, and the exposure of sensitive receptors to substantial pollutant concentrations.

Regional Significance Thresholds

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the SCAB, shown in Table 4.3-4.

Table 4.3-4 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of VOC	55 pounds per day of VOC
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X
150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

Source: SCAQMD 2019

Localized Significance Thresholds

In addition to the SCAQMD regional thresholds, the SCAQMD has developed LSTs in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the CEQA Air Quality Handbook (SCAQMD 1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, carbon monoxide, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions within construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). For the purposes of this analysis, LSTs are applied to onsite construction and operational emissions associated with the project.

The project is in SRA 2 (Northwest Coastal Los Angeles County). The SCAQMD provides LST lookup tables for project sites that measure one, two, or five acres. The project site is approximately 0.99 acres; therefore, the LST analysis uses one-acre LSTs. LSTs are provided for receptors at 25 meters to 500 meters from the project disturbance boundary to the sensitive receptors. The border of construction activity would be approximately 310 feet (95 meters) from the nearest offsite sensitive receptors (i.e., the multi-family residences located to the south of the project site along North La Brea Avenue). Therefore, the analysis below uses the LST values for 100 meters (approximately 328 feet). LSTs for construction in SRA 2 on a one-acre site with a receptor 100 meters away are shown in Table 4.3-5.

Table 4.3-5 Applicable SCAQMD LSTs in SRA 2 (Construction/Operation)

Pollutant	Allowable Emissions for a 1-Acre Site in SRA 2 for a Receptor 100 Meters Away in Pounds per Day (Construction/Operation)
Gradual conversion of NO_X to NO_2	121/121
Carbon Monoxide	1,233/1,233
PM_{10}	27/7
$PM_{2.5}$	8/2

lbs/day = pounds per day; NO_X = nitrogen oxides; NO_2 = nitrogen dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter; SCAQMD = South Coast Air Quality Management District

Source: SCAQMD 2009

Health Risk Thresholds

SCAQMD has developed significance thresholds for the emissions of TACs based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate a Maximum Incremental Cancer Risk of 10 in one million. Additionally, non-carcinogenic health risks are assessed in terms of a Hazard Index. A project would result in a potentially significant impact if it would result in a chronic and acute Hazard Index greater than 1.0 (SCAQMD 2019).

Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROJECT'S CONTRIBUTION TO POPULATION, HOUSING, AND EMPLOYMENT GROWTH IN THE CITY WOULD BE WITHIN SCAG GROWTH FORECASTS AND THE PROJECT WOULD NOT GENERATE CRITERIA POLLUTANT EMISSIONS IN EXCEEDANCE OF THE APPLICABLE SCAQMD THRESHOLDS. THEREFORE, THE PROJECT WOULD NOT CONFLICT WITH IMPLEMENTATION OF THE AQMP AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed under *Methodology* of this section, a project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP, or if it increases the frequency or severity of an air quality standards violation or cause new violations (SCAQMD 1993). The 2022 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and SCAG's 2020-2045 RTP/SCS socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2022; SCAG 2020). With respect to the City's General Plan and zoning, and as discussed in Section 4.9, *Land Use and Planning,* of this EIR, the project would require a Development Permit for development of a 34-story, approximately 426,000 sf mixed-use development with 514 apartments and 30,000 sf of commercial/retail use, which (as proposed) exceeds the base development standards for floor area ratio and height; a Development Agreement to establish vested rights and defined terms for the development of the mixed-use development in exchange for public benefits; and a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement. As shown in Table 4.9-4 in Section 4.9, *Land Use and Planning*, the project would be consistent with the applicable goals and policies of the General Plan Land Use and Urban

Form Chapter and would not obstruct implementation of any General Plan goal or policy. Upon approval of the Development Permit, Development Agreement, and Zoning Map Amendment, the project would also be consistent with the City's zoning.

The population growth forecasts in SCAG's 2020-2045 RTP/SCS estimate that the City of West Hollywood population would increase from 36,700 persons in 2016 to 42,600 persons in 2045 for an increase of 5,900 persons (SCAG 2020). Based on California DOF population and household estimates, the average household size in West Hollywood is 1.46 persons (California DOF 2024). Therefore, the proposed 514-unit project would result in a population increase of approximately 750 persons. The population addition of 750 residents would represent approximately 12.7 percent of the total growth forecasted within the city. Furthermore, SCAG's 2020-2045 RTP/SCS projects an increase from 26,000 households in 2016 to 30,100 households by 2045 for an increase of 4,100 households. Therefore, the project's contribution of 514 units to existing housing in the city would also be within SCAG growth projections, accounting for approximately 12.5 percent of the total household growth forecasted within the city.

The employment growth forecasts in SCAG's 2020-2045 RTP/SCS estimate that the City's total employment would increase from 22,579 jobs in 2017 to 38,100 jobs in 2045, an increase of 15,521 employees. As discussed in *Methodology* of this section, the project would add approximately 84 employees to the city's total employment for operation of its commercial/retail and residential uses; therefore, the project's contribution to employment growth in the city would be within SCAG growth projections, accounting for approximately 0.5 percent of the total employment growth. Furthermore, factoring in the employees associated with the former concrete batch plant (i.e., an estimated 25 employees according to CEMEX), the project's net employment growth would be an estimated 59 employees, further reducing the project's contribution to growth.

The project's contribution to population, housing, and employment growth in the city would be within SCAG growth forecasts, and therefore the proposed project would be consistent with the underlying assumptions of the emissions forecasts contained in the 2022 AQMP. Furthermore, as discussed under Impact AQ-2, the project would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (ROG and NO_X) and $PM_{2.5}$. Impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 2:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

Impact AQ-2 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS IN NON-ATTAINMENT UNDER THE APPLICABLE FEDERAL OR STATE STANDARDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The SCAB has been designated as a federal non-attainment area for ozone and $PM_{2.5}$ and a State non-attainment area for ozone, PM_{10}, and $PM_{2.5}$. The SCAB is designated unclassifiable or in attainment for all other federal and State standards.

Construction Emissions

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles in addition to VOC emissions that would be released during the drying of architectural coating and paving phases. Table 4.3-6 on the following page summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed SCAQMD regional thresholds or LSTs. Therefore, project construction would not 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. Impacts would be less than significant.

Table 4.3-6 Project Construction Maximum Daily Pollutant Emissions

	Maximum Daily Emissions (Pounds per Day)				
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
2025	34.5	12.0	56.0	3.1	1.0
2026	2.8	11.6	45.9	7.6	1.9
2027	16.2	13.5	52.0	8.9	2.2
2028	2.8	12.3	43.3	7.7	2.0
Maximum Daily Project Emissions	**34.5**	**13.5**	**56.0**	**8.9**	**2.2**
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*
Exceed SCAQMD Regional Thresholds?	**No**	**No**	**No**	**No**	**No**
Maximum On-Site Project Emissions	**34.2**	**8.3**	**53.9**	**2.0**	**0.7**
Localized Significance Thresholds (LSTs)[1]	*N/A*	*121*	*1,233*	*27*	*8*
Exceed LSTs?	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

[1] Allowable emissions in pounds per day as a function of receptor distance (100 meters) from site boundary. LSTs for SRA 2: Northwest Coastal Los Angeles County.

Source: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

Note: Some numbers may not add up precisely due to rounding. See Appendix C for complete modeling results.

For a conservative estimate of project emissions, emissions were modeled during winter and summer, then reported for the maximum day during the winter or summer, whichever was highest. Maximum daily emission estimates were then compared to the SCAQMD thresholds and LSTs measured in pounds per day.

Operational Emissions

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Natural gas would only be potentially utilized for the non-residential commercial/retail portion of the project. Table 4.3-7 on the following page summarizes the project's maximum daily operational emissions by emission source. As shown therein, operational emissions would not exceed SCAQMD regional thresholds or LSTs for criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Table 4.3-7 Project Operation Maximum Daily Pollutant Emissions

Emission Source	Maximum Daily Emissions (Pounds per Day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	6.8	4.9	53.6	0.1	12.9	3.3
Area	16.3	0.4	42.7	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Stationary	4.2	17.2	9.8	<0.1	0.6	0.6
Maximum Daily Project Emissions	**27.3**	**22.2**	**106.0**	**0.2**	**13.5**	**3.9**
Concrete Batch Plant Emissions	0.6	0.3	2.2	<0.1	0.4	0.1
Maximum Net Project Emissions	**26.7**	**21.9**	**103.8**	**0.2**	**13.1**	**3.8**
SCAQMD Regional Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Exceed SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum On-Site Project Emissions	**19.9**	**17.7**	**52.5**	**0.1**	**0.6**	**0.6**
Localized Significance Thresholds (LSTs)[1]	*N/A*	*121*	*11,233*	*N/A*	*7*	*2*
Exceed LSTs?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

[1] Allowable emissions (pounds per day) as a function of receptor distance (100 meters) from site boundary. LSTs for SRA 2: Northwest Coastal Los Angeles County.

Source: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

Notes: Some numbers may not add up precisely due to rounding considerations. See Appendix C for complete modeling results.

For a conservative estimate of project emissions, emissions were modeled during winter and summer, then reported for the maximum day during the winter or summer, whichever was highest. Maximum daily emission estimates were then compared to the SCAQMD thresholds and LSTs measured in pounds per day.

Mitigation Measures

Mitigation measures would not be required.

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS (E.G., TACS). IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Toxic Air Contaminants

CONSTRUCTION

Project construction would result in temporary increases in local TAC emissions as a result of DPM generated by heavy-duty construction equipment. The potential cancer risk from the inhalation of DPM outweighs the potential non-cancer health impacts and is therefore the focus of this analysis

(CARB 2022b). Cancer risk and non-cancer health impacts resulting from construction TAC emissions were quantified for this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period of time. Construction of the project would occur over approximately two years and seven months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual.

Under PDF AQ-1, the project would implement Tier 4 construction equipment which would further reduce impacts of TACs. In addition, the project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these requirements would minimize emissions of TACs during construction.

Based on modeling and health risk calculations, the maximally exposed individual receptor would be exposed to a 30-year excess cancer risk of approximately 1.4 in one million, which does not exceed SCAQMD's recommended cancer risk criteria of ten excess cases of cancer in one million individuals. In addition, chronic health risk is approximately 0.001, which does not exceed SCAQMD's hazard index threshold of one (SCAQMD 2019). A summary of this assessment is shown in Table 4.3-8 as follows, whereas Appendix C includes the modeling assumptions, modeling inputs, risk calculations associated with this assessment.

Table 4.3-8 Health Risk Assessment Results

Scenario	Excess Cancer Risk (per million)	Chronic Health Risk[1]
Residents	1.4	0.001
SCAQMD Significance Threshold	*>10*	*>1*
Threshold Exceeded?	**No**	**No**

[1] Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

Notes: See Appendix C for modeling assumptions, modeling inputs, and risk calculations.

Therefore, the construction of the proposed project would not result in the exposure of sensitive receptors to substantial pollutant concentrations, and the impact would be less than significant.

OPERATION

CARB's Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities) (CARB 2005). CARB guidelines provide the recommended siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. Residential and mixed-use land uses do not generate substantial TAC emissions based on the air toxic sources listed in CARB's guidelines. Therefore, the expected hazardous TACs generated on site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. The

project would not expose off-site sensitive receptors to significant amounts of carcinogenic substances or TACs. Therefore, operational impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.2.4 Cumulative Impacts

The planned and pending projects within a one-mile radius of the project site are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). However, the geographic scope for analyzing cumulative air quality impacts is the SCAB. The SCAB is designated a non-attainment area for the ozone NAAQS and CAAQS, the PM_{10} CAAQS, the 24-hour $PM_{2.5}$ NAAQS, and annual $PM_{2.5}$ NAAQS and CAAQS. The SCAB is in attainment of all other NAAQS and CAAQS. Therefore, cumulative air quality impacts related to particulate matter and ozone are potentially significant.

In accordance with *CEQA Guidelines* Section 15064(h)(3), the SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. If a project's mass regional emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. The proposed project would contribute emissions of particulate matter and ozone precursors VOC and NO_X to the area during construction and operation. As described under Impact AQ-2, project emissions during construction and operation would not exceed SCAQMD regional significance thresholds. Therefore, the proposed project's contribution to cumulative air quality impacts related to particulate matter and ozone would not be cumulatively considerable.

Furthermore, as discussed under Impact AQ-3, the proposed project would also not result in a significant impact related to TACs. Analysis of this impact considers the cumulative nature of the pollutants in the region; for example, the cancer risk and non-cancer risk thresholds have been set pursuant to existing cancer risks in the area and exceeding those thresholds would be considered a cumulative impact. Because the proposed project would not exceed those thresholds, it would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from TACs. Therefore, the project's contribution to cumulative air quality impacts related to these pollutants would not be cumulatively considerable.

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4.3 Cultural Resources

This section has been prepared in accordance with Section 15064.5 of the *CEQA Guidelines*, which considers potential impacts historical resources, archaeological resources, and human remains, and includes a summary of background information and review of known archaeological, and built environment resources, as well as the proposed project's potential impacts on these resources. The analysis in this section has been summarized from the Cultural Resources Technical Report prepared by Rincon Consultants in July 2024 (revised December 2024) for the proposed project, which is included as Appendix D to this EIR, and the Geotechnical Investigation prepared by Geocon West, Inc. (Geocon) for the project, which is included as Appendix F to this EIR:

- *Geocon, Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California, May 10, 2023*

For a discussion of the project's potential impacts on tribal cultural resources, refer to Section 4.13, *Tribal Cultural Resources*, of this EIR.

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation and preparation of the Cultural Resources Technical Report (Appendix D) for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

To clarify the applicable federal, State, and local regulatory criteria relevant to cultural resources and provide necessary context for the discussion that follows, the *Regulatory Setting* is purposefully presented prior to the *Setting* in this section, distinct from the other sections of the EIR.

4.3.1 Regulatory Setting

This section includes a discussion of the applicable State and local laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during implementation of the project.

Federal Regulations

National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the National Register of Historic Places (NRHP) are automatically listed in the California Register of Historical Resources (CRHR). The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local

history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 Code of Federal Regulations Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several of these seven qualities, if not all, defined as follows:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997: 41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

State Regulations

California Environmental Quality Act

California Public Resources Code (PRC) Section 21084.1 requires that lead agencies determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a *historical resource* is a resource listed in, or determined eligible for listing in, the CRHR, a resource included in a local register of historical resources or identified in a historical

resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the NRHP are automatically listed in the CRHR, as are California Historical Landmarks 770 and above; both are therefore historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (*CEQA Guidelines* Section 15064.5[c][4]). *CEQA Guidelines* Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). *Material impairment* is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (*CEQA Guidelines* Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

The requirements for mitigation measures under CEQA are outlined in *CEQA Guidelines* Section 15126.4(a)(1). In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards) is considered to be mitigated below a level of significance (*CEQA Guidelines* Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (*CEQA Guidelines* Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 Section 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use to include a range of historical resources that better reflect the history of California (PRC Section 5024.1[b]). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (OHP 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (OHP 2011). Generally, the California Office of Historic Preservation (OHP) recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (OHP 1995: 2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: Is associated with the lives of persons important to our past

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification.

California Public Resources Code Section 5097.98

Section 5097.98 of the PRC states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

Local Regulations

West Hollywood General Plan 2035

The Historic Preservation Chapter of the City's General Plan addresses the City's goals and policies in preserving and protecting its cultural resources. Goals and policies that apply to the project include the following (West Hollywood 2011):

Goal HP-3: Protect cultural resources from demolition and inappropriate alterations.

> **Policy HP-3.6:** Suspend development activity when archaeological resources are discovered during construction. The project sponsor will be required to retain a qualified archaeologist to oversee the handling of resources in coordination with appropriate local and State agencies and organizations and local Native American representatives, as appropriate.

West Hollywood Municipal Code

The City's Cultural Heritage Preservation Ordinance (WHMC Title 19 Article 19-4 Chapter 19.58) authorizes the Historic Preservation Commission (HPC) to approve a nomination application for and recommend the designation of a cultural resource to the City Council. The Council may designate a cultural resource, or any portion thereof (both interior and exterior), or a historic district by the procedures outlined in the ordinance. An eligible property may be nominated and designated as a cultural resource if it meets one or more of the following criteria:

A. *Exemplifies Special Elements of the City.* It exemplifies or reflects special elements of the city's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses integrity of design, location, materials, setting, workmanship feeling, and association in any of the following ways:
    1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship.
    2. It contributes to the significance of a historic area by being:
        a. A geographically definable area possessing a concentration of historic or scenic properties
        b. A thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development
    3. It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning.
    4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation.
    5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city.

B. *Example of Distinguishing Characteristics.* It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen.

C. *Identified with Persons or Events.* It is identified with persons or events significant in local, state, or national history.

D. *Notable Work.* It is representative of the work of a notable architect, builder, or designer.

The cultural heritage preservation ordinance also provides measures to reduce impacts to cultural resources due to development. As defined in WHMC Title 19 Article 19-6 Chapter 19.90, a *cultural resource* is:

> Any building, structure, portion of a structure, improvement, natural area feature, object, or site, district, or any grouping of structures or improvements which may be of aesthetic, archaeological, architectural, cultural, educational, historic, landscape architectural, or scientific significance to the citizens of the city, state or nation which is, or may be, eligible for designation or which has been designated and determined to be subject to historic preservation in compliance with the provisions of Chapter 19.58. Cultural resources includes all potential and designated resources, and contributing resources in historic districts.

Per WHMC Section 19.58.040 of the ordinance, the HPC shall serve as the review authority for all projects involving designated or eligible cultural resources, including applications for Certificates of Appropriateness. The HPC's recommendations regarding Certificates of Appropriateness are subject to the approval of the City's Planning Commission.

WHMC Section 19.58.090 of the ordinance includes regulations for the issuance of a Certificate of Appropriateness for any project that proposes to alter or demolish a designated or potential cultural resource. The purpose of the City's Certificate of Appropriateness procedures is to protect cultural resources from any development activity that would result in an adverse effect. To achieve this purpose, a Certificate of Appropriateness is required for the alteration, demolition, or removal of any designated or potential cultural resource by the City, any agent of the City, or a private party. All requirements and findings pertaining to Certificates of Appropriateness are applicable to both individual resources and contributors to historic districts. Non-contributing resources within historic districts are not reviewed under a Certificate of Appropriateness requirements, except when a non-contributing property is proposed to be demolished. All other development projects involving a non-contributing property are subject to review by the HPC to ensure that the proposed development would not adversely affect the historic district. The review and approval of a Certificate of Appropriateness requires environmental review compliant with the *CEQA Guidelines* as they relate to historic resources.

As detailed in Section WHMC 19.58.100, a Certificate of Appropriateness shall be issued for a proposed alteration if certain conditions are met, including that:

a) The proposed work will neither adversely affect the significant architectural features of the cultural resource nor adversely affect the character or historic, architectural, aesthetic interest, or value of the cultural resource and its site; and

b) The proposed work conforms to the prescriptive standards and design guidelines, if any, prepared by the Historic Preservation Commission for the particular resource, and to the Secretary of the Interior's Standards for Rehabilitation (Standards), and does not adversely affect the character of the cultural resource; and

c) In the case of construction of a new improvement upon a cultural resource property, the use and design of the improvement shall not adversely affect, and shall be compatible with, the use and design of existing cultural resources within the same historic district.

Alterations to a cultural resource that would otherwise be found to be adverse may be considered not adverse when the alteration is:

a) Limited to the rehabilitation or restoration of improvements; and
b) Conducted in a manner that preserves the archaeological, cultural, and historic value of the cultural resource through conformance with the prescriptive standards adopted by the HPC for that cultural resource, cultural resource property, or historic district, and the guidelines of the Secretary of the Interior's Standards for Rehabilitation.

WHMC Section 19.58.110 establishes guidelines for the HPC to recommend the issuance of a Certificate of Appropriateness for a project proposing to demolish a designated or eligible cultural resource. The HPC may recommend a Certificate of Appropriateness if all the following findings are made:

a) The cultural resource cannot be remodeled, rehabilitated or re-used in a manner which would allow a reasonable use;
b) Denial of the application will diminish the value of the subject property so as to leave substantially no value;
c) The cultural resource cannot be remodeled, rehabilitated, or re-used in a manner that would allow a reasonable rate of return; and
d) The applicant demonstrated that all means involving city-sponsored incentives (e.g., financial assistance, grants, loans, reimbursements, tax abatements, and changes in the Zoning Map or Zoning Ordinance), as well as the possibility of a change of use or adaptive reuse in compliance with Section 19.58.150(E)(5)(b) (Change of Use or Adaptive Reuse), above have been explored to relieve possible economic hardship, and further, that all other means for alleviating economic hardship, including state or federal tax credits, grants to subsidize the preservation of the property, have been exhausted and have failed to alleviate the hardship.

If approval of a Certificate of Appropriateness will result in the demolition of a cultural resource, the applicant is required to document the resource proposed for demolition in a manner consistent with the standards of the Historic American Building Survey. The following types of documentation are acceptable: archaeological survey, floor plans, measured drawings, photographs, or other documentation specified by the HPC. The HPC may also require that a memorialization of the resource be incorporated into the proposed redevelopment of the site. Memorialization may be affected by the creation of a book or pamphlet, photographic display, small museum or exhibit, reuse of original fixtures, and/or other methods not specified in the ordinance.

City of Los Angeles Historic Cultural Monument Eligibility Criteria

Although the project site is not located in the City of Los Angeles, two adjacent parcels associated with the former CEMEX concrete batch plant (Assessor Parcel Numbers [APNs] 5531-014-013 and -014) are located within the City of Los Angeles and have the potential to qualify as a City of Los Angeles Historic-Cultural Monument (HCM), the local historic landmark designation in Los Angeles. The following summary of the HCM eligibility criteria is provided below.

The City of Los Angeles Cultural Heritage Ordinance defines a *monument* or *local landmark* as any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles (Los Angeles Municipal Code

Section 22.171.7 Added by Ordinance No. 185,472, Effective 4-28-2018). A proposed HCM may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

4.3.2 Setting

The following discussion summarizes background information pertaining to the natural and cultural context of the project site and places the project site within the broader natural environment that has sustained populations throughout history. This section also provides an overview of regional indigenous history and post-contact history. This background information describes the distribution and type of cultural resources documented near the project site to inform the cultural resources sensitivity assessment and the context within which resources have been evaluated.

Natural and Environmental Setting

The project site is situated within the northern portion of the physiographic area known as the Los Angeles Basin, on an alluvial fan that formed from the sediments originating from the Santa Monica Mountains, located approximately one mile north of the project site. There are no substantial topographical features on the project site and none of the surrounding area retains its natural setting, with the project site located in a commercial area characterized by a mix of commercial buildings and businesses and apartment complexes. Vegetation near the site consists of ornamental trees, including low groundcover and succulents, consistent with urban environmental settings. The nearest natural (albeit channelized) water source, the Los Angeles River, is located approximately 6.5 miles east of the project site.

Cultural Setting

Indigenous History

The project site is in what is generally described as the Northern Bight archaeological region, one of eight organizational divisions of California designated by Jones and Klar (2007). The California Bight is bounded by the Southern California coastline and encompasses the previously designated Southern Coast archaeological region described by Moratto (1984). The Northern Bight archaeological region primarily includes the counties of Santa Barbara, Ventura, and portions of Los Angeles, extending from the coastline at Vandenberg Space Force Base inland to the Cuyama River Valley and south to the Santa Monica Mountains and the Los Angeles Basin. Following Glassow et al. (2007), the prehistoric cultural chronology for the Northern Bight is generally divided into six periods: Paleo-Indian (ca. 10,000–7000 before common era [BCE]), Millingstone Horizon (7000–5000 BCE), Early Period (5000 BCE–2000 BCE), Middle Period (2000 BCE–1 common era [CE]), Middle-Late Transition Period (1–1000 CE), and Late Period (1000 CE–Historic Contact).

Post-Contact Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968, Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabríllo and Vizcaíno (Bancroft 1885, Gumprecht 1999).

By the eighteenth century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823. Within present day Los Angeles County, the Mission San Gabriel Arcángel was founded in 1771 and the Mission San Fernando Rey De España was founded in 1797.

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822–1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848–Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton, and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as United States territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the Southern California economy through 1850s. The discovery of gold in the northern part of the State led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from Southern to Northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

LOCAL HISTORY

The project area is in southwest West Hollywood adjacent to the city's boundary with the City of Los Angeles. Although a portion of one of the properties constituting the project site is located in Los Angeles (these City of Los Angeles parcels are not a part of the project site), the project site's history is best understood in the context of the history of West Hollywood, which is briefly summarized below.

The area that became West Hollywood was first developed in the 1890s. During this period, Moses H. Sherman, a pioneer in transportation systems, and his brother-in-law, Eli P. Clark, formed the Pasadena and Pacific Railroad to connect Los Angeles with Santa Monica. The railway line crossed what was once known as the Cahuenga Valley, a landscape characterized by marshes, tar pits, and

citrus groves. At the base of the Hollywood Hills, the Cahuenga area was recognized as having conditions favorable to agriculture. Unaffected by frost, winter vegetables and lemons were raised successfully there.

Settlement was sparse until the late 1890s, when, in 1896, a water delivery system was introduced to the area. That same year Sherman and Clark built a rail yard and power plant approximately halfway between Los Angeles and Santa Monica, where modern-day Santa Monica and San Vicente Boulevards intersect, approximately two miles west of the project site. They also established a small town adjacent to the railyard where residential lots were available for $150, establishing the small, working-class town of Sherman for railroad workers and their families (Guinn 1915, Masters 2011).

Farms and open fields separated Sherman from the neighboring communities of Hollywood and Colegrove. Following the arrival of the motion picture industry in Los Angeles in the late 1910s, Sherman experienced associated growth, primarily due to its convenient location between Hollywood and Beverly Hills. By the 1920s, development in Los Angeles expanded to meet with the border of Sherman, at which point the town's population boomed (Masters 2011). While much of the development in what is now the eastern part of West Hollywood represented the residential and commercial expansion of Sherman, the area near the intersection of North La Brea Avenue and Santa Monica Boulevard, where the current project site is located, witnessed significant industrial growth by the 1920s, including the establishment of building materials enterprises, phonographic record manufacturing, and an ice plant (ProQuest 1926, 1950). While annexation into the City of Los Angeles was discussed, Sherman remained unincorporated, officially changing its name to West Hollywood in 1925 (Masters 2011).

An important aspect of West Hollywood's economy from the 1920s to World War II was the emergence of major commercial corridors on Sunset and Santa Monica boulevards. The section of Sunset Boulevard known as the Sunset Strip became famous as an entertainment center associated with the Hollywood film industry, due largely to the area's proximity to several studios and the lax enforcement of liquor laws in unincorporated Los Angeles County. In the late 1920s and 1930s, a number of residential and commercial landmarks were erected along the Sunset Strip, including the Sunset Tower, Sunset Plaza, the Garden of Allah, and Café Trocadero. Development on Santa Monica Boulevard was of a generally more prosaic character. For instance, the road's status as a segment of United States Route 66 (so designated in 1926) led to typically low-rise, automobile-oriented development (Galvin Preservation Associates Consulting [GPA] 2016).

In the two decades following World War II, West Hollywood faced significant change. The community emerged as a center for the arts, including a large concentration of interior designers in the southeast section of the city. At the same time, by the 1960s, the supper clubs that characterized the heyday of the Sunset Strip gave way to modern high-rise hotels and offices. Where older commercial buildings remained, they were often taken over by enterprises catering to the youth culture of the period. The forerunner to such youth-oriented businesses was the nightclub Whiskey-A-Go-Go, which opened in 1964 and became "one of the most celebrated clubs in the history of rock music" (GPA 2016).

Though the late-twentieth century, a period in which the community incorporated as a city, West Hollywood was a magnet for an increasingly diverse community, as described in the following excerpt from the 2016 *City of West Hollywood Commercial Historic Resources Survey*, prepared for the City by GPA.

> "From 1966 to 1984, West Hollywood was a destination for several diverse groups of people. The interior design industry continued to be an important force in the area through the 1970s and 1980s. Numerous European firms, including Ligne Rosset, opened their only stores in the United States in West Hollywood, demonstrating the supremacy of the area to the design industry in the country. Spearheaded by developers Friedman and Kates, the construction of the Pacific Design Center in 1975 further affirmed the growth and permanence of the design industry in West Hollywood's economy. By the end of the 1980s, "More than 40% of the city's economic activity derived from creative industries such as fashion, food, and the arts." In addition, West Hollywood became one of the centers of the music and art scenes for the youth and counter-culture movements of the 1960s and 1970s. The Sunset Strip became synonymous with youth culture as it evolved from the swinging '60s to the harder rock scenes of the late 1970s and early 1980s. At the same time, Santa Monica Boulevard became a business district catering to the gay and lesbian population as they increasingly asserted their rights to identify publicly as homosexuals. At the end of the period another group, Russian Jewish immigrants, also found a refuge in West Hollywood. The older population of renters would join with these newer groups to create the new city of West Hollywood in 1984."

READY-MIX CONCRETE INDUSTRY

The ready-mix concrete process emerged in the early-twentieth century in the United States as a logistical improvement on existing practices for the production of concrete. Earlier practices relied on the shipment of unprocessed materials—cement, aggregate, and water—to a construction site, where they were mixed and poured. Ready-mix concrete, on the other hand, was processed at a central plant and delivered to a job site via horse-drawn wagon or, later, trucks and truck mixers.

The first delivery of ready-mix concrete may have occurred in 1913 in Baltimore, Maryland, though this claim is sometimes disputed. An early patent for a truck mixer was submitted by Stephan Stepanian of Columbus, Ohio, in 1916. This patent was rejected, however, and the advent of reliable truck mixers was held off several years due to the inadequacy of early automotive technology. Whatever the details of its origins, the industry's heyday occurred during the 1920s. In 1922 or 1923, the first soundly documented ready-mix plant was established in Danville, Virgina. This plant stood as proof-of-concept for the ready-mix plant, and by 1925, there were at least 25 such plants in the United States (Arthur 2004). Among these was a plant opened in 1923 on the current project site, at 1000 North La Brea Avenue, which may have been the first established in the Western United States (Concrete 1924). As discussed in more detail in Section *4.3.1, Setting*, of this section, that site has undergone substantial changes since the 1920s, including the thorough replacement of mill equipment and enlargement of the plant footprint. By 1929, the growing use of concrete as a primary building material supported more than 100 concrete ready-mix plants nationally (Arthur 2004).

The advent of the ready-mix plant coincided with a major building boom in Greater Los Angeles. In this period, reinforced concrete became, as one source puts it, "a signifier of the highest-quality of commercial and industrial building in the early twentieth century." Among the material's notable characteristics were its fireproof and earthquake resistant qualities. As concrete became a predominant building material, use of ready-mix plants allowed suppliers to overcome significant logistical inefficiencies in the shipment of raw materials. Instead, a plant could be erected in an area experiencing new development, only to be disassembled and relocated once jobs in the area were completed (City of Los Angeles 2018).

Ready-mix concrete production received a boost with the development of reliable mixer trucks. Early on, the development of the vehicle type was hindered by the mechanical limitations of trucks through the 1920s. By the early 1940s, though, technical advances allowed for heavier trucks with more powerful engines, making the mixer truck more practical and in relatively high demand by World War II (PCA 2022).

Ready-mix concrete plants continued to support development in the Southern California region during the building boom of the Post-World War II Era. At least two ready-mix plants of more than 50 years of age remain in the Greater Los Angeles area, the aforementioned site on North La Brea Avenue and one constructed at the intersection of Ethel Avenue and Raymer Street in Los Angeles in 1953 (City of Los Angeles 2018).

LATE MODERNE STYLE ARCHITECTURE

The Late Moderne style emerged during the late-1940s Southern California construction boom as a fusion of the Streamline Moderne and Public Works Administration Moderne styles popular during the years of the Great Depression and International Style, which became widespread in Southern California in the early Post World War II Era. Los Angeles architect Stiles O. Clements was a key innovator of the style, notably in his designs for prominent department stores and supermarkets. Key features of the style include curved canopies and corners borrowed from the Streamline Moderne style and from the International Style, a box-like form, flat roof, bezeled, and horizontal ribbons of windows. Walls are typically clad in smooth stucco and may be penetrated by front-facing recessed display cases or windows. Late Moderne style properties are most likely to be found in commercial districts developed in the early postwar period (City of Los Angeles 2021).

Project Site Setting

The project site encompasses 1000, 1014, 1020, and 1028 North La Brea Avenue, located in West Hollywood, immediately adjacent to the city's boundary with the City of Los Angeles. The northern end of the project site (identified as 1020 North La Brea Avenue in this analysis) is characterized by a Late Moderne-style commercial and industrial building constructed in 1947. The southern end of the project site (identified as 1000 North La Brea Avenue in this analysis) consisted of a portion of a ready mix concrete batch plant, which was first developed in the 1920s and extended east of the project site into incorporated City of Los Angeles. The 1000 North La Brea property was redeveloped with new concrete mixing facilities in the 1930s and 1960s. The concrete batch plant facilities, as they existing prior to CEMEX ceasing operations and vacating the concrete batch plant from the site and which were heavy industrial in character, dated to the 1960s redevelopment. This analysis, based on the findings of the Cultural Resources Technical Report (Appendix D), considers potential impacts to the concrete batch plant, including the portion that was located within the City of Los Angeles despite that portion being located outside the project site. The historical significance evaluations prepared for the Cultural Resources Technical Report are presented in the following *Methodology* section.

4.3.3 Impact Analysis

Methodology

The methods utilized in support of the Cultural Resources Technical Report (Appendix D), upon which this analysis is based, were developed to facilitate CEQA compliance by identifying any

cultural resources, including built environment/historical resources, archaeological resources, and human remains, which could be significantly impacted by the proposed project.

California Historical Resources Information System Records Search

On September 28, 2023, a California Historical Resources Information System (CHRIS) records search was completed at the South Central Coastal Information Center (SCCIC) to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.25-mile radius surrounding it. The CHRIS records search research identified 11 cultural resources that have been previously recorded within 0.25 miles of the project site, all of which are built environment resources; no prehistoric or historic-period archaeological resources were identified.

A review of the NRHP, California OHP Built Environment Resources Directory, City of Los Angeles HCM listings, City of West Hollywood local register, and survey reports for surveys conducted in the cities of West Hollywood and Los Angeles identified the following: two individual built environment resources within the project site, three individual built environment resources adjacent to the project site, a portion of one special planning district adjacent to the project site, and additional resources located elsewhere in the 0.25-mile radius (not within or adjacent to the project site), including 15 individual built environment resources and portions of two built environment historic districts.

Sacred Lands File Search

The Native American Heritage Commission (NAHC) was contacted on September 28, 2023, to request a search of the Sacred Lands File (SLF). The NAHC replied on November 15, 2023, stating that the results of the SLF search were negative indicating that no sacred lands have been previously identified in the vicinity of the project.

Field Survey

A qualified architectural historian completed a built environment survey of the project site on September 29, 2023. Built environment resources existing within the project site at that time, including buildings and structures associated with the CEMEX concrete batch plant and its operations. Pursuant to OHP Guidelines (OHP 1995: 2), properties over 45 years of age were evaluated for listing in the NRHP and recorded on California Department of Parks and Recreation 523 Forms (Appendix C to the Cultural Resources Technical Report, Appendix D). The overall condition and integrity of these resources were documented and assessed. Properties with no potential for historical significance and/or to be negatively affected by the project were documented but exempted from further evaluation or consideration. This included minor, ubiquitous, or fragmentary infrastructure elements, such as utility lines and roads. Site characteristics and conditions were documented using notes and digital photographs. Because the entirety of the project site is developed, an associated archaeological survey was not conducted.

Historical Resources Evaluations

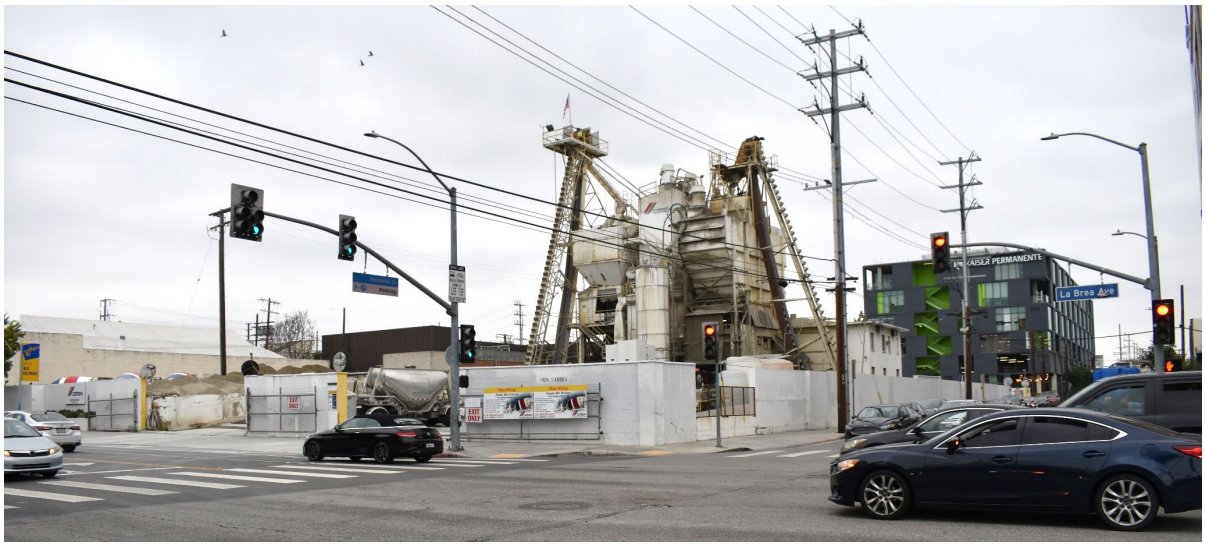
Historical resources evaluations, summarized below, were completed as a part of the Cultural Resources Technical Report prepared in support of the project (Appendix D). Potential resources were evaluated for eligibility for the NRHP, CRHR, and local registers in the cities of West Hollywood and Los Angeles, as applicable.

1000 North La Brea Avenue

PHYSICAL DESCRIPTION

The property at 1000 North La Brea was an approximately 1.2-acre, ready-mix concrete batch plant, occupying four parcels that form an overall L-shaped plan site that spans areas of cities of West Hollywood and Los Angeles, with the westernmost two parcels (APNs 5531-015 and -016) and most of the former mill structure located in West Hollywood's jurisdiction and the easternmost two parcels (APNs 5531-014-013 and -014), including a minor portion of the mill and other minor features, located in Los Angeles' jurisdiction. Notably, the parcels located in the City of Los Angeles are not part of the current project and are discussed only relative to their historical associations with the project site. CEMEX's concrete batch plant equipment centered on a vertical concrete mill, located near the property's southwest corner, in addition to such secondary features as stockpile bins, paved parking and staging areas, and an open-frame shelter (Figure 4.3-1).

Figure 4.3-1 Overview of 1000 North La Brea Avenue, Facing Northeast



The facility's centerpiece was the vertical cement mill (Figure 4.3-2 on the following page). A towering steel structure, the mill consisted of a series of hoppers suspended above a central concrete mixer. The hoppers, and through them the mixer, were fed cement and aggregate from nearby stockpiles via conveyors on the north and south sides of the mill. The mixer was suspended above a passage in which truck mixers were loaded with processed, yet still plastic, concrete. Vehicular access to the mixer and stockpiles was made via low concrete ramps, while a stairway and catwalk allowed pedestrian access to some upper features of the mill.

Figure 4.3-2 Detail of Cement Mill at 1000 North La Brea Avenue, Facing East

Attached to the southeast of the mill structure was a two-story office building featuring a utilitarian design aesthetic (Figure 4.3-3). It had a rectangular plan, concrete foundation, and flat precast concrete roof with a moderate overhang on all four sides. Its exterior was exposed structural concrete blocks. Elevated first-story entrances faced the raised loading dock on the east elevation. One entrance featured a sliding wood door, while the door type at the other entrance could not be determined due to limited access. An upper-story entrance faced north, where a concrete and steel exterior staircase accessed a glazed wood-panel door. Windows included paired steel casements punctuating the exterior of both stories.

Figure 4.3-3 Office Building at 1000 North La Brea Avenue, Facing West

At the northeast corner of the property was the open-frame shelter. It was a simple, utilitarian structure, consisting of a steel-pole frame and a corrugated metal roof that sheltered a concrete-paved area.

A concrete-masonry-unit wall traces the property's street-facing west, east, and south boundaries. Access is controlled by chain-link gates that front all three streets bordering the property. Security and safety features include stretches of barbed wire, steel grilles, and convex mirrors.

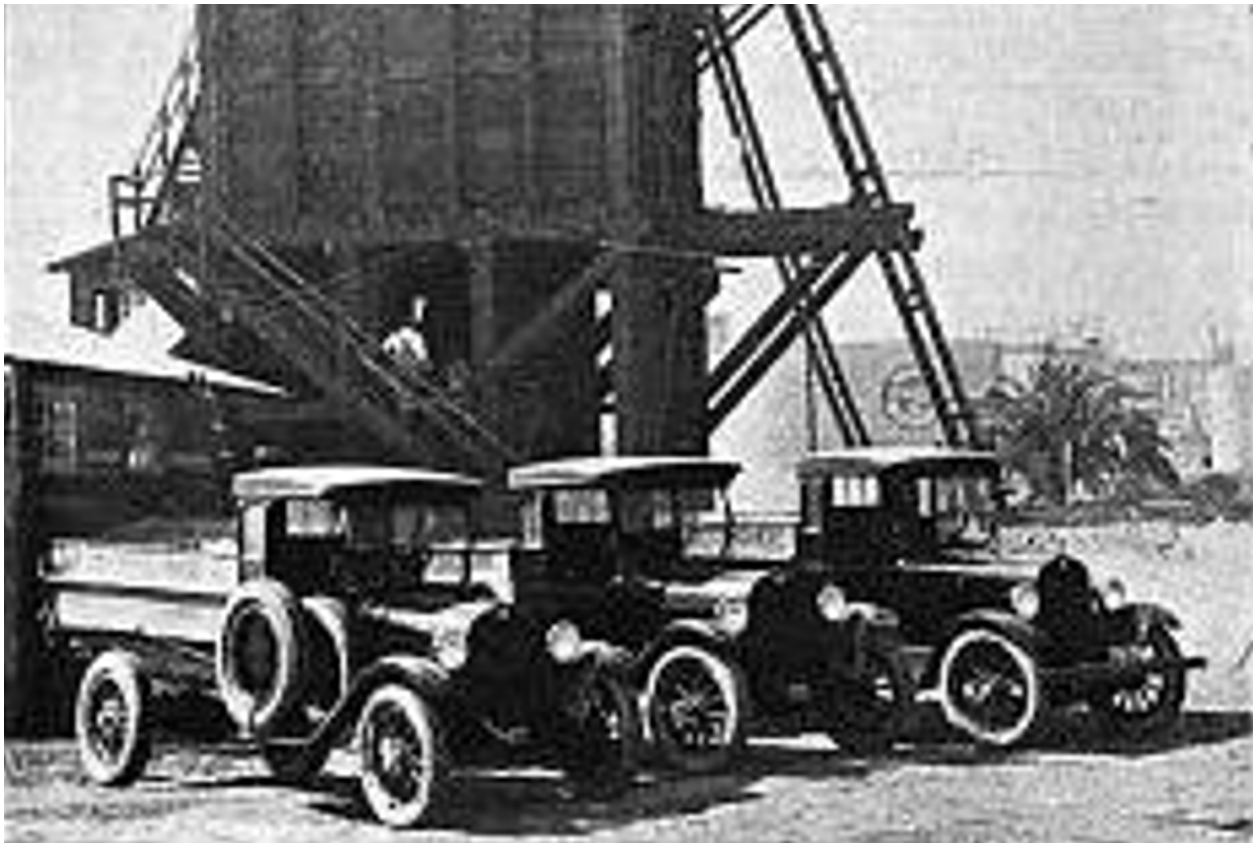
PROPERTY HISTORY

By the early 1920s, United States Geological Survey (USGS) topographical maps show, the urbanization of Greater Los Angeles began to encroach on the area surrounding 1000 North La Brea Avenue, with much of the development in the immediate area being industrial. As part of this development trend, the Uniform Mixed Concrete Company established a concrete plant on the site in 1923 or 1924 (USGS 2023, *Los Angeles Evening News* 4/12/1924, *Concrete* 1924). The company was a venture of Southern California construction firm Stine and Ellis. Available documentation identifies the proprietors only as Mr. Stine and Mr. Ellis and provides few details on their identities or biographies, outside their involvement in the construction industry under the business names Stein and Ellis and Uniform Mix Concrete Company (*Concrete* 1924).

According to a 1924 article in the trade magazine *Concrete*, the origins of the 1000 North La Brea Avenue plant traced back to Stine and Ellis experimentations with the use of temporary central mixing facilities to supply construction of the Coast Highway between Santa Barbara and Gaviota. Through internal accounting, the firm found their central production method, though crude and dependent on "insufficient" machinery, helped to save costs when compared with then-conventional methods involving the shipment of component materials to a job site and mixing on-site. The company soon decided to build a plant in the booming Los Angeles area, eventually settling on the North La Brea Avenue site. Operating under the name Uniform Mix Concrete Company, its proprietors conceived of the central mix plant as a "concrete store" conveniently available to local developers (*Concrete* 1924).

As described in the 1924 article, the company's 1000 North La Brea Avenue facility was "the pioneer central mixing plant of the West." It was developed at cost of $25,000, four electric rock hoppers and a nine-sack tilting mixer offering a production capacity of 365 cubic yards of concrete per eight-hour period (*Concrete* 1924). The photograph accompanying the 1924 article offers only a partial view of the North La Brea Avenue plant but shows a one-story office building and an adjacent concrete mill that was likely considerably smaller and of less elaborate design than the mill that existed on-site (Figure 4.3-4). The flat-bed delivery trucks the firm used were also unsophisticated in comparison with the large truck mixers developed by the 1930s. By the time of the article's publication, Uniform Mixed Concrete Company established two additional ready-mix plants in the region (*Concrete* 1924).

Figure 4.3-4 Trucks and Mill at Uniform Mixed Concrete Company, ca. 1924



Source: *Concrete* 1924

By 1936, Transit Mixed Concrete Company had taken over the plant at 1000 North La Brea Avenue. The firm was founded in 1930 by Howard Switzer and his older brother, L. Glenn Switzer, both originally of Long Beach, California. The North La Brea Avenue plant was at least the third plant run by the company, which also operated plants in Pasadena and Pomona (*Los Angeles Illustrated Daily News* 6/18/1936, *Los Angeles Times* 1/9/1997). On the following page, Figure 4.3-5 shows a truck mixer in front the company's cement mill. The mill shows apparent heavy timber construction similar to that in the 1924 photograph presented in Figure 4.3-4; however, the mill appears to have been either rebuilt or enlarged substantially. In addition, a concrete bunker (non-extant) for material storage is situated next to the mill. Based on a review of historical photographs and the site visit conducted for this study, it appears that no elements of the plant depicted in Figure 4.3-4 or Figure 4.3-5 were extant.

Figure 4.3-5 Mill and Truck Mixer at Transit Mixed Concrete Company, 1000 North La Brea Avenue, View to Southeast, 1937

Source: Calisphere.org

A review of historical aerial photographs and County of Los Angeles assessor data show Transit Mixed Concrete replaced the mill pictured above with the existing mill and adjoining office building in 1962 (NETR Online 2023, Los Angeles County Assessor 2023). Further expansion was accommodated with the demolition of the shop buildings at the north end of the site ca. 1964 (Advantage Environmental Consultants [AEC] 2023). No notable physical changes had been made to the plant since the 1960s. However, by the early twenty-first century, the plant came under the ownership of the Mexico-based firm CEMEX Construction Materials (AEC 2023). Research for this study found no information of consequence pertaining to the mill following its redevelopment in 1962 or acquisition by CEMEX.

The following Table 4.3-1 summarizes the construction and alteration history of 1000 North La Brea Avenue prior to CEMEX prior to CEMEX ceasing operations and vacating the concrete batch plant between September 2024 and December 2024.

Table 4.3-1 1000 North La Brea Avenue Construction History

Permit #	Date Issued	Description of Work	Architect/ Contractor	Property Owner	Notes
N/A	N/A	Construction of cement mill	Unknown	Uniform Mixed Concrete Company	Constructed 1923 or 1924, per historical magazine article
N/A	N/A	Construction or enlargement of cement mill	Unknown	Transit Mixed Concrete Company	Ca. 1937 per historical site photograph
32765	1941	Concrete footing for rock and sand bunker	N/A	N/A	Some details of permit are not legible
N/A	N/A	Dust collector built or installed	N/A	Transit Mixed Concrete Company	Some details of permit are not legible
N/A	N/A	Installation of underground tanks	Petra Builders	N/A	Some details of permit are not legible
N/A	N/A	Development of existing cement mill and office; demolition of shops at north end of site	Unknown	Transit Mixed Concrete Company	Date of 1962 estimated, based on County assessor data and historical aerial photos via NETR Online 2023

Sources: County of Los Angeles Building Permits, *Concrete* 1924, Calisphere.org 1937, Los Angeles County Assessor 2023, NETR Online 2023

HISTORICAL EVALUATION

The east side of the 1000 North La Brea property (i.e., the portion not included as part of the project site) crosses the City's boundary into Los Angeles. Therefore, in addition to having the potential to be eligible for the NRHP, CRHR, and local listing in West Hollywood, it also has potential to quality for local designation in the Los Angeles. Therefore, in keeping with professional best practices, the entirety of the property was evaluated under both the Los Angeles cultural resources regulations, and the West Hollywood cultural resources regulations, despite the current project site being located entirely in West Hollywood. The concrete batch plant was previously identified in the *City of West Hollywood Commercial Historic Resources Survey* in 2016 and assigned an OHP status code of 6Z, meaning it was recommended ineligible for listing in the NRHP, CRHR, and/or at the local level. Although details of the previous evaluation are not provided in available documentation, Rincon concurs with the finding of ineligibility and recommends the property ineligible for the NRHR, CRHR, City of West Hollywood register, or City of Los Angeles HCM designation.

National Register of Historic Places, California Register of Historical Resources, and City of Los Angeles Historic-Cultural Monument Evaluation

Because the evaluation criteria for the NRHP, CRHR, and HCM designation are consistent with one another, this section combines the analysis for each in a single evaluation. The City of West Hollywood cultural resources designation evaluation is presented separately, as follows.

The property was first developed in 1923 or 1924 as a ready-mix concrete plant and operated under the commercial name Uniform Mixed Concrete Company. The research conducted for this study found information suggesting it was the first of its kind developed in the Greater Los Angeles Area and the Western United States and was part of a shift within the building materials industry of the

1920s, not only toward the increasing use of reinforced concrete, but also toward the rise of centrally mixed concrete at ready-mix plants to generally replace the earlier and less-efficient practice of mixing concrete at job sites. Due to its place in the regional history of concrete production and the wider building materials industry, the property is significant under Criterion A/1 in the area of Industry and under HCM Criterion 1 under the context Industrial Development, 1850-1980; context Building the City, 1876-1965; and property type Industrial – Building and Construction – Concrete Ready Mix Plants. Its period of significance is the plant's original construction date of 1923–1924, recognizing the plant's role in pioneering the ready-mix concrete plant in the western states. However, although the property remained in use as a ready-mix concrete plant until recently, it did not retain sufficient integrity to convey its historical significance. The property had been subject to at least three significant phases of development: the initial establishment of the plant, including a heavy-timber mill and office building in 1923 or 1924; the reconstruction or significant expansion of the heavy-timber mill, removal of previously existing and construction of a new office building circa 1937; and the development of the modernized plant ca. 1962, which included the erection of the steel-fabricated mill and concrete-block office building as they existed prior to CEMEX ceasing operations and vacating the concrete batch plant, in addition to the expansion of the property. The property had, as a result, substantially lost its integrity of design, materials, workmanship, feeling, and association and no longer possessed the visual essence of the groundbreaking concrete plant first developed in the 1920s. Therefore, despite the property's historical significance dating to the period 1923 to 1937, it did not meet the integrity thresholds necessary to qualify for listing in the NRHP or CRHR or designation as an HCM under Criterion A/1/HCM 1.

City of Los Angeles historical resources guidance published in the SurveyLA historic context statement *Industrial Development, 1850-1980*, indicates ready-mix concrete mills may also be significant under Criterion A/1/HCM 1 for associations with the Los Angeles building boom of the Post-World War II Era (City of Los Angeles 2018). However, although the property retained a high degree of integrity to its 1960s redevelopment and had many potential character-defining features of its property type, research for this study found no evidence the ready-mix mill played a singularly significant role in the context of the Post-World War II-era building industry. Rather, it was one of several mills that provided raw materials needed to support building in the Los Angeles area during this period and collectively contributed to Los Angeles' exponential growth in the Mid- Century period. Additionally, research did not suggest that it was significant in any other event or trends important to the history of the city, region, State, or nation not mentioned above (Criterion A/1/HCM 1).

Research for this study found few individuals directly associated with the property. While the individuals identified as Mr. Stine and Mr. Ellis arguably made an important historical contribution due to their role in the history of concrete production in Greater Los Angeles and the Western United States, as discussed above, the property no longer had sufficient integrity to convey any association with their firm's tenure at the property in the 1920s. Available sources do not suggest any subsequent owner or occupant of the property, including Howard and L. Glenn Switzer of Uniform Mixed Concrete, has made significant contributions to the history of the city, region, State, or nation (Criterion B/2/HCM 2).

The property consisted of a cement mill and other utilitarian structures, in addition to an office building exhibiting no discernible architectural style. Available references do not suggest the mill represented any distinctive engineering characteristics or that it is anything other than a typical ready-mix concrete plant. Architecturally, the office was an undistinguished industrial building.

Neither the individual building and structures, nor the property as a whole embodied the distinctive characteristics of a type, period, or method of construction, represented the work of a master, or possessed high artistic values (Criterion C/3/HCM 3).

Based on background research and the records search results, the property is not likely to contain information important to prehistory of history (Criterion D/4).

City of West Hollywood Cultural Resources Evaluation

Based on the preceding information presented in the NRHP, CRHR, and HCM evaluation, the property is also recommended ineligible for designation under the City of West Hollywood's cultural resources designation criteria. It did not embody distinctive characteristics of a period, method, style, or type of construction, and was not a valuable example of the use of indigenous materials or craftsmanship (Criterion A1). It also did not contribute to the significance of a historic area by contributing to a geographically definable area possessing a concentration of historic or scenic properties (Criterion A2a) or a thematically related grouping of properties which are unified aesthetically by plan or physical development (Criterion A2b). As an ordinary concrete mixing facility, it did not singularly represent significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning (Criterion A3) or embody elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation (Criterion A4). Research for this study did not find that the property had a unique location or singular physical characteristic or that it was a view or vista representing an established and familiar visual feature of a neighborhood, community, or city (Criterion A5). While it was the only concrete mixing facility remaining in the city, it did not possess distinguishing characteristics of an important architectural or historical type or specimen (Criterion B). As discussed previously in the NRHP/CRHR Criterion A/1 and B/2 evaluation, the building was not identified with persons significant in local, State, or national history and lacked integrity to its period of significance to convey its associations with important historical events (Criterion C). Finally, the property was not known to be representative of the work of a notable architect, builder, or designer (Criterion D).

Historic District Consideration

Research for this study found no evidence 1000 North La Brea Avenue would qualify for designation as contributor to any known or potential historic district eligible at the national, State, or local levels. Although the area in which it was located was historically dominated by industrial concerns, available evidence does not suggest it shared a common theme with the extant buildings in its vicinity, which represent a combination of commercial, residential, and industrial historical uses.

1020 North La Brea Avenue

PHYSICAL DESCRIPTION

The property at 1020 North La Brea Avenue is a two-story industrial warehouse constructed with elements of the Late Moderne style of architecture (Figure 4.3-6 on the following page). It is rectangular in plan with a raised concrete foundation and capped with a warehouse roof with monitor. Its exterior consists of structural reinforced concrete and stack-bond-brick veneer on the front-facing, west elevation and exposed structural brick on the south elevation. The other elevations, on the north and east, were not visible during the field survey. The primary elevation's

predominant visual is a series of windows. The ground level features a pair of fixed wood-sash, display windows, each consisting of three large lower panes with a ribbon of 12 small lights above. On the second story, a continuous band of steel-sash windows, alternating in pairs of one-over-four fixed and casement configurations. The ribbon begins near the north end of the building and terminates at an oversized fixed pane window situated above the southernmost entrance. There are four entrances on the main elevation. These consist of two deeply recessed standard sized doors, accessed by concrete steps, each paired with a warehouse bay entrance with a metal roll-up door. Detailing is minimal, limited to features such as the bevel surrounding the upper-story window assembly and a non-original ornamental transom grille that is affixed above the northernmost standard entry and does not have a corresponding transom light. Key elements related to Late Moderne style architecture are the horizontal overall emphasis, band of steel casement windows, stack-bond brick accents, and lack of ornament. Alterations include the addition of the transom grille and related door surround, installation of security gates at all four entrances, and likely replacement doors at the southernmost entrance.

Figure 4.3-6 1020 North La Brea Avenue, West and South Elevations, Facing Northeast

PROPERTY HISTORY

According to County of Los Angeles assessor data, 1020 North La Brea Avenue was constructed in 1947. Available records do not identify the designer, builder, or original occupants or function of the building. However, the 1950 Sanborn fire insurance map covering the property shows it was, by that date, an electronics warehouse owned by the Record Corporation of America (RCA), known formally at the time as RCA Victor (ProQuest 1950). The company was the product of the merger in the 1920s of radio equipment manufacturer RCA and photographic equipment producer Victor Talking Machine Company. By the time the firm began occupying the building at 1020 North La Brea Avenue, it was a leading producer of radios, phonographs, and televisions, in addition to running a successful record label that produced recordings for many notable twentieth-century musicians (Encyclopedia.com 2023). RCA's association with the property was consistent with industrial land uses in the area. Around that time, the vicinity of La Brea Avenue and Romaine Street was a hub for

media industry activities, most notably recording studios and phonographic record pressing plants (Hollywood Media District 2023). RCA's own record pressing plant on the 1000 block of Sycamore Avenue, just east of 1020 North LA Brea Avenue (ProQuest 1950, Hollywood Media District 2023). A review of historical newspapers and city directories suggests RCA's tenure at the North La Brea Avenue property was at most four years. By 1951, RCA appears to have moved out of the building, with North La Brea Stanford's occupying the unit at 1020, Chenille Corporation of America at the 1022 unit, and American Shower Door, Inc. at the 2028 unit, and (Citadel EHS 2022). Thereafter, a succession of commercial, industrial, and entertainment-related interests occupied the building. Through the 1950s and early 1960s, home furnishings sellers and electronics firms conducted business from the property, typically on a short-term basis.

The research conducted for this study identified no information of consequence related to the property's occupants from this era, except the Califone Corporation, later Rheem-Califone, which was established at 1020 North La Brea Avenue by 1959 (*South Gate Press* 10/22/1959). Founded in 1946 by Robert G. Metzner, Califone produced audio equipment. Early in the company's run, it specialized in the manufacture of high-quality phono equipment for radio stations, though the system also became popular among private consumers, who wanted a hi-fi system at home. The key to the company's enduring success, however, may have been its entry into the market for phonographs designed for educational purposes. In 1953, Metzner patented a mechanism for the variation of speed of a phonograph ("varipole," by Metzner's term), which proved popular amid a 1950s revival of square dancing. The variable speed feature allowed square dance instructors to slow the speed of a record, thereby allowing novice dancers to learn steps at a more favorable tempo (Lee 1953). By 1953, the firm had a plant at 1041 Sycamore Street, located behind and on the same block as 1020 North La Brea Avenue. By the time the Rheem Manufacturing Company of New York acquired Califone in autumn 1959 (rechristening it as a fully owned subsidiary named Rheem Califone), the outfit had a presence at the North La Brea Avenue location, though it is not known to what purpose the firm designated the property. Under the Rheem Califone Corporation banner, the company manufactured Rheem's line of teaching machines for schools and industry and the Califone line of "record players, sound systems, language laboratories, and related teaching equipment" (*South Gate Press* 10/22/1959). The company was at this location until at least as recently as July 1960 (*Los Angeles Evening Citizen News* 7/8/1960).

By the late 1960s, the building was increasingly shared by companies in the entertainment industry, typically providing technical, equipment, and management services. Research suggests none of these firms remained at the property for more than a few years, or that they made any significant marks in their respective industries. Since the 1990s, the mix of occupants doing business from the property has been eclectic, representing the entertainment industry, automotive sales, and interior furnishings sales. The following Table 4.3-2 provides a summary of the property's occupancy history, as supported by the research for this study.

Table 4.3-2 1020 North La Brea Avenue Ownership/Occupancy History

Date	Property Owners/Tenants	Source
1950	Record Corporation of America	Sanborn fire insurance map (ProQuest 1950)
1951	North La Brea Sanfords; Chenille Corp of America; North La Brea American Shower Door Inc	Citadel EHS 2023
1956	George Held, Inc (electronic components); The Carpet Mill	City directory
1959	Rheem Califone	South Gate Press, October 22, 1959
1960	Rheem Califone; Film Salvage Co.; Marcus Yahr	City directory
1962	Marcus Yahr, cabinet maker; Harry Ivan	Citadel EHS 2023
1967	Marcus Yahr, cabinet maker; Chenault; Robt Productions; WCD Inc.	Citadel EHS 2023
1971	Neil Aronstam; Marketing Resources & Applications West Inc.; Media Sales Development; Marcus Yahr, cabinet maker; Barbore Productions Inc.; Channel One Studio; Enterprise Artists Agency	Citadel EHS 2023
1973	Action Communications; Lee Motion Picture Service ; Austin McKinney ; Lee Stronsnider	City directory
1976	Blue Ridge Editorial; Julius Danyi, cabinet shop; The Pleasure Chest; Lee Motion Picture Service; Austin McKinney	Citadel EHS 2023
1981,	M 2 Research; Leo Bonamy; Carolynne Co.; ABC Management; Transvideo Productions; VIP Video	Citadel EHS 2023
1986	M 2 Research; Continental Scenery	Citadel EHS 2023
1990	M 2 Research; Continental Scenery; ABA Advertising; Aaron Berger Advertising; Clarasol Productions; Creative Hispanic Marketing; International Crusade for the Penny; La Brea Studios; Medicos Unidos	Citadel EHS 2023
1994	M 2 Research; Boses Collections; Hollywood Picture Vehicles; Briers Motors	Citadel EHS 2023
1999	Boses Collections; Hollywood Picture Vehicles	Citadel EHS 2023
2000	Rocio VillaPando; Boses Collections; Hollywood Picture Vehicles; Briers Motors; Hollywood Picture Vehicles; Tonichi Trading USA Inc.	Citadel EHS 2023
2004	Boses Collection; Briers Motors; Hollywood Picture Vehicles; Tonichi Trading USA Inc.	Citadel EHS 2023
2006	The Scissors Clinic Sharpening Service and Salon; Briers Motors; Designers Views; Hollywood Picture	Citadel EHS 2023
2009	Hollywood Picture Cars; The Boses Collection; Briers Motors; Designers Views	Citadel EHS 2023
2014	Designers Views	Citadel EHS 2023

HISTORICAL EVALUATION

The property at 1020 North La Brea Avenue was previously identified in the *City of West Hollywood Commercial Historic Resources Survey* and assigned an OHP status code of 6Z, meaning it was recommended ineligible for listing in the NRHP, CRHR, and/or at the local level. Although details of the previous evaluation are not provided in available documentation, Rincon concurs with the results and recommends the property ineligible for the NRHP, CRHR, and local register, due to a lack of historical and architectural significance.

National Register of Historic Places and California Register of Historical Resources Evaluation

1020 North La Brea Avenue was developed in 1947 in an industrial area of West Hollywood near the RCA Victor record pressing plant and other media industry businesses. RCA Victor was the property's first documented occupant, though details on the function of the building under RCA Victor's occupancy are limited to the general characterization that the building was an electronics warehouse, serving only a prosaic and peripheral role in the company's business. While RCA Victor is a historically significant firm, and the history of the record industry and Greater Los Angeles had an important role in the performance, production, and distribution of recorded music consumed throughout the United States, there is no indication in available sources that the property was directly related to any important event related to either of these themes. Like RCA Victor, most of the companies that subsequently conducted business from the property did so on a short-term basis. Moreover, none of these businesses attained a level of significance that would merit designation at the national, State, or local level. Califone, later Rheem Califone, was the most successful business to operate from the property, aside from RCA Victor. However, available research did not find evidence that any incarnation of the firm made a singularly significant contribution to the history of audio reproduction equipment manufacturing while at this location. Furthermore, research did not find evidence that the property was directly associated with any other event or trend with significance to the history of the city, region, State, or nation (Criteria A/1).

Research for this study identified only a few individuals associated with the building at 1020 North La Brea Avenue. Among them, the best candidate for historical significance is Metzner, who founded Califone and patented a speed control for the phonograph. However, available evidence did not suggest his contributions, either generally through the work of his company or more specifically through his patent, are or should be regarded as historically significant contributions (Criterion B/2).

Architecturally, 1020 North La Brea Avenue is a warehouse whose façade features elements of Late Moderne design. However, these elements, including concrete construction, stucco cladding, and the horizontal emphasis achieved through the placement of the bezeled ribbon of upper-story windows, are concentrated at the façade and do not appear in the south elevation, which is characterized by exposed structural brick (the remaining two elevations, on the north and east, were not visible from the public right-of-way). As such, much of the building lacks the characteristic modernistic appearance of the style, instead, resembling the brick construction of conventional industrial buildings from earlier eras. Given the limited application of the style, the building does not embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or possess high artistic values (Criterion C/3).

Based on background research and the records search results, the property is not likely to contain information important to prehistory of history (Criterion D/4).

City of West Hollywood Cultural Resources Evaluation

The property at 1020 North La Brea Avenue is recommended ineligible for designation under the City of West Hollywood's cultural resources designation criteria. It does not embody distinctive characteristics of a period, method, style, or type of construction and is not a valuable example of the use of indigenous materials or craftsmanship (Criterion A1). It also does not contribute to the significance of a historic area by contributing to a geographically definable area possessing a concentration of historic or scenic properties (Criterion A2a) or a thematically related grouping of properties, which are unified aesthetically by plan or physical development (Criterion A2b). As a

common warehouse, it does not singularly represent significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning Criterion A3) or embody elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation (Criterion A4). Research for this study did not find that the property has a unique location or singular physical characteristic or that it is a view or vista representing an established and familiar visual feature of a neighborhood, community, or city (Criterion A5). As examples of the Late Moderne style of architecture were built widely throughout the Greater Los Angeles region, the property is not one of the few remaining examples in the city, region, State or nation, possessing distinguishing characteristics of an architectural or historical type or specimen (Criterion B). As discussed in the NRHP/CRHR Criterion A/1 and B/2 evaluation, the building is not singularly identified with persons or events significant in local, State, or national history (Criterion C). Finally, the property is not known to be representative of the work of a notable architect, builder, or designer (Criterion D).

Historic District Consideration

Based on the research conducted for this study, the property also has no potential to qualify for designation as a contributor to any known or potential historic district. Although the area was during the early and mid-twentieth century home to multiple properties with direct associations with the recording industry, the subject property had on a short-term association with this theme. That is, after serving no more than four years as a warehouse for the firm RCA Victor, the building was used by a succession of enterprises involved in a mix of businesses that included educational photograph production, home furnishing sales, motion picture production, and entertainment industry management. As such, the property's associations with the recording industry were historical tenuous, short-lived, and insufficient to merit designation in the NRHP, CRHR, or local register as part of a historic district centered on the area's history in the recording industry. Research for this study did not identify any other theme under which the property may be a historic district contributor.

Geoarchaeological Review

According to the to the Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2024a), the project site consists of one soil type: Urban land-Grommet-Ballona complex with 0 to 5 percent slopes and includes Urban land, Grommet, Ballona, Typic Xerothents, Pico, and Cropley soils, with Urban land accounting for approximately 45 percent of the soil type within the project site.

Given that A-horizons form on stable landforms, they are the primary horizons wherein archaeological materials would be typically deposited. There are different classes of A-horizons, including Ap-horizons, which are A-horizons that have been disturbed by agricultural activities such as plowing, and Ab-horizons, which are A-horizons that have been buried by depositional processes. Archaeological resources encountered within Ap-horizons represent a disturbed context wherein archaeological materials have been displaced by plowing and discing. Because Ab-horizons are buried A-horizons, they have the greatest likelihood to contain intact subsurface archaeological deposits. The project site does not contain subsurface topsoil (Ab horizon).

A review of the USGS mineral resources (USGS 2024) online spatial data for geology indicates that the project site is underlain by Quaternary alluvium and marine deposits from the Pleistocene to Holocene epochs. Late Pleistocene-era and Holocene-age alluvial fan formations have the potential

to support the presence of buried archaeological resources as these soils are contemporaneous with the documented period of prehistoric human habitation of the area and have potential to preserve cultural material in context, depending on the area-specific topographical setting.

The Geotechnical Investigation (Appendix F), addresses subsurface conditions within the project site (Geocon 2023). A review of the subsurface exploratory investigation results revealed that artificial fill soils are present from surface to depths between three and eight feet bgs in the areas investigated and is underlain by older alluvium from the Pleistocene age.

Sensitivity Analysis

The project site is underlain by geologic formations that have the potential to support the presence of buried archaeological resources depending on the area-specific topographical setting. However, given the lack of Ab horizons it is unlikely that the project site contains archaeological deposits buried by natural processes. Additionally, subsurface geotechnical investigations performed within the project site revealed that artificial fill soils are present from surface to depths between three and eight feet bgs in the areas investigated. In consideration of these factors, coupled with the results of the CHRIS and SLF records searches, the potential to encounter Intact subsurface archaeological materials from current grade to between three and eight feet bgs is unlikely; however, there is potential, though low, for intact cultural deposits to exist within native soils (at depths below between three and eight feet bgs) to the depths of proposed ground disturbance.

Significance Thresholds

The impact analysis included herein is organized based on the cultural resources checklist questions included in Appendix G of the *CEQA Guidelines*. Checklist item (1) broadly refers to historical resources. To differentiate between archaeological and built environment resources more clearly, analysis under checklist item (1) is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to *CEQA Guidelines* Section 15064.5 and those that may be considered unique archaeological resources pursuant to PRC Section 21083.2, are considered under checklist item (2).

According to Appendix G of the *CEQA Guidelines*, a project would have a significant impact on cultural resources if it would:

1) Cause a substantial adverse change in the significance of a historical resource, as defined in *CEQA Guidelines* Section 15064.5.
2) Cause a substantial adverse change in the significance of a unique archaeological resources pursuant to *CEQA Guidelines* Section 15064.5.
3) Disturb any human remains, including those interred outside of dedicated cemeteries.

All impact thresholds are addressed in the following impact discussion. However, the project's potential impacts to tribal cultural resources are addressed in Section 4.12, *Tribal Cultural Resources*, of this EIR.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact CUL-1 THE PROPOSED PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF HISTORICAL RESOURCES PURSUANT TO SECTION 15064.5. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Project implementation would cause impacts on historical resources if such activities would cause a substantial adverse change in the significance of a historical resource, which, as defined below, would include the demolition or substantial alteration of a resource such that it would no longer be able to convey its significance. Historical resources include properties eligible for listing in the NRHP or CRHR or as a local historic resource or landmark. Pursuant to PRC Section 15064.5, "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." As detailed in the following analysis, the project's potential to cause impacts to historical resources was analyzed for built environment resources located within the project site and known historical resources located immediately adjacent to the project site and within a 0.25-mile radius of the project site.

Built Environment Resources within the Project Site

Both 1000 and 1020 North La Brea Avenue were previously recommended ineligible for the NRHP, CRHR, or local designation as part of the City of West Hollywood Commercial Historic Resources Survey (GPA 2016) and are also recommended ineligible for listing in the NRHP, CRHR, or local designation based on the independent analysis provided above. Therefore, they do not qualify as historical resources pursuant to CEQA, their demolition would not constitute the material impairment of a historical resource.

Known Historical Resources Immediately Adjacent to the Project Site

In addition, archival research found that adjacent to the project site there are three properties, all historically industrial in character, designated or previously recommended eligible for the NRHP, CRHR, and City of Los Angeles HCM designation: 1040 North Sycamore Avenue (300 feet north of the project site; recommended eligible by SurveyLA), 960 North La Brea Avenue (80 feet south of the project site; recommended eligible by SurveyLA), and 7000 West Romaine Street (210 feet south; recommended eligible by SurveyLA and designated as City of Los Angeles HCM #1238; City of Los Angeles 2015, 2022).

Due to their listing or eligibility, the resources depicted in Figure 4.3-7 qualify as historical resources pursuant to CEQA. The project would not directly physically alter any of these properties but has the potential to affect the resources through the introduction of new visual elements and ground-borne vibration related to construction activities, discussed as follows.

The introduction of the new building within an existing urban setting is not anticipated to diminish the integrity of the existing historic properties near the project. Under CEQA, in addition to direct physical alterations, alterations to the setting of a historical resource have the potential to cause a substantial adverse change by altering the characteristics that convey the historical significance of The research conducted in support of the current project did not suggest that setting is a significant feature of any of the immediately adjacent known historical resources.

Figure 4.3-7 Resources Designated or Previously Determined Eligible for NRHP, CRHR, and/or HCM Designation

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23-14457 EPS
Fig X Project Location with Location Pins1

Additionally, the current setting of these resources is comprised of a variety of property types of varying scale, mass, and density. Among the buildings in the setting of these resources are three large-scale, multi-story properties constructed in the 2000s and 2010s, specifically, the West Hollywood Gateway shopping mall at 7100 Santa Monica Boulevard and the six- and eight-story buildings, respectively at the northeast and southwest corners of Romaine Street and North Sycamore Avenue. Therefore, the introduction of the proposed building into the setting of these historical resources would not diminish their respective settings such that the resources would no longer convey their historical significance. The project would be consistent with the character of the surrounding area in that the area is densely urbanized with buildings of various sizes, scales, architectural styles, and ages. Among the buildings in the immediate setting of these resources are three large-scale, multi-story properties constructed in the 2000s and 2010s, specifically, the West Hollywood Gateway shopping mall at 7100 Santa Monica Boulevard and the six- and eight-story buildings, respectively at the northeast and southwest corners of Romaine Street and North Sycamore Avenue. Given the immediate setting of these historical resources is already disturbed by relatively recent development, some of it on a relatively large scale, the proposed project would be consistent development in the area and would not result in the alteration of the physical characteristics that convey the historical significance of these adjacently located resources. Following the implementation of the project, these adjacent resources will remain eligible for historical resource designation, and they would remain qualified historical resources pursuant to CEQA. Further analysis of the project's potential for visual impacts is detailed in Section 4.1*, Aesthetics,* of this EIR.

Additionally, due to the scale of the project, the potential for ground-borne vibration produced during project construction activities to result in impacts to adjacent historical resources was analyzed. Adjacent historical resources are located across North Sycamore Avenue and Romain Avenue and include the properties at 1040 North Sycamore Avenue, 960 North La Brea Avenue, and 7000 West Romaine Street. For the purposes of the analysis of the potential for construction-related vibration to significantly impact historical resources, impacts would be considered significant if they would result in physical damage to historical resources. However, analysis completed as part of the EIR for the project concluded that the vibration levels in these locations would be under the limit for the most stringent threshold for vibration impacts and would not result vibration impacts to the known historic resources immediately adjacent to the project site. Analysis of ground-borne vibration is detailed further in Section 4.10*, Noise,* of this EIR.

Known Historical Resources within 0.25-Mile of the Project Site

The Cultural Resources Technical Report also identified 22 other eligible and designated historical resources that are not immediately adjacent to the project site but are located within a 0.25-mile radius surrounding the project site. As they are eligible for listing or designation or already listed, these qualify as historical resources pursuant to CEQA. The project would not directly physically alter any of these properties but the project would introduce a new visual element into the setting of these historical resources. However, the introduction of the new building within an existing urban setting is not anticipated to diminish the integrity of the existing historical resources within the vicinity of the project because the project would be consistent with the character of the surrounding area in that the area is already densely urbanized and has been subject to periodic redevelopment with buildings of various sizes, scales, architectural styles, and ages. As such, the proposed project would not result in the alteration of the physical characteristics that convey the historical significance of these adjacently located resources. The project is also unlikely to produce any vibration impacts to known historical resources within the wider 0.25-mile radius of the project site.

Given ground-borne vibration levels produced by construction activities would remain below the critical threshold in areas immediately adjacent to the project site, it is unlikely these historical resources situated even further from the project site would be subject to vibrations capable of causing damage to the historical resources. Following the implementation of the project, these adjacent resources will remain eligible for historical resource designation, and they would remain qualified historical resources pursuant to CEQA.

SUMMARY OF IMPACTS TO HISTORICAL RESOURCES

The project would not result in the material impairment of any known historical resource because it would not alter in an adverse manner, those physical characteristics that convey their historical significance and that justify their inclusion in the NRHP, CRHR, or a local register. Impacts to historical resources would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact CUL-2 ALTHOUGH THE PROPOSED PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A KNOWN ARCHAEOLOGICAL RESOURCES PURSUANT TO SECTION 15064.5, CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES THAT MAY HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED ARCHAEOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

No archaeological resources were identified within the project site or 0.25-mile search radius as a result of the CHRIS records search or NAHC's SLF database search. The CHRIS records search results did not identify any previous archaeological studies that address the project site, which suggests that the entirety of the project site has not been subject to any previous archaeological surveys prior to the placement of fill soils and/or development.

The project site is situated within the Los Angeles Basin, on an alluvial fan that formed from the sediments originating from the Santa Monica Mountains, located approximately one mile north of the project site. Desktop geoarchaeological review indicates that the project site is underlain Late Pleistocene-era and Holocene-age alluvial fan formations, which have the potential to support the presence of buried archaeological resources as these soils are contemporaneous with the documented period of prehistoric human habitation of the area and have potential to preserve cultural material in context, depending on the area-specific topographical setting. There are no substantial topographical features on the project site and the project site does not contain subsurface topsoil (Ab horizon), which suggests that it is unlikely that the project site contains archaeological deposits buried by natural processes. A review of geotechnical investigations that address the project site identified artificial fill soils from surface to depths between three and eight feet below ground surface (bgs) within the project site and is underlain by older alluvium from the Pleistocene age.

A review of historical maps and aerial photographs indicates that development within the project site occurred as early as 1924, as evidenced by the presence of a structure, which likely represents the extant ready-mix concrete plant. By 1948, the project site is shown to be subject to steady

development through to 1964, associated with the expansion of the concrete batch plant. By 1972, the project site is shown to be generally consistent with present-day site conditions.

The entirety of the project site (100 percent) is currently developed, and as such, an archaeological survey was not conducted. However, as previously mentioned, geotechnical investigations encountered artificial fill soils from surface to depths below between three and eight feet bgs. The presence of fill soils demonstrates that native soils, within which cultural deposits might exist in context, would not have been observed if an archaeological pedestrian survey were conducted.

In consideration of all these factors and given the level of disturbance as a result of development within the project site and the subsurface conditions documented in the geotechnical investigations, the potential to encounter intact subsurface archaeological deposits within fill soils (from surface to between three and eight feet bgs) is unlikely. The potential for intact subsurface archaeological deposits to exist within native soils (at depths below between three and eight feet bgs) is unknown, though considered low. Resources that may be encountered during project construction activities may include historic-period cultural material associated with the extant concrete plant, including building foundations, privies, refuse deposits, and other buried infrastructure.

In the event that unanticipated or previously unknown archaeological resources are encountered during project implementation, such resources could qualify as either historical resources or unique archaeological resources under CEQA, and therefore, impacts to these resources would be potentially significant.

Mitigation Measures

CUL-1 Workers Environmental Awareness Program Training

Prior to the start of ground-disturbing construction activities, all construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of construction activities. A recording of a basic power point presentation shall be prepared and presented by a qualified archaeologist to inform all personnel working on the project about the archaeological sensitivity of the area. The recording shall be presented by the project applicant and/or subsequent responsible parties to all construction personnel throughout all phases of project construction who have not previously attended the training for the project. The purpose of the Workers Environmental Awareness Program training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call Qualified Archaeologist and if appropriate, tribal representative. The necessity of training attendance shall be stated on all construction plans and a record of attendance via a sign-in sheet shall be maintained as part of the mitigation and monitoring reporting program.

CUL-2 Retention of an On-Call Qualified Archaeologist

Prior to ground-disturbance activities, the project applicant and/or subsequent responsible parties shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional

Qualifications Standards for Archaeology (NPS 1983)[1] (Qualified Archaeologist), to prepare and provide the Workers Environmental Awareness Program training as outlined under Mitigation Measure CUL-1 and to respond to any inadvertent discoveries identified for the duration of construction activities. The Qualified Archaeologist should possess experience and familiarity with historic-period and prehistoric archaeological resources in the region.

CUL-3 Inadvertent Discovery of Archaeological Resources

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop and the Qualified Archaeologist shall be contacted immediately. The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist shall evaluate the significance of the find and determine whether or not additional study is warranted. Work on the other portions of the project outside of the buffered area of the discovery may continue during this assessment period. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to resources of an archaeological nature. Depending upon the significance of the find under CEQA (14 California Code of Regulations 15064.5[f]; Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. For resources that are Native American in origin, the City, along with the Qualified Archaeologist, shall coordinate with the Kizh Nation on appropriate treatment.

Significance After Mitigation

Implementation of Mitigation Measure CUL-1 would require that all project construction personnel participate in a Workers Environmental Awareness Program training for the proper identification and treatment of inadvertent discoveries. In addition, Policy HP 3.6 of the City's General Plan Historic Preservation Chapter requires the suspension of all development activities in the event of an unanticipated archaeological discovery and the retention of a qualified archaeologist to address inadvertent discoveries. Therefore, in concert with Policy HP 3.6, Mitigation Measure CUL-2 and CUL-3 would be required to facilitate appropriate treatment of any inadvertent discovery of archaeological resources in accordance with CEQA. With implementation of Mitigation Measures CUL-1 through CUL-3, impacts related to previously unidentified archaeological resources would be less than significant with mitigation.

Threshold 3:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES THAT MAY HAVE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HUMAN REMAINS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

No prehistoric or historic-period burials, within or outside of formal cemeteries, were identified within the project site as a result of the CHRIS records search or NAHC's SLF search. However, the discovery of human remains is always a possibility during ground-disturbing activities. Therefore, impacts would be potentially significant.

[1] National Park Service (NPS). 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. https://www.nps.gov/history/local-law/arch_stnds_0.htm.

Mitigation Measure

CUL-4 Inadvertent Discovery of Human Remains

In accordance with California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e), if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC that shall notify those persons believed to be the most likely descendant (MLD). The MLD will be afforded an opportunity to inspect the find and make recommendations, in consultation with the property owner and lead agency, for the treatment and disposition of the identified human remains. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after being granted access to the project site to examine the remains, the landowner, working with the lead agency, will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

Significance After Mitigation

Mitigation Measure CUL-4 would facilitate compliance with existing regulations to avoid potential impacts to previously undiscovered human remains. Impacts to humans remains would be less than significant with mitigation.

4.3.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*, and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east).

The proposed new developments at 1040 North La Brea Avenue and 1011 North Sycamore Steet would not cause the demolition of, or other direct alterations to, any known built environment historical resources but would, along with the proposed project, further alter the setting of historical resources immediately adjacent to, and within an 0.25-mile radius of, the project site through the introduction of new visual elements. Under CEQA, in addition to direct physical alterations, alterations to the setting of a historical resource have the potential to cause a substantial adverse change by altering the characteristics that convey the historical significance of the resource such that it constitutes a material impairment. However, cumulative changes to the settings of immediately adjacent and nearby historical settings would remain consistent with the pattern of periodic redevelopment that has characterized the area, which has resulted in a mix of buildings of varied sizes, scales, ages, and architectural styles. The cumulative projects represent a continuation of this pattern and would not result in any changes that would undermine the eligibility of any designated or eligible built environment resource such that it would no longer qualify as a historical resource pursuant to CEQA.

As previously discussed, development of the proposed project, in combination with other projects in the area, has the potential to contribute to a cumulatively significant impact to archaeological

resources due to the unanticipated discovery of archaeological resources unique to the region. However, implementation of Mitigation Measures CUL-1 through CUL-3 requires that in the unlikely event of an unanticipated cultural discovery, work will halt, and the resource will be evaluated and recovered, as necessary, to ensure protection of cultural resources. Implementation of these mitigation measures would reduce the proposed project's incremental potential impacts to historical and archaeological resources to a less-than-significant level and ensure that the proposed project's impacts to cultural resources are not cumulatively considerable.

Moreover, although proposed project construction has the potential to disturb human remains, as does construction of other projects in the cumulative study area, adherence to appropriate State laws and protocols, including State of California Health and Safety Code Section 7050.5 and PRC Section 5097.98 would be implemented in the event of an inadvertent discovery of human remains. In the case of the proposed project, this would be implemented under Mitigation Measure CUL-4, if necessary. Therefore, cumulative impacts related to the inadvertent discovery of human remains would be less than significant.

4.4 Energy

This section discusses the project's potential impacts related to energy use, including electricity, natural gas, and petroleum. Energy use was estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod results are included in Appendix C to this EIR.

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of project construction and includes these activities in the project modeling assessing construction impacts.

4.4.1 Setting

Fundamentals of Energy

Energy is generally transmitted either in the form of electricity, measured in kilowatts (kW) or megawatts (MW); natural gas, measured in British thermal units (BTU), cubic feet, or therms; or fuel (such as gasoline or diesel), measured in gallons or liters. Electricity is used primarily for lighting, appliances, cooking purpose, heating, ventilation, and air conditioning (HVAC) equipment, and other uses associated with building and vehicle operations. Electricity sources range from renewable (e.g., hydroelectric, solar, wind, geothermal, biomass) to nonrenewable (e.g., natural gas, oil, nuclear, coal). Natural gas is used primarily for space and water heating, as well as cooking purposes and industrial processes. Natural gas is typically associated with building operations. Fuel is used primarily for powering on-road and off-road vehicles and equipment. Typical fuel types are diesel and gasoline.

Electricity Generation, Distribution, and Use

California

According to the California Energy Commission (CEC), California generated approximately 203,257 gigawatt-hours (GWh) of electricity in 2022. Approximately 47 percent of this electricity was sourced from natural gas, 45 percent from renewable sources, seven percent from large hydroelectric sources, and the remaining one percent was sourced from coal, oil, and other/ unspecified sources. Specifically, 35.7 percent of California's 2022 retail electric sales were served by renewable resources, including wind, solar, geothermal, biomass, and small hydroelectric (CEC 2023a). Electricity is distributed through the various electric load-serving entities in California. These entities include investor-owned utilities, publicly owned load-serving entities, rural electric cooperatives, community choice aggregators, and electric service providers (CEC 2023a). According to the United States (U.S.) Energy Information Administration (EIA), total retail sale of electricity

within California in 2022 was 251,869,136 GWh. California electricity consumption in 2022 represented approximately 6.4 percent of total U.S. electricity consumption in 2022 (EIA 2023).

Los Angeles County

Los Angeles County consumed approximately 68,484 GWh of electricity in 2022 from residential and non-residential uses (CEC 2024a). The project would be served electricity by Southern California Edison (SCE). SCE's default power mix offers 33.2 percent renewable, and they offer customers options for 50 percent or 100 percent renewable power mixes (SCE 2022). In conjunction with SCE and other utility companies, the California Public Utilities Commission (CPUC) engages in energy conservation programs. SCE is the electricity provider for the City of West Hollywood. Clean Power Alliance is a community choice program that allows users of electricity in West Hollywood to opt into its program, which provides renewable energy to its customers.

Natural Gas Distribution and Use

California

According to the CPUC, natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are the Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora (CPUC 2022). Because natural gas is a dispatchable energy resource that provides load when the availability of hydroelectric power generation and/or other energy sources decreases, distribution varies from year to year. The availability and distribution of hydroelectric-sourced energy, increasing renewable-source energy, and overall consumer demand shape the need for natural gas. In 2022, total California natural gas demand for industrial, residential, commercial, and electric power generation was 11,711 million therms per year.

Los Angeles County

Los Angeles County consumed approximately 2820 million therms of natural gas in 2022, in both residential and non-residential uses (CEC 2024b). Southern California Gas (SoCalGas) is the natural gas provider for the City of West Hollywood.

Fuel Distribution and Use

California

According to the 2015 CEC market share data, distributors of gasoline include companies or individuals who make the first distribution of gasoline in California. Aircraft manufacturers and certificated or licensed carriers by air may be included within the definition of distributor. Distributors can also be "brokers," which includes every person, other than a distributor or a retailer, who deals in lots of 200 or more gallons of gasoline (CEC 2015).

Based on the California Transportation of Petroleum Second Northern California Refinery Safety Forum, output from the refineries is usually placed in intermediate tanks before blending finished products. Most gasoline is shipped from refinery by pipeline, which serves over 60 distribution terminals, which is then transported to retail and nonretail stations by tanker trucks (Schremp 2015).

The main category of fuel use in California is transportation fuel, specifically gasoline and diesel. Gasoline is the most used transportation fuel in California: 97 percent of all gasoline sold in California is consumed by light-duty cars, pickup trucks, and sport utility vehicles. In 2021, an estimated 13,640 million gallons of gasoline annually were used (i.e., 37 million gallons gasoline per day) (CEC 2023d). Diesel is the second largest transportation fuel used in California. Many heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, along with farm, construction, and heavy-duty military vehicles and equipment have diesel engines. According to the 2022 California Annual Retail Fuel Outlet Report Results (CEC-A15), in 2022, 2,290 million gallons of diesel annually (i.e., 6.3 million gallons of diesel per day), including off-road diesel were sold (CEC 2023d).

Los Angeles County

Gasoline is distributed throughout the county by retail and non-retail gas stations. In 2022, Los Angeles County had an estimated total of 2,110 retail gasoline stations (CEC 2024c). According to the California Annual Retail Fuel Outlet Report Results (CEC-A15), retail gasoline sales in Los Angeles County totaled approximately 3.66 billion gallons, and retail diesel sales totaled approximately 295 million gallons in 2022 (CEC 2024c). As shown in Table 4.4-1, average per capita gasoline consumption in the County is approximately 371 gallons and average per capita diesel consumption in the county is approximately 30 gallons.

Table 4.4-1 Los Angeles County Gasoline and Diesel Consumption (2022)

Fuel Type	County Consumption (gallons per year)	County Population (2022)	County Per Capita Consumption (gallons)
Gasoline	3,659,000,000	9,861,493	371
Diesel	295,000,000	9,861,493	30

Sources: California Department of Finance 2024; CEC 2024c

4.4.2 Regulatory Setting

Federal Regulations

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the National Highway Traffic and Safety Administration (NHTSA), a part of the U.S. Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The U.S. Environmental Protection Agency (USEPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon (mpg) for the 1975 model year to 30.7 mpg for the 2014 model year and may increase to 54.5 mpg by 2025.

On August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated into two parts as described below.

- Part One, "One National Program" (84 Federal Register 51310) revokes a waiver granted by USEPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of greenhouse gas (GHG) emission reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.
- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

The USEPA and NTHSA published final rules to amend and establish national carbon dioxide and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 Federal Register 24174). On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, thereby restoring California's right to enforce more stringent fuel efficiency standards (NHTSA 2022). Most recently, on December 21, 2021, the NHTSA finalized rules to repeal the SAFE I Rule. The final rule concludes the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule ensures the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges (NHTSA 2022).

Construction Equipment Fuel Efficiency Standard

USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004] and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

Energy Star Program

In 1992, USEPA introduced Energy Star© as a voluntary labeling program designed to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specification for maximum energy use established under the program are certified to display the Energy Star© label. In 1996, USEPA joined with the Energy Department to expand the program, which now also includes qualifying commercial and industrial buildings, as well as homes (Energy Star 2024).

State Regulations

Additional State Regulations related to energy are provided in Section 4.6, *Greenhouse Gas Emissions*.

California Energy Action Plan

The CEC, in collaboration with CPUC, is responsible for preparing the California Energy Action Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The 2003 Energy Action Plan calls for the State to assist in transformation of the transportation system to improve air quality, reduce congestion, and increase efficient use of fuel supplies with the least environmental and energy costs. The Energy Action Plan identifies strategies, such as assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs and encourages urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access. In the 2005 Energy Action Plan, the CEC and CPUC updated the energy policy vision by adding dimensions to the policy areas, such as information on the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the 2005 Energy Action Plan in 2008 that supplements the earlier Energy Action Plans and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1279 and 2022 Scoping Plan

Assembly Bill (AB) 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative greenhouse gas emissions thereafter. In addition, AB 1279 states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. The 2022 Scoping Plan lays out a path to achieve AB 1279 targets (CARB 2022). The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Senate Bills 350, 100, and 1020

The Clean Energy and Pollution Reduction Act of 2015 (Senate Bill [SB] 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. This act also requires doubling of the energy efficiency in existing buildings by 2030.

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program (last updated by SB 350). SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

Signed into law on September 16, 2022, SB 1020 requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035, 95 percent by 2040, and 100 percent by 2045. All State agencies facilities must be served by 100 percent renewable and zero-carbon resources by 2030. SB 1020 also requires the CPUC, CEC, and CARB to issue a joint

progress report outlining the reliability of the electrical grid with a focus on summer reliability and challenges and gaps. In addition, SB 1020 requires the CPUC to define energy affordability and use energy affordability metrics to develop protections, incentives, discounts, or new programs for residential customers facing hardships due to energy or gas bills.

Assembly Bill 1007

Assembly Bill (AB) 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The CBC's energy-efficiency and green building standards are outlined as follows.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS (CALIFORNIA ENERGY CODE)

CCR Title 24, Part 6 contains the 2022 Building Energy Efficiency Standards (or California Energy Code) for new residential and non-residential buildings, which became effective on January 1, 2023. This code, originally enacted in 1978, builds on California's technology innovations, encouraging inclusion of market-ready electric products in new construction, such as heat pumps for climate control and water heating, to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The 2022 Building Energy Efficiency Standards focus on four key areas: 1) encouraging electric heat pump technology and use; 2) establishing electric-ready requirements when natural gas is installed; 3) expanding solar photovoltaic (PV) system and battery storage standards; and 4) strengthening ventilation standards to improve indoor air quality. The 2022 Building Energy Efficiency Standards are the applicable building energy efficiency standards for the proposed project because they became effective on January 1, 2023.

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential projects including: increasing the number of parking spaces that

must be prewired for electric vehicle (EV) chargers in residential development; requiring residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Local Regulations

West Hollywood General Plan 2035

The Land Use and Urban Form Chapter, Mobility Chapter, and Infrastructure, Resources, and Conservation Chapter of the City's General Plan identify specific policies related to energy use. The following policies would be applicable to the proposed project (West Hollywood 2011). Additional goals and policies pertaining to energy use are discussed in Section 4.6, *Greenhouse Gas Emissions.*

LAND USE AND URBAN FORM CHAPTER

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

> **Policy LU-1.13:** Seek to reduce the demand for motorized transportation by supporting land use patterns that prioritize pedestrian, bicycle, and transit mobility options, and mixed use development.

MOBILITY CHAPTER

Goal M-3: Maintain and enhance a pedestrian-oriented City.

> **Policy M-3.1:** Encourage and provide incentives and programs for people to walk more and drive less.
>
> **Policy M-3.10:** Require design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.

INFRASTRUCTURE, RESOURCES, AND CONSERVATION CHAPTER

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

> **Policy IRC-4.2:** Encourage and provide incentives and programs for people to walk more and drive less.
>
> **Policy IRC-6.10:** Implement policies in this Infrastructure, Resources, and Conservation Chapter that reduce GHG emissions related to water and wastewater, energy, green building, recycling, and solid waste, and facilities for City operations, including policies that accomplish the following:
>
> - Reduce energy associated with the use, treatment, and conveyance of water and wastewater
> - Improve energy efficiency in existing buildings
> - Ensure high levels of energy performance in new construction
> - Maximize the use of renewable energy

- Reduce the amount of waste sent to landfills
- Improve energy efficiency and increase energy conservation within city facilities

City of West Hollywood Climate Action and Adaptation Plan

The City also adopted a Climate Action and Adaptation Plan (CAAP) in September 2021 that builds from the progress of the 2011 Climate Action Plan. It outlines the City's intended path to achieve carbon neutrality by 2035 and adapt to the impacts of a changing climate. The CAP outlines a course of action and GHG emission reduction strategies, actions, and measures, to reduce municipal and community-wide GHG emissions that contribute to climate change that would enable the City to meet its GHG reduction targets for 2035. The CAAP contains measures intended to increase energy efficiency and expand the use of renewable energy. Specific measures in the CAP related to energy use include the following (West Hollywood 2021):

- **Measure EN-2:** Promote, support, and expand the use of local solar power and battery storage.
- **Measure EN-3:** Decarbonize the future building stock and implement best practices in sustainable and resilient new construction.
- **Measure EN-4:** Enhance community energy resilience.
- **Measure EN-5:** Promote EV readiness.
- **Measure TM-1:** Increase sustainable mode share in West Hollywood (Walking, Bicycling, Transit).
- **Measure TM-2:** Promote zero and near zero carbon transportation.

West Hollywood Municipal Code

In October 2007, the City adopted a mandatory Green Building Ordinance (West Hollywood Municipal Code [WHMC] Section 19.20.060). The ordinance establishes new standards for all new development projects such as drought-tolerant landscaping, low-flow plumbing fixtures, and energy efficient appliances. The ordinance also develops a Green Building Point System for new construction with incentives for projects that exceed minimum requirements.

4.4.3 Impact Analysis

Methodology

The approach to analyzing energy impacts is based on Public Resources Code Section 21100(b)(3), which states an EIR shall include "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." Guidance for implementing this section is provided in Appendix F of the *CEQA Guidelines* (Energy Conservation). *CEQA Guidelines* Section 15126.2(b) further explains, "This [energy] analysis may be included in related analyses of air quality, GHG emissions, transportation or utilities in the discretion of the lead agency." Consistent with that approach, additional discussion of the physical environmental impacts associated with consumption of energy is also included in the other resource chapters of this EIR included, but not limited to, Section 4.2, *Air Quality*, Section 4.6, *Greenhouse Gas Emissions*, Section 4.12, *Transportation/Circulation*, and Section 4.14, *Utilities and Service Systems*.

Energy consumption is analyzed herein in terms of construction and operational energy. Construction energy demand accounts for anticipated energy consumption during construction of development facilitated by the project, such as fuel consumed by construction equipment and

construction workers' vehicles traveling to and from the construction site. Operational energy demand accounts for the anticipated energy consumption during operation of the development facilitated by the project, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning. This analysis considers the equipment and processes employed during construction and operation of future project development to qualitatively determine whether energy consumed during construction and operation would be wasteful, inefficient, or unnecessary.

Construction energy demand was obtained from CalEEMod (Appendix C) and considers diesel fuel consumption associated with operation of off-road construction equipment and vendor/hauling truck trips as well as gasoline fuel consumption associated with worker trips to and from construction sites. Energy demand for off-road construction equipment is based on anticipated equipment, usage hours, horsepower, load factors, and construction phase duration provided in CalEEMod, as well as *Exhaust and Crankcase Emission Factors for Nonroad Compression Ignition Engines* (USEPA 2018). Hauling, vendor, and worker trip fuel consumption were determined from CalEEMod default values, which consider anticipated daily trips, default trip lengths, and average fuel efficiency values obtained from the Bureau of Transportation Statistics (USDOT 2023). Petroleum use associated with project generated vehicle trips was estimated based on the traffic volume calculations provided by Fehr & Peers using the Institute of Transportation Engineers (ITE), Trip Generation, 11th Edition, 2021.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, a project may be deemed to have a significant impact on energy if it would:

1) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 NEITHER CONSTRUCTION NOR OPERATION OF THE PROPOSED PROJECT WOULD RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction Energy Demand

Project construction would require demolition, including hauling material off-site; site preparation and grading; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the construction site, and vehicles used to deliver materials to the site.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions (Appendix C).

Table 4.4-2 on the following page presents the estimated construction energy consumption of construction. Diesel fuel consumption, including construction equipment operation and vendor/hauling trips, would total approximately 164,339 gallons. Other petroleum fuel consumption, including worker trips to and from construction sites, would total approximately 267,944 gallons. Construction-related energy calculations are included in Appendix E.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Furthermore, heavy-duty diesel-powered construction equipment would be equipped with Tier 4 Final or better diesel engines. In addition, construction contractors would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, pursuant to applicable regulatory requirements such as 2022 CALGreen, the project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary.

Table 4.4-2 Estimated Fuel Consumption during Project Construction

Fuel Type	Gallons of Fuel	MMBtu
Diesel Fuel[1,2]	164,339	20,947
Other Petroleum Fuel[3]	267,944	29,417
Total	**N/A**	**50,364**

[1] Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment's horsepower, the equipment's load factor, and the equipment's fuel usage per horsepower per hour of operation, which are taken from CalEEMod outputs (see Appendix C), and from compression-ignition engine brake-specific fuel consumptions factors for engines (USEPA 2018a). Fuel consumed for construction equipment is assumed to be diesel.

[2] Fuel demand rate for hauling and vendor trips (cut material imports) is derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from "Trips and VMT" Table contained in Section 3.0, Construction Detail, of the CalEEMod results (see Appendix C). The fuel economy for hauling and vendor trip vehicles is derived from the USDOT (USDOT 2018). Fuel consumed for hauling trucks is assumed to be diesel.

[3] The fuel economy for worker trip vehicles is derived from the USDOT National Transportation Statistics (24 mpg) (USDOT 2018).

On-site construction equipment may include alternatively fueled vehicles where feasible. Furthermore, the selected construction contractors would use the best available engineering techniques, construction and design practices, and equipment operating procedures, thereby ensuring that the wasteful consumption of fuels and use of energy would not occur. Energy efficiency is also expected for the off-site production of construction materials, based on the economic incentive for efficiency and cost savings. Furthermore, such construction energy expenditures are necessary to implement the project and meet the project objectives. Therefore, project construction would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Operational Energy Demand

Operations of the project would contribute to regional energy demand by consuming electricity, gasoline, diesel, and potentially natural gas. Electricity would be used for lighting, appliances, and water and wastewater conveyance, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by visitors and employees of future development. As discussed in Section 2, *Project Description*, the residential portion of the project would be 100 percent electric and would not utilize natural gas. However, the non-residential commercial/retail portion of the project could potentially utilize natural gas for heating and cooling systems for the limited retail program.

Operation of the proposed project would consume approximately 4,519,125 kWh (4.52 GWh) of electricity per year (Appendix C). As mentioned in Section 4.4.1, *Setting*, of this section, the proposed project would be served by SCE, which provided more than 85,800 GWh of electricity in 2022. The project's electricity demand would represent less than 0.006 percent of electricity provided by SCE in 2018. Therefore, SCE would have sufficient supplies for the project.

Estimated natural gas consumption for the commercial/retail portion of the project would be 0.001 MMthm per year (Appendix C). The project's natural gas demand would be serviced by SoCalGas, which provided 5,026 MMthm in 2022. The project's natural gas consumption would represent less than 0.0001 percent of natural gas provided by SoCalGas; therefore, SoCalGas would have sufficient supplies for the project.

The project would be required to comply with all standards set in the latest iteration of the CBC (CCR Title 24) and the City's Green Building Ordinance (i.e., WHMC Section 19.20.060, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the buildings during operation. California's 2022 CALGreen standards (CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. In addition, the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Pursuant to CALGreen, all plumbing fixtures used in future developments facilitated by the project would be high-efficiency fixtures, which would minimize the potential for the inefficient or wasteful consumption of energy related to water and wastewater. Furthermore, as discussed in Section 4.12, *Transportation/Circulation*, the project would result in a less than significant VMT impact. Therefore, project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 2:	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-2 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY. NO IMPACT WOULD OCCUR.

As outlined in Section 4.6.3, *Regulatory Framework*, several State and local plans and policies for renewable energy and energy efficiency have been adopted. The following analysis discusses the project's consistency with applicable State and local plans.

Consistency with State Plans – CCR Title 24 and SB 100

The proposed project would be required to comply with all building design standards set in the CBC (CCR Title 24). California's 2022 CALGreen standards (CCR Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects, and the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. As the name implies, these standards are specifically crafted for new buildings to result in energy-efficient performance, so the buildings do not result in inefficient consumption of energy. The standards are updated every three years, and each iteration is more energy efficient than the previous standards. For example, according to the CEC, nonresidential buildings built with the 2019 standards used about 30 percent less energy than buildings built with the 2016 standards due to lighting upgrades (CEC 2019b).

SB 100 mandates 100 percent clean electricity for California by 2045. The project's use of nonrenewable energy resources would be reduced over time because the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045. Because the proposed project would be powered by the existing state electricity grid, it would be powered by renewable energy as mandated by SB 100.

Therefore, the project impacts related to consistency with applicable state plans for increased energy efficiency and renewable energy use would be less than significant.

Consistency with Local Plans – West Hollywood General Plan 2035 and the City of West Hollywood Climate Action and Adaptation Plan

The City of West Hollywood CAAP contains measures intended to increase energy efficiency and expand the use of renewable energy (West Hollywood 2021). The project would include several sustainability elements, including an on-site solar PV system, installed EV charging stations, and other energy-efficiency measures (e.g., low emission glazing, daylit corridors) that would facilitate energy efficiency and renewable energy generation. As an infill mixed-use development with on-site bicycle parking and in close proximity to community-serving commercial/retail uses and, public transit options, the project would encourage multimodal transportation and reduce reliance on single-occupancy vehicles.

As summarized in Table 4.6-4 in Section 4.6, *Greenhouse Gas Emissions*, the project would be consistent with the City's CAAP, including Measures TM-1, TM-2, and EN-5, which are intended to reduce vehicle fuel consumption, and Measures CLG-3 and EN-3 which are intended to reduce energy consumption during construction and operation of new buildings. The project's consistency with the City's General Plan is summarized in Table 4.6-5 in Section 4.6, *Greenhouse Gas Emissions.*

As shown therein, the project would be consistent with Policies M-3.1 and M-3.10, which are intended to encourage and incentivize multimodal transportation. In addition, the project would be consistent with Policy IRC-6.8, which is intended to reduce building and transportation-related GHG emissions, thereby reducing nonrenewable energy consumption (West Hollywood 2011). Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy of energy efficiency, and impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.4.4 Cumulative Impacts

The planned and pending projects within a one-mile radius of the project site are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). The proposed project and related projects would incrementally increase energy demand in the region, which includes the respective SCE and SoCalGas service areas. Although the geographic scope of the cumulative energy analysis would be these service areas, there are numerous State and local requirements that apply to the proposed project and related projects that would reduce energy demand of new development and redevelopment in the area. Moreoever, a development pattern of increased density combined with increased efficiency is less energy intensive when compared with new development located on previously undeveloped land away from urban centers. As such, while the proposed project and related projects would result in increasing energy consumption in the region, they would also result in increased energy efficiency.

Energy use during construction of cumulative projects would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. As with the proposed project, construction contractors of other proposed development would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption, as well as 2022 CalGreen, which requires that construction waste management practices divert a minimum of 65 percent of construction debris. Furthermore, construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. These practices would result in efficient use of energy necessary for the construction of projects under a cumulative scenario such that construction energy impacts would not be cumulatively considerable.

All cumulative projects would also be required to comply with the CCR Title 24 minimum 2022 Building Energy Efficiency (CCR Title 24, Part 6) and CALGreen requirements (CCR Title 24, Part 11). Future cumulative projects would be designed in accordance with these minimum State energy efficiency standards for residential and nonresidential buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), and indoor and outdoor lighting. The incorporation of CBC standards into the design of cumulative projects, including the proposed project, would result in reduced wasteful, inefficient, or unnecessary use of energy during operation. Furthermore, the proposed project would be consistent with the City of West Hollywood CAAP and General Plan. Therefore, the project

would not conflict with or obstruct a State or local plan for renewable energy of energy efficiency and the project's operation impacts related to energy would not be cumulatively considerable.

4.5 Geology and Soils

This section provides an overview of geology and soils and evaluates the impacts associated with the proposed project. Notably, the Initial Study (see Appendix B) concluded that the project site soils would not be prone to liquefaction; the probability for a seismically induced landslide occurring on-site or in the project area is low due to the urban area's general lack of elevation difference; the project would not result in substantial soil erosion or loss of topsoil; and, since the site is fully served by existing sewer facilities, no other impact would occur related to the use of septic tanks or an alternative wastewater disposal system. Specifically, this analysis focuses on the potential for impacts related to earthquake fault rupture, seismic ground shaking, soil suitability/unstable soils; and paleontological resources. This section was prepared utilizing documents and maps published by the United States Geological Survey, California Department of Conservation, California Geological Survey (CGS), the City of West Hollywood, and a Geotechnical Investigation prepared by Geocon West, Inc. (Geocon) for the project, which is included as Appendix F to this EIR:

- *Geocon, Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California, May 10, 2023*

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section also includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

4.5.1 Setting

Regional and Local Geology

The project site is in the northern portion of the Los Angeles Basin on a southerly sloping alluvial fan formed from sediments derived from the Santa Monica Mountains. The Los Angeles Basin is a coastal plain that is bound by the Santa Monica Mountains on the north, the Elysian Park and Repetto Hills on the northeast, the Puente Hills and Whittier Fault on the east, the Palos Verdes Peninsula and Pacific Ocean on the west and south, and the Santa Ana Mountains and San Joaquin Hills on the east and southeast. The basin is underlain by a deep structural depression which has been infilled by both marine and continental sedimentary deposits that are, in turn, underlain by a basement complex of igneous and metamorphic composition (Geocon 2023).

Regionally, the site is in the northern portion of the Peninsular Ranges geomorphic province, near the southern boundary of the Transverse Ranges geomorphic province. The Peninsular Ranges geomorphic province is characterized by northwest-trending physiographic and geologic structures in contrast to the Transverse Ranges geomorphic province that is characterized by east-west trending geologic structures. The Hollywood Fault, located approximately one mile to the north of

the project site, forms the boundary between the Peninsular Ranges geomorphic province and the Transverse Ranges geomorphic province to the north (Geocon 2023).

Faulting and Seismicity

The numerous faults in Southern California include Holocene-active, pre-Holocene, and inactive faults. The criteria for these major groups are based on criteria developed by the CGS for the Alquist-Priolo Earthquake Fault Zone Program. By definition, a Holocene-active fault is one that has had surface displacement within Holocene time (about the last 11,700 years). A pre-Holocene fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive (Geocon 2023).

The closest surface trace of an active fault to the project site is the Hollywood Fault located approximately one mile to the north. Other nearby active faults include the Newport-Inglewood Fault Zone, the Santa Monica Fault, and the Raymond Fault, located approximately four miles southwest, 4.4 miles northwest, and 7.3 miles east-northeast of the site, respectively. The active San Andreas Fault Zone is located approximately 34 miles northeast of the site. Although several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth, these faults are not exposed at the ground surface and are typically identified at depths greater than three kilometers (i.e., approximately 1.9 miles) (Geocon 2023). Figure 4.5-1 and Figure 4.5-2 on the following pages show faults in the region and the location of the Hollywood Fault relative to the city and project site, respectively.

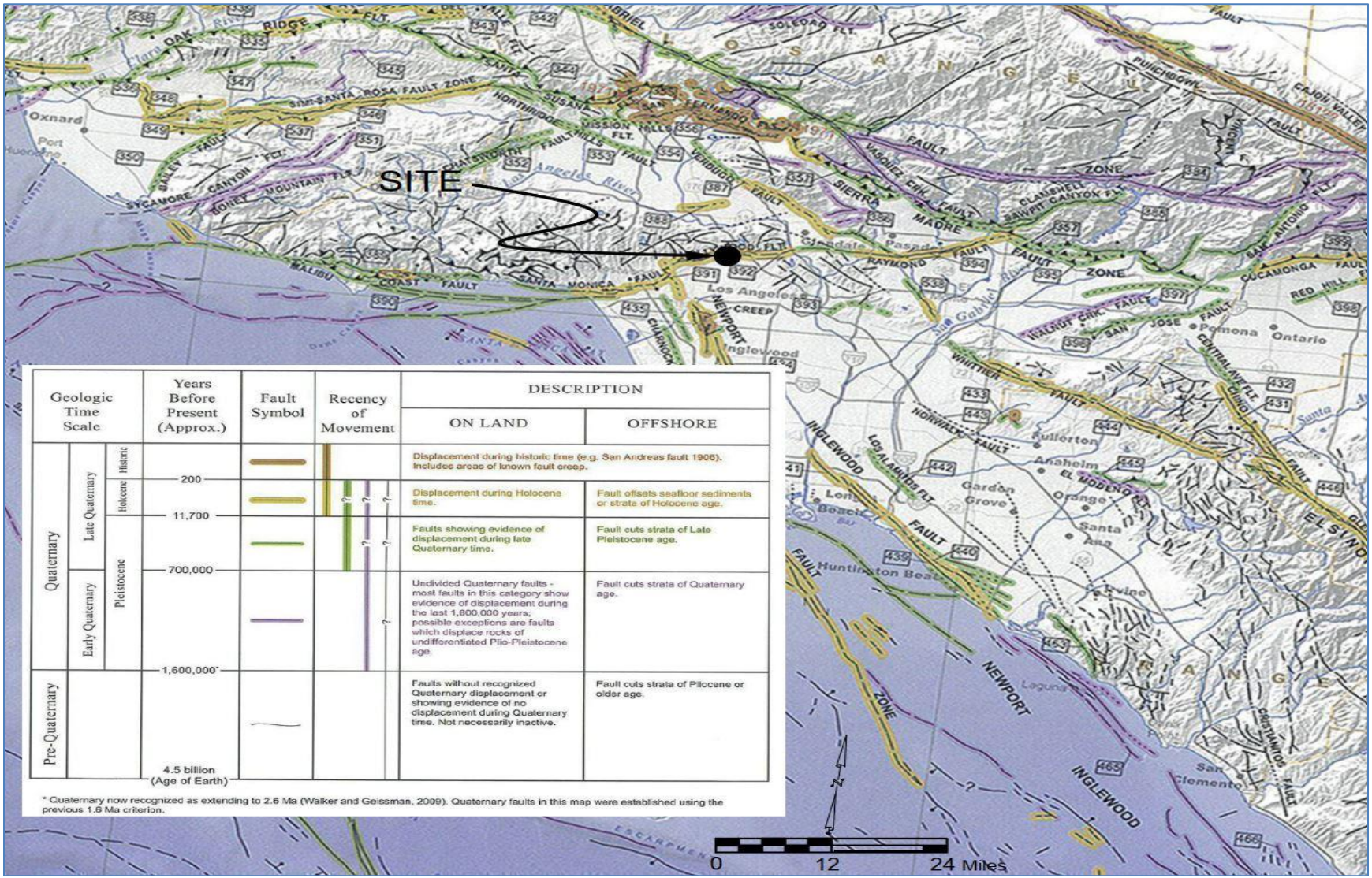
As with all Southern California, the site has experienced historic earthquakes from various regional faults and could be subjected to strong seismicity, particularly from an earthquake originating along the nearby Hollywood Fault. Moreover, although buried thrust faults and others in the greater Los Angeles area are not exposed at the surface, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking. For example, the October 1, 1987 (magnitude 5.9) Whittier Narrows earthquake and the January 17, 1994 (magnitude 6.7) Northridge earthquake were a result of movement on the Puente Hills Blind Thrust and the Northridge Thrust, respectively (Geocon 2023). Figure 4.5-3 on the following pages shows other local seismic hazard zones (i.e., liquefaction and landslides).

Shrink/Swell (Expansive Soils)

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. The higher the clay content, the more the soil will swell when wet and shrink when dry. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

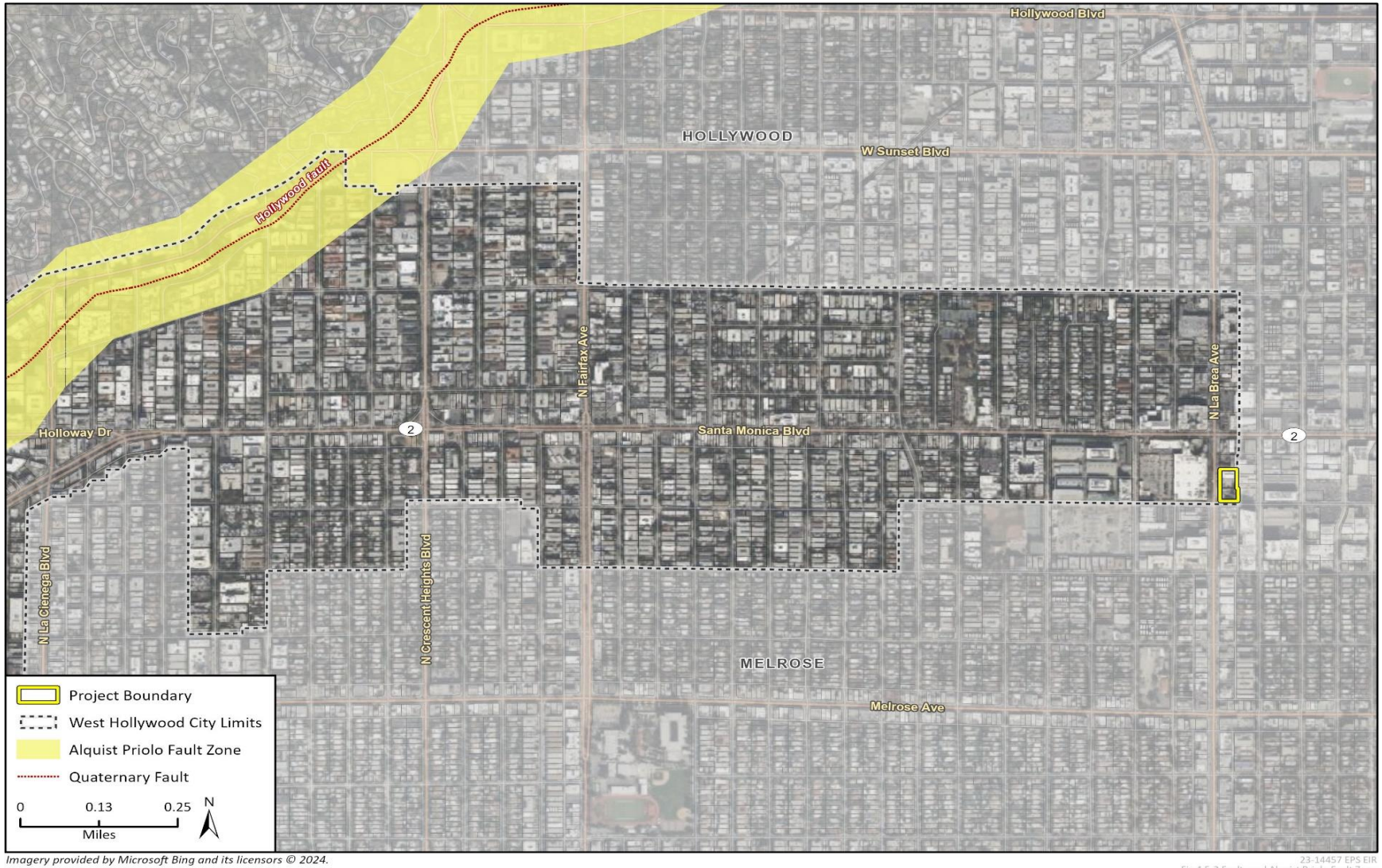
Because the extent of expansive soils in the city is not currently mapped, expansive materials may exist in various areas of the city. Clay-rich soils are more prevalent in the southern part of the city, south of Santa Monica Boulevard. However, current provisions of the California Building Code (CBC) contain requirements for slab-on-ground building foundations located on expansive soils. If expansive soils are detected based on a preliminary soil report, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent structural damage, to be determined on a project-by-project basis.

Figure 4.5-1 Regional Fault Map



Source: Geocon 2023

Figure 4.5-2 Local Fault Map



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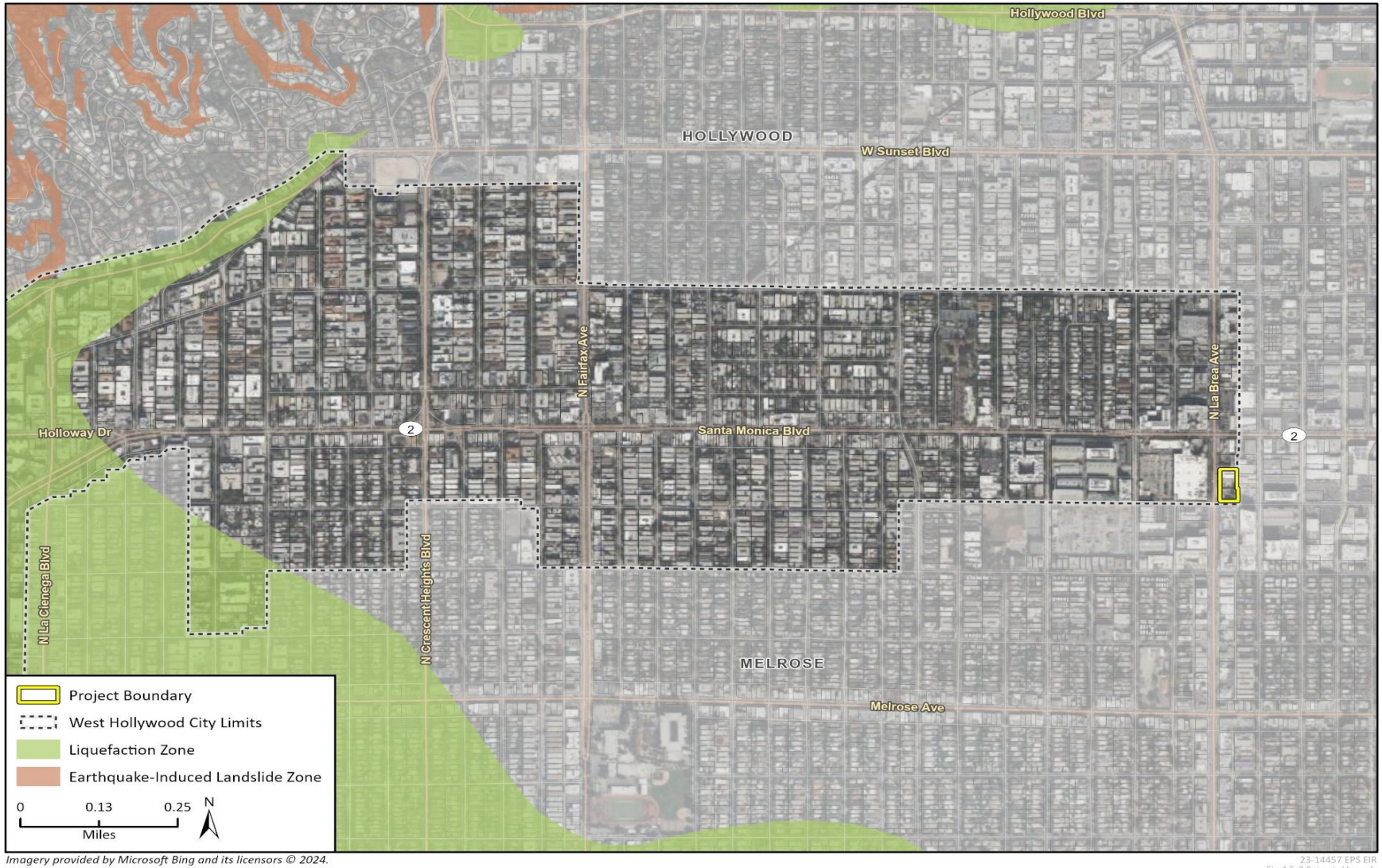
Additional data provided by CGS, 2020.

23-14457 EPS EIR
Fig 4.5-2 Faults and Alquist Priolo Fault Zone

Figure 4.5-3 Local Seismic Hazards Map



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Additional data provided by CGS, 2020.

23-14457 EPS EIR
Fig 4.5-3 Seismic Hazards

Project Site Geology

According to the Geotechnical Investigation prepared by Geocon, prior investigations reviewed and referenced by Geocon, and published geologic maps of the area, the site is underlain by artificial fill that is, in turn, underlain by Pleistocene age alluvial sediments (Geocon 2023). The following discussion provides further detail regarding the site's soil and geologic conditions.

Artificial Fill

Artificial fill was encountered in Geocon's boring to a maximum depth of three feet below ground surface (bgs). The artificial fill generally consists of dark brown to black clay that can be characterized as moist and soft to firm. According to the Geotechnical Investigation, a prior investigation encountered fill to a maximum depth of approximately eight feet bgs and consisted of clay silt and sand. The fill can be characterized as moist, stiff, or medium dense. The artificial fill is likely the result of past grading or construction activities at the site (Geocon 2023).

According to the Geotechnical Investigation, the soils encountered during a prior investigation at a depth between one and five feet bgs were considered to have a "medium" to "high" expansive potential and are classified as "expansive" in accordance with the CBC Section 1803.5.3 (Geocon 2023).

Older Alluvium

The artificial fill is underlain by Pleistocene age alluvium and consisted of yellowish brown to reddish brown, or grayish brown, interbedded clays, silts, and sand with varying amounts of fine gravel. The alluvium is characterized as slightly moist to wet and loose to very dense or firm to hard. Siltstone was encountered at depts of 105 and 107.5 feet bgs at the project site, classified as Puente Formation bedrock (Geocon 2023).

Groundwater

Based on a review of the Seismic Hazard Evaluation Report for the Hollywood 7.5 Minute Quadrangle and the City of West Hollywood General Plan, the historic high groundwater level beneath the site is approximately 15 to 20 feet bgs. Based on borings conducted as part of the Geotechnical Investigation, groundwater was encountered at a depth of 17 feet bgs; however, previous investigations have encountered groundwater at depths of 18.5 and 19 feet bgs (Geocon 2023).

Regional and Project Site Paleontology

The following discussion also provides information regarding paleontological sensitivity at the project site based on research conducted by Rincon Consultants, Inc. (Rincon).

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010).

The project site is situated in the Peninsular Ranges, one of the eleven geomorphic provinces of California (CGS 2002). In general, the Peninsular Ranges consist of northwest-southeast trending mountain ranges and faults (Norris and Webb 1976). These mountains are generally comprised of Mesozoic to Cenozoic plutonic and extrusive igneous and Cretaceous marine sedimentary rocks. The project site is within the Los Angeles Basin, which lies at the northern edge of the Peninsular Ranges. The Los Angeles Basin is a sedimentary basin which contains many-kilometer-thick layers of Cenozoic marine and terrestrial sedimentary rocks and has undergone much deformation due to tectonic folding and faulting. The project site is in the *Hollywood, California* U.S. Geological Survey 7.5-minute topographic quadrangle.

The geology of the region surrounding the project site was mapped by Campbell et al. (2016), who identified a single geologic unit, Quaternary old fan deposits (Unit 4), underlying the project site. Quaternary old fan deposits consist of slightly to moderately consolidated silt, sand, and gravel, that was deposited as alluvial fans. The project's geotechnical investigation reported that the alluvial sediments underlying the project site consist of yellowish-brown, reddish-brown, or grayish-brown interbedded clay, silt, and sand, with occasional gravel (Geocon 2023). Quaternary old fan deposits referred to Unit 4 are late Pleistocene in age. Pleistocene-aged alluvial sediments have produced many significant paleontological resources in Los Angeles County, including mammoth (*Mammuthus*), saber-toothed cat (*Smilodon*), dire wolf (*Aenocyon*), ground sloth (*Megalonyx*, *Paramylodon*), other mammals, reptiles, birds, and invertebrates (Bell 2023; Jefferson 2010; Paleobiology Database 2023). Given the fossil-producing history of similar sediments in the region, Quaternary old fan deposits (Unit 4) have high paleontological sensitivity.

4.5.2 Regulatory Setting

Federal Regulations

International Building Code

The International Building Code (IBC) consists of building codes developed by the International Code Council to establish minimum requirements for building safety and health. California has adopted the IBC, with some modifications, as part of its own building code, the CBC. The most recent version of the IBC is the 2021 edition, which was published in early 2021. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

State Regulations

California Building Code

The CBC, Part 2 of Title 24 of the California Code of Regulations (CCR), is a set of regulations that governs the design and construction of buildings in California. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

The CBC is updated every three years by order of the legislature, with supplements published in intervening years. State Law mandates that local government enforce the CBC. In addition, a city and/or county may establish more restrictive building standards reasonably necessary because of local climatic, geological, or topographical conditions. The 2022 CBC is based on the 2021 IBC with amendments and additions.

California Multi-Hazard Mitigation Plan

The California Office of Emergency Services prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Federal Disaster Mitigation Act of 2000 for the State to receive federal funding. The Federal Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971 magnitude 6.6 San Fernando earthquake. The Alquist-Priolo Earthquake Fault Zoning Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis, and its intent is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Structures for human occupancy must generally be set back from the fault by approximately 50 feet. The Alquist-Priolo Earthquake Fault Zoning Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

Seismic Safety Act

The California Seismic Safety Commission was established by the Seismic Safety Act in 1975 with the intent of providing oversight, review, and recommendations to the Governor and State Legislature regarding seismic issues. The commission's name was changed to Alfred E. Alquist Seismic Safety Commission in 2006. Since then, the Commission has adopted several documents based on recorded earthquakes, such as the January 17, 1994 Northridge earthquake. Some of these documents include:

- Research and Implementation Plan for Earthquake Risk Reduction in California 1995 to 2000, report dated December 1994;
- Commercial Property Owner's Guide to Earthquakes Safety, report dated October 2006; and
- California Earthquake Loss Reduction Plan 2007–2011, report dated July 2007.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 was passed into law following the destructive October 17, 1989 magnitude 6.9 Loma Prieta earthquake. The Seismic Hazards Mapping Act directs the CGS to delineate Seismic Hazard Zones, and its purpose is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Seismic Hazards Mapping Act requires site-

specific geotechnical investigations, including mitigation measures based on site-specific conditions, prior to permitting most urban development projects in seismic hazard zones.

California Public Resources Code Section 5097.5

Section 5097.5 of the California Public Resources Code states "no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface" any "vertebrate paleontological site" on public lands without the "permission of the public agency having jurisdiction over such lands", where "public lands" means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Local Regulations

City of West Hollywood Hazard Mitigation Plan

The City adopted a Hazard Mitigation Plan on November 5, 2018. This plan describes the process for identifying hazards, risks, and vulnerabilities; identifying and prioritizing mitigation actions; encouraging the development of local mitigation; and providing technical support for those efforts. The HMP mentions that numerous major faults in the region could cause strong ground shaking in the city. (City of West Hollywood 2018).

West Hollywood General Plan 2035

The Safety and Noise Chapter of the City's General Plan contains goals and polices related to hazards, including seismic hazards, and identifies the City as susceptible to strong ground-shaking. The following policies are relevant to the project (City of West Hollywood 2020).

Goal SN-1: Reduce injury and damage from natural hazards.

> **Policy SN-1.1:** Follow State guidelines regarding requiring upgrades or minimize the use of buildings and facilities that are vulnerable to natural or man-made hazards throughout the community through a program of orderly and effective identification of vulnerable buildings, outreach, education, support and enforcement.
>
> **Policy SN-1.2:** Allow the consideration of potential natural or man-made hazards in project review and in City operations, considering best practices in hazard-avoidance and mitigation in the siting, structural engineering, maintenance, and building and landscape design for all development projects.
>
> **Policy SN-1.4:** Maintain high standards for the seismic performance of buildings in all new development, through requirements for detailed geotechnical investigations following State guidelines and prompt adoption and careful enforcement of the best available standards for seismic design.
>
> **Policy SN-1.6:** Utilize relevant data on natural hazards, including earthquakes, flooding, liquefaction, landslides, natural gas and subsurface methane gas, and apply this information for purposes of land use planning, including any permitting.

West Hollywood Municipal Code

Chapter 19.32 of the West Hollywood Municipal Code (WHMC) establishes seismic safety standards that are designed to protect development proposed in areas with seismic hazards such as the fault precaution, liquefaction, and landslide susceptibility zones shown in Figure 4.5-2 and Figure 4.5-3 under Section 4.5.1, *Setting*, of this section.

4.5.3 Impact Analysis

Methodology

Baseline information for the analysis was compiled from a review of data and reports published by State agencies, information compiled and evaluated by the City of West Hollywood related to local topography, geologic and soil conditions, and seismic hazards. In addition, a site-specific Geotechnical Investigation was prepared by Geocon for the project in 2023, which discusses existing geologic conditions in relation to development of the proposed project.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, impacts of the proposed project related to geology and soils are significant if the proposed project would:

1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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; or
    b. strong seismic ground shaking; or
    c. seismic-related ground failure, including liquefaction; or
    d. landslides.
2) Result in substantial soil erosion or the loss of topsoil.
3) 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.
4) 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.
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The Initial Study (see Appendix B) determined that the project would have a less than significant impact related to checklist items (1.c), (1.d) and (2) since on-site soils would not be prone to liquefaction; the probability for a seismically induced landslide occurring on-site or in the project area is low due to the urban area's general lack of elevation difference; and the project would not result in substantial soil erosion or loss of topsoil. The project would also have no impact related to checklist item (5) since the site is fully served by existing sewer facilities and the project would not require the use of septic tanks or an alternative wastewater disposal system. Specifically, this

section focuses on checklist items (1.a), (1.b), (3), (4) and (6) for potential impacts related to earthquake fault rupture, seismic ground shaking, soil suitability/unstable soils; and paleontological resources.

Project Impacts and Mitigation Measures

Threshold 1.a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

Threshold 1.b: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-1 ALTHOUGH THE PROPOSED PROJECT WOULD NOT BE SUBJECT TO ADVERSE EFFECTS FROM RUPTURE OF A KNOWN FAULT, THE PROJECT WOULD BE EXPOSED TO SEISMIC GROUND SHAKING. HOWEVER, THE PROJECT WOULD NOT INCREASE THE POTENTIAL FOR HAZARDS ASSOCIATED WITH SEISMIC GROUND SHAKING, AND COMPLIANCE WITH APPLICABLE BUILDING REGULATIONS AND INCORPORATION OF GEOTECHNICAL DESIGN FEATURES PROVIDED BY THE PROJECT-SPECIFIC GEOTECHNICAL INVESTIGATION WOULD REDUCE POTENTIAL IMPACTS RELATED TO SEISMIC GROUND SHAKING TO LESS THAN SIGNIFICANT WITH MITIGATION.

The project site is not within a State-designated Alquist-Priolo Earthquake Fault Zone or a City-designated Fault Precaution Zone. The closest Alquist-Priolo Fault Zone is the Hollywood Fault Zone, which is located approximately one mile north of the project site, as shown in Figure 4.5-2. No other Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is low (Geocon 2023). The project site is, however, located in a region of high potential for seismic activity, similar to most of Southern California. Several potentially active fault systems located in the City could expose the project to moderate to strong ground shaking in the event of an earthquake.

The proposed project would have a taller building height than surrounding uses (i.e., 34 stories or 352 feet) and larger employee population compared to current conditions. In addition to additional on-site persons being exposed to potential effects of ground shaking during seismic events, the proposed building could also experience damage during these events. However, the overall level of effects of potential ground shaking would not change because the project site is developed and construction of the proposed building would occur within the same physical boundary. Therefore, the proposed project would infill developed parcels and would not exacerbate the potential for ground shaking.

Although the project would be subject to ground shaking, particularly in the event of an earthquake originating along the Hollywood Fault, this hazard is common in the region and would be addressed through structural design in conformance with current building codes and engineering practices to resist or absorb damaging seismic forces. As required by Chapter 16 of the CBC for the construction of new buildings or structures, specific engineering design and construction measures would be implemented to minimize the potential for adverse impacts to human life and property, including impacts caused by seismically induced ground shaking. Consistent with the requirements of the CBC, Policy SN-1.4 of the Safety and Noise Chapter of the City's General Plan encourages new development to maintain high standards for seismic performance through requirements for

geotechnical investigations following State guidelines for seismic design. Similarly, per Chapter 19.32 of the WHMC, the project applicant would be required to incorporate recommendations from the project-specific geotechnical report, which would address issues such as foundational support and soil stability. As concluded by Geocon in the Geotechnical Investigation prepared for the project, neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the geotechnical recommendations included in the Geotechnical Investigation are incorporated during design and construction. As such, without incorporation of identified geotechnical recommendations, this impact would be potentially significant.

Mitigation Measure

GEO-1 Geotechnical Investigation Recommendations

The project applicant and contractor shall follow all recommended geotechnical design features, including (but not limited to) those related to dewatering, grading, foundation construction, floor slab design, included in Sections 8.5 through 8.28 of the *Geotechnical Investigation, Proposed Mixed-Use High-Rise Development, 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California* prepared by Geocon West, Inc, dated May 10, 2023 and any subsequent analysis. Prior to the issuance of grading and building permits, the City's Building and Safety Division shall review and approve the detailed construction plans or report documenting compliance with recommended geotechnical design features to ensure the project implements the measures included in the Geotechnical Investigation.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1, along with compliance with the CBC, would reduce the direct or indirect risk of life or property by implementing geotechnical design grading, dewatering, foundation, and floor slab design recommendations, which would reduce impacts related to seismic ground shaking. Impacts would be less than significant with mitigation.

Threshold 3:	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?
Threshold 4:	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?

Impact GEO-2 DEVELOPMENT OF THE PROPOSED PROJECT WOULD OCCUR ON A SITE WITH EXPANSIVE SOILS; HOWEVER, DUE TO THE DEPTH OF EXCAVATION ASSOCIATED WITH PROJECT CONSTRUCTION, THE PROJECT WOULD NOT BE SUBJECT TO ADVERSE EFFECTS FROM THESE SOILS. MOREOVER, COMPLIANCE WITH APPLICABLE BUILDING REGULATIONS AND INCORPORATION OF GEOTECHNICAL DESIGN FEATURES PROVIDED BY THE PROJECT-SPECIFIC GEOTECHNICAL INVESTIGATION WOULD REDUCE POTENTIAL IMPACTS RELATED TO THE HIGH GROUNDWATER TABLE AND OTHER UNSTABLE SOILS TO LESS THAN SIGNIFICANT WITH MITIGATION.

Expansive soils are clays, which increase in volume (swell) when saturated and shrink when dried. According to the Geotechnical Investigation, on-site soils at a depth between one and five feet bgs are considered to have a "medium" to "high" expansive potential and are classified as "expansive" in accordance with the CBC Section 1803.5.32022. Development that is constructed on expansive

soils could be subject to damage or could become unstable when the underlying soil shrinks or swells. However, as concluded in the Geotechnical Investigation, based on the depth of up to 32 feet for the proposed subterranean levels (i.e., beyond five feet bgs), the project would not be prone to the effect of expansive soils (Geocon 2023). Moreover, development of the proposed project would not increase the potential exposure to or extent of expansive soils.

However, groundwater was encountered was encountered at a boring depth of up to 20 feet bgs. Based on the depth to groundwater encountered in the current and prior borings at the site and the depth of proposed construction (i.e., 32 bgs), groundwater is anticipated to be encountered during construction and groundwater dewatering would be required during excavation activities and construction of the subterranean parking garage. As discussed under Impact GEO-1, and per the CBC, the Safety and Noise Chapter of the City's General Plan, and Chapter 19.32 of the WHMC, the project applicant would be required to incorporate recommendations from the project-specific geotechnical report, which would address issues such as foundational support and soil stability. As concluded by Geocon in the Geotechnical Investigation prepared for the project, neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the geotechnical recommendations included in the Geotechnical Investigation are incorporated during design and construction.

The proposed project's compliance with the CBC and Mitigation Measure GEO-1 for incorporation of recommended geotechnical design features, including design features for resistance to hydrostatic forces, identified in the Geotechnical Investigation, would reduce impacts related to unstable geologic units/soils. This impact would be less than significant.

Mitigation Measure

Mitigation Measure GEO-1.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1, along with compliance with the CBC, would reduce the direct or indirect risk of life or property by implementing geotechnical design grading, dewatering, foundation, and floor slab design recommendations, which would reduce impacts related to unstable soils. Impacts would be less than significant with mitigation.

Threshold 6:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-3 CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The Geotechnical Investigation reported a three- to eight-foot layer of artificial fill throughout the project site that consisted of brown to black clay (Geocon 2023). Artificial fill represents disturbed and/or human-deposited sediments; therefore, they have no paleontological sensitivity.

A paleontological records search of the Natural History Museum of Los Angeles County conducted on September 24, 2023 by Rincon recovered no known fossil localities within the project site (Bell 2023). The nearest known fossil locality is approximately 0.9 mile southwest of the project site and produced a bison (*Bison*) fossil from approximately 12 feet below the surface. Several other fossil

localities are known within two miles of the project site and have produced Pleistocene vertebrates from depths between 12 and 174 feet below the surface.

Ground disturbing activities within previously undisturbed sediments with high paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data. This project requires excavations up to 32 feet bgs, meaning that previously undisturbed Quaternary old fan deposits (Unit 4) would be impacted. Therefore, impacts to paleontological resources would be potentially significant.

Mitigation Measure

GEO-2 Paleontological Resources Monitoring and Mitigation

Qualified Professional Paleontologist. Prior to excavation, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) (SVP 2010)[1]. The Qualified Professional Paleontologist shall draft a Paleontological Resources Mitigation and Monitoring Plan, which shall direct all mitigation measures related to paleontological resources.

Paleontological Worker Environmental Awareness Program. Prior to the start of ground-disturbing construction activities, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. A recording of a basic power point presentation shall be prepared and presented by the Qualified Professional Paleontologist to inform all personnel working on the project about the archaeological sensitivity of the area. The recording shall be presented by the project applicant and/or subsequent responsible parties to all construction personnel throughout all phases of project construction who have not previously attended the training for the project. The necessity of training attendance shall be stated on all construction plans and a record of attendance via a sign-in sheet shall be maintained as part of the mitigation and monitoring reporting program.

Paleontological Monitoring. A full-time paleontological monitor shall be present on-site to observe ground-disturbing construction activities (e.g., grading, excavating, trenching) that impact native soils (i.e., undisturbed, non-fill sediments). Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP for a Paleontological Resources Monitor (SVP 2010). The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, the following shall be completed:

[1] Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

- **Fossil Salvage.** The paleontological monitor shall salvage (i.e., excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. After the fossil(s) is (are) salvaged, construction activity may resume.
- **Fossil Preparation and Curation**. Fossils shall be identified to the lowest (i.e., most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Professional Paleontologist.
- **Final Paleontological Mitigation Report.** Upon completion of ground-disturbing construction activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City of West Hollywood and, if fossil curation occurs, the designated scientific institution.

Significance After Mitigation

Implementation of Mitigation Measure GEO-2 would reduce potential impacts to paleontological resources to a level of less-than-significant and would effectively mitigate the project's impacts to these resources through the recovery, identification, and curation of previously unrecovered fossils.

4.5.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*, and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). The geographic scope for considering cumulative impacts to geology and soils is the project site and the immediately adjacent sites. This scope is appropriate because geological materials and soils occur at specific locales and are generally affected by activities directly on or immediately adjacent to the soils, and not by activities occurring outside the area.

Cumulative development in the project vicinity would gradually increase project area occupation and therefore gradually increase the number of people exposed to potential geological hazards, including effects associated with seismic events such as ground rupture, seismic shaking, and expansive or unstable soils. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. In addition, cumulative development projects would be required to comply with the current CBC, the City's General Plan, the WHMC, other laws and regulations mentioned under *Regulatory Setting* of this section, and recommendations from any site-specific geotechnical investigations. Seismic and geologic hazards would be addressed on a case-by-case

basis and would not result in cumulatively considerable impacts. As discussed under Impacts GEO-1 and GEO-2, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to seismic hazards through compliance with the CBC and Mitigation Measure GEO-1.

Cumulative projects would also increase the potential for impacts to paleontological resources through construction activities in the area. Although the project site has potential for unknown paleontological resources, the project would be required to implement Mitigation Measure GEO-2 to reduce project impacts on paleontological resources to a less-than-significant level. As with geologic hazards, any potential impact to paleontological resources associated with each individual site would be limited to that site without affecting other areas. As such, potential impacts to paleontological resources would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Moreover, with implementation of Mitigation Measure GEO-2, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to paleontological resources.

4.6 Greenhouse Gas Emissions

This section evaluates the potential impacts of greenhouse gas (GHG) emissions associated with the proposed project and the project's consistency with applicable GHG reduction plans. Construction and operational GHG emissions associated with project buildout are calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1 CalEEMod results are included in Appendix C to this EIR.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of project construction and includes these activities in the project modeling assessing construction impacts.

4.6.1 Setting

Climate Change and Greenhouse Gases

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

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).[1]

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are

[1] The Intergovernmental Panel on Climate Change's (2021) Sixth Assessment Report determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) Fourth Assessment Report. Therefore, this analysis utilizes a GWP of 25.

measured originates from historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (IPCC 2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33°C cooler (World Meteorological Organization 2023). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels. Specifically, 34,522 MMT of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent. These sources account for approximately 96 percent (United States Environmental Protection Agency [USEPA] 2022).

United States Emissions Inventory

United States GHG emissions were 6,347.7 MMT of CO_2e in 2021 or 5,593.5 MMT CO_2e after accounting for sequestration. Emissions increased by 6.8 percent from 2020 to 2021. The increase from 2020 to 2021 was driven by an increase in CO_2 emissions from fossil fuel combustion which increased seven percent relative to previous years and is primarily due to the economic rebounding after the COVID-19 Pandemic. In 2020, the energy sector (including transportation) accounted for 81 percent of nationwide GHG emissions while agriculture, industrial and waste accounted for approximately 10 percent, six percent, and three percent respectively (USEPA 2023).

California Emissions Inventory

Based on a review of the California Air Resource Board (CARB) California Greenhouse Gas Inventory for the years between 2000-2020, California produced 369.2 MMT of CO_2e in 2020, which is 35.3 MMT of CO_2e lower than 2019 levels. The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. The major source of GHG emissions in California is the transportation sector, which comprises 37 percent of the State's total GHG emissions. The industrial sector is the second largest source, comprising 20 percent of the State's GHG emissions while electric power accounts for approximately 16 percent. The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e (CARB 2022). The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Local Emissions Inventory

The City of West Hollywood conducted a GHG emissions inventory for 2018, which represents the baseline inventory, or existing conditions in the city. The emissions categories are stationary energy, transportation, waste and wastewater, product use, urban forestry, and other Scope 3 emissions (from electricity use for water and wastewater treatment). A description of emissions associated with each category (organized by total contribution to communitywide GHG emissions, from biggest to smallest) and the relationship between the categories identified in this inventory and categories are defined as follows.

- **Stationary Energy:** emissions from energy use in residential, commercial, and institutional buildings and facilities.
- **Transportation:** emissions from fuel combustion in passenger vehicles, light-duty and medium-duty trucks, and public transit systems. The emissions are based on vehicle miles traveled (VMT), which is estimated using modeled data representing the City's travel demand and regional transportation patterns. The VMT data is combined with regional vehicle and fuel mix to calculate emissions from gasoline, diesel, and compressed natural gas use in the City.
- **Product Use:** emissions from HFC use in residential and commercial applications, such as refrigerants, foams, aerosols, fire retardants and as alternatives to ozone depleting substances.
- **Water and Wastewater:** emissions associated with the decomposition of waste in landfills and biological treatment at composting and anaerobic digestion.
- **Urban Trees:** Trees act as a sink for carbon dioxide by fixing carbon during photosynthesis and storing carbon as biomass. Sequestration from urban trees in West Hollywood are estimated using parcel-level tree canopy data for Los Angeles County.
- **Other Scope 3 Emissions:** West Hollywood does not have any water filtration nor wastewater treatment plants within the city boundaries and therefore does not have control over energy-related emissions from water filtration and wastewater treatment. These electricity-related scope 3 emissions are estimated using water consumption data provided by the Los Angeles Department of Water and Power and the City of Beverly Hills' water services and associated grid emission factors from Southern California Edison (SCE).

The inventory determined that communitywide emissions were approximately 221,361 metric tons (MT) of CO_2e. The stationary energy sector was the largest contributor of GHG emissions, followed by the transportation sector. These two categories collectively make up 91 percent of emissions, followed by product use (6 percent) and waste (3 percent) (West Hollywood 2021).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. The year 2022 was the sixth warmest year since global records began in 1880 at 0.86°C (1.55°F) above the 20th century average of 13.9°C (57.0°F). This value is 0.13°C (0.23°F) less than the record set in 2016 and it is only 0.02°C (0.04°F) higher than the last year's (2021) value, which now ranks as the seventh highest (National Oceanic and Atmospheric Administration 2023). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land Surface Air Temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

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

Air Quality and Wildfires

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

Water Supply

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

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (CNRA 2019). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.4 millimeters per year, double the 20th century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2023). Global mean sea levels in 2013 were about 0.23 meter higher than those of 1880 (National Oceanic and Atmospheric Administration 2022). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of Southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (CNRA 2019). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has an over $51 billion annual agricultural industry that produces over a third of the country's vegetables and three-quarters of the country's fruits and nuts (California Department of Food and Agriculture 2022). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase

water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (CNRA 2019). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

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

4.6.2 Regulatory Setting

Federal Regulations

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

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

State Regulations

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. There are numerous regulations aimed at reducing the State's GHG emissions. These initiatives are summarized below. For more information on the Senate and Assembly Bills (AB), executive orders, building codes, and reports discussed below, and to view reports and research referenced below, please refer to the following websites: https://www.energy.ca.gov/data-reports/reports/californias-fourth-climate-change-assessment, www.arb.ca.gov/cc/cc.htm, and https://www.dgs.ca.gov/BSC/Codes.

California Advanced Clean Cars Program (Assembly Bill 1493)

California's Advanced Clean Cars program (also referred to as "Pavley"), or AB 1493 (2002), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allows California to implement more stringent vehicle emission standards than those promulgated by the USEPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "Low Emission Vehicle III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

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

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

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

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

analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

California Climate Crisis Act (Assembly Bill 1279)

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

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

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

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

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Update includes emissions and carbon sequestration in NWLs and explores how NWLs contribute to

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

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375)

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

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an eight percent reduction in per capita GHG emissions from passenger vehicles by 2020 and a 19 percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. On April 4, 2024, the SCAG's Regional Council formally adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS), also known as Connect SoCal 2024, which meets the requirements of SB 375.

Senate Bill 1383

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

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

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

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from

eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

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

California Building Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The CBC's energy-efficiency and green building standards are outlined as follows.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS (CALIFORNIA ENERGY CODE)

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

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

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

California Integrated Waste Management Act (Assembly Bill 341)

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

Executive Order N-79-20

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

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

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

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

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

Local Regulations

Southern California Association of Governments

On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS, also known as Connect SoCal 2024. The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2020-2045 RTP/SCS and includes plan elements organized within the pillars of Mobility, Communities, Environment and Economy. The SCS implementation strategies include advancing the transition to clean transportation technologies, efficient, multimodal, and accessible transit networks, compact and mixed-use development patterns prioritizing walkability, urban greening, and transit-oriented development (SCAG 2024).

The SCS technical report of the 2024-2050 RTP/SCS demonstrates the region's ability to attain and exceed the GHG emission reduction targets set forth by CARB; and outlines the region's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the 2024-2050 RTP/SCS maximizes current voluntary local efforts that support the goals of SB 375. The 2024-2050 RTP/SCS emphasizes new housing and job growth in transit priority areas, livable corridors, high-quality transit areas, and neighborhood mobility areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

West Hollywood General Plan 2035

The Land Use and Urban Form Chapter, Mobility Chapter, and Infrastructure, Resources, and Conservation Chapter of the City's General Plan identify specific policies related to GHG emissions. The following policies would be applicable to the proposed project (West Hollywood 2011).

LAND USE AND URBAN FORM CHAPTER

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

Policy LU-1.1: Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City.

Policy LU-1.13: Seek to reduce the demand for motorized transportation by supporting land use patterns that prioritize pedestrian, bicycle, and transit mobility options, and mixed use development.

Goal LU-2: Maintain a balanced mix and distribution of land uses that encourage strategic development opportunities and mobility choices within the City.

Policy LU-2.1: Direct the majority of new development to the City's commercial corridors served by high levels of existing or future public transit, with an emphasis on developing transit-supportive land use mixes and intensities near high frequency transit stops such as Santa Monica Boulevard near Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard.

MOBILITY CHAPTER

Goal M-3: Maintain and enhance a pedestrian-oriented City.

Policy M-3.1: Encourage and provide incentives and programs for people to walk more and drive less.

Policy M-3.6: Continue to work with businesses and business groups to improve walkability on major corridors and support private investment into pedestrian-oriented amenities.

Policy M-3.9: Require new commercial development to provide for the construction of pedestrian rights of way to allow convenient and unimpeded circulation to, though, and within the property being developed.

Policy M-3.10: Require design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.

INFRASTRUCTURE, RESOURCES, AND CONSERVATION CHAPTER

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

Policy IRC-4.2: Encourage and provide incentives and programs for people to walk more and drive less.

Goal IRC-6: Reduce the City's contribution to global climate change, and adapt to its effects.

Policy IRC-6.8: Implement policies in the Urban Form and Land Use Chapter of this General Plan that reduce building and transportation-related GHG emissions.

Policy IRC-6.9: In conjunction with policies in the Mobility Chapter of this General Plan, encourage a shift in travel from single-occupant autos to walking, biking, public transit, and ride-sharing, with a focus on policies that promote the following:

- Increase walking and biking within the City
- Increase transit use and reduce barriers to transit ridership
- Increase ride-sharing
- Promote alternatives to automobile ownership

Policy IRC-6.10: Implement policies in this Infrastructure, Resources, and Conservation Chapter that reduce GHG emissions related to water and wastewater, energy, green building, recycling, and solid waste, and facilities for City operations, including policies that accomplish the following:

- Reduce energy associated with the use, treatment, and conveyance of water and wastewater
- Improve energy efficiency in existing buildings
- Ensure high levels of energy performance in new construction
- Maximize the use of renewable energy
- Reduce the amount of waste sent to landfills
- Improve energy efficiency and increase energy conservation within city facilities

City of West Hollywood Climate Action and Adaptation Plan

The City of West Hollywood adopted their 2021 Climate Action and Adaptation Plan (CAAP) in December 2021. The City prepared the CAAP as an update to their 2011 Climate Action Plan and establishes a target of achieving community-wide carbon neutrality by 2035. The updated CAAP outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets.

The City's CAAP includes 20 climate measures and 60 sub-actions, organized into five categories, aimed at enabling the City to achieve carbon neutrality by 2035 and become a more climate resilient city. The following measures and sub-actions would be applicable to the proposed project:

Measure CLG-3: Lead by example in addressing consumption-based emissions.

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

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

- **Sub-action EN-3A:** Adopt energy reach codes and/or resilience codes that exceed State requirements.
- **Sub-action EN-3D:** Promote and support the adoption of clean and resilient energy technologies in affordable housing, schools, and other critical facilities.

Measure EN-5: Promote electric vehicle (EV) readiness.

- **Sub-action EN-5A:** Increase access to EVs through shared mobility services, expanded options for public and shared charging, and continued advocacy and support for the conversion of private vehicle fleets.
- **Sub-action EN-5C:** Incentivize EV charging infrastructure, prioritizing publicly accessible areas and existing parking spaces, in partnership with SCE and the Clean Power Alliance.

Measure TM-1: Increase sustainable mode share in West Hollywood (Walking, Bicycling, Transit).

- **Sub-action TM-1F:** Explore opportunities to improve surface bus transit and enhance supportive infrastructure (e.g., bus stops and shelters, transit and mobility lanes, traffic signal prioritization, etc.).

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

- **Sub-action TM-2A:** Electrify West Hollywood's municipal and public transportation fleets with plug-in EVs (e.g., Ambiance CityLine, the Pickup, Dial-a-Ride services, etc.).
- **Sub-action TM-2B:** Expand publicly accessible on-street and off-street EV charging infrastructure (for light, medium, and heavy-duty vehicles).

4.6.3 Impact Analysis

Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects related to GHG emissions. The analysis focuses on CO_2, CH_4, and N_2O because these comprise 98 percent of all GHG emissions by volume and are the GHG emissions the proposed project would emit in the largest quantities (IPCC 2014). Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (i.e., CO_2e). Minimal amounts of other GHGs (such as chlorofluorocarbons) would be emitted; however, these other GHG emissions would not substantially add to the total. GHG emissions associated with project construction and operational activity were calculated using the CalEEMod version 2022.1. CalEEMod modeling outputs are included in Appendix C to this EIR.

Construction

During construction, the proposed project would generate GHG emissions primarily from the use of internal combustion engines to power on-site equipment as well as off-site transportation of workers and materials. Default trip length estimates for workers and vendors are based on the 2015 California Statewide Travel Demand Model (CSTDM) and regional travel demand models from local metropolitan planning organizations. Further detail for the assumptions included in the modeling of GHG emissions is provided in Section 4.2, *Air Quality*. Construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime, which is assumed to be 30 years for the proposed project.

Operation

During operation, the proposed project would generate GHG emissions from area sources, energy use, mobile sources, water use, and waste disposal. Further detail for the assumptions included in the modeling of GHG emissions is provided in Section 4.2, *Air Quality*. Specific modeling assumptions used for the estimation of GHG emissions not included in Section 4.2, *Air Quality*, are detailed as follows:

- The project's CalEEMod model uses default CalEEMod assumptions for energy and solid waste sources for the high-rise residential, commercial, and parking structure land uses.
- Natural gas assumptions from CalEEMod for high-rise residential and strip mall land uses were utilized.

- The project's GHG emissions from construction of the proposed project were amortized over a 30-year period and added to annual operational emissions to determine the project's total annual GHG emissions.

The project includes several design features and characteristics that support consistency with the 2022 Scoping Plan, such as inclusion of EV and bicycle parking spaces, a rooftop solar photovoltaic (PV) system, and high-density infill development. These project components are discussed further under Impact GHG-2 and compared to the 2022 Scoping Plan, 2024-2050 RTP/SCS, and the City's CAAP and General Plan.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have significant impacts related to GHG emissions if the project would:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines*, Section 15064[h][1]).

CEQA Guidelines Section 15064.4 provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards.

CEQA Guidelines Section 15064.4 does not, however, establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and, in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7(c)).

Per *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. Therefore, *CEQA Guidelines* Section 15064(h)(3) allows a lead agency to make a finding of a less than significant impact for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions. [2]

[2] *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 229, as modified on denial of reh'g (Feb. 17, 2016)

A qualified GHG reduction plan adopted pursuant to *CEQA Guidelines* Section 15183.5 is considered by the Association of Environmental Professionals [AEP] (2016) in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions. The City of West Hollywood CAAP demonstrates sector-specific pathways to carbon neutrality by 2035, which surpasses the target of carbon neutrality by 2045 set forth in the 2022 Scoping Plan. The CAAP specifies measures and performance standards that would achieve the specified emission targets and is therefore considered to be a qualified GHG reduction plan. Accordingly, project significance is determined by considering whether the project would be consistent with the City's CAAP. In addition, project impacts are compared goals and policies outlined in the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan.

This analysis also quantifies the project's GHG emissions consistent with *CEQA Guidelines* Section 15064.4.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
Threshold 2:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE POLICIES INCLUDED IN THE 2022 SCOPING PLAN FOR THE PURPOSE OF REDUCING GHG EMISSIONS, AS WELL AS OTHER APPLICABLE MEASURES IN SCAG'S 2024-2050 RTP/SCS AND THE CITY'S CAAP AND GENERAL PLAN. CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD ALSO NOT GENERATE GHG EMISSIONS THAT WOULD, EITHER DIRECTLY OR INDIRECTLY, HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The following discussion analyzes the project's consistency with the plans, policies, regulations and GHG reduction actions/strategies outlined in the City's CAAP, 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. This analysis also considers the combined impact of quantified GHG emissions from both construction and operation. However, as discussed under *Significance Thresholds*, project impacts are determined based on consistency with the City of West Hollywood CAAP, 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. As such, GHG emissions are quantified and shown herein for informational purposes.

West Hollywood Climate Action and Adaptation Plan

Table 4.6-1 summarizes the project's consistency with the City's CAAP. As discussed therein, the project would be consistent with the actions and measures contained in the local GHG reduction plan. Impacts would be less than significant.

Table 4.6-1 Project Consistency with the City of West Hollywood CAAP

Goals	Consistency
Measure CLG-3: Lead by example in addressing consumption-based emissions.	**Consistent.** The project would comply with all standards set forth in the CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. All proposed residences would be equipped with energy-efficient appliances and lighting, water-efficient fixtures, and water-efficient irrigation systems. As mentioned above under the 2022 Scoping Plan, the project would be consistent with the State's climate goals by incorporating sustainable building practices and providing energy efficiency in the buildings.
Measure EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction	**Consistent.** The project would include several sustainable design features, including those required by Title 24 and CALGreen standards. All proposed residences would be equipped with energy-efficient electric appliances and lighting, water-efficient fixtures, and water-efficient irrigation systems. The project would meet the requirements of the 2022 California Energy Code, in addition to several measures contained in the West Hollywood Municipal Code regarding low-impact development, construction debris control, grading, and paving. The project would incorporate green roof areas and would not include fireplaces. Proposed on-site facilities would establish residences on an underutilized lot adjacent to existing development within a major transportation corridor. Therefore, the project would provide connectivity with planned neighboring commercial and residential developments.
Measure EN-5: Promote EV readiness	**Consistent.** The project would provide 59 EV Capable parking spaces, 146 EV Ready parking spaces, and 30 EVSE parking spaces with installed Level 2 EV charging equipment for residential use and an additional 17 EV Capable parking spaces and four EVSE parking spaces for commercial/retail use. Therefore, the proposed project would promote electrifying the vehicle fleet with electric chargers.
Measure TM-1: Increase sustainable mode share in West Hollywood (walking, bicycling, transit).	**Consistent.** The project would provide housing near city parks, commercial areas, and schools. Furthermore, the project would include design features such as sidewalks and multiple access points to the project site. These features would promote active transportation and foster efficient development patterns within the project site vicinity. Public transit options located near the project site include Los Angeles County Metropolitan Transportation Authority (Metro) Routes 4 and 212; Antelope Valley Transit Authority (AVTA) Bus Route 786; City shuttles, including CityLine Local Cedars-Sinai and the CityLine Commuter Hollywood/Highland; and the City's trolley service, The PickUp. The project would include improvement of pedestrian and bicycle facilities, and site access would be provided along several access points.
Measure TM-2: Promote zero and near zero carbon transportation.	**Consistent.** The project would provide 59 EV Capable parking spaces, 146 EV Ready parking spaces, and 30 EVSE parking spaces with installed Level 2 EV charging equipment for residential use and an additional 17 EV Capable parking spaces and four EVSE parking spaces for commercial/retail use. Therefore, the proposed project would promote electrifying the vehicle fleet with electric chargers. The project would be located within 500 feet of commercial destinations and bus stops for Metro and AVTA services, in addition to providing bicycle parking and storage for visitors, employees, and residents.

Source: West Hollywood 2021

2022 Scoping Plan

The principal State plans and policies for reducing GHG emissions are AB 32, SB 32, and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020; the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030; and the goal of AB 1279 is to achieve net zero GHG emissions no later than 2045 and reduce GHG emissions by 85 percent below

1990 levels no later than 2045. The 2022 Scoping Plan expands upon earlier plans to include the AB 1279 targets. The 2022 Scoping Plan emphasizes strategies including reducing fossil fuel use and vehicle miles traveled; decarbonizing the electricity sector, maximizing recycling and diversion from landfills; and increasing water conservation.

The 2022 Scoping Plan includes Appendix D, Local Actions, which outlines project-specific measures that can be implemented so that a project is consistent with the Scoping Plan (CARB 2022b). These measures, referred to as "Key Project Attributes," emphasize three priority areas; transportation electrification, VMT reduction, and building decarbonization. Table 4.6-2 lists the Key Project Attributes as they are presented in Appendix D of the 2022 Scoping Plan followed by a discussion of the proposed project's consistency with these Key Project Attributes:

Table 4.6-2 Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute
Transportation Electrification	▪ The project provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.
VMT Reduction	▪ The project is located on an infill site that is surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer). ▪ The project does not result in the loss or conversion of natural and working lands. ▪ The project consists of transit-supportive densities (minimum of 20 residential dwelling units per acre); or is in proximity to existing transit stops (within 0.5 mile); or satisfies more detailed and stringent criteria specified in the region's SCS. ▪ The project reduces parking requirements by: eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or providing residential parking supply at a ratio of less than one parking space per dwelling unit; or for multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. ▪ The project has at least 20 percent of units included that are affordable to lower-income residents ▪ The project results in no net loss of existing affordable units
Building Decarbonization	▪ The project would install all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

Source: CARB 2022b

The proposed project would include EV parking spaces meeting mandatory measures for EV charging infrastructure set forth in the latest CALGreen.[3] However, Appendix D of the 2022 Scoping Plan requests that projects meet the most ambitious voluntary CALGreen standards, which would be Tier 2. While the project would meet mandatory standards, the project would not meet the most ambitious voluntary standard, which would require 45 percent of the parking spaces be EV capable (rough-in for future chargers), with 33 percent of those spaces installed with a Level 2 charger. Increasing the number of EV parking spaces would be cost-prohibitive and infeasible for the project due to the required electrical load and would hinder advancement of other key attributes such as increasing residential density that is consistent with Appendix D of the Scoping Plan.

[3] The 2022 CALGreen Mandatory Measures for multifamily development projects with 20 or more dwelling units require that 10 percent of parking spaces shall be EV Capable, 25 percent of spaces shall be EV Ready, and five percent of spaces shall be equipped with Level 2 Electric Vehicle Supply Equipment.

The project would provide housing near city parks, commercial areas, and schools. Furthermore, the project would include design features such as sidewalks and multiple access points to the project site. These features would promote active transportation and foster efficient development patterns within the project site vicinity. Public transit options located near the project site include Metro Routes 4 and 212; AVTA Bus Route 786; City shuttles, including CityLine Local Cedars-Sinai and the CityLine Commuter Hollywood/Highland; and the City's trolley service, The PickUp. The project would include improvement of pedestrian and bicycle facilities, and site access would be provided along several access points. Therefore, the project would have accessible and reliable travel options and be designed to reduce reliance on solo gasoline-powered vehicle trips, thereby advancing progress towards transportation electrification.

With respect to VMT-reducing attributes, the project is surrounded by existing urban uses including commercial uses to the north and west and residential uses to the south. The proposed project would be centrally located between urban uses and would not encroach on natural or working lands. The project is located on underutilized land that is served by existing utilities and essential public services. The project includes 514 units on 0.99 acre and would therefore consist of a transit-supportive density (at least 20 units per acre). Additionally, as previously stated, the project would be located within 0.5 mile of several public transit options. The project would preserve natural and working lands by developing land in a location surrounded by urban uses rather than converting "greenfield" land to urban uses. The project would not result in a net loss of existing affordable units. The percentage of affordable units provided by the project would be approximately 25 percent, which exceeds the minimum percentage recommended in Appendix D of the 2022 Scoping Plan.

The project in its entirety would not be 100 percent electric; however, its residential component would be 100 percent electric. The project would also comply with the latest Title 24 CALGreen and Building Efficiency Energy Standards and the AB 341 waste diversion goal of 75 percent. In addition, the project would receive electricity from SCE, which is required to reduce GHG emissions by increasing procurement from eligible renewable energy by set target years as required by SB 100.

According to the 2022 Scoping Plan, residential and mixed-use development projects that incorporate all of the Key Project Attributes are aligned with the State's priority GHG reduction strategies for local climate action and with the State's climate and housing goals; however, lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the Key Project Attributes are consistent with the State's climate goals. Although the project would not fully attain Appendix D attributes regarding building decarbonization, the project would include other key GHG-reducing attributes which demonstrate consistency with the 2022 Scoping Plan through VMT-reducing features such prioritization of infill development, facilitation of multimodal transportation, and proximity to public transit options. Therefore, the proposed project would be consistent with the 2022 Scoping Plan, and impacts would be less than significant.

SCAG 2024-2050 RTP/SCS

SB 375 requires that each MPO prepare an SCS with the RTP that demonstrates how the region will meet GHG emissions targets. SB 375 establishes a collaborative relationship between MPOs and CARB to establish GHG emissions targets for each region in the state.

SCAG's 2024-2050 RTP/SCS (also known as Connect SoCal 2024) was developed to provide a blueprint to achieve goals within four core categories: mobility, communities, environment and economy. In addition to meeting the GHG reduction targets established by SB 375 and other

regional goals, the 2024-2050 RTP/SCS was designed to deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel-time reliability, air quality, economic productivity, environmental justice and transportation asset condition.

The 2024-2050 RTP/SCS integrates land use and transportation strategies to help achieve a coordinated and balanced regional transportation system. As discussed in Section 4.6.2, *Regulatory Setting*, of this section, SCAG's 2024-2050 RTP/SCS is a regional plan intended to reduce GHG emission from automobiles and light trucks for the SCAG region to 19 percent below 2005 levels by 2035. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. This plan projects that 66 percent of new households and 54 percent of new jobs between 2019 and 2050 will be in Priority Development Areas, either near transit or in walkable communities. The SCS is expected to result in an improved jobs-housing balance and more opportunity for transit-oriented development.

The project is in a Priority Development Area and would be within 500 feet of commercial destinations along Santa Monica Boulevard and transit options including Metro and AVTA bus stops. The project would increase housing availability near destinations and mobility options, thereby supporting the 2024-2050 RTP/SCS implementation strategies emphasizing balanced jobs and housing growth in Priority Development Areas. Approximately 128 residential units (25 percent) would be designated affordable, supporting SCAG efforts to advance equitable housing growth in walkable communities. The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors, supporting expansion of mobility options and reducing reliance on single occupancy vehicles and trucks. The project would advance adoption of EV technology by providing 59 EV Capable parking spaces, 146 EV Ready parking spaces, and 30 Electric Vehicle Supply Equipment (EVSE) parking spaces with installed Level 2 EV charging equipment for residential use and an additional 17 EV Capable parking spaces and four EVSE parking spaces for commercial/retail use. These project design features would reduce GHG emissions from mobile vehicle trips and are aligned with the core goals of the 2024-2050 RTP/SCS.

The project would implement transit-supportive development and design standards that emphasize compact, well-designed, and pedestrian-friendly residential land uses. Therefore, the project would not conflict with the 2024-2050 RTP/SCS.

West Hollywood General Plan 2035

Table 4.6-3 summarizes the project's consistency with the City's General Plan. As discussed therein, the project would be consistent with the project-level actions and measures contained in the local General Plan.

Table 4.6-3 Project Consistency with the City of West Hollywood General Plan

Policy	Consistency
Land Use and Urban Form Chapter	
Policy LU-1.1: Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City. **Policy LU-1.13:** Seek to reduce the demand for motorized transportation by supporting land use patterns that prioritize pedestrian, bicycle, and transit mobility options, and mixed use development. **Policy LU-2.1:** Direct the majority of new development to the City's commercial corridors served by high levels of existing or future public transit, with an emphasis on developing transit-supportive land use mixes and intensities near high frequency transit stops such as Santa Monica Boulevard near Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard.	**Consistent.** The project would create sidewalks and pathways within the project site to accommodate pedestrians and cyclists, which would connect to existing and planned off-site pedestrian and bicycle facilities. The project would provide housing at all levels of affordability within 0.5 mile of retail businesses, employment opportunities, cultural institutions, and other supportive urban uses within the City. As discussed in Table 4.6-4, the project would provide EV ready and EV installed parking spaces in addition to bicycle parking and storage for both residential and nonresidential uses. The project site is located within the Santa Monica Boulevard commercial corridor, which is served by high level of existing and future public transit.
Mobility Chapter	
Policy M-3.1: Encourage and provide incentives and programs for people to walk more and drive less. **Policy M-3.9:** Require new commercial development to provide for the construction of pedestrian rights of way to allow convenient and unimpeded circulation to, through, and within the property being developed. **Policy M-3.10:** Require design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.	**Consistent.** The project would create sidewalks and pathways within the project site to accommodate pedestrians and cyclists, which would connect to existing and planned off-site pedestrian and bicycle facilities. In addition, the project would provide bicycle parking and storage for both residential and nonresidential uses.
Infrastructure, Resources, and Conservation Chapter	
Policy IRC-6.8: Implement policies in the Urban Form and Land Use Chapter of this General Plan that reduce building and transportation-related GHG emissions.	**Consistent.** The project would comply with all standards set forth in the CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. All proposed residences would be equipped with energy-efficient appliances and lighting, water-efficient fixtures, and water-efficient irrigation systems. As mentioned above under the 2022 Scoping Plan, the project would be consistent with the State's climate goals by incorporating sustainable practices and providing energy efficiency in the buildings.

Source: West Hollywood 2011

The plan consistency analysis demonstrates that the project complies with the plans, policies, regulations and GHG reduction actions/strategies outlined in the City's CAAP, 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. Impacts would be less than significant.

Quantification of Project's Estimated GHG Emissions

Construction and operation of the project would generate GHG emissions. Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects.

CONSTRUCTION EMISSIONS

Construction facilitated by the project would generate temporary GHG emissions primarily from the operation of construction equipment on-site, as well as from vehicles transporting construction workers to and from the project site, and heavy trucks to transport building and concrete materials. As shown in Table 4.6-4, construction associated with the project would generate 3,958 MT of CO_2e. Amortized over a 30-year period, construction associated with the project would generate 132 MT of CO_2e per year.

Table 4.6-4 Project Construction GHG Emissions

Year	Emissions (MT of CO_2e)
2025	210
2026	1,660
2027	1,843
2028	245
Total	**3,958**
Amortized over 30 years	**132**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix C

OPERATIONAL AND TOTAL PROJECT EMISSIONS

Operation of the proposed project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, wastewater and solid waste generation, and stationary sources operated at the project site (e.g., emergency diesel generator). As shown in Table 4.6-5, when combined with amortized construction emissions in Table 4.6-4, the project would result in 3,325 MT of CO_2e per year.

Table 4.6-5 Estimated GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e/year)
Construction	
Amortized over 30 years	**132**
Operational	
Mobile	2,232
Area	15
Energy	722
Water	52
Waste	128
Refrigerant	1
Stationary	43
Total Emissions	**3,325**

MT CO_2e = metric tons of carbon dioxide equivalent

Source: CalEEMod worksheets in Appendix C

The GHG emissions shown herein represent a conservative estimate because they do not account for the reduction in emissions anticipated from decommissioning of the former concrete batch plant. As discussed under *Significance Thresholds,* the determination of whether project generated GHG emissions would have a significant impact on the environment is based on consistency with the City's CAAP, CARB's 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. As shown in Table 4.6-3 through 4.6-5 above, the project would be consistent with policies contained in the City's CAAP, 2022 Scoping Plan, and the City's General Plan. Analysis above also demonstrates the project's consistency with SCAG's 2024-2050 RTP/SCS. Therefore, impacts associated with project generated GHG emissions would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.6.4 Cumulative Impacts

GHG emissions impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of an adopted numeric threshold for the City of West Hollywood, the significance of the project's GHG emissions is evaluated via a consistency analysis with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the City's CAAP, 2022 Scoping Plan, 2024-2050 RTP/SCS, and the City's General Plan. As discussed under Impact GHG-1, and provided for information purposes, the project's GHG emissions would be approximately 3,325 MT of CO_2e per year. In addition, as discussed under Impact GHG-2, the proposed project would be consistent with the statewide and regional plans by including energy conservation measures consistent with the latest Title 24 Building Energy Efficiency Standards (Part 6) and CALGreen (Part 11). Furthermore, the proposed project would be an infill development that would not covert natural lands and would contribute to the job and housing balance. The project site is located within 0.5 mile of transit options and commercial destinations and would implement bicycle parking spaces, which would promote alternative modes of transportation for residential and nonresidential uses. These project design features would ensure consistency with the City's CAAP, which is the most applicable local plan for GHG impacts, as well as other State, regional, and local plans. Therefore, based on the *CEQA Guidelines* for determining the significance of GHG emissions, the proposed project's contribution to cumulative impacts would not be cumulatively considerable.

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4.7 Hazards and Hazardous Materials

This section addresses the regulatory setting, and existing environmental setting, and analyzes the potential hazards and hazardous materials impacts of the proposed project during both construction and operational phases, respectively.

The Initial Study (see Appendix B) concluded that the project would not result in a safety hazard or expose on-site residents and employees to excessive noise from airport operations; the project would not significantly interfere with an existing emergency evacuation plan or emergency response plan; and the project would not expose people or structures to a significant risk involving wildland fires. Specifically, this analysis focuses on the potential for an accidental release of hazardous materials to the environment related to the project site's historic and current land use operations and the project site's underlying soil and groundwater conditions.

The analysis presented herein is based on a review of the following environmental site assessments (ESAs) prepared by Advantage Environmental Consultants, LLC (AEC) and Citadel EHS (Citadel) for the proposed project, which are included as Appendix G to this EIR:

- *AEC, Phase I Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California, July 9, 2019*
- *AEC, Phase II Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California, August 23, 2019*
- *AEC, Phase I Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California, May 17, 2023*
- *AEC, Phase I Environmental Site Assessment (Revised), 1000 N La Brea Avenue, West Hollywood California, March 19, 2024*[1]
- *Citadel, Phase I Environmental Site Assessment Report, 1020 North La Brea Avenue, West Hollywood, California, February 18, 2022*
- *Citadel, Limited Phase II Site Assessment Report, 1020 North La Brea Avenue, March 18, 2022*
- *Citadel, Limited Phase II Site Assessment Report (Revised), 1020 North La Brea Avenue, West Hollywood, California, April 4, 2024*

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

[1] The cover page of this revised Phase I ESA states that the assessment was originally completed on May 4, 2023, subsequently revised on March 19, 2024. However, this is a typographical error as the original assessment was completed on May 17, 2023 (also listed herein).

4.7.1 Setting

Existing Conditions

The project site encompasses 1000, 1014, 1020, and 1028 North La Brea Avenue, located in West Hollywood, immediately adjacent to the city's boundary with Los Angeles. The southern portion of the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX (i.e., the Hollywood Ready-Mix Concrete Plant). The concrete batch plant consisted of a 634-square-foot (sf) office building, an industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation of the concrete batch plant included the production and shipment of ready-mix concrete. The northern portion of the project site is developed with an 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way.

The project site is in an urban area characterized by a mix of commercial and residential uses. Notably, the project site's eastern and southern boundaries border the Hollywood neighborhood of the City of Los Angeles. Specifically, the project site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant to the east; Romaine Street and warehouse, commercial, and residential uses to the south; and North La Brea Avenue, commercial uses, and the West Hollywood Gateway shopping center to the west.

2019 AEC Phase I ESA, 1000 North La Brea Avenue – CEMEX Concrete Batch Plant

AEC completed a Phase I ESA for the southern portion of the project site developed with the former CEMEX concrete batch plant and the remainder of the former CEMEX concrete batch plant to the east dated July 9, 2019. AEC's assessment revealed the following recognized environmental conditions (RECs) in connection with the CEMEX concrete batch plant:

- Current presence of a reported 10,000-gallon diesel underground storage tank (UST) on the eastern portion of the CEMEX concrete batch plant
- Former presence of USTs in the southeastern potion of the CEMEX concrete batch plant
- Hazardous materials use and hazardous waste generation associated with maintenance operations at the CEMEX concrete batch plant
- A reference to Lees Richfield Service Station in a city directory from 1962, unknown location at the CEMEX concrete batch plant

As part of this Phase I ESA, AEC reviewed a Preliminary Site Assessment prepared by TRC Solutions Inc. (TRC) dated May 2019. The TRC assessment noted the following:

- Los Angeles City Fire Department (LAFD) permitted a 10,000-gallon diesel fuel UST located at the northeastern portion of the CEMEX concrete batch plant
- On-site presence of eight aboveground storage tanks (ASTs) containing chemicals for cement formulas

TRC reported that an April 2, 1999 tank closure report identified the removal of two 10,000-gallon diesel fuel USTs, associated fuel dispenser and piping, and one 500-gallon waste oil UST that had

been previously abandoned in place with slurry in 1990. The tank removal was reportedly completed under LAFD oversight, including the issuance of a no further action letter by LAFD dated June 30, 1999. In any case, the former location of these USTs and ASTs remains unknown.

2019 AEC Phase II ESA, 1000 North La Brea Avenue – CEMEX Concrete Batch Plant

AEC prepared a Phase II ESA for both the project site and eastern portion of the former CEMEX concrete batch plant ("the assessment area") on August 23, 2019. As part of the ESA, 10 soil borings (S1 through S10) were completed, six groundwater samples were collected, and 19 soil, 12 soil vapor, and six groundwater samples were analyzed for total petroleum hydrocarbons (TPH), metals, and volatile organic compounds (VOCs).

- Ten of the 17 Title 22 Metals were detected at or above analytical laboratory reporting limits in one or more of the soil samples obtained during sampling. The detected metals included barium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, vanadium, and zinc. The maximum concentrations of these analytes reported in the soil samples were not considered by AEC to be elevated relative to human health risk based on the screening criteria used.[2]
- TPH was detected in eight of the 19 soil samples analyzed. TPH in the gasoline range (TPHg) was detected at concentrations that exceeded commercial Environmental Screening Levels (ESLs)[3] in the central and northeastern portions of the assessment area (adjacent to the 10,000-gallon diesel fuel UST). TPH in the diesel range (TPHd) was detected at concentrations exceeding residential ESLs in the central-northern portion of the assessment area. TPH in the oil range (TPHo) was detected in the northwestern portion of the assessment area at concentrations below ESLs.
- Nineteen soil samples were analyzed for VOCs; of the detected VOCs, naphthalene was detected at a concentration exceeding its respective human health risk-based screening criteria in the northeastern corner of the assessment area.[4]
- Of the 12 soil vapor samples, one or more VOCs were detected at or above laboratory reporting limits throughout the assessment area.
- Of the six groundwater samples, collected at a depth of approximately 15 to 16 feet below ground surface (bgs), detected VOC concentrations exceeded California Department of Toxic Substances Control (DTSC) Maximum Contaminant Levels in the northern and southern portions of the assessment area.

Based on these results, AEC concluded the following regarding the western and eastern portions of the former CEMEX concrete batch plant:

- *"The existing UST at the plant will require removal under permit."*
- *"Petroleum hydrocarbons and VOCs (petroleum and solvent based) are present in soil, soil gas and groundwater, contaminated soil will need to be segregated from non-impacted soil during future construction activities and delivered to a licensed landfill or treatment/recycling facility."*

[2] 2019 State Water Resources Control Board (SWRCB), Region 2 – San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) for residential and commercial/industrial soil, and Department of Toxic Substances Control (DTSC) Screening Levels (SLs) for residential and industrial soil as published in the DTSC Human and Ecological Risk Office (HERO) Note 3
[3] 2019 San Francisco Bay RWQCB ESLs for residential and commercial/industrial soil
[4] DTSC SLs (HERO Note 3, 2019) and 2019 San Francisco Bay RWQCB ESLs.

- *"Soil vapor mitigation is considered to be warranted when the new subterranean parking structure is constructed."*
- *"The presence of petroleum hydrocarbons and VOCs in groundwater should be considered during the design of the dewatering system for the proposed future project."*

2023 AEC Phase I ESA, 1000 North La Brea Avenue – Western Portion of CEMEX Concrete Batch Plant

AEC completed a Phase I ESA for 1000 North La Brea Avenue, dated May 17, 2023. AEC again identified RECs in connection with hazardous material use and hazardous waste generation associated with project site operations as a concrete batch plant. AEC concluded the following based on their 2019 Phase II ESA (which was completed for the project site and the remainder of the former CEMEX concrete batch plant) and results from their 2023 Phase I ESA:

- *"According to the 2019 Phase II assessment, petroleum hydrocarbons and VOCs (petroleum and solvent based) are considered to be the primary contaminants of concern at the subject property. Such contaminants are present in soil, soil gas, and groundwater. At this time, the origin of the groundwater impacts beneath the subject property have not been identified. However, review of nearby release properties suggests the area is subject to regional groundwater impacts. Additionally, concentrations of petroleum hydrocarbon related constituents of concern in groundwater beneath the subject property are below thresholds established in the California State Water Resources Control Board Low Threat Underground Storage Tank Case Closure Policy criteria. As such, groundwater impacts at the subject property are not considered to be a significant concern and can be mitigated during redevelopment activities under a subject property specific soil and groundwater management plan."*
- *"Contaminated soil will need to be segregated from non-impacted soil during future construction activities and delivered to a licensed landfill or treatment/recycling facility. The handling and disposal of impacted soils encountered during redevelopment activities can be outlined in a subject property specific soil and groundwater management plan."*
- *"Vapor mitigation in the form of a vapor barrier is considered to be warranted when the new subterranean parking structure is constructed at the subject property."*

2024 AEC Phase I ESA (Revised), 1000 North La Brea Avenue – Western Portion of CEMEX Concrete Batch Plant

AEC completed a revised Phase I ESA for 1000 North La Brea Avenue, dated March 19, 2024. AEC re-documented RECs in connection with past and current operations. AEC concluded similar findings from their 2023 Phase I ESA with a revised groundwater recommendation that *"Any groundwater encountered during construction activities will be properly managed in accordance with dewatering permit requirements,"* instead of *"a subject property specific soil and groundwater management plan."*

2022 Citadel Phase I ESA Report, 1020 North La Brea Avenue – Warehouse Building

Citadel prepared a Phase I ESA, dated February 18, 2022, for the northern portion of the project site located at 1020 North La Brea Avenue, which is currently developed with a vacant, one-story commercial and warehouse building. A historical review of the subject property revealed occupancies of various commercial and warehouse businesses and its current configuration as a

commercial warehouse has remained the same since 1947. In their Phase I ESA, Citadel identified RECs in connection with the historical review of subject property and adjacent properties, including possible vapor encroachment.

Based on the findings of the Phase I ESA, Citadel recommended:

- "*Conducting a Phase II Subsurface Investigation to determine if the historical operations of a used car lot, cabinet making, studio production and backdrop shop, and a print shop; and current and historic operations of the adjoining and nearby properties to the Site have impacted the subsurface at the Site."*
- *"The property owner follow best management practices, in conformance with current regulations, in regard to potential use of regulated hazardous materials and/or waste generated during everyday operations."*

Based on the age of the on-site structures, Citadel also recommended performing a "survey for asbestos-containing building materials, lead-based paint, and polychlorinated biphenyls."

2022 Citadel Limited Phase II ESA Report, 1020 North La Brea Avenue – Commercial/Warehouse Building

Citadel prepared a Limited Phase II ESA Report, dated March 18, 2022, for 1020 North La Brea Avenue. The scope of the report was based on the recommendations from Citadel's Phase I ESA Report previously summarized. Soil and soil vapor samples were collected at four borings across the property. Results of the analyses indicate the following:

- Benzene, tetrachloroethene (PCE), trichloroethene (TCE), and cis-1,2-dichloroethene were reported in soil vapor at concentrations above their respective San Francisco Bay RWQCB ESLs.[5]
- TCE was reported in soil vapor at concentrations that exceed the United States Environmental Protection Agency (USEPA) Short-Term Action Level (STAL).[6]
- TCE and TPHd were reported in one soil sample, at concentrations below their respective ESLs.

Based on these results, Citadel concluded in the Limited Phase II ESA Report that:

- *"[The project site] is impacted by VOCs.*
- *"The presence of VOCs in soil vapor may pose a health risk to construction workers and future building occupants."*
- *"The presence of TCE in concentrations that exceed the STAL triggers the regulatory response that indoor air sampling be conducted expeditiously."*

Based on these results, Citadel recommended the following:

- *"Indoor air quality sampling be conducted as soon as possible."*
- *"Results from the indoor air sampling would then be evaluated to determine the appropriate mitigation response action."*
- *"A Human Health Risk Assessment (HHRA) be conducted for the Site."*

[5] Results reported were compared to the 2019 San Francisco Bay RWQCB ESLs. "*The soil vapor ESLs for evaluating soil vapor intrusion are based on indoor air concentrations over an attenuation factor (AF) of 0.03."* Comparison to the San Francisco RWQCB is an industry standard as this RWQCB was the first regional office to publish these ESLs.
[6] California Environmental Protection Agency (CalEPA), DTSC. Revision 1, October 2015. *Advisory for Active Soil Gas Investigations*.

- "Implementation of *"mitigation measures to reduce potential vapor pathways, that may include, slab repair, retrofitting or replacement; installation of a vapor-inhibiting membrane to the slab or subslab; installation of a passive or active venting system; or a combination of these measures."*
- *"An air flow test and balancing assessment be conducted by a qualified mechanical engineer or HVAC [heating, ventilation, and air conditioning] specialist."*
- *"The results of the assessment will be used to design and implement engineering measures."*
- *"An environmental monitoring specialist be present during any construction activity that could potentially disturb soil including concrete slab removal and utility trenching."*
- *"Indoor air quality sampling be conducted for the future building approximately one to three months following final construction and implementation of mitigation measures. Subsequent air sampling should be conducted approximately six months after the first indoor air sampling events."*

2024 Citadel Limited Phase II ESA Report (Revised), 1020 North La Brea Avenue – Commercial/Warehouse Building

Citadel prepared a revised Limited Phase II ESA Report, dated April 4, 2024, for 1020 North La Brea Avenue. The Citadel investigation was intended to assess soil impacts (i.e., VOCs, TPH, heavy metals) and soil vapor impacts (i.e., VOCs) from historical on-site and adjacent operations described in the 2022 Citadel Phase I ESA Report. This investigation determined that the project site has been impacted by benzene, PCE, cis-1,2-dichloroethane, and TCE. Citadel recommended similar findings included in their 2022 Phase II ESA Report with the addition of *"A demolition-level survey of asbestos-containing materials, lead based paint and other environmentally regulated materials be completed prior to demolition of the existing [warehouse] building."*

4.7.2 Regulatory Setting

Federal, State, and local government laws define hazardous materials as substances that are toxic, flammable/ignitable, reactive, or corrosive. Extremely hazardous materials are substances that show high or chronic toxicity, carcinogenic, bioaccumulative properties, persistence in the environment, or that are water reactive. Hazardous materials impacts are normally a result of project-related activities disturbing or otherwise encountering such materials in subsurface soils or groundwater during site grading or dewatering. Other means for human contact with hazardous materials are transportation accidents associated with the conveyance of hazardous materials along highways and railroads.

The management of hazardous materials and hazardous wastes is regulated at the federal, State, and local levels through programs administered by the USEPA, agencies within the California Environmental Protection Agency (CalEPA) such as DTSC and the State Water Resources Control Board (SWRCB), federal and State occupational safety agencies such as the Occupational Safety and Health Administration (OSHA) and the Division of Occupational Safety and Health (DOSH), and locally by the Los Angeles County Fire Department (LACFD) Health and Hazardous Materials Division (HHMD).

Federal Regulations

Primary federal agencies with responsibility for hazardous materials management include the USEPA, United States Department of Labor's OSHA, and the United States Department of Transportation (USDOT). The major laws enforced by these agencies are described below.

Toxic Substances Control Act of 1976 and the Resource Conservation and Recovery Act of 1976

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. The Resource Conservation and Recovery Act (RCRA) was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Occupational Safety and Health Act of 1970

OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California, also known as the California Division of Occupational Safety and Health (CalOSHA).

Hazardous Materials Transportation Act of 1975

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (49 CFR Section 101 et seq.), which is administered by the Office of Hazardous Materials Safety within the Pipeline and Hazardous Materials Administration of USDOT. The Hazardous Materials Transportation Act governs the safe transportation of hazardous materials by all modes. The USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, or causes to be transported or shipped hazardous materials, or who is involved in any way with the manufacture or testing of hazardous materials packaging or containers. The USDOT regulations govern every aspect of the movement of hazardous materials including packaging, handling, labeling, marking, placarding, operational standards, and highway routing.

The Residential Lead-Based Paint Hazard Reduction Act of 1992

The Residential Lead-Based Paint Hazard Reduction Act of 1992 protects families from lead exposure from paint, dust, and soil and provides a national framework for addressing lead-based paint hazards at federal residential properties. Furthermore, it requires sellers to provide buyers with information on lead-based paint hazards from risk assessments or inspections in the seller's possession. The law includes provisions that educate the public on lead-based health risks and the proper steps to abate or remove the hazards of lead-based paint.

Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, the Clean Air Act (discussed further in Section 4.2, *Air Quality,* of this EIR) and the Clean Water Act (discussed further in Section 4.8, *Hydrology and Water Quality*, of this EIR) address hazardous materials with respect to air and water pollutants:

State Regulations

The CalEPA DTSC is the primary state agency governing the storage, transportation, and disposal of hazardous wastes. DTSC is authorized by the USEPA to enforce and implement federal hazardous materials laws and regulations. Regulation of hazardous material use and transport also occurs under a variety of state agencies and authorities, many of whom are partners in the CalEPA-administered Certified Unified Program Agency (CUPA) program discussed further in this section. There are many State statutes and regulations governing hazardous materials and wastes, and they are contained within many distinct parts of the States' codes, therefore only regulations relevant to this analysis are the following.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law is the primary hazardous waste statute in the State of California and implements RCRA as a "cradle-to-grave" waste management system in the State of California for handling hazardous wastes in a manner that protects human health and the environment and would reduce potential resulting impacts. The law exceeds federal requirements by mandating source reduction planning, and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste and waste management activities that are not covered by federal law.

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (Health and Safey Code [HSC] Section 25100 et seq.), which is implemented by regulations described in California Code of Regulations (CCR) Title 26. The State program is similar to, but more stringent than, the federal program under RCRA. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5.

Government Code Section 65962.5 requires that CalEPA, via the DTSC, the California Department of Health Services (DHS), the SWRCB, and the California Department of Resources, Recycling, and Recovery (CalRecycle) compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state (collectively known as the Cortese List). The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the project site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in CCR Title 22. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the project site may

be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Health and Safety Code

HSC Section 25150 requires DTSC to adopt, and revise when appropriate, standards and regulations for the management of hazardous wastes to protect against hazards to the public health, domestic livestock, wildlife, or the environment. In adopting or revising standards and regulations pursuant to this chapter, the department shall, insofar as practicable, make the standards and regulations conform with corresponding regulations adopted by the USEPA pursuant to the federal act. This section does not prohibit the department from adopting standards and regulations that are more stringent or more extensive than federal regulations.

CalEPA, in cooperation with the DTSC and the SWRCB and the Office of Environmental Health Hazard Assessment, publishes a list of screening numbers for select contaminants. Screening numbers are defined as the concentration of a contaminant published by CalEPA as an advisory number. In determining screening numbers, CalEPA considers the toxicology of the contaminant, risk assessments prepared by federal or state agencies, epidemiological studies, risk assessments or other evaluations of the contaminant during remediation of a site, and screening numbers that have been published by other agencies.

In January 2018, the DTSC's Human and Ecological Risk Office (HERO) issued Human Health Risk Assessment Note Number 3. The document lists DTSC-modified screening levels (DTSC-SL) for select compounds in soil, tap water, and air for use in the human health risk assessment process at hazardous waste sites and permitted facilities, and the DTSC-SLs were last updated in 2022.

Certified Unified Program Agency

In accordance with Chapter 6.11 of HSC Section 25404, et seq., local regulatory agencies enforce six environmental and emergency response programs through the CUPA program, as listed below:

- Hazardous Materials Release Response Plans and Inventories (Business Plan) Program
- California Accidental Release Prevention Program
- UST Program
- AST Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements

The State agency partners involved in the Unified Program have the responsibility of setting program element standards, working with CalEPA on ensuring program consistency, and providing technical assistance to the CUPA. The following State agencies are involved with the Unified Program:

- CalEPA is responsible for coordinating the administration of the Unified Program. The Secretary of the CalEPA certifies CUPAs.
- DTSC provides technical assistance and evaluation for the hazardous waste generator program including on-site treatment (tiered permitting).

- The Office of Emergency Services is responsible for providing technical assistance and evaluation of the Business Plan and the California Accidental Release Prevention programs.
- The Office of the State Fire Marshal is responsible for ensuring the implementation of the Hazardous Material Management Plans and the Hazardous Material Inventory Statements. These programs tie in closely with the Business Plan program.
- The SWRCB provides technical assistance and evaluation for the UST program in addition to handling the oversight and enforcement for the AST program.

The LACFD is the CUPA for the City of West Hollywood and is responsible for implementing the federal and state laws and regulations pertaining to the handling of hazardous wastes and hazardous materials.[7]

California Code of Regulations Title 8 (Workplace Safety Regulations)

CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations. These regulations concern the use of hazardous materials in the workplace, including requirements for employee safety training; availability of safety equipment; accident and illness prevention programs; hazardous-substance exposure warnings; and preparation of emergency action and fire prevention plans.

CalOSHA also enforces hazard communication program regulations, including procedures for identifying and labeling hazardous substances, and requires that safety data sheets (formerly known as material safety data sheets) be available for employee information and training programs. CalOSHA standards are generally more stringent than federal regulations. Construction workers and operational employees within the plan area would be subject to these requirements.

CCR Title 8, Section 1529 authorizes CalOSHA to implement the survey requirements of CFR Title 29 relating to asbestos. These federal and state regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos. Workers who conduct asbestos abatement must be trained in accordance with federal and State OSHA requirements.

CCR Title 8, Section 1532.1 includes requirements to manage and control exposure to lead-based paints (LBPs). These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based material. Loose and peeling LBPs must be disposed of as a State and/or federal hazardous waste if the concentration of lead equals or exceeds applicable hazardous waste thresholds. Federal and State OSHA regulations require a supervisor who is certified with respect to identifying existing and predictable lead hazards to oversee air monitoring and other protective measures during demolition activities in areas where LBPs may be present. Special protective measures and notification of CalOSHA are required for highly hazardous construction tasks related to lead, such as manual demolition, abrasive blasting, welding, cutting, or torch burning of structures, where LBPs are present.

[7] Los Angeles County Public Works is a Unified Program Agency and a Participating Agency to the Los Angeles CUPA, which is managed by the LACFD HHMD. The Los Angeles County CUPA has jurisdiction in all unincorporated and incorporated areas unless the City is a Participating Agency or a CUPA. The City of West Hollywood is not a Participating Agency or a CUPA.

California Code of Regulations Title 22 (Environmental Health Standards for the Management of Hazardous Waste)

CCR Title 22, Division 4.5 contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. The California Hazardous Waste Control Law, under CCR Title 22, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California.

California Fire Code

The California Fire Code (CFC) is Part 9 of CCR Title 24. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification.

California Public Resources Code 21151.4

Pursuant to Public Resources Code Section 21151.4, projects that can be reasonably anticipated to produce hazardous air emissions or handle extremely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school must consult with the potentially affected school district and provide written notification not less than 30 days prior to the proposed certification or adoption of an environmental document. Where a school district proposes property acquisition or the construction of a school, the environmental document must address existing environmental hazards, and written findings must be prepared regarding existing pollutant sources.

California Multi-Hazard Mitigation Plan

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Federal Disaster Mitigation Act of 2000 for the State to receive federal funding. The Federal Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

California Emergency Plan

The foundation of California's emergency planning and response is a Statewide mutual aid system, which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the State, and the

governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The California Emergency Services Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the California Emergency Services Act are reflected and expanded on by appropriate local emergency ordinances. The California Emergency Services Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under State disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and State. CalOES divides the State into several mutual aid regions. Los Angeles County is located in Mutual Aid Region I, which includes Los Angeles, Orange, San Luis Obispo, Santa Barbara, and Ventura Counties.[8]

Soil Contamination Health Risk Assessment

Regulatory agencies such as the USEPA, DTSC, and the California Office of Environmental Health Hazard Assessment set forth guidelines that list concentration thresholds over which contaminants pose a risk to human health. USEPA combines current toxicity values of contaminants with exposure factors to estimate what the maximum concentration of a contaminant can be in environmental media (e.g., soil, air, water, biota) before it is a risk to human health. These concentrations set forth by USEPA are termed Regional Screening Levels (RSL) for various pollutants in soil, air, and tap water (USEPA 2021). RSL concentrations can be used to screen pollutants in environmental media, trigger further investigation, and provide an initial cleanup goal. RSLs for soil contamination have been developed for both industrial and residential land uses. Residential RSLs are more conservative and take into account the possibility of the contaminated environmental media coming into contact with sensitive receptor sites such as nurseries and schools. RSLs consider exposure to pollutants by means of ingestion, dermal contact, and inhalation, but do not consider impacts to groundwater.

Groundwater Contamination

USEPA, DHS, and SWRCB regulate the concentration of various chemicals in drinking water. DHS thresholds are generally stricter than those set by USEPA. Primary maximum contaminant levels (MCL) are established for a number of chemical and radioactive contaminants (Title 22, Division 4, Chapter 15, CCR). MCLs are often used by regulatory agencies to determine cleanup standards when contaminants affect groundwater.

Lead and Asbestos

South Coast Air Quality Management District (SCAQMD) Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, potentially applies to demolition activity within the project site.

[8] CalOES. 2024. Southern Region Response Operational Area Assignments. Available: https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/regional-operations/southern-region/ (accessed May 2024)

Compliance with SCAQMD Rule 1403 requires that the owner or operator of any demolition or renovation activity have an asbestos survey performed prior to demolition.

Lead-based materials exposure is regulated by CalOSHA. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards.

Local Regulations

City of West Hollywood Hazard Mitigation Plan

The City adopted a Hazard Mitigation Plan on November 5, 2018. This plan describes the process for identifying hazards, risks and vulnerabilities, identify and prioritize mitigation actions, encourage the development of local mitigation and provide technical support for those efforts.

West Hollywood General Plan 2035

The Safety and Noise Chapter of the City's General Plan contains goals and policies related to hazards and hazardous materials. The following policies are relevant to the project (West Hollywood 2011).

Goal SN-2: Minimize exposure to hazardous materials.

> **Policy SN-2.1:** As feasible, continue to avoid toxic cleaning and building materials and products in civic facilities and services to avoid health impacts to building occupants, visitors, maintenance crew, and to minimize environmental pollution to the soil, air, and water from material production and disposal.
>
> **Policy SN-2.2:** Provide information, opportunities, and incentives to the community for proper disposal of toxic materials to avoid environmental degradation to the air, soil, and water resources from toxic materials contamination.

4.7.3 Impact Analysis

Methodology

The methodology used in this section includes review of the listed ESAs prepared by AEC and Citadel for the project site and other readily available information to assess the potential presence of hazards and contamination sources.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts of the proposed project related to hazards and hazardous materials are significant if the proposed project would:

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2) 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.
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

4) Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
5) For a project located in 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, result in a safety hazard or excessive noise for people residing or working in the project area.
6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The Initial Study (Appendix B) determined that the proposed project would result in less than significant or no impacts related to checklist items (5) through (7) as the project would not result in a safety hazard or expose on-site residents and employees to excessive noise from airport operations; would not significantly interfere with an existing emergency evacuation plan or emergency response plan; and would not expose people or structures to a significant risk involving wildland fires. Therefore, this section focuses on checklist items (1) through (4) and evaluates whether the project could result in potentially significant impacts related to conditions involving the release of hazardous materials and the project's location on a contaminated site.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold 2:	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?

Impact HAZ-1 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT COULD INVOLVE THE USE, STORAGE, DISPOSAL OR TRANSPORTATION OF HAZARDOUS MATERIALS. FURTHERMORE, THE PROJECT SITE HAS THE POTENTIAL TO CONTAIN LEAD-BASED PAINT, ASBESTOS-CONTAINING MATERIALS, AND POLYCHLORINATED BIPHENYLS DUE TO THE AGE OF ON-SITE STRUCTURES. HOWEVER, COMPLIANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS WOULD RESULT IN LESS THAN SIGNIFICANT IMPACTS.

Transport and use of hazardous materials for the proposed project could occur during the construction and operation of the proposed project. This section addresses impacts from aboveground hazardous material generation, handling, use, and transport. Potential impacts with respect to public and environmental exposure to soil, soil vapor, and groundwater contaminants are discussed further under Impact HAZ-3.

Construction

Construction associated with the proposed project may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If the proposed project involves the removal of contaminated soil, grading or excavation, then the project would also result in the transport and disposal of hazardous materials as they are unearthed and removed from the project site. Hazardous material transport may occur regularly throughout construction, as materials are brought to and from the project site. Any use, transport, and release

of hazardous materials, such as solvents, construction fuels, LBPs, or asbestos-containing materials (ACMs), would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, as discussed under the *Regulatory Setting*, of this section (i.e., SCAQMD Rule 1403, CCR Section 1532.1). Hazardous materials would be transported by DTSC-registered transporters and be required to follow all USDOT regulations under the Hazardous Materials Transport Act, in addition to CalEPA and local CUPA regulations regarding hazardous materials transport. In addition, construction activities that transport hazardous materials would be required to transport such materials along designated roadways in the city and county. Project construction would comply with the West Hollywood Municipal Code (WHMC) Chapter 9.70, the City's Construction Management regulations, which requires that a construction haul route be identified prior to the issuance of building permits to avoid disruption to the flow of traffic and prevent unreasonable impacts to the community related to materials transported to and from the project site. The City of West Hollywood Engineering Division would review the construction haul route. Therefore, transporters would spend a limited time in the local area, primarily on major transit thoroughfares and virtually no time in residential streets, limiting risk of upset near sensitive uses, such as residences. The requirements for transportation of any hazardous materials along designated routes would further minimize any risks from use, storage, or transport of hazardous materials during construction, ensuring that the proposed project would not present a significant risk to the public or the environment, and impacts would be less than significant.

Operation

Although new residential development at the project site could involve the use, storage, disposal, or transportation of minute quantities of hazardous materials, new residential uses would not be expected to involve large quantities of these materials. Normal residential activities do not generally present a significant threat to the public or the environment through the use, storage, disposal, or transportation of significant quantities of hazardous materials. Some materials considered hazardous may be used or stored on the project site, but these materials would be limited primarily to common household solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies and would not be substantially different from household chemicals and solvents already in general and wide use throughout any residential area. Residents are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, exposure of the public or environment to the routine use or accidental release of hazardous materials from operation of the proposed mixed-use development would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-2 THE PROPOSED PROJECT HAS THE POTENTIAL TO EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS MATERIALS, SUBSTANCES OR WASTE, PARTICULARLY DURING CONSTRUCTION ACTIVITIES. THE PROJECT SITE IS LOCATED WITHIN 0.25 MILE OF AN EXISTING PRESCHOOL; HOWEVER, COMPLIANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS WOULD RESULT IN LESS THAN SIGNIFICANT IMPACTS.

The nearest existing school to the project site is Brella Hollywood, a child daycare center and preschool, located approximately 700 feet southwest of the project site at 909 North Orange Drive in the City of Los Angeles. Cheder of Los Angeles, a high school, is located 0.23 mile south of the project site at 801 North La Brea Avenue also in the City of Los Angeles. There are no existing or planned schools in West Hollywood located within 0.25 mile of the project site. The nearest existing school in West Hollywood is West Hollywood Children's Academy, a preschool located approximately 0.44 mile west of the project site at 1030 North Vista Street.

As discussed under Impact HAZ-1, construction and operation of the proposed project may involve the use of hazardous materials, including handling of soil or transport of hazardous wastes and materials off-site. However, hazardous materials would be transported by DTSC-registered transporters and be required to follow all USDOT regulations under the Hazardous Materials Transport Act, in addition to CalEPA and local CUPA regulations regarding hazardous materials transport. In addition, WHMC Chapter 9.70 requirements for transportation of any hazardous materials along designated routes would further minimize any risks to schools from the handling and transport of hazardous materials during construction. Moreover, operation of the proposed project would not be reasonably expected to generate hazardous materials or waste, other than minor quantities typically used for maintenance activities, such as cleaning or landscaping, including chlorine or bromine for the on-site pool.

Therefore, impacts related to construction and operation hazardous materials to schools within 0.25 mile of the project site would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material 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?

IMPACT HAZ-3 ALTHOUGH THE PROJECT SITE IS NOT INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5, THERE ARE KNOWN HAZARDOUS MATERIAL IMPACTS TO SOIL, SOIL VAPOR, AND GROUNDWATER AT THE PROJECT SITE. COMPLIANCE WITH APPLICABLE REGULATIONS AND MITIGATION MEASURES FOR POTENTIAL SOIL, SOIL VAPOR, AND/OR GROUNDWATER IMPACTS AT THE PROJECT SITE WOULD MINIMIZE HAZARDS FROM THE PROPOSED PROJECT. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The project site is not associated with a hazardous materials release site compiled pursuant to Government Code Section 65962.5. However, based on the results of soil investigations conducted at the project site by AEC in 2019 and Citadel in 2022 and 2024 (discussed under *Existing Conditions* of this section), there are known petroleum hydrocarbon and VOC impacts in the soil, soil vapor,

and groundwater at the project site at concentrations exceeding the applicable regulatory screening levels for residential land use, including:

- TPHg-impacted soil in the central and northeastern portions of the project site
- TPHd-impacted soil in the central-northern portion of the project site
- VOC-impacted soil in the northeastern corner of the project site
- VOC-impacted soil vapor throughout the project site
- VOC-impacted groundwater in the northern and southern portions of the project site.

Construction

Groundwater at the project site has been measured at 15 to 16 feet bgs and is known to be impacted with VOCs. Due to the anticipated depth of groundwater (i.e., up to 20 feet bgs), and based on the depth of excavation for the proposed project (anticipated to be up to 32 feet bgs), groundwater is expected to be encountered during construction activities at the project site and would require special handing and/or dewatering. Notably, soil and soil vapor at the project site is known to be impacted with vinyl chloride, cis-1,2 dichloroethene, chloroform, benzene, TCE, and PCE. Moreover, impacted soil would be hauled off-site for disposal during project construction and the soil may require special handling or disposal as a waste. With the known impacted soil, soil vapor, and groundwater at the project site, there is a potential for grading and construction workers to be exposed to contaminants (e.g., TPH, VOCs, and metals) via dust and/or soil, air, and groundwater.

The existing conditions at the project site would result in a potentially significant hazard to the public (construction workers on-site) or the environment during grading and construction. Therefore, construction impacts would be potentially significant.

Operation

The risk of hazardous materials creating a significant hazard to the public or the environment would primarily occur during construction of the project as on-site contamination is disturbed. However, contamination may remain in place at the project site during operation and engineering controls, such as a vapor barrier, may be necessary. Therefore, operation impacts would be potentially significant.

Mitigation Measures

HAZ-1 Regulatory Agency Oversight

Prior to issuance of a grading permit, the project applicant shall enter into a voluntary oversight agreement with the California Department of Toxic Substances Control (DTSC), Los Angeles Regional Water Quality Control Board (RWQCB), or Los Angeles County Fire Department (LACFD) (regulatory Agency) to provide regulatory oversight of identified releases at the project site. The regulatory Agency shall be utilized for agency oversight of assessment and remediation of the project site at least through completion of construction activities.

Prior to commencement of construction and grading activities at the project site, the project applicant shall submit the following documents to the selected oversight agency:

- Current development plan (e.g., architectural drawings and project description) and any modifications to the development plan

- All environmental assessment documents completed for the project site, including the Phase I and II Environmental Site Assessments listed in the Initial Study and EIR for the proposed project
- All future environmental documents completed for the project site

Upon submittal of the previously listed information, and in accordance with the regulatory Agency's voluntary oversight agreement, the regulatory Agency may require actions such as: development of subsurface investigation workplans; completion of additional soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and off-site disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. Subsurface soil, soil vapor, and groundwater investigations, if required, shall be conducted in accordance with a sampling plan that shall be reviewed and approved by the regulatory Agency. The regulatory Agency approval documents shall also be submitted to and reviewed by the City prior to issuing grading permits.

HAZ-2 Soil and Groundwater Management Plan

Prior to commencement of demolition and construction/grading activities at the project site, the project applicant shall retain a qualified environmental consultant (PG or PE) to prepare a Soil and Groundwater Management Plan (SGMP) for the project site. The SMGP shall address:

1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil or groundwater with solvent or chemical odors) if such soils or impacted wastes are encountered, and
2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction phase.

The plan must establish engineering controls and soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs.
- Proper disposal procedures of contaminated materials.
- Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities.
- Monitoring and reporting
- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection.
- The health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City shall review the SGMP and have the authority to propose and include modifications prior to submittal to the regulatory Agency, which shall be the same Agency that the project applicant enters into a voluntary oversight agreement with per Mitigation Measure HAZ-1. The regulatory Agency shall review and approve the SGMP prior to construction (demolition and grading) activities at the project site. The City shall review the final SGMP prior to issuance of grading permits. The

project applicant shall implement the SGMP during demolition, grading, and construction at the project site.

HAZ-3 Sub-slab Vapor Mitigation System

Where soil vapor is known and is identified to be present at chemical concentrations exceeding regulatory screening thresholds for sub-slab/soil vapor intrusion, the project applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a vapor mitigation system design for the proposed project in accordance with adopted regulations.

The plan shall include, but is not limited to:

- Design specifications
- Material specifications
- Installation requirements
- Monitoring requirements

The regulatory Agency shall review and approve the Sub-slab Vapor Mitigation System Design prior to construction. Engineering measures or institutional controls shall be submitted to the City's Planning and Development Services Department prior to the issuance of any grading or building permits. The project applicant and/or contractor shall incorporate a sub-slab vapor barrier during construction, the implementation of which shall prevent the potential for soil vapor volatile organic compounds (VOCs) from migrating to indoor air.

HAZ-4 Groundwater Disposal

If disposal of contaminated groundwater (decontamination water, purge water, dewatering, or underground structures [groundwater leakage into the final structure]) is generated during construction of the project, the Los Angeles Regional Water Quality Control Board (RWQCB) or the City West Hollywood Department of Public Works shall be consulted to determine if the treated groundwater can be disposed through one of their waste discharge permit options. Los Angeles RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities.

The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern and shall therefore be developed in consultation with the City and the applicable regulatory agency.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 through HAZ-4 during grading and construction and operation of the project would reduce potential hazardous material impacts at the project site below applicable thresholds of significance. Implementation of HAZ-1 ensures the assessment and remedial efforts are conducted under regulatory oversight. Implementation of HAZ-2 would identify, manage on-site, and/or remove hazardous material impacted soils prior to construction (demolition and grading) and would reduce exposure to hazards resulting from development of a potential hazardous materials site to a less-than-significant level. Where potential impacts are identified in the above Phase I and Phase II ESAs, implementation of Mitigation Measures HAZ-2 through HAZ-4 would address the on-site handling and management of impacted soils, groundwater or other impacted wastes and would reduce hazards to construction workers and future occupants. These practices would increase construction worker safety, prioritize the health of future workers and

residents, facilitate remediation of hazardous soils and/or provide engineering controls. Impacts would be less than significant with implementation of mitigation.

4.7.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east).

Cumulative development at the project site could have the potential to place people in areas with risk of accidents involving hazardous materials and health hazards associated with hazardous materials by potentially developing and/or redeveloping a group of contaminated sites. However, as analyzed in this section of the EIR, implementation of the proposed project with mitigation measures would result in less than significant impacts related to human exposure to hazardous materials. Demolition activities involving structures that may contain ACMs or LBPs would be required to comply with federal, state, and local regulations that would ensure that cumulative development, as with the proposed project, would not accidentally release these hazardous materials to the environment. On a project-specific basis, the proposed project would include mitigation that requires proper remediation of contaminated soils on the project site and the construction of a sub-slab soil vapor barrier in accordance with the regulatory agency submittal for the proposed project. Implementation of Mitigation Measures HAZ-1 through HAZ-4 during demolition, construction, and operation of the project would reduce potential hazardous material impacts at the project site below applicable thresholds of significance by requiring additional investigation and remedial measures, transportation of impacted materials, and/or site management practices ensure construction worker safety and the health of future workers and visitors. As such, with implementation of mitigation, the project would not contribute a significant cumulative impact related to hazards and hazardous materials. In addition, operation of the proposed project, as with the adjacent hotel/restaurant and office/retail proposed developments, would not involve the use, storage, emissions, or generation of significant quantities of hazardous materials and hazardous waste common to industrial projects, and would not subject nearby residents, workers, and students to risk from accidents involving hazardous materials.

4.8 Hydrology and Water Quality

This section analyzes potential impacts pertaining to water quality and groundwater, including groundwater supply, recharge, and management, which would result from implementation of the proposed project and within the context of the existing environmental and regulatory setting.

The Initial Study (Appendix B) determined that the proposed project would result in less than significant impacts related to the alteration of an existing drainage pattern that would result in erosion, siltation, flooding, excess runoff water, or redirected flood flows. The Initial Study also found that the project would have no impact related to the release of pollutants due to site inundation since the site is not located near any dams, levees, or other major bodies of water that could flood the site. Therefore, this analysis focuses on evaluating whether the project would substantially degrade water quality or impact groundwater supply, recharge, and management.

This section references the Water Supply Assessment prepared by Rincon Consultants in July 2024 (revised December 2024) for the proposed project, which is included as Appendix H to this EIR.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section also includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

4.8.1 Setting

Surface Water Resources

The Ballona Creek Watershed, a subwatershed of Santa Monica Bay Watershed Management Area, is approximately 130 square miles in size and is bounded by the Santa Monica Mountains to the north and the Baldwin Hills to the south, which includes the City of West Hollywood. The watershed is highly developed with 49 percent of it covered by roads, rooftops, and other Impervious surfaces (LAStormwater 2024).

Ballona Creek flows in an open concrete channel for 10 miles from mid-Los Angeles through Culver City, reaching the Pacific Ocean at Playa del Rey (Marina del Rey Harbor). The Estuary portion, from Centinela Avenue to its outlet, is soft-bottomed and includes the Ballona Wetlands. A network of underground storm drainage lines, which reach north into the cities of Beverly Hills and West Hollywood, feeds Ballona Creek. Major tributaries of Ballona Creek include Centinela Creek, Sepulveda Channel and Benedict Canyon Channel. Ballona Creek is currently listed on the CWA Section 303(d) list as impaired by pollutants (i.e., trash, metals, bacteria, nutrients) due to the Watershed's large, dense population and the amount of impervious ground surface that prevents large quantities of runoff from infiltrating into the soils (LAStormwater 2024).

Urban surface runoff in the form of stormwater flows from inland areas to the Pacific Ocean at Santa Monica Bay approximately six miles southwest of the city through a network of manufactured drainage lines. The storm drain infrastructure in the city is jointly owned and operated by the County of Los Angeles and City of Beverly Hills (West Hollywood 2011). County-owned storm drain facilities and catch basins are located adjacent to the project site along North La Brea Avenue to the west and Romaine Street to the south (County of Los Angeles n.d.). The project site is currently developed and largely consists of impervious surfaces. There are no freshwater waterways or natural surface water bodies on any portion of the project site or in the immediate vicinity. As with the surrounding urban area, surface water from the project site flows through a network of storm drainage lines to Ballona Creek and ultimately to Santa Monica Bay.

Groundwater Resources

Water supply service in most of West Hollywood is provided by the Los Angeles Department of Water and Power (LADWP), which has a service territory that overlies multiple groundwater basins and includes the adjudication area for the Upper Los Angeles River Area (ULARA) watershed. As discussed in the Water Supply Assessment prepared for the project (Appendix H), the ULARA watershed, and four groundwater basins contained therein (i.e., San Fernando, Sylmar, Verdugo, and Eagle Rock basins), has been adjudicated since 1979 in accordance with the judicial decree of the Superior Court of the State of California for the County of Los Angeles in Case No. *650079, City of Los Angeles v. City of San Fernando, et. al.*, dated January 26, 1979 (ULARA Judgment) and subsequent Sylmar Basin Stipulation (Sylmar Stipulation). The ULARA Judgement identifies all parties with rights to use groundwater from the adjudication area and requires safe yield operations to ensure groundwater extractions over the long term do not create a condition of overdraft in any basin within the ULARA adjudication area. The court-appointed ULARA Watermaster produces an Annual Report that provides current information on the water rights of each party to the adjudication, as well as basin-specific information such as geologic conditions, local supply, groundwater extractions, changes in depth to groundwater or amount in storage, recharge operations, and water quality data. Through the ULARA Judgment, the City holds groundwater rights to 109,809 acre-feet per year (AFY) from local basins. The majority of the City's groundwater rights are within the San Fernando Basin (i.e., 87,000 acre feet [AF]), which has an available storage capacity of 500,000 AF (Rincon Consultants 2024). In addition to production of its groundwater rights from the ULARA adjudication area, LADWP also uses portions of the adjudicated area for storage of imported and recycled water for future uses, such as during dry years when imported surface water deliveries are reduced.

4.8.2 Regulatory Setting

Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act (CWA). The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface

water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the USEPA and United States Army Corps of Engineers (USACE).

The federal CWA places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the State and regional levels in California, the CWA is enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB). Water quality for all surface water and groundwater within the greater Los Angeles area is regulated under the jurisdiction of the Los Angeles RWQCB.

Section 402: National Pollutant Elimination System

Section 402 of the CWA establishes the National Pollutant Elimination System (NPDES) regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the CWA to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by the USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[1] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

The USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the USEPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs. Further discussion of the NPDES program and permits in California relevant to the project is provided under *State Regulations* and *Local Regulations*, as follows.

State Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of State waters through the issuance of waste discharge requirements and through the development of TMDLs. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with

[1] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

the Porter-Cologne Act. The City of West Hollywood, including the project site, is within the jurisdictional boundaries of the Los Angeles RWQCB (Region 4 of the SWRCB).

Antidegradation Policy

The State Antidegradation Policy (Resolution No. 68-16) was adopted by SWRCB in 1968 to protect surface water and groundwater from degradation. The Antidegradation Policy applies to the disposal of waste to high-quality surface water and groundwater. The Antidegradation Policy requires the water quality of these water bodies be maintained unless SWRCB finds the change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses of the waters, and will not result in water quality less than that prescribed in policies regulating water quality. The Antidegradation Policy also requires the best practicable treatment or control of discharges to high-quality waters to assure pollution or nuisance will not occur and the highest possible water quality will be maintained.

Municipal Stormwater Permitting Program

The Municipal Stormwater Permitting Program regulates stormwater discharges from MS4s. As discussed previously, the NPDES MS4 permits in California are issued in two phases by SWRCB and the RWQCBs. Phase I MS4 permits are issued by the RWQCBs to medium (i.e., serving between 100,000 and 250,000 people) and large (i.e., serving more than 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permit is issued by the SWRCB and is applicable to smaller municipalities (i.e., populations of less than 100,000 people) and nontraditional small MS4s (e.g., military bases, public campuses, prison, and hospital complexes). The Phase II MS4 Permit (*Waste Discharge Requirements [WDRs] for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems [MS4s] General Permit], Order No. 2013-0001-DWQ, NPDES No. CAS000004, as amended by Order Nos. 2015-0133-EXEC, 2016-0069-EXEC, 2017-XXXX-DWQ, 2018-0001-EXEC, and 2018-0007-EXEC*) became effective on July 1, 2013 and covers Phase II permittees statewide, including the City of West Hollywood in Los Angeles County. The Phase I and Phase II MS4 Permits require permittees to develop a stormwater management program and individual dischargers to develop and implement Stormwater Management Plans.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies construction best management practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires Groundwater Sustainability Plans (GSP) to be developed for medium- and high-priority groundwater basins. The San Fernando Basin is designated as a very low priority basin and, therefore, is not required to prepare a GSP. No GSP has been formed for the San Fernando Basin.

California Green Building Standards Code

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) includes mandatory measures for residential and nonresidential development. Section 4.106.2 requires residential projects that disturb less than one acre and are not part of a larger common plan of development to manage stormwater drainage during construction through on-site retention basins, filtration systems, and/or compliance with a stormwater management ordinance. Section 5.106.1 requires newly constructed nonresidential projects and additions of less than one acre to prevent the pollution of stormwater runoff from construction through compliance with a local ordinance or implementing BMPs that address soil loss and good housekeeping to manage equipment, materials, and wastes.

Local Regulations

Phase I Municipal Stormwater Permit

The Los Angeles RWQCB issues combined NPDES permits under the CWA and Waste Discharge Requirements (under the California Water Code) to point dischargers of waste to surface waters. To

ensure protection of water quality, NPDES permits may contain effluent limitations for pollutants of concern, pollutant monitoring frequencies, reporting requirements, schedules of compliance (when appropriate), operating conditions, BMPs, and administrative requirements. NPDES permits apply to publicly owned treatment works discharges; industrial wastewater discharges; and municipal, industrial, and construction site stormwater discharges.

On July 23, 2021, the Los Angeles RWQCB adopted Order R4-2021-0105 (*Waste Discharge Requirements and NPDES Permit for Municipal Separate Storm Sewer System [MS4] Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties*). Order R4-2021-0105 became effective on September 11, 2021 and serves as the NPDES permit for coastal watershed stormwater and non-stormwater discharges originating from the Los Angeles County and Ventura County region. The permit (hereafter referred to as the "Los Angeles County and Ventura County MS4 Permit") specifically covers the Los Angeles County Flood Control District, County of Los Angeles, 85 incorporated cities within the coastal watersheds of Los Angeles County, Ventura County Watershed Protection District, County of Ventura, and 10 incorporated cities within Ventura County that are subject to waste discharge requirements (WDRs) for their MS4 discharges originating from within their jurisdictional boundaries composed of stormwater and non-stormwater. In coordination with permittees under MS4 Permit, Los Angeles RWQCB staff performs annual performance reviews and evaluations of the City's stormwater management program and NPDES compliance activities.

The proposed project is considered a Priority Project under the following categories specified in the Los Angeles County and Ventura County MS4 Permit:

- New development projects equal to one acre or greater of disturbed area and create 10,000 square feet (sf) or more of impervious surface;
- Redevelopment projects that create and/or replace 5,000 sf or more of impervious surface (collectively over the entire project site) on any of the following on existing sites of 10,000 sf or more of impervious surface area; and
- New development and redevelopment projects that create and/or replace 5,000 sf or more of impervious surface (collectively over the entire project site) and support one or more of the following uses: restaurants, parking lots, automotive service facilities, retail gasoline outlets.

Los Angeles County Department of Public Works Hydrology Manual

The Los Angeles County Department of Public Works' Hydrology Manual (Hydrology Manual) requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Hydrology Manual also includes TMDLs for pollutants per CWA Section 303 and BMPs for managing stormwater quality during construction. As the holder of the MS4 Permit, the Los Angeles RWQCB is responsible for enforcing these BMPs. The County limits the allowable discharge into existing storm drain facilities based on the municipal separate stormwater sewer systems permit and is enforced on all new developments that discharge directly into the County's storm drain system. Any proposed drainage improvements of County-owned storm drain facilities such as catch basins and storm drain lines require the approval/review from the Los Angeles County Flood Control District, which maintains the backbone flood control system, a network of catch basins, and underground storm drain pipes. The City of West Hollywood owns and maintains a few catch basins and small storm drain pipes that directly flow into the Los Angeles County Flood Control District system. On an annual basis, the City performs maintenance to clean catch basins (storm drain inlets). The City also stencils "no dumping" logos and installs debris excluder devices to prevent entry of trash into the storm drains.

The Hydrology Manual also contains the Standard Urban Stormwater Mitigation Plan (SUSMP) that applies to development and re-development projects in Los Angeles County, discussed in further detail as follows.

LOS ANGELES COUNTY STANDARD URBAN STORMWATER MITIGATION PLAN

In accordance with CWA Section 402(p), municipal NPDES permits prohibit the discharge of non-stormwater pollutants except under certain conditions and require controls to reduce pollutants in discharges to the maximum extent practicable. Such controls include BMPs, as well as system, design, and engineering methods. Under the municipal NPDES permit, permittees are required to implement a development planning program to address stormwater pollution.

The SUSMP is a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment in Los Angeles County. The purpose of the SUSMP is to reduce the discharge of pollutants in stormwater by outlining BMPs that must be incorporated into the design plans of new development and redevelopment. The SUSMP requirements contain a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. The SUSMP requirements define, based upon land use type, the types of practices that must be included and issues that must be addressed as appropriate to the development type and size. A project is subject to SUSMP if it falls under one of the categories listed as follows:

- Single-family hillside homes
- Ten or more-unit homes (including single family homes, multifamily homes, condominiums, and apartments).
- Automotive service facilities
- Restaurants
- 100,000 or more sf of impervious surface in industrial/commercial development.
- Retail gasoline outlet
- Parking lots with 5,000 sf or more of surface area or with 25 or more parking spaces
- Redevelopment projects in subject categories that meet redevelopment thresholds
- Location within or directly adjacent to or discharging directly to an environmentally sensitive area if the discharge is likely to impact a sensitive biological species or habitat and the development creates 2,500 sf or more of impervious surface.

The SUSMP requirements are administered, implemented, and enforced through the City's Community Development Director. During the review process, individual development project plans are reviewed for compliance with stormwater requirements.

Since the proposed project includes the construction and operation of a new 34-story mixed-use residential and commercial building with 514 apartment units and 30,000 sf of commercial/retail use, a SUSMP is required to be prepared in accordance with the requirements of Order 2021-0105 and the Los Angeles County Hydrology Manual.

Water Quality Control Plan for the Los Angeles Region (Basin Plan)

The Los Angeles RWQCB provides permits for projects that may affect surface waters and groundwater locally and is responsible for preparing the Water Quality Control Plan, or Basin Plan, for the Los Angeles region. The Basin Plan designates beneficial uses of water in the region and

establishes narrative and numerical water quality objectives. Water quality objectives, as defined by the CWA Section 13050(h), are the "limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses or the prevention of nuisance within a specific area."

Ballona Creek Enhanced Watershed Management Program

Conditions of the MS4 Permit require that all permittees develop a watershed management plan on an individual or joint basis that will address water quality issues in the permitee's jurisdictional area. The Ballona Creek Watershed Management Group (BC-WMG) is comprised of the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Unincorporated Los Angeles County, Santa Monica, and West Hollywood. The BC-WMG developed and submitted the Ballona Creek Enhanced Watershed Management Plan (BC-EWMP) to the Los Angeles RWWCB in 2016. The BC-EWMP established implementation strategies in individual cities to meet the goals and objectives to achieve an ecologically healthy Ballona Creek Watershed. The plan addresses an area of approximately 130 square miles, roughly bounded by the Santa Monica Mountains and the Hollywood Hills to the north, Interstate 110 to the east, the Baldwin Hills to the south, and the Pacific Ocean to the west. It is intended to support and inform ongoing planning efforts, as well as provide a framework for future projects that are consistent with the goal to restore ecological health to the watershed. Objectives of the plan include the following:

- Implement projects with BMPs and other methods to reduce pollutant loads and improve water quality, consistent with TMDL implementation that includes dry and wet weather runoff management through the implementation of Low Impact Development (LID) BMPs
- Pollutant source control generating from the site

West Hollywood General Plan 2035

Applicable project-related policies of the City's General Plan Infrastructure, Resources, and Conservation Chapter in relation to stormwater management and apply to the project include the following (West Hollywood 2011):

Goal IRC-9: Provide safe, sanitary and environmentally sustainable stormwater management.

> **Policy IRC-9.6:** Reduce the amount and improve the quality of stormwater that leaves the City through best management practices, including stormwater reuse and the use of vegetation and permeable surfaces to capture and filter stormwater.
>
> **Policy IRC-9.7:** Encourage development projects to manage stormwater on site in accordance with the City approved Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.
>
> **Policy IRC-9.9:** Require that development projects pay for the cost of stormwater system improvements necessitated by that development.

West Hollywood Municipal Code

Chapter 15.56 of the West Hollywood Municipal Code (WHMC), otherwise known as the City's Storm Water Management and Discharge Control Ordinance, outlines water quality and discharge requirements for new development and redevelopment projects to ensure compliance with the current municipal NPDES permit. Specifically, Section 15.56.060 of the WHMC lists six prohibited activities, including littering and non-stormwater discharges, which would compromise water

quality and the effectiveness of the City's stormwater system. Section 15.56.090 of the WHMC requires that construction activities follow all requirements of the NPDES permit, including sediment control, BMPs, and if the site is one acre or greater, the requirement of a Local SWPPP and Wet Weather Erosion Control Plan. Section 15.56.095 identifies stormwater pollution control measures required in development and redevelopment projects, including LID Plan requirements.

4.8.3 Impact Analysis

Methodology

Impacts to hydrology and water quality are assessed based on whether activities associated with construction or operation of the project would substantially degrade water quality or impact groundwater supply, recharge, and management resulting in impacts when compared to existing and applicable regulations.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, project impacts associated with hydrology and water quality would be considered significant if implementation of the proposed project would:

1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3) 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:
    a. Result in substantial erosion or siltation on- or off-site;
    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
    c. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems of provide substantial additional sources of polluted runoff; or
    d. Impede or redirect flood flows.
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The Initial Study (Appendix B) determined that the proposed project would result in less than significant impacts related to checklist item (3.a) through (3.d) as the project site is comprised of impervious surfaces and the project would not significantly modify the existing drainage patterns to the extent that it would cause erosion, siltation, flooding, excess runoff water, or redirected flood flows. Moreover, the Initial Study determined that the project would have no impact related to the checklist item (4) release of pollutants due to site inundation since the site is not located near any dams, levees, or other major bodies of water that could flood the site. Therefore, this section focuses on checklist items (1), (2), and (5), and evaluates whether the project would substantially degrade water quality or impact groundwater supply, recharge, and management.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 **THE PROPOSED PROJECT WOULD DISTURB ON-SITE CONTAMINATED SOILS DURING CONSTRUCTION AND INCREASE ON-SITE DEVELOPMENT DENSITY/INTENSITY WITH POTENTIAL TO DEGRADE WATER QUALITY. HOWEVER, COMPLIANCE WITH EXISTING LAWS AND REGULATIONS THAT GOVERN PROJECT CONSTRUCTION AND OPERATION, AS WELL AS IMPLEMENTATION OF BMPS, SAFETY REQUIREMENTS, AND MITIGATION MEASURES FOR POTENTIAL GROUNDWATER IMPACTS AT THE PROJECT SITE WOULD MINIMIZE POTENTIAL WATER QUALITY IMPACTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

Construction

Construction activities would disturb approximately one acre of soil.[2] Soil disturbance would increase the potential for erosion and sedimentation. If construction activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site or downstream to receiving waters. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported off-site via stormwater runoff.

Projects that disturb more than one acre of soil are subject to the requirements of SWRCB's Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP to control the discharge of pollutants, including sediment, into surface water drainages.[3] The SWPPP would specify the stormwater monitoring and construction BMPs required to minimize water quality degradation. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste.

The proposed project would also comply with the City's Storm Water Management and Discharge Control Ordinance (i.e., Chapter 15.56 of the WHMC), which outlines water quality and discharge requirements for new development and redevelopment projects. Specifically, Section 15.56.090 of the WHMC requires that construction activities follow all requirements of the NPDES permit, including sediment control, BMPs, and if the site is one acre or greater, the requirement of a Local SWPPP and Wet Weather Erosion Control Plan. The project specific SWPPP would describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required by the SWPPP to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary. The project specific SWPPP would be approved by the City prior to the issuance of

[2] As discussed in Section 2, *Project Description*, the three parcels that comprise the project site encompass 43,316 sf, or approximately 0.99 acre. However, the project would also involve reducing the number of existing driveways on La Brea Avenue from five driveways to only one located at the northwest corner of the site. The project would also implement two new adjacent driveways along Romaine Street at the southeast corner of the site. Therefore, for the purpose of this analysis, it is assumed that construction of the project would involve approximately one acre of ground disturbance.

[3] In cases where projects disturb between one and five acres, the project may be eligible for a Small Construction Rainfall Erosivity Waiver, which would exempt the project from coverage under the Construction Stormwater General Permit. To obtain a waiver, the project would need to demonstrate there would be no adverse water quality impacts because construction activities would only occur when there is a low erosivity potential (i.e., the rainfall erosivity value in the Revised Universal Soil Loss Equation [R value[2]] for the project is less than five [5]). Based on a construction start date of October 2025 and an end date of June 2028, the R factor for the project would be 44.94 (USEPA 2024). Therefore, the project would not qualify for a Small Construction Rainfall Erosivity Waiver.

a grading or building permit. Section 15.56.095 identifies stormwater pollution control measures required in development and redevelopment projects, including LID Plan requirements. LID controls reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff.

Project construction would involve demolition of the on-site structures; however, as discussed in Section 4.7, *Hazards and Hazardous Materials*, on-site structures may contain asbestos and lead. Therefore, demolition activities have the potential to release these pollutants to on-site soils, where they could then be transported off-site in stormwater runoff during storm events. However, the release and transport of hazardous materials, such as lead-based paints or asbestos-containing materials, would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, including California Code of Regulations Title 8, Sections 1529 and 1532.1 and South Coast Air Quality Management District Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Furthermore, the SWRCB's Construction Stormwater General Permit includes requirements for projects to address demolition-related pollutants. In compliance with these requirements, the SWPPP would specify BMPs to control the discharge of pollutants associated with demolition, including PCBs, asbestos, and lead.

Project construction would also involve excavation of an estimated 56,407 cubic yards of soil from the site for construction of the subterranean parking garage. Due to the anticipated depth of groundwater (i.e., up to 20 feet below ground surface [bgs]) and the anticipated depth of excavation (i.e., 32 feet bgs), groundwater dewatering would be required during excavation activities. As discussed in Section 4.7, *Hazards and Hazardous Materials*, soil and soil vapor at the project site is known to be impacted with vinyl chloride, cis-1,2 dichloroethene, chloroform, benzene, trichloroethene, and tetrachloroethene. Impacted soil would be hauled off-site for disposal during project construction and the soil may require special handling or disposal as a waste. With the known impacted soil, soil vapor, and groundwater at the project site, there is potential for exposure to contaminants via dust and/or soil, air, and groundwater.

Therefore, based on existing conditions at the project site, project construction would result in a potential violation of water quality standards or waste discharge requirements protecting surface and ground water quality. Therefore, construction impacts would be potentially significant.

Operation

Once constructed, the project would be required to comply with the requirements of the Los Angeles County and Ventura County MS4 Permit and thus a SUSMP is required to be prepared in accordance with the requirements of the MS4 Permit. The SUSMP requirements contain a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. The SUSMP requirements define, based upon land use type, the types of practices that must be included and issues that must be addressed as appropriate to the development type and size. Compliance with NPDES requirements, including incorporation of operational BMPs into project design to target pollutants of concern, would minimize pollutant discharge during operation. Operational BMPs include, but are not limited to, rain gardens, permeable pavement, green roofs, bioswales, and strategic tree planting. WHMC Chapter 15.56.060 also prohibits the discharge of waste or any garbage into the sanitary sewer system.

Moreover, because of the project site's high groundwater table, the project's subterranean parking garage would be designed to resist hydrostatic forces in lieu of installation of a permanent dewatering system. As discussed in the Geotechnical Investigation (Appendix F) prepared for the

project, this would eliminate the need for maintenance of a permanent dewatering system and continuous handling of waters pumped from the system. However, as further discussed in Section 5, *Geology and Soils*, neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the geotechnical recommendations identified in the Geotechnical Investigation, including those related to the design of the subterranean retaining wall and building foundation, are incorporated during design and construction. As such, without incorporation of identified geotechnical recommendations addressing the existing groundwater table as part of the project design and ongoing operation, this impact would be potentially significant.

Mitigation Measures

Mitigation Measures HAZ-1 through HAZ-6 in Section 4.7, *Hazards and Hazardous Materials*, and Mitigation Measure GEO-1 in Section 4.5, *Geology and Soils.*

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 through HAZ-6 during grading and construction and operation of the project would reduce potential hazardous material impacts at the project site. Specifically, implementation of HAZ-1 ensures the assessment and remedial efforts are conducted under regulatory oversight, and implementation of Mitigation Measures HAZ-2 through HAZ-5 would address the on-site identification, management, and removal of impacted soils, groundwater or other impacted wastes. With respect to dewatering activities required during excavation, Mitigation Measure HAZ-6 would also require consultation with the City of West Hollywood Department of Public Works and the applicable regulatory agency since groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern. As a result, groundwater dewatering during excavation activities would not introduce pollutants to receiving waters or violate water quality standards or waste discharge requirements. Therefore, compliance with the Construction Stormwater General Permit, including implementation of the required project specific SWPPP and construction BMPs, as well as compliance with applicable regulations and Mitigation Measures HAZ-1 through HAZ-6 regarding the handling of hazardous materials would minimize pollutant discharge during demolition and excavation activities. Furthermore, as discussed in Section 5, *Geology and Soils*, with implementation of Mitigation Measure GEO-1, the project would be required to incorporate all geotechnical recommendations included in the Geotechnical Investigation prepared for the project, including those related to the design of the subterranean retaining wall and building foundation to resist to hydrostatic forces throughout project operation.

Therefore, project construction and operation would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant with mitigation.

Threshold 2:	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?

Impact HYD-2 DURING CONSTRUCTION, GROUNDWATER DEWATERING WOULD BE TEMPORARY, AND UPON OPERATION, THE PROJECT WOULD BE DESIGNED TO RESIST HYDROSTATIC FORCES IN LIEU OF INSTALLATION OF A PERMANENT DEWATERING SYSTEM AND WOULD NOT RESULT IN A SUBSTANTIAL CHANGE IN IMPERVIOUS SURFACES WHEN COMPARED TO EXISTING CONDITIONS. THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

As discussed under Impact HYD-1 of this section, groundwater was encountered at a boring depth of up to 20 feet bgs. Based on the depth to groundwater encountered in the current and prior borings at the site and the depth of proposed construction (i.e., 32 bgs), groundwater is anticipated to be encountered during construction and groundwater dewatering will be required during excavation activities. However, groundwater dewatering would be temporary during excavation, which is anticipated to occur for two months, and construction of the subterranean parking garage (i.e., retaining walls). Moreover, as discussed under Impact HYD-3, the San Ferando Basin (including any basin in the ULARA adjudication area) is managed by the ULARA Judgement, which requires safe yield operations to ensure groundwater extractions over the long term do not create a condition of overdraft. As the project would also be implemented in compliance with the ULARA Judgement, project construction would/would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Operation

During operation, a majority of the project site would be impervious (similar to existing conditions) due to the presence of building roofs, walkways, and hardscape. The project would not result in substantial amounts of new impervious surfaces which might impede groundwater recharge. Although the project would receive water from LADWP, which utilizes groundwater as a portion of their water supply, LADWP has sufficient water supply to serve the proposed project, as discussed in the Water Supply Assessment prepared for the project (Appendix H). Moreover, the project would be designed to resist hydrostatic forces in lieu of installation of a permanent dewatering system. As discussed in the Geotechnical Investigation (Appendix F) prepared for the project, this would eliminate the need for maintenance of a permanent dewatering system and continuous handling of waters pumped from the system. Accordingly, the project would not substantially decrease groundwater supplies during operation such that the project would impede sustainable groundwater management of the basin, and the impact would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-3 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Water Quality Control Plan

The Los Angeles RWQCB provides permits for projects that may affect surface waters and groundwater locally and is responsible for preparing the Water Quality Control Plan, or Basin Plan, for the Los Angeles region. The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. As discussed under Impact HYD-1 of this section, project construction would thus be subject to the requirements of SWRCB's Construction Stormwater General Permit, the City's Storm Water Management and Discharge Control Ordinance, and a project-specific SWPPP. Moreover, temporary groundwater dewatering during excavation activities would not introduce pollutants to receiving waters or violate water quality standards or waste discharge requirements. Upon operation, the project would be required to comply with the requirements of the Los Angeles County and Ventura County MS4 Permit (and thus a SUSMP) and the City's Storm Water Management and Discharge Control Ordinance. Therefore, project construction and operation would not degrade water quality in receiving waters protected by the Basin Plan and would not conflict with or obstruct implementation of the Basin Plan. This impact would be less than significant.

Sustainable Groundwater Management Plan

The project site overlies the San Fernando Basin, which is designated as a very-low priority basin pursuant to Sustainable Groundwater Management Plan, and development of a GSP was not required. Therefore, there is no GSP that is applicable to the project. Moreover, the San Fernando Basin (including any basin in the ULARA adjudication area) is managed by the ULARA Judgement, which requires safe yield operations to ensure groundwater extractions over the long term do not create a condition of overdraft. As the project would also be implemented in compliance with the ULARA Judgement, the project would not conflict with or obstruct implementation of a sustainable groundwater management plan, and no impact would occur.

Mitigation Measures

Mitigation measures would not be required.

4.8.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east).[4]

[4] While the proposed project would result in approximately one acre of ground disturbance, the projects at 1040 North La Brea Avenue and 1011 North Sycamore Street would result in approximately 0.15 acre (6,613 sf) and 0.60 acre (26,211 sf) of ground disturbance, respectively. Under a conservative analysis assuming simultaneous construction of all adjacent projects, cumulative development would result in an estimated 1.75 acres of concurrent ground disturbance.

The cumulative study area for hydrology and water quality is the Ballona Creek Watershed, a subwatershed of Santa Monica Bay Watershed Management Area. Cumulative development in the Ballona Creek Watershed is a continuation of the existing urban pattern of development that has already resulted in extensive modifications to watercourses in the area. The area's watercourses have been channelized and drainage systems have been put into place to respond to the past urbanization that has occurred in this area. Cumulative projects would discharge to the same watershed and, more specifically, the same water system as the proposed project due to its location adjacent to the project. However, all projects, including the proposed project, would be required to comply with NPDES and local water quality requirements and drainage standards. All projects that disturb one acre or more of soil must comply with the requirements of the Construction Stormwater General Permit and WHMC grading requirements. In addition, each project that creates and/or replaces 5,000 sf or more of impervious surface would be required to comply with the Los Angeles County and Ventura County MS4 Permit. Implementation of a SWPPP or erosion and sediment control plans (for construction) and a Stormwater Management Plan (for operation) would be required for each cumulative project to determine appropriate BMPs to minimize water quality impacts. Many of the cumulative projects would be required to prepare a hydrology report and incorporate drainage facilities to minimize hydrologic impacts consistent with applicable NPDES and City requirements. The design of each project would be subject to the City's review and approval of project design to verify the appropriate drainage improvements and BMPs will be implemented to manage surface flows and reduce off-site stormwater discharge. Compliance with the Construction Stormwater General Permit, WHMC grading requirements, and the Los Angeles and Ventura County MS4 requirements would require each individual project would incorporate BMPs and design measures to address water quality protection. Furthermore, project-specific implementation Mitigation Measures HAZ-1 through HAZ-6 regarding the handling of hazardous materials would minimize pollutant discharge during demolition and excavation activities. Moreover, Mitigation Measure GEO-1 would require incorporation all geotechnical recommendations included in the Geotechnical Investigation prepared for the project, including those related to the design of the subterranean retaining wall and building foundation to resist to hydrostatic forces throughout project operation. Therefore, with implementation of mitigation, project construction and operation would not contribute a significant cumulative impact related to water quality standards, waste discharge requirements, or surface/ground water quality.

The cumulative study area for groundwater is the San Fernando Basin, which is designated as a very-low priority basin pursuant to Sustainable Groundwater Management Plan. Cumulative projects identified in Section 3, *Environmental Setting*, are located above the same groundwater basin and, more specifically, would potentially impact the same groundwater table as the proposed project due to its location adjacent to the project. However, groundwater dewatering would be temporary during construction, and, upon operation, the project would be designed to resist hydrostatic forces in lieu of installation of a permanent dewatering system that would impact groundwater recharge. In addition, each cumulative project, including the proposed project, would also be reviewed by the City to verify infiltration BMPs are incorporated into project design, where infiltration is feasible. Moreover, the ULARA Judgement requires safe yield operations to ensure groundwater extractions over the long term do not create a condition of overdraft in any basin (including the San Fernando Basin) within the ULARA adjudication area, which would minimize the potential for water supplied to cumulative development from groundwater to substantially decrease groundwater supplies. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to groundwater management.

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4.9 Land Use and Planning

This section analyzes the proposed project's consistency with relevant land use policies of applicable regional and local plans, including the Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the West Hollywood General Plan 2035 (General Plan), and West Hollywood Municipal Code (WHMC). The analysis contains a description of the planning context of the project site, the regulatory setting for project site land use and zoning, and a discussion of the project's consistency with applicable land use plans, policies, and regulations.

The Initial Study (see Appendix B) concluded that the project would have no impact related to the physical division of an established community as it would not extend beyond the project site boundaries or necessitate any permanent closures of streets or sidewalks. Other potential land use or site compatibility conflicts associated with implementation of the proposed project are discussed in other sections of this EIR, including Sections 4.1, *Aesthetics*; 4.2, *Air Quality*; 4.7, *Hazards and Hazardous Materials*; and 4.10, *Noise*. Population growth and housing is addressed in the Initial Study (Appendix B) to this EIR and Section 5, *Other CEQA Required Discussions*. Therefore, this section is focused on land use, with the acknowledgement that land use is inherently a major factor in the other listed topics.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section includes the early disassembly, demolition, and removal of these buildings and structures as being part of the proposed project.

4.9.1 Setting

Project Site

The project site is located at 1000, 1014, 1020, and 1028 North La Brea Avenue on the northeast corner of the North La Brea Avenue and Romaine Street intersection in the City of West Hollywood. The site encompasses 43,316 square feet (sf), or approximately 0.99 acre, and consists of three contiguous parcels: APNs 5531-014-015, -016, and -017. The project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX (i.e., the Hollywood Ready-Mix Concrete Plant). The concrete batch plant consisted of a 634-sf two-story office building, an industrial plant structure/machinery, water tanks, metal grating, and surface parking. Operation of the concrete batch plant included the production and shipment of ready-mix concrete. The project site is also developed with a vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue. The project site is void of landscaping except for two mature trees located along the eastern boundary of the warehouse building and an additional two street trees along the North La Brea Avenue right-of-way. Figure 2-2 through Figure 2-6 in Section 2,

Project Description, shows the location of the site in its neighborhood context and provides photos of the CEMEX concrete batch plant as it existed and operated prior to execution of the Demolition Permit as well as the remaining vacant warehouse building at the project site.

According to the General Plan Land Use and Urban Form Chapter, the site's land use designation and zoning is Commercial, Regional Center (CR) with a Mixed-Use Incentive Overlay. The project site is also located in the Santa Monica/La Brea Transit District commercial sub-area. According to the City's Zoning Map, the site is zoned Commercial, Regional Center (CR) which is consistent with the site's CR land use designation. A more detailed discussion of the Land Use and Urban Form Chapter and the site's land use designation and zoning is included in Section 4.9.2, *Regulatory Setting*, of this section.

Surrounding Land Uses

As shown in Figure 2-2 in Section 2, *Project Description*, the project site is in an urban area characterized by a mix of commercial and industrial uses. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant to the east; Romaine Street, warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses, and the West Hollywood Gateway shopping center to the west. Figure 4.1-1 through Figure 4.1-4 in Section 4.1, *Aesthetics*, provide photos of the existing land uses surrounding the project site.

According to the General Plan Land Use and Urban Form Chapter, surrounding land uses north and west of the site are also in the Santa Monica/La Brea Transit District commercial sub-area and are designated/zoned CR with a Mixed Use Incentive Overlay akin to the project site. Notably, surrounding land uses to the east and south of the site (across Romaine Street) are within the City of Los Angeles' city limits. According to the City of Los Angeles' Zone Information and Map Access System (ZIMAS), surrounding land uses are designated Limited Manufacturing and zoned either Restricted Industrial Zone (MR1) or Limited Industrial Zone (M1) (City of Los Angeles N.d.).

4.9.2 Regulatory Setting

Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

SCAG is an association of local governments and agencies that serves as the federally recognized metropolitan planning organization (MPO), which encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. In addition, SCAG serves as data clearinghouse and information hub for the region, conducting research and analysis in pursuit of regional planning goals. In this role, SCAG reviews proposed development and infrastructure projects to analyze their potential impacts on regional planning programs. As Southern California's MPO, SCAG cooperates with the Southern California Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents.

SCAG's 2020-2045 RTP/SCS, also referred to as Connect SoCal, was adopted on September 3, 2020 and is a long-range regional transportation and land use network plan that looks ahead 20+ years and provides a vision of the region's future mobility and housing needs with economic, environmental, and public health goals. The 2020-2045 RTP/SCS was in effect at the time the NOP

for this EIR was circulated, and, therefore, provides the environmental baseline for the proposed project. However, for an added analysis using the most updated long-range regional planning goals and objectives, this section of the EIR also refers to and provides a consistency analysis with the goals and strategies of the 2024-2050 RTP/SCS (also referred to as Connect SoCal 2024), which was adopted on April 4, 2024. The RTP/SCS identifies major challenges as well as potential opportunities associated with growth, transportation finances, the future of airports in the region, and pending transportation system deficiencies that could result from regional growth. SCAG works to support local jurisdictions and partnerships by identifying ways to implement the SCS in a way that fits the vision and needs of each local community. As part of the 2020-2045 RTP/SCS, SCAG characterized and identified Priority Growth Areas (PGAs); however, in the 2024-2050 RTP/SCS, they are known as Priority Development Areas (PDAs). PGAs, or PDAs, are places within the SCAG region where future growth can be located to help the region reach mobility or environmental goals, which, in general, means that people in these areas would have access to multiple modes of transportation or that trip origins and destinations are closer together. These include transit priority areas (TPAs), neighborhood mobility areas (NMAs), livable corridors, and spheres of influence (in unincorporated areas only) (SCAG 2020, SCAG 2024).

The 2020-2045 RTP/SCS outlined several overarching goals tied to economy, mobility, environment, and healthy/complete communities (SCAG 2020):

1. Encourage regional economic prosperity and global competitiveness.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.
3. Enhance the preservation, security, and resilience of the regional transportation system.
4. Increase person and goods movement and travel choices within the transportation system.
5. Reduce greenhouse gas emissions and improve air quality.
6. Support healthy and equitable communities.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.
10. Promote conservation of natural and agricultural lands and restoration of habitats.

The 2020-2045 RTP/SCS also includes strategies and tools that are consistent with local jurisdictions' land use policies and are supportive of its broader goals (SCAG 2020):

1. Focus growth near destinations and mobility options
2. Promote diverse housing choices
3. Leverage technology innovations
4. Support implementation of sustainability policies
5. Promote a green region

Under the 2024-2050 RTP/SCS, SCAG outlines mutually reinforcing goals into four core categories. The subgoals identified for each goal reflect SCAG's vision for the region in the year 2050, which is "A healthy, prosperous, accessible and connected region for a more resilient and equitable future." (SCAG 2024):

1. Mobility – Build and maintain an integrated multimodal transportation network
   - Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas (GHG) emissions
   - Ensure that reliable, accessible, affordable and appealing travel options are readily available while striving to enhance equity in the offerings in high-need communities
   - Support planning for people of all ages, abilities and backgrounds
2. Communities – Develop, connect and sustain communities that are livable and thriving
   - Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
   - Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households
3. Environment – Create a healthy region for the people of today and tomorrow
   - Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
   - Integrate the region's development pattern and transportation network to improve air quality, reduce GHG emissions and enable more sustainable use of energy and water
   - Conserve the region's resources
4. Economy – Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents
   - Improve access to jobs and educational resources
   - Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

Local Regulations

West Hollywood General Plan 2035

The City's General Plan (adopted in 2011) is the primary means for guiding future change in West Hollywood and provides a guide for land use decision-making. The General Plan includes the following chapters: Land Use and Urban Form; Historic Preservation; Economic Development; Mobility; Human Services; Parks and Recreation; Infrastructure, Resources, and Conservation; Safety and Noise; and Housing. In coordination with the Historic Preservation and Mobility chapters, the Land Use and Urban Form chapter defines how the City's buildings and public spaces – homes, stores, offices, parks, streets, and sidewalks – should organize and shape the community in the future (West Hollywood 2011).

The Historic Preservation chapter provides the City's approach in preserving and protecting its historic resources, whereas the Mobility chapter presents the City's vision for a multi-modal transportation system (e.g., enhancements to the pedestrian and bicycle network, improvements to public transit, land use strategies to improve transit use). A more detailed discussion of the Historic Preservation and Mobility chapters are included in Section 4.3, *Cultural Resources*, and Section 4.12, *Transportation/Circulation*, respectively. A discussion of the Land Use and Urban Form Chapter is included as follows.

LAND USE AND URBAN FORM CHAPTER

The Land Use and Urban Form Chapter provides planning goals and policies related to land use and development patterns and is the primary means for guiding the urban form in West Hollywood. Guidelines include permitted uses, density, design standards, and height for each land use designation. According to the Land Use and Urban Form Chapter, the site's CR land use designation and CR zoning with a Mixed-Use Incentive Overlay. The CR land use designation is intended to create high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. The CR land use designation also allows for a base floor area ratio (FAR) of 3.0 and a height of 90 feet, without applicable bonuses. The Mixed-Use Incentive Overlay designation is intended to focus residential mixed-use projects in high priority nodes, focused on commercial corridors and including locations with high transit levels of service and major intersections. New development with a mix of residential and commercial uses in the Mixed-Use Incentive Overlay zone may receive an additional 0.5 FAR and 10 feet in height (West Hollywood 2011).

Goals and policies of the General Plan Land Use and Urban Form Chapter that relate to and apply to the project are included in Table 4.9-4 of this section and incorporate the goals and policies included in Section 4.1, *Aesthetics*.

Santa Monica/La Brea Transit District

West Hollywood's commercial and other non-residential land uses are mostly located along the City's main thoroughfares and serve the surrounding neighborhoods as well as the region; however, there are five commercial subareas identified for purposes of the General Plan: the Melrose/Beverly District, Santa Monica Boulevard West, the Santa Monica/Fairfax Transit District, the Santa Monica/La Brea Transit District, and Sunset Boulevard. The project site is in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points. According to the General Plan Land Use and Urban Form Chapter, La Brea Avenue includes several large-format retail businesses providing a wide range of goods to shoppers, and its intersection with Santa Monica Boulevard operates as the primary eastern gateway to the city (West Hollywood 2011).

West Hollywood Municipal Code

Title 19, Zoning Ordinance, of the WHMC establishes the City's various zoning districts and special planning areas, including their zoning requirements and development standards. The Zoning Ordinance also facilitates the policies of the General Plan by classifying and regulating the uses of land and structures in the city. According to the City's Zoning Map, the site is zoned CR which is consistent with the site's CR land use designation. Per WHMC Section 19.10.020, the CR zone identifies areas that are principal commercial activity centers. Uses permitted in the CR zone include a wide range of low- to high-intensity commercial uses to serve local and regional market areas. Table 4.9-1 on the following page summarizes the base and overlay lot area, height, and FAR, and height regulations for CR zone and the applicable Mixed-Use Incentive Overlay zone.

Table 4.9-1 Base and Overlay Zoning Regulations

Standard	Commercial, Regional Center (CR)	Mixed-Use Incentive Overlay
Minimum Lot Area	5,000 sf	--
Maximum Height	90 feet, 8 stories	+ 10 feet
Maximum FAR	3.0	+ 0.5

FAR = floor-to-area ratio; sf = square feet

Source: WHMC Section 19.10.040

4.9.3 Impact Analysis

Methodology

Land use and planning impacts are assessed based on whether the project would conflict with plans, policies, and regulations, which have been adopted for the purpose of avoiding or mitigating an environmental effect. This analysis evaluates the project's consistency with applicable plans and regulations included in the City's General Plan and Zoning Ordinance.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, land use and planning impacts are significant if the proposed project would:

1. Physically divide an established community; or
2. 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.

The Initial Study (Appendix B) determined that there would be no impact related to checklist item (1) as the project would not extend beyond the project site boundaries and would not necessitate any permanent closures of streets or sidewalks that would physically divide an established community. Therefore, this section focuses on checklist item (2) and evaluates the proposed project's consistency with applicable land use plans, policies, and regulations.

Project Impacts and Mitigation Measures

Threshold 2: 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?

Impact LU-1 THE PROPOSED PROJECT IS CONSISTENT WITH SCAG'S 2020-2045 RTP/SCS AND 2024-2050 RFP/SCS, APPLICABLE LAND USE AND PLANNING GOALS AND POLICIES OF THE CITY'S GENERAL PLAN, AND THE CITY'S ZONING ORDNANCE UPON APPROVAL OF THE PROJECT'S ZONING MAP AMENDMENT. THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project site is in an urban area characterized by a mix of commercial and industrial uses. The project would involve demolition of on-site buildings and structures and removal of two mature trees for the construction and operation of a new 34-story (352-foot-tall) mixed-use residential and commercial building with 514 apartment units (including 128 affordable and workforce units and

386 market rate units) and 30,000 sf of commercial/retail use on the ground floor. Apart from the 30,000-sf commercial/retail space, the ground floor would include an entry plaza open to the public, a café outdoor seating area, and a residential lobby with associated leasing office and mailroom. The project would provide a total of 674 parking spaces, outdoor gardens, a fitness center, lounge/recreation room, a yoga room, library, and outdoor swimming pool with a pool deck and firepit interspersed throughout the building. Approximately 27,976 sf of common open space and 32,420 sf of private open space would be provided. The rooftop would include a solar photovoltaic (PV) system and a rooftop emergency helipad structure. These roof level improvements would exceed the finished 352-foot height of the building by an additional 25 feet. The project would also integrate up to seven billboards, proposed to be a combination of static and/or full motion video, with varied dimensions throughout all facades of the building. The site is surrounded by commercial uses and a parking lot to the north; commercial uses and the remainder of the former CEMEX concrete batch plant to the east; Romaine Street, warehouse and commercial uses to the south; and North La Brea Avenue, commercial uses, and the West Hollywood Gateway shopping center to the west.

The following analysis discusses the project's consistency with applicable plans and regulations, including SCAG's 2020-2045 RTP/SCS, the City's General Plan, and the City's Zoning Ordinance.

SCAG 2020-2045 RTP/SCS and 2024-2050 RTP/SCS Consistency

As discussed in Section 4.9.2, *Regulatory Setting*, of this section, the goals of the 2020-2045 RTP/SCS focus on economy, mobility, environment, and healthy/complete communities. The 2020-2045 RTP/SCS is intended to help guide transportation and land use decisions and public investments (SCAG 2020). Under the 2024-2050 RTP/SCS, SCAG outlines mutually reinforcing goals into four core categories: mobility, communities, environment, and economy. As discussed under *Regional Transportation Plan/Sustainable Communities Strategy*, the 2024-2050 RTP/SCS defines and identifies PDAs, which are places within the SCAG region where future growth can be located to help the region reach mobility or environmental goals, which, in general, means that people in these areas would have access to multiple modes of transportation or that trip origins and destinations are closer together (SCAG 2024). In the 2020-2045 RTP/SCS, these places are defined and identified as PGAs (SCAG 2020). According to the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, the project is located in a PDA (or PGA) and more specifically within a TPA, NMA, and livable corridor (SCAG 2020, SCAG 2024). As a mixed-use development with residential and commercial uses that would encourage public transit use, the project would be consistent with the goals of the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS as it would encourage economic prosperity and locate diverse housing types near multiple transportation options.

The 2020-2045 RTP/SCS also includes specific implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. These strategies are intended to be supportive of implementing the regional SCS and its overarching goals. Table 4.9-2 evaluates the project's consistency with the strategies of the SCAG 2020-2045 RTP/SCS.

Table 4.9-2 Project Consistency with the 2020-2045 RTP/SCS

Strategy	Project Consistency
Focus Growth Near Destinations and Mobility Options	
▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent.** The proposed project would involve demolition of on-site buildings and structures, including a vacant warehouse (i.e., underutilized land), for construction of a mixed-use building providing residential units, commercial space, open space and recreation uses, and employment opportunities on North La Brea Avenue within the city. The project site is in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points. Furthermore, the project is within a TPA, NMA, and livable corridor as mapped by SCAG (SCAG 2020, SCAG 2024). The location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. As discussed in Section 4.12, *Transportation/Circulation*, the project would have a less-than-significant impact related to vehicle miles traveled (VMT); indicating that the project would not need to implement a transportation demand management (TDM) strategy to mitigate VMT. Nonetheless, the project is still subject to the TDM requirements included in WHMC Chapter 10.16 for commercial projects with more than 10,000 sf of floor area and residential projects with more than 20 units. The site is also served by several existing transit lines (i.e., Los Angeles County Metropolitan Transportation Authority [Metro] Routes 4 and 212, Antelope Valley Transit Authority [AVTA] Bus Route 786, City shuttles including Cityline Local Cedars-Sinai and the Cityline Commuter Hollywood/Highland, and the City's trolley service The PickUp). The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors.
Promote Diverse Housing Choices	
▪ Preserve and rehabilitate affordable housing and prevent displacement ▪ Identify funding opportunities for new workforce and affordable housing development ▪ Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply ▪ Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**Consistent.** Of the 514 total apartment units under the proposed project, 128 units would be affordable and workforce units. The project would also include 30,000 sf of commercial/retail use on the ground floor which would provide local shopping and employment opportunities near housing and support reduction of vehicle trips.
Leverage Technology Innovations	
▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other	**Consistent.** The project would comply with the City's Green Building Standards Code (WHMC Chapter 13.24), which incorporates the Green Building Standards Code of the Los Angeles County Code and the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations. The project's green building features include electric vehicle (EV) charging

Strategy	Project Consistency
incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	stations and a solar PV system. As a building near the Santa Monica Boulevard commercial corridor and along the North La Brea Avenue corridor, the project would be accessible via car sharing, bicycle sharing, and scooter services already available throughout the city.
Support Implementation of Sustainability Policies	
▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable.** These measures are applicable to municipal actions as opposed to individual developments. The project would not conflict with any of these policies.
Promote a Green Region	
▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	**Consistent.** The project is an infill development that would involve construction of residences and commercial uses in an urbanized area and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would also comply with the City's Green Building Standards Code (WHMC Chapter 13.24), which incorporates the Green Building Standards Code of the Los Angeles County Code and the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations. The project's green building features include energy efficient lighting and mechanical systems, energy-star appliances, high efficiency plumbing and other water fixtures, drought-tolerant landscaping and biofiltration planters, EV charging stations, demolition and construction waste diversion, low impact development planters, a solar PV system, and electric metering only for residential units.

Source: SCAG 2020

The subgoals identified for each goal in the 2024-2050 reflect SCAG's vision for the region in the year 2050. Table 4.9-3 evaluates the project's consistency with the goals and subgoals in the SCAG 2024-2050 RTP/SCS.

Table 4.9-3 Project Consistency with the 2024-2050 RTP/SCS

Goal/Subgoals	Project Consistency
Mobility – Build and maintain an integrated multimodal transportation network	
▪ Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized GHG emissions ▪ Ensure that reliable, accessible, affordable and appealing travel options are readily available while striving to enhance equity in the offerings in high-need communities ▪ Support planning for people of all ages, abilities and backgrounds	**Consistent.** The project site is in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points that would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. The site is served by several existing transit lines (i.e., Metro Routes 4 and 212, AVTA Bus Route 786, City shuttles including Cityline Local Cedars-Sinai and the Cityline Commuter Hollywood/Highland, and the City's trolley service The PickUp). The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors. Moreover, the project's green building features include EV charging stations.
Communities – Develop, connect and sustain communities that are livable and thriving	
▪ Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances ▪ Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households	**Consistent.** The proposed project would involve construction of a 34-story mixed-use building providing 514 residential units (128 units would be affordable and workforce units) and employment opportunities on North La Brea Avenue. The project would also include 30,000 sf of commercial/retail use on the ground floor which would provide local shopping and employment opportunities near housing and support reduction of vehicle trips. The project site is in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points. The location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce travel distances.
Environment – Create a healthy region for the people of today and tomorrow	
▪ Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change ▪ Integrate the region's development pattern and transportation network to improve air quality, reduce GHG emissions and enable more sustainable use of energy and water ▪ Conserve the region's resources	**Consistent.** The project would comply with the City's Green Building Standards Code (WHMC Chapter 13.24), which incorporates the Green Building Standards Code of the Los Angeles County Code and the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations. The project's green building features include EV charging stations and a solar PV system. The location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. The site is served by several existing transit lines (i.e., Metro Routes 4 and 212, AVTA Bus Route 786, City shuttles including Cityline Local Cedars-Sinai and the Cityline Commuter Hollywood/Highland, and the City's trolley service The PickUp). The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors.

Goal/Subgoals	Project Consistency
Economy – Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents	
▪ Improve access to jobs and educational resources ▪ Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities	**Consistent.** The proposed project would the construction of a mixed-use building providing residential units, commercial space, open space and recreation uses, and employment opportunities on North La Brea Avenue within the city. With respect to goods movement, the project site is in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points. Therefore, on a project scale, the location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation, particularly for local purchases and other errands.

Source: SCAG 2024

As shown in Table 4.9-2 and Table 4.9-3, the project would be consistent with the applicable strategies of the SCAG 2020-2045 RTP/SCS and 2024-2050 RTP/SCS.

City's General Plan and Zoning Ordinance Consistency

According to the Land Use and Urban Form Chapter and City's Zoning Ordinance, the site's CR land use designation and zoning are intended to create low-to high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. The site's Mixed-Use Incentive Overlay zone is intended to focus residential mixed-use projects in high priority nodes, focused on commercial corridors and including locations with high transit levels of service and major intersections. The project site is also in the Santa Monica/La Brea Transit District commercial sub-area, which is the current location of a significant number of transit routes and transfer points (West Hollywood 2011). By comparison, the proposed project is a high-density, infill development project involving the construction of a 34-story mixed-use residential and commercial building with up to seven billboards, proposed to be a combination of static and/or full motion video, with varied dimensions. The site is served by several existing transit lines (i.e., Metro Routes 4 and 212, AVTA Bus Route 786, City shuttles including Cityline Local Cedars-Sinai and the Cityline Commuter Hollywood/Highland, and the City's trolley service The PickUp). The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors. The location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. Although the project would increase the massing and intensity of development on the project site compared to existing conditions, the building would be consistent with the site's land use designation, except as permitted through development incentives and density bonuses, and would be compatible with the Santa Monica/La Brea Transit District commercial sub-area.

As discussed in Section 2, *Project Description*, during the recent October 7th, 2024 City Council Regular Meeting, City Council directed City staff to explore and subsequently draft a zone text amendment to codify policy in the WHMC that would permit off-site signage outside of Sunset Boulevard in commercial zones on Santa Monica Boulevard, Fairfax Avenue, and La Brea Avenue when off-site signed is associated with mixed-use developments providing a higher percentage of affordable units (West Hollywood 2024). Although this direction is in its preliminary stages and

additional details are not known at this time, the project (i.e., a mixed-use development providing 128 affordable and workforce units along North La Brea Boulevard) currently exhibits a general consistency with the type of developments that would be targeted under this prospective zone text amendment.

Regarding specific development standards, the CR land use designation and zoning allows for a base FAR of 3.0 and a height of 90 feet (or eight stories), without applicable bonuses. New development with a mix of residential and commercial uses in the Mixed-Use Incentive Overlay zone may also receive an additional 0.5 FAR and 10 feet (or one story) in height. Therefore, without additional bonuses, the development standards for the project site would include a FAR of 3.5 and a height of 100 feet (or nine stories), which the project would exceed.

As such, the project would require a Development Permit in response to this exceedance to allow the development of a 34-story, approximately 426,000 sf mixed-use development with 514 apartments and 30,000 sf of commercial/retail use; a Development Agreement to establish vested rights and defined terms for the development of the mixed-use development in exchange for public benefits; and a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement. Moreover, the project would include 128 affordable and workforce units (approximately 25 percent of all units) and, therefore, utilize affordable housing incentives per the regulations in WHMC Section 19.22.050.

Table 4.9-4 further outlines the proposed project's consistency with the applicable goals and policies of General Plan Land Use and Urban Form Chapter and includes those listed in Section 4.1, *Aesthetics*.

Table 4.9-4 Project Consistency with the Land Use and Urban Form Chapter

Goal/Policy	Project Consistency
Goal LU-1: Maintain an urban form and land use pattern that enhances quality of life and meets the community's vision for its future. **Intent:** To provide housing, employment, retail and services, recreation, culture and arts, education, and entertainment for the City's residents and businesses in an urban environment that promotes health, safety, prosperity, and well-being and improves the quality of life for the community.	
▪ **Policy LU-1.1:** Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City. ▪ **Policy LU-1.2:** Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing. ▪ **Policy LU-1.4:** Continue to maintain regulations that encourage preservation of existing housing and development of new housing that accommodates households that are diverse in size, type and income. ▪ **Policy LU-1.13:** Seek to reduce the demand for motorized transportation by supporting land use patterns that prioritize pedestrian, bicycle, and transit mobility options, and mixed use development.	**Consistent.** The land use pattern of the immediate area majorly consists of commercial uses, including retail and office, and industrial uses. The proposed project would be consistent with the site's land use designation and would involve construction of a 34-story mixed-use building providing 514 residential units (128 units would be affordable and workforce units), commercial space, and employment opportunities on North La Brea Avenue. The location of the project site and project features would encourage pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. As discussed in Section 4.12, *Transportation/Circulation*, the project would have a less-than-significant impact related to vehicle miles traveled (VMT); indicating that the project would not need to implement a transportation demand management (TDM) strategy to mitigate VMT. Nonetheless, the project is still subject to the TDM requirements included in WHMC Chapter 10.16 for commercial projects with more than 10,000 sf of floor area and residential projects with more than 20 units. The site is also served by several existing

Goal/Policy	Project Consistency
	transit lines (i.e., Metro Routes 4 and 212, AVTA Bus Route 786, City shuttles including Cityline Local Cedars-Sinai and the Cityline Commuter Hollywood/Highland, and the City's trolley service The PickUp). The project would also include 394 short-term and long-term bicycle parking stalls located on the ground floor and near the parking access points for project's residents, employees, and visitors. Although the project would increase the scale and massing on the project site in comparison to surrounding development, the design of the building considers this change brought by the proposed development. The proposed building's unevenly layered floors would allow for assorted balcony placements and other overhanging areas that would help reduce the abrupt change of the building's scale and massing within its urban context. Furthermore, West Hollywood is one of the densest areas in Southern California with a mix of heights, including high rise buildings. The proposed project would be implemented in accordance with WHMC Article 19-3, which provides development standards related to visual quality, including management of the aesthetic character (e.g., building heights, lot coverage, setbacks, landscaping, and signage) and light and glare levels.
Goal LU-2: Maintain a balanced mix and distribution of land uses that encourage strategic development opportunities and mobility choices within the City. **Intent:** To encourage specific types of new development in key areas of West Hollywood to help diversify the economy, support a high level of social services, achieve climate change reduction goals, promote transit, walking, and biking as viable transportation modes, and help improve the physical health of residents.	
▪ **Policy LU-2.1:** Direct the majority of new development to the City's commercial corridors served by high levels of existing or future public transit, with an emphasis on developing transit-supportive land use mixes and intensities near high frequency transit stops such as Santa Monica Boulevard near Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard. ▪ **Policy LU-2.2:** Consider the scale and character of existing neighborhoods and whether new development improves and enhances the neighborhood when approving new infill development. ▪ **Policy LU-2.5:** Allow increases to permitted density/intensity and height for projects that provide affordable housing. ▪ **Policy LU-1.4:** Continue to maintain regulations that encourage preservation of existing housing and development of new housing that accommodates households that are diverse in size, type and income. ▪ **Policy LU-1.5:** Encourage the retention and success of existing, and the incubation of new, commercial establishments that serve the needs of residents.	**Consistent.** See analysis for Goal LU-1. The project site is located within walking distance of multiple commercial opportunities along North La Brea Avenue. The proposed project would involve demolition on-site buildings and structures, including a vacant warehouse (i.e., underutilized land), for construction of a mixed-use building providing residential units, commercial space, open space and recreation uses, and employment opportunities on North La Brea Avenue within the city. The proposed project would include 30,000 sf of commercial/retail use on the ground floor and plaza space to enhance the neighborhood, serve the needs of residents, and encourage pedestrian activity. The proposed project would be implemented in accordance with WHMC Article 19-3, which provides development standards related to visual quality, including management of the aesthetic character (e.g., building heights, lot coverage, setbacks, landscaping, and signage) and light and glare levels.

Goal/Policy	Project Consistency
Goal LU-4: Provide for an urban environment oriented and scaled to the pedestrian. **Intent:** To support and increase pedestrian activity and walkability throughout the City, encouraging a vibrant public realm and walking as a safe, comfortable, healthy, and viable mode of transportation.	
▪ **Policy LU-4.1:** Implement land use patterns that locate a wide range of destinations within a short walk of every West Hollywood resident in order to encourage walking as a desirable mode of transportation. ▪ **Policy LU-4.2:** Continue to improve the pedestrian environment through a coordinated approach to street tree planting, sidewalk maintenance and enhancement, pedestrian amenities, and a focus on human-scale frontage design for building renovations and new development projects. ▪ **Policy LU-4.3:** Continue to implement parking strategies and standards that ensure parking areas do not dominate street frontages and are screened from public views whenever possible	**Consistent.** See analysis for Goal LU-1 and Goal LU-2. The ground-floor commercial uses and the entrance to the plaza would front North La Brea Avenue to create an active street frontage. The proposed project would include site street landscaping (e.g., street trees and planters) and sidewalk enhancements to improve the pedestrian experience along North La Brea Avenue. Furthermore, the proposed parking garages would have separate access points. Commercial patron vehicles would enter and exit the subterranean parking garage via a driveway at the ground floor along North La Brea Avenue. Resident vehicles would enter and exit the aboveground parking garage via a driveway at the ground floor along Romaine Street, thereby minimizing vehicle intrusions across the sidewalk on North La Brea Avenue.
Goal LU-5: Encourage a high level of quality in architecture and site design in all construction and renovation of buildings. **Intent:** To beautify the City and its public spaces, create a comfortable and enjoyable pedestrian experience, and encourage integrated urban design.	
▪ **Policy LU-5.1:** Continue to encourage diverse architectural styles that reflect the City's diversity and creativity.	**Consistent.** The project would be contemporary in style in a neighborhood with diverse architectural and high-end design styles. As discussed in Section 2.5.2, *Architectural Features* under Section 2, *Project Description*, the proposed building design is characterized by assorted wall recesses, cut-outs, balcony placements that would reduce the visual impact of the building's massing, contribute to the architecture along the North La Brea Avenue corridor, and create a counterpoint to the rectilinear massing of the adjacent properties. Articulated building elements include but are not limited to wood look metal mullions, metal panels, frosted glazed windows, wood finish metal canopy, and glass railings as decorative elements.
Goal LU-6: Create a network of pedestrian-oriented, human-scale and well-landscaped streets and civic spaces throughout the City. **Intent:** To provide beautiful, comfortable, and inviting public and pedestrian spaces, encouraging walking and public gathering.	
▪ **Policy LU-6.1:** Where appropriate, development projects should incorporate open spaces that are accessible to the public.	**Consistent.** See analysis for Goal LU-4.
Goal LU-7: Seek to expand urban green spaces and sustainable landscapes. **Intent:** To enhance environmental sustainability, create ecologically healthy spaces, and provide residents with the physical and mental health benefits that come from an enhanced connection to nature.	
▪ **Policy LU-7.5:** Promote the use of drought-tolerant and native plants throughout the City. ▪ **Policy LU-7.7:** Encourage green roofs.	**Consistent.** As discussed in Section 2.4.5, *Landscaping*, under Section 2, *Project Description*, the project would maintain the two existing street trees along North La Brea Avenue and include the planting of additional trees and shrubs along the North La Brea Avenue and Romaine Street rights-of-way. The entry plaza along the site's frontage at North La Brea Avenue would include drought-tolerant trees and shrubs, raised painted metal planters,

Goal/Policy	Project Consistency
	and hard-piped irrigated planter pots. Similarly, the outdoor gardens on floors 7, 17, 19, and the rooftop of the proposed building would include variations of planters, flexible natural lawn area, artificial turf for pets, and drought-tolerant trees and shrubs.
Goal LU-14: Encourage a high-intensity, lively and vibrant transit-oriented commercial area centered around the intersection of Santa Monica Boulevard and La Brea Avenue. **Intent:** To create a high-intensity, lively and vibrant transit node with an active sidewalk scene and an identifiable sense of place, marking a major eastern entry to the City. It is physically defined by the presence of the Gateway retail center and nearby film and media facilities, and can capitalize on high levels of pedestrian activity and bus ridership, as well as potential future transit enhancements. Over time, the area is intended to transition into a pedestrian-oriented district with a diverse mix of neighborhood and regional retail stores, jobs, and transit-oriented housing.	
▪ **Policy LU-14.3:** Encourage ground-floor commercial and restaurant uses in all new development facing Santa Monica Boulevard and La Brea Avenue to capitalize on and serve the high volumes of pedestrian traffic and public transit and to activate public spaces. ▪ **Policy LU-14.4:** Encourage an increase in the amount and diversity of multi-family residential uses in this area. ▪ **Policy LU-14.5:** Continue to enhance the La Brea/Santa Monica intersection as a major gateway to West Hollywood through building architecture, streetscape design, and signage.	**Consistent.** See analysis for Goal LU-1, Goal LU-2, and Goal LU-5. The proposed project would include 30,000 sf of commercial/retail use on the ground floor and plaza space to enhance the neighborhood, serve the needs of residents, and encourage pedestrian activity. The project would also integrate up to seven billboards, proposed to be a combination of static and/or full motion video, with varied dimensions throughout all facades of the building. WHMC Section 19.34.080 establishes standards and procedures for the design, review, and approval of billboards (including large screen digital signs) in the city consistent with the City's off-site signage policies referenced by Policies LU-16-1 through LU-16-8 of the General Plan Land Use and Urban Form Chapter that emphasize public benefit, city image, and economic stimulation in the city. The City Council has also directed staff to analyze the potential for allowing billboards in other parts of the City besides the Sunset Strip. The project would be required to comply with such standards.
Goal LU-16: Maximize the iconic urban design value and visual creativity of signage in West Hollywood. **Intent:** Support signage that has a strong public benefit, adds to the City's image, and stimulates the local economy.	
▪ **Policy LU-16.1:** Consider aesthetics, size, location, lighting, and siting in the evaluation of offsite signage. ▪ **Policy LU-16.2:** Design and locate offsite signage to minimize its impact on: adjacent properties, the public right of way, cultural resources, creation of shade and shadow, and potential conflict with the development of adjacent properties. ▪ **Policy LU-16.3:** Consider impacts to surrounding neighborhoods when evaluating off-site signage. ▪ **Policy LU-16.4:** Design offsite signage in new developments in concert with the architectural lighting, landscape, and public art program of the development. ▪ **Policy LU-16.8:** Carefully integrate offsite signage into new development so that the building and not the sign is the primary use of the land.	**Consistent.** See analysis for Goal LU-14. The proposed billboards would be positioned flush with the buildings' exterior and would not substantially protrude from the building. Furthermore, the primary use of the site would be the mixed-use building rather than up to seven proposed billboards. WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 also provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including sign illumination.

Goal/Policy	Project Consistency
Goal LU-17: Ensure that on-site signs are an asset to the City. **Intent:** Require that the amount and placement of on-site signs is visually attractive and provides high quality imagery for the City.	
▪ **Policy LU-17.1:** Prohibit the use of roof signs, pole signs, and flashing and animated signs, except as part of a Creative Sign Program. ▪ **Policy LU-17.2:** Rely on size, placement, location, and numeric limits for on-site signs that properly integrate into overall site development, avoiding undue proliferation of signage and preventing signs from dominating or overpowering buildings. ▪ **Policy LU-17.3:** Allow imaginative signage that is a positive contribution to its surroundings through the use of Creative Sign Permits, and in the execution of Comprehensive Sign Programs. ▪ **Policy LU-17.4:** Encourage signage that is designed for pedestrians, especially where there is discretionary authority such as Creative Signs and Comprehensive Sign Programs.	**Consistent.** See analysis for Goal LU-14. In addition to up to seven proposed billboards, proposed to be a combination of static and/or full motion video, other on-site signage would be properly integrated into and flush with the building's facades. WHMC Section 19.20.100 and WHMC Sections 19.34.040 and G-34.250 also provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality, including sign illumination.

Source: West Hollywood 2011

As shown in Table 4.9-4, the proposed project would be consistent with applicable goals and policies of the General Plan Land Use and Urban Form Chapter and would not obstruct implementation of any General Plan goal or policy. The proposed project is also consistent with the General Plan Historic Preservation and Mobility chapters, as further discussed in Section 4.3, *Cultural Resources*, and Section 4.12, *Transportation/Circulation*, respectively. Moreover, upon approval of the Development Permit, Development Agreement, and Zoning Map Amendment, the project would also be consistent with the City's zoning. Furthermore, the proposed project is consistent with the strategies, goals, and subgoals of SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS. The project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating and environmental effect, and impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.9.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*, and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). Of note, the remaining planned and pending projects identified in Section 3, *Environmental Setting*, are located 0.20-mile and greater from the project site.

Similar to the project, land use regulations and policy consistency impacts associated with other cumulative projects would be addressed on a case-by-case basis to determine their consistency with applicable plans and policies, including the City's General Plan and Zoning Ordinance. Moreover, because the proposed project's impacts related to land use compatibility and consistency with local

plans and goals would be less than significant, the proposed project's contribution to land use and planning impacts would not be cumulatively considerable. In the case of the proposed office and retail building development abutting the project site to the east located in City of Los Angeles (i.e., 1011 North Sycamore Street), this project would be subject to Los Angeles' land use and planning regulations, including goals and policies of the Los Angeles General Plan. Cumulative impacts with respect to the Historic Preservation and Mobility chapters of the General Plan are further discussed in Section 4.3, *Cultural Resources* and Section 4.12, *Transportation/Circulation*, respectively.

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4.10 Noise

This section analyzes the project's potential noise and vibration impacts related to construction activities and project operation. As discussed in the Initial Study (see Appendix B) the proposed project is not within an airport's noise contours or area of influence and would not expose on-site residents and employees to excessive noise from airport operations. Specifically, this analysis focuses on potential temporary and permanent noise impacts from project construction and operation as well as potential impacts related to excessive groundborne vibration generated by the project. Noise measurement data, modeling results, and other reference data utilized for this analysis are included in Appendix I to this EIR.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this EIR also includes the early disassembly, demolition, and removal of these buildings and structures as being part of project construction and includes these activities in the project modeling assessing construction impacts.

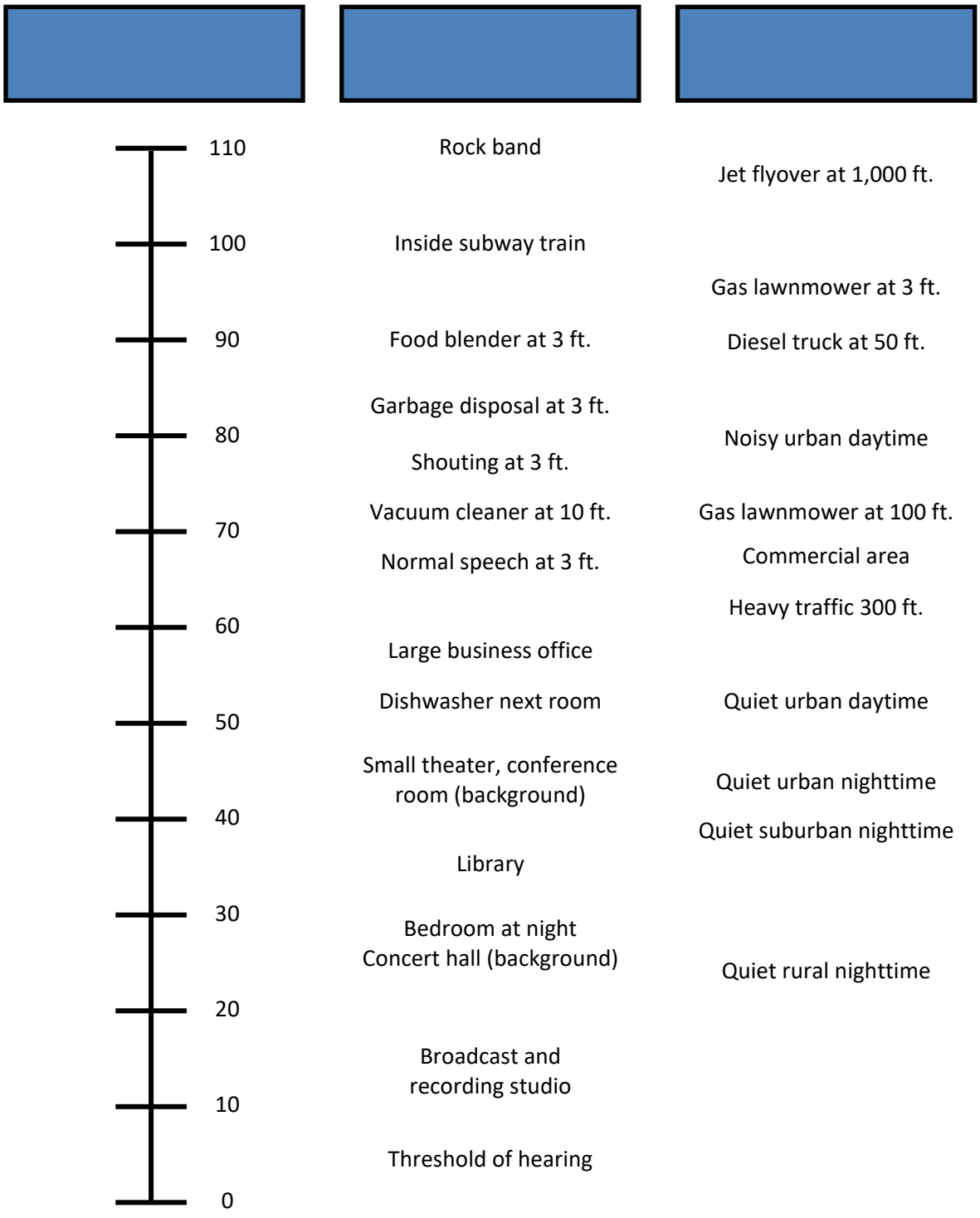
4.10.1 Setting

Fundamentals of Noise

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

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dBA; similarly, dividing the energy in half would result in a decrease of 3 dBA (Crocker 2007). Common outdoor and indoor noise sources and their typical corresponding A-weighted noise levels are shown in Figure 4.10-1 on the following page.

Figure 4.10-1 Examples of Typical Noise Levels



Source: Caltrans 2013

Human perception of noise has no simple correlation with sound energy. The perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The manner by which noise declines with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result simply from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013).

Noise levels may also be reduced by intervening structures. The amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and manufactured features, such as buildings and walls, can alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, its frequency, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed.

One of the most frequently used noise metrics that considers both duration and intensity is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). Normal conversational levels at three feet are in the 60- to 65-dBA L_{eq} range and ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (L_{dn} or DNL), which is a 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 PM to

7:00 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 PM to 10:00 PM and a +10 dBA penalty for noise occurring from 10:00 PM to 7:00 AM (Caltrans 2013). Noise levels described by DNL and CNEL usually differ by about 0.5 dBA. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Fundamentals of Groundborne Vibration

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

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018).

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Descriptor

Vibration amplitudes are usually described in terms of the peak particle velocity (PPV). PPV, measured in inches per second, is the maximum instantaneous peak of the vibration signal. PPV is appropriate for evaluating potential building architectural damage (Caltrans 2020), whereas RMS (measured in vibration decibels, or VdB) is typically more suitable for evaluating human response.

Existing Conditions

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Sensitive receivers are defined as places where noise could interfere with regular activities such as sleeping, talking, and recreating. According to the City's General Plan Safety and Noise Chapter, noise sensitive receivers include hospitals, residences, convalescent homes, schools, churches, libraries, parks, and religious institutions (West Hollywood 2020). The closest noise sensitive receptors near the site are multi-family residences approximately 300 feet south of the

southernmost project boundary along North La Brea Avenue. Vibration sensitive receivers are similar to noise sensitive receivers, such as residences, and institutional uses, such as schools, churches, and hospitals.

Project Site Noise

The most common source of noise in the project site vicinity is vehicular traffic from North La Brea Avenue, Santa Monica Boulevard, Romaine Street, and existing commercial and industrial uses. To characterize ambient noise levels in the project vicinity and at the project site, four short-term (15-minute) noise level measurements and one long-term (24-hour) noise level measurement were conducted on February 13 and February 14, 2024. The approximate noise measurement locations are shown in Figure 4.10-2 on the following page.

As shown in Figure 4.10-2, short term noise level measurement 1 (ST-1), ST-2, ST-3 and ST-4 were conducted at various commercial and industrial areas surrounding the project site to capture ambient noise levels surrounding the project site. Long-term noise level measurement 1 (LT-1) was conducted north of the northeast corner of the project site to capture ambient noise levels near the project site. The measurements were completed using a Piccolo II sound level meter fitted with a windscreen. The meter complies with American National Standards Institute Standard S1.4. The sound level meters were set to "slow" response and "A" weighting (dBA). The meters were calibrated prior to and after the monitoring period. All measurements were at least five feet above the ground and away from reflective surfaces.

Table 4.10-1 and Table 4.10-2 on the following pages summarize the results of the short-term and long-term noise level measurements. Noise monitoring data is included in Appendix I.

Table 4.10-1 Short-Term (15-Minute) Noise Level Measurement Results

Measurement Location	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST-1	Approximately 80 feet south of the southeast corner of North La Brea Avenue and Santa Monica Boulevard	12:28 – 12:43 PM	Approximately 15 feet east of centerline of the nearest lane of North La Brea Avenue	70	61	84
ST-2	Western side of Sycamore Avenue, approximately 160 feet south of Santa Boulevard	12:47 – 1:02 PM	Approximately 180 feet to centerline of nearest lane of Santa Monica Boulevard	63	48	87
ST-3	Approximately 40 feet east of northeast corner of Romaine Street and North Sycamore Avenue	11:50 – 12:05 PM	Approximately 30 feet to Romaine Street centerline	68	59	80
ST-4	Approximately 60 feet east of the northeast corner of North La Brea Avenue and Romaine Street	12:10 – 12:25 PM	Approximately 30 feet to Romaine Street centerline; approximately 100 feet to the centerline of North La Brea Avenue	68	62	85

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

See Figure 4.10-2 for approximate noise measurement locations and Appendix I for noise monitoring data.

Figure 4.10-2 Approximate Noise Measurement Locations

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23-14457 EPS
Fig X Noise Monitoring Locations

Table 4.10-2 Long-Term (24-Hour) Noise Level Measurement Results

Sample Time	dBA L_{eq}	Sample Time	dBA L_{eq}
February 13-14, 2024			
12:00 PM	71	12:00 AM	67
1:00 PM	70	1:00 AM	68
2:00 PM	69	2:00 AM	69
3:00 PM	69	3:00 AM	63
4:00 PM	69	4:00 AM	68
5:00 PM	69	5:00 AM	65
6:00 PM	70	6:00 AM	71
7:00 PM	70	7:00 AM	70
8:00 PM	68	8:00 AM	73
9:00 PM	68	9:00 AM	72
10:00 PM	70	10:00 AM	72
11:00 PM	71	11:00 AM	72
24-hour Noise Level (dBA CNEL)			**75**

dBA = A-weighted decibels; L_{eq} = equivalent noise level; CNEL = community equivalent noise level

See Figure 4.10-2 for approximate noise measurement locations and Appendix I for noise monitoring data.

4.10.2 Regulatory Setting

Federal and State Regulations

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970, the Occupational Safety and Health Administration has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

California Building Code

The California Building Code (CBC), Part 2 of Title 24 of the California Code of Regulations (CCR), is a set of regulations that governs the design and construction of buildings in California. According to the CBC, Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the CCR interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. A habitable room is typically a residential room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

California Department of Transportation

Caltrans has developed limits for the assessment of vibration from transportation and construction sources, which are reflective of standard practice for analyzing vibration impacts. Table 4.10-3 presents Caltrans' impact criteria for structural damage to buildings.

Table 4.10-3 Vibration Damage Potential Criteria

Structure and Condition	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

PPV = peak particle velocity; in./sec. = inches per second

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020

The State noise and vibration guidelines are to be used as guidance with respect to planning for noise, not standards and/or regulations to which the City of West Hollywood must adhere.

Local Regulations

West Hollywood General Plan 2035

The Safety and Noise Chapter of the City's General Plan is intended to identify sources of noise and provide goals, objectives, and policies that ensure that noise from various sources, including transportation and stationary sources, does not create an unacceptable noise environment. As shown in Table 4.10-4 on the following page, the City has adopted land use compatibility standards for use in assessing the compatibility of various land use types that are exposed to noise levels generated by transportation sources, predominantly from vehicular traffic. A project is compatible with the noise environment if the noise exposure level falls within Zone A or Zone B. According to the City's standards shown in Table 4.10-4, ambient noise up to 60 CNEL is normally acceptable (Zone A) whereas ambient noise up to 70 CNEL is conditionally acceptable for residences (Zone B). The Safety and Noise Chapter also requires the provision of sufficient insulation as part of residential building design to reduce interior ambient noise levels to 45 CNEL consistent with the CBC, Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the CCR (West Hollywood 2020).

Table 4.10-4 Noise/Land Use Compatibility Matrix

Land Use Category	Zone A Normally Acceptable[1] ($CNEL/L_{dn}$)	Zone B Conditionally Acceptable[2] ($CNEL/L_{dn}$)	Zone C Normally Unacceptable[3] ($CNEL/L_{dn}$)	Zone D Clearly Unacceptable[4] ($CNEL/L_{dn}$)
Residential	Up to 60	61-70	71-75	76 and higher
Transient Lodging – Motels, Hotels	Up to 60	61-75	76-80	81 and higher
Schools, Libraries, Churches, Hospitals, Nursing Homes	Up to 60	61-70	71-80	81 and higher
Auditoriums, Concert Halls, Amphitheaters	–	Up to 70	–	71 and higher
Sports Arenas, Outdoor Spectator Sports	–	Up to 75	–	76 and higher
Playgrounds, Parks	Up to 70	–	71-75	76 and higher
Golf Courses, Riding Stables, Water Recreation, Cemeteries	Up to 70	–	71-80	81 and higher
Offices Buildings, Business Commercial, and Professional	Up to 65	66-75	76 and higher	–
Industrial, Manufacturing, Utilities, Agriculture	Up to 70	71-80	81 and higher	–

[1] Zone A – Normally Acceptable: Specified land use is satisfactory based upon the assumption that any buildings involved meet conventional Title 24 construction standards. No special noise insulation requirements.
[2] Zone B – Conditionally Acceptable: New construction or development shall be undertaken only after a detailed noise analysis is made and noise reduction measures are identified and included in the project design
[3] Zone C – Normally Unacceptable: New construction or development is discouraged. If new construction is proposed, a detailed analysis is required, noise reduction measures must be identified, and noise insulation features included in the design.
[4] Zone D – Clearly Unacceptable: New construction or development should not be undertaken
Source: West Hollywood 2020

When stationary noise is the primary noise source, the City applies separate standards for determining general compatibility of proposed residential properties, shown in Table 4.10-5. These noise levels represent the maximum acceptable levels for new developments as measured from any adjoining or proposed residential property in the city. Accordingly, as stated in the City's General Plan Safety and Noise Chapter, proposed new development should not cause, or if residential in nature, be exposed to a noise level that exceeds the noise levels shown in Table 4.10-5.

Table 4.10-5 Stationary Source Noise Standards for Noise-Sensitive Land Uses

	Daytime Hourly Noise Level (8 AM to 10 PM)	Nighttime Hourly Noise Level (10 PM to 8 AM)
Exterior Noise Standards	55 dBA L_{eq}	50 dBA L_{eq}

dBA = A-weighted decibels; L_{eq} = equivalent noise level
Note: Noise levels should be measured, or modeled, at the property line of the affected property or a primary exterior use area within the affected property.
Source: West Hollywood 2020

In addition to the City's compatibility noise standards, the following goals and policies from the Safety and Noise Chapter of the City's General Plan related to noise exposure would be applicable to the proposed project (West Hollywood 2020):

Goal SN-3: Minimize the impact of point source noise and ambient noise levels throughout the community.

Policy SN-3.1: As feasible, ensure that construction and occupancy of new development is compatible with and does not exceed thresholds defining the acceptable noise environment in surrounding areas.

Policy SN-3.2: Require the inclusion of noise-reducing design features in development projects to address the impact of noise on residential development.

Policy SN-3.3: Review development proposals to ensure that noise standards and compatibility criteria set forth in the General Plan are met.

Policy SN-3.4: Require all proposed development within the 65 CNEL contour as shown on Figure 10-5 in the Safety and Noise Chapter of the General Plan to comply with Title 24, as amended.

Policy SN-3.5: Require all proposed multi-family residential uses within the 60 CNEL contour as shown on Figure 10-5 in the General Plan Safety and Noise Chapter to comply with Title 24, as amended.

Policy SN-3.6: Require development projects to implement mitigation measures, where necessary, to reduce noise levels to meet the adopted standards and criteria. Such measures may include, but are not limited to, berms, walls, and sound attenuating architectural design and construction methods.

Policy SN-3.7: Require new development to meet adopted noise standards and regulations.

Goal SN-4: Minimize transportation-related noise.

Policy SN-4.1: Require new development and/or modifications to existing development to include sound-reducing design measures, where needed, to maintain compatibility with adjacent and surrounding uses.

Goal SN-5: Create a healthy physical environment related to noise.

Policy SN-5.1: Work to minimize stationary noise impacts on sensitive receptors and noise emanating from construction activities, private developments/residences, landscaping activities, night clubs and bars, and special events.

Policy SN-5.2: Require that mixed-use structures and areas be designed to prevent transfer of noise from commercial uses to residential uses.

West Hollywood Municipal Code

Chapter 9.08 of the City of West Hollywood Municipal Code (WHMC), also known as the City's noise ordinance, prohibits specific noise sources from reaching excessive levels such that they disturb the comfort and tranquility of persons who live and work in the city. As detailed in Section 9.08.050 of the WHMC, the City prohibits the following activities relative to residential and commercial development:

a. *Amplified Sound, Radios, and Musical Instruments, Etc.* The using, operating or permitting to be played, of any radio, musical instrument, stereo, television set, or instrument or device between the hours of 10:00 PM and 8:00 AM such that the production of volume is sufficiently loud as to be plainly audible at a distance of 25 feet from the source.

b. *Engines, Motors and Mechanical Devices in or Near Residential District.* The sustained, continuous or repeated operation or use between the hours of 10:00 PM and 8:00 AM of any motor or engine or the repair, modification, reconstruction, testing or operation of any automobile, motorcycle, machine, contrivance, or mechanical device or other contrivance or facility unless such motor, engine, automobile, motorcycle, machine or mechanical device is enclosed within a sound insulated structure so as to prevent noise and sound from being plainly audible at a distance of 50 feet or more from such structure, or at a distance of 10 feet or more from any residence. Racing the engine of any motor vehicle or needlessly bringing to a sudden start or stop of any motor vehicle shall be prohibited at any time at any location.

d. *Construction.*

1. Construction between the hours of 7:00 PM and 8:00 AM on weekdays; or at any time on Saturday (except, between the hours of 8:00 AM and 7:00 PM, interior construction is permissible); or at any time on Sunday, New Year's Day, Martin Luther King Day, President's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, the day after Thanksgiving, Christmas Day and observed holidays; all except as provided in subsection (d) of Section 9.08.060. If New Year's Day, Independence Day or Veterans Day falls on a weekend, then the following Monday or preceding Friday is a holiday.
2. To minimize the disturbance to the surrounding community, the motors and engines for construction related vehicles and equipment shall not be left idling and shall be turned off when not in use.

g. *Noises by Animals.* No person shall permit any animal that is kept or maintained upon any premises owned, occupied or controlled by such person to permit such animal to emit any noise, sound, or cry which interferes with the comfortable enjoyment of life and property by any individual. It is hereby declared a public nuisance to keep, maintain or permit an animal which emits such noise upon any lot or parcel of land.

h. *Leaf Blowers.* The use or operation or allowing the use or operation of any portable machine powered with a combustion or gasoline engine used to blow leaves, dirt and other debris off sidewalks, driveways, lawns and other surfaces.

i. *Commercial Establishments Adjacent to Residential Property.* Notwithstanding any provision of this code to the contrary, continuous, repeated or sustained noise from the premises of any commercial establishment which is adjacent to one or more residential dwelling units, including any outdoor area part of or under the control of the establishment, between the hours of 10:00 PM and 8:00 AM that is plainly audible from the residential dwelling unit's property line.

j. *Loud Parties or Gatherings.* Generating any noise from a party, event or other gathering of people on private property (whether from a home, a commercial business or any other location in the city) that is determined by a law enforcement officer at the scene to constitute a threat to public peace, health and safety or a violation of this code or state law due to the magnitude of the crowd, the volume of noise, the level of disturbance to the surrounding neighborhood, unruly behavior, excessive traffic or destruction of property generated by the party or gathering.

k. *Commercial Tree Removal or Trimming Services*. The trimming or removing of trees by a commercial service using any electrical or gas powered machine between the hours of 7:00 PM and 8:00 AM on weekdays; or at any time on Saturday or Sunday, New Year's Day, Martin Luther King Day, President's Day, Memorial Day, Independence Day, Labor Day, Veteran's Day, Thanksgiving Day, the day after Thanksgiving and Christmas Day.

4.10.3 Impact Analysis

Methodology

The following describes the methodology, including models, used to evaluate the significance of potential noise and vibration impacts related to the proposed project. Noise modeling results associated with the analysis herein are included in Appendix I to this EIR.

Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment. Model results are included in Appendix I.

For demolition, site preparation, grading, building construction, paving and architectural coating, from the edge of the project site, the nearest noise-sensitive receivers include multi-family residences located approximately 300 feet south on North La Brea Avenue. Therefore, construction noise was modeled at this distance. Attenuation from intervening structures or topography was conservatively not included in the calculations. Equipment assumed for each phase of construction was modeled consistent with the methodology utilized for Section 4.2, *Air Quality*.

Operational Noise

Of note, the proposed rooftop helipad would not be utilized as part of daily on-site operations but would be available 24/7 for emergencies. Therefore, it would not be a daily on-site noise source and it is not discussed further in this section.

ON-SITE MECHANICAL EQUIPMENT

The primary on-site noise sources associated with operation of housing developments, including mixed-use developments such as the proposed project, would include noise from stationary heating, ventilation, and air conditioning (HVAC) equipment, on-site vehicle movement (e.g., delivery and trash hauling), and outdoor activities. Analysis of outdoor activity considers the existing noise environment and refers to regulations included in the City's noise ordinance (i.e., Chapter 9.08 of the WHMC). From information provided by the client, the project would use two fluid coolers with a sound pressure level of 86 dBA at 3 feet and 93 dBA at 3 feet, and one air source heat pump with a sound pressure level of 96 dBA at 3 feet. These units would be mounted on the roof of the proposed project.

OFF-SITE TRAFFIC

Ambient noise levels characterizing the project site vicinity are primarily influenced by traffic along North La Brea Avenue, Santa Monica Boulevard and Romaine Street. North La Brea Avenue is a four to five-lane roadway with a posted speed limit of 35 miles per hour (mph); Santa Monica Boulevard is a four-lane roadway with a posted speed limit of 30 mph (mph); and Romaine Street is a two-lane roadway with a posted speed limit of 25 mph. Project generated vehicle trips would contribute to the existing traffic volumes along surrounding roadways. Traffic volumes used for the noise analysis are based on the North La Brea Avenue/Romaine Street intersection turning movement data provided by Fehr & Peers for the proposed project. The off-site traffic noise analysis is based on the formula 10 x LOG(future traffic volume/existing traffic volume) and the assumption that the daily traffic volume is approximately ten times the peak hour traffic volume. This formula was applied to assess multiple traffic scenarios including an "Existing plus Project" scenario.

Groundborne Vibration

The greatest vibratory source during construction would be a vibratory roller and large bulldozer. Neither blasting nor pile driving would be required for construction of the proposed project. Table 4.10-6 shows typical vibration levels for various pieces of construction equipment.

Table 4.10-6 Typical Vibration Levels for Construction Equipment

Equipment	PPV (in./sec.) at 25 Feet
Vibratory Roller	0.21
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003
Static Roller	0.05

PPV = peak particle velocity; in./sec. = inches per second

Source: FTA 2018

Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities are based on information and recommend procedures contained in the FTA Transit Noise and Vibration Impact Assessment Manual (FTA 2018).

Impact of the Environment on the Project

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA] v. Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is generally not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. Therefore, this environmental analysis does not consider the potential impacts of the environment (i.e., existing noise) on the project.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact with related to noise and vibration if it would:

1) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2) Generate excessive groundborne vibration or groundborne noise levels; and
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Project area to excessive noise levels.

The Initial Study (see Appendix B) determined that the proposed project would have no impact related to checklist item (3) as the site is not within an airport's noise contours or area of influence and would not expose on-site residents and employees to excessive noise from airport operations. Specifically, this analysis focuses on checklist items (1) and (2) for potential temporary and permanent noise impacts from project construction and operation and potential impacts related to excessive groundborne vibration generated by the project.

Construction Noise Thresholds

While the City does not have specific noise level criteria for assessing construction impacts, the metric used in assessing the significance of the construction noise impact was the increase in exposure over ambient levels. For a conservative analysis of noise impacts at the nearest sensitive receivers (i.e., multi-family residences approximately 300 feet south of the site), noise level measurement ST-4 measured immediately south of the project site was utilized given its 100-foot distance from the centerline of North La Brea Avenue compared to the residential building's location adjacent to North La Brea Avenue (as shown in Figure 4.10-2). As such, noise level measurement ST-4 characterizes a quieter noise environment and if construction noise does not exceed the threshold based on the measured noise level at this location, then it would not exceed the threshold based on the ambient noise level at the nearest multi-residences. The City of West Hollywood's criterion for significance is an increase of 10 dBA L_{eq} above the ambient noise level (i.e., a threshold of 78 dBA L_{eq} due to the 68 dBA L_{eq} recorded at location ST-4 as shown in Table 4.10-1).[1]

As described under *Regulatory Setting,* construction hours would comply with Section 9.08.050 of the WHMC and would not occur during nighttime hours between 7:00 PM and 8:00 AM Monday through Friday, or at any time on Saturday (except, between the hours of 8:00 AM and 7:00 PM, interior construction is permissible), or at any time on Sunday, New Year's Day, Martin Luther King Day, President's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, the day after Thanksgiving, Christmas Day and observed holidays. Therefore, nighttime construction noise is not analyzed further in this section.

Operational Noise Thresholds

The City has adopted exterior noise standards in the WHMC and the General Plan Noise and Safety Chapter regulating operational stationary noise sources in the City. The proposed project would result in a significant impact if noise from project stationary operational noise sources exceeds 50 dBA L_{eq} at a residential property line during nighttime hours between 10:00 PM and 8:00 AM or 55 dBA L_{eq} during daytime hours between 8:00 AM and 10:00 PM.

[1] The construction noise threshold used in the analysis in this EIR is consistent with the threshold in the published October 2022 Draft EIR for the 9160-9176 Sunset Boulevard Project in the City of West Hollywood.

Off-site operational noise (i.e., traffic noise) would result in a significant impact if vehicle trips generated by the project would cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA or more, which would be a perceptible increase in traffic noise.

Groundborne Vibration Thresholds

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual is used to evaluate potential construction vibration impacts related to potential building damage (Caltrans 2020). Construction vibration impacts from housing development would be significant if vibration levels exceed the Caltrans criteria shown in Table 4.10-3. For example, impacts would be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures and 1.0 in./sec. PPV for commercial structures, which is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. Construction vibration impacts would also be significant if vibration levels exceed 0.1 in./sec. PPV for historic buildings. In addition, vibration annoyance impacts from project construction would be significant if vibration levels exceed the Caltrans criteria shown in Table 4.10-7. For example, impacts would be significant if vibration levels exceed 72 VdB for residences and 75 VdB for commercial uses.

Table 4.10-7 Federal Transit Administration Vibration Impact Criteria

Land Use Category	Vibration Impact Level for Frequent Events (VdB)[1]
Category 1: Buildings where low ambient vibration is essential for interior operations	65
Category 2: Residences and buildings where people normally sleep	72
Category 3: Institutional land uses with primarily daytime use	75

VdB = vibration decibels

[1] "Frequent events" is defined as more than 70 events per day.

Sources: Caltrans 2020; FTA 2018

Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION OF THE PROJECT WOULD TEMPORARILY INCREASE NOISE LEVELS IN THE PROJECT SITE VICINITY; HOWEVER, NOISE LEVELS WOULD NOT EXCEED FTA THRESHOLDS. FURTHERMORE, OPERATION OF THE PROJECT WOULD NOT INCLUDE PERMANENT NOISE SOURCES THAT WOULD EXCEED STANDARDS ESTABLISHED BY THE CITY. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction Noise

Construction of the proposed project is expected to occur over approximately 32 months, proposed to commence in October 2025 and end by June 2028. Noise sensitive receivers in the vicinity of the project site include multi-family residences south of the site. Construction noise levels during all phases of construction (i.e., demolition, site preparation, grading, building construction, paving, and architectural coating) were modeled using the FHWA RCNM to determine construction noise

impacts on nearby noise sensitive receivers. Table 4.10-8 shows the maximum expected construction noise levels based on the combined use of construction equipment anticipated to be used concurrently during each phase of project construction.

Table 4.10-8 Estimated Noise Levels by Construction Phase

Construction Activity Phase	Ambient Noise Level (dBA L_{eq})	Multi-family Residences to the South (dBA L_{eq})	New Total Noise Exposure[1] (dBA L_{eq})	Increase Over Ambient (dBA L_{eq})
Distance in feet		*300*	-	-
Demolition	68	66	70	2
Site Preparation	68	61	69	1
Grading	68	66	70	2
Building Construction	68	63	69	1
Paving	68	62	69	1
Architectural Coating	68	61	69	1

L_{eq} = equivalent noise level

[1] This column represents the noise level from combining the ambient noise level with the modeled construction noise level from both columns to the left to obtain a new noise exposure level and the increase over the ambient noise level. Because decibels are measured on a logarithmic scale, for example, adding 68 dBA to 66 dBA equates to a 70 dBA noise exposure level, or a 2 dBA increase over the ambient noise level.

Notes: RCNM calculations are included in Appendix I. Noise levels rounded to the nearest whole number.

As shown in Table 4.10-8, construction could generate noise levels as high as approximately 66 dBA L_{eq} during the demolition and grading phase at the nearest noise-sensitive residential receivers located approximately 300 feet to the south from the southern boundary of the project site, which would be a 2 dBA L_{eq} increase over ambient (the closest recorded ambient noise level of 68 dBA L_{eq}). Therefore, construction noise levels would not exceed the City's construction noise threshold of 10 dBA over ambient. To minimize the disturbance to the surrounding community, WHMC Section 9.08.050(d) also requires that motors and engines for construction related vehicles and equipment be turned off when not in use. In addition, the project would be built in compliance with the standard construction hours detailed in WHMC Section 9.08.050(d), which prohibits construction between the hours of 7:00 PM and 8:00 AM on weekdays; or at any time on Saturday (except, between the hours of 8:00 AM and 7:00 PM, interior construction is permissible); or at any time on Sunday or major holidays. Therefore, noise impacts from temporary construction activities would be less than significant.

Operational Noise

ON-SITE MECHANICAL EQUIPMENT

The primary on-site operational noise source from the project would be from mechanical equipment two fluid coolers and one air source heat pump. These units, assumed to operate simultaneously, were modeled from their roof location on the project plans provided by Large Architecture (Large 2023). This area is located approximately 410 feet from the residential property line to the south.

The combined sound pressure level of the two fluid coolers and the one air source heat pump units would be 98 dBA at three feet. According to the project plans, there would be an enclosed mechanical room to the south of the HVAC units, which would provide at least an additional 10 dBA

reduction. Based on the distance to the residential property line to the south, noise levels generated by the three rooftop mechanical equipment operating simultaneously, and the additional 10 dBA reduction from the proposed mechanical room, would be approximately 45 dBA L_{eq} at 410 feet. This is a conservative assumption as it does not take into account the additional noise attenuation provided by the difference in height of the proposed building and the residential receptor, in addition to attenuation from off-site buildings. Therefore, on-site mechanical equipment noise would not exceed the residential noise nighttime limit of 50 dBA L_{eq}.

Additional on-site noise sources such as landscape maintenance and conversations would be typical of noise generated by neighboring land uses and would not significantly contribute to overall ambient noise levels. Therefore, noise from on-site operations would be less than significant.

OFF-SITE TRAFFIC

The project would generate new vehicle trips that would use area roadways. The traffic noise increases caused by project traffic are shown in Table 4.10-9. As shown therein, under an "Existing plus Project" scenario the traffic noise increase is 0.2 dBA L_{eq} on North La Brea Avenue between Santa Monica Boulevard and Romaine Street, and 1.5 dBA L_{eq} on Romaine Street east of North La Brea Avenue. Therefore, the project's traffic noise increases would not exceed 3 dBA, a perceptible noise increase, and off-site traffic noise impacts would be less than significant.

Table 4.10-9 Traffic Noise Increases (dBA L_{eq}) – Existing Plus Project Scenario

Roadway/Segment	Existing ADT	Existing + Project ADT	Increase (dBA L_{eq})
North La Brea Avenue between Santa Monica Boulevard and Romaine Street	20,010	20,840	0.2
Romaine Street east of North La Brea Avenue	3,320	4,670	1.5

ADT = average daily trips

Mitigation Measures

Mitigation measures would not be required.

Threshold 2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 PROJECT CONSTRUCTION WOULD INTERMITTENTLY GENERATE GROUNDBORNE VIBRATION ON A SITE WHICH MAY AFFECT SENSITIVE RECEIVERS NEAR THE PROJECT SITE BUT WOULD NOT CREATE EXCESSIVE LEVELS OF VIBRATION THAT COULD CAUSE STRUCTURAL DAMAGE, DISTURB SLEEP AT NEARBY SENSITIVE RESIDENTIAL RECEIVERS, OR INTERFERE WITH OPERATION OF THE SENSITIVE RECEIVERS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Project construction would not involve activities typically associated with excessive groundborne vibration such as pile driving or blasting. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which may be used within 10 feet of the nearest commercial structures to the north and east. A dozer creates a vibration level of approximately 0.089 in./sec. PPV at a distance of 25 feet. At the distance of 10 feet, vibration levels would attenuate to 0.352 in./sec. PPV, which is lower than the Caltrans threshold of 1.0 in./sec. PPV for commercial structures. As discussed in Section 4.3, *Cultural Resources*, the closest historical resource (960 North La Brea Avenue) is located approximately 80 feet to the south across Romaine

Street. At a distance of 80 feet, vibration levels would attenuate to 0.016 in./sec. PPV, which is lower than the Caltrans threshold of 0.1 in./sec. PPV for historic buildings. Additionally, the closest residential use is located approximately 300 feet to the south. At a distance of 300 feet, vibration levels would attenuate to 0.002 in./sec. PPV, which is lower than the Caltrans threshold of 0.2 in/sec PPV for residential structures. Furthermore, a dozer creates a vibration level of approximately 87 VdB at a distance of 25 feet (FTA 2018). At the distance of 460 feet from the center of site to the nearest residential building to the south, vibration levels would attenuate to 49 VdB, which is lower than the Caltrans vibration annoyance threshold of 72 VdB for residential buildings. Additionally, at a distance of 70 feet from the center of site to the commercial use to the east, vibration levels would attenuate to 74 VdB, which is lower than the Caltrans vibration annoyance threshold of 75 VdB for commercial buildings. All other vibration sensitive resources would be located at a further distance away and would experience even less vibration levels from project construction. Therefore, temporary vibration impacts associated with construction would be less than significant.

Operation of the project would not include any substantial vibration sources. Therefore, operational vibration impacts would also be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.10.4 Cumulative Impacts

The planned and pending projects within a one-mile radius of the project site with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east).

As discussed under Impact N-1, impacts related to noise generated by construction of the proposed project would be less than significant. Construction activities on the related projects in the area would generate noise levels similar to those of the proposed project. Construction noise is localized and rapidly attenuates within an urban environment. Most of the related projects outside the immediate site vicinity are located far from the project site; however, the seven-story hotel and restaurant development at 1040 North La Brea Avenue and the seven-story office and retail development at 1011 North Sycamore Street are adjacent to the project site. Similar to the proposed project, all adjacent cumulative development in West Hollywood or Los Angeles would comply with the construction hours outlined by Section 9.08.050(d) of the WHMC or Los Angeles Municipal Code (LAMC) Section 112.05.[2] Considering that the proposed projects on 1040 North La Brea Avenue and 1011 North Sycamore Street are smaller in size and near the proposed project, a conservative analysis was conducted by applying the construction noise level of the loudest phase of the proposed project to both off-site cumulative projects. The combined noise levels of all three projects would result in a cumulative noise level of 87 dBA L_{eq} at 50 feet, which would attenuate to 73 dBA L_{eq} at the nearest residences located 300 feet to the south of the site, which would be a 5 dBA L_{eq} increase over ambient (the closest recorded ambient noise level of 68 dBA Leq). Therefore, even in a scenario where all three projects would be under simultaneous construction, cumulative

[2] LAMC Section 112.05 limits noise from construction equipment located within 500 feet of a residential zone to maximum noise level of 75 dBA between 7:00 AM and 10:00 PM, as measured at a distance of 50 feet from the source, i.e., construction site.

construction noise would not exceed the ambient noise threshold of 68 dBA L_{eq} by more than 10 dBA, and would therefore not be considerable.

With respect to cumulative groundborne vibration, and in a scenario where the proposed project and adjacent development would be under simultaneous construction, the potential for construction groundborne vibration impacts (i.e., structural damage) would occur if multiple heavy equipment were to operate within relatively close distances to one another (e.g., within approximately 25 feet for a large bulldozer) and within a relatively close distance to the same off-site structure or wall. Although the proposed project would share site boundaries with 1040 North La Brea Avenue and 1011 North Sycamore Street, construction equipment used for each project would remain within the respective project site's boundaries and equipment pertaining to the construction of one project would not cross onto another project site. Therefore, even in a scenario where all projects would be under simultaneous construction, no two or more projects would operate construction equipment within 25 feet of the same off-site structure or wall. Cumulative groundborne vibration impacts would not be considerable.

Cumulative development would result in stationary (non-traffic) operational noise increases in the project vicinity; however, the project would comply with WHMC Section 9.08.050, which includes regulations that limit select noise-generating activities (e.g., amplified sound, mechanical devices, outdoor gatherings) typically associated with residential and commercial development. Similarly, the development on 1101 North Sycamore Street would be required to comply with LAMC Chapter XI, which includes provisions for regulating unnecessary and excessive noises. Furthermore, based on the project's long-term stationary noise discussed under Impact NOI-1, impacts from the proposed project's operational noise would be less than significant. Given the difference in height between the proposed project (i.e., 34 stories) and the seven-story hotel and restaurant development at 1040 North La Brea Avenue and the seven-story office and retail development to the east on 1011 North Sycamore Street (and because noise dissipates as it travels away from its source), cumulative noise impacts associated with on-site activities and other stationary sources would be limited to the immediate project site and vicinity. As such, the operational (non-traffic) noise associated with the nearest off-site proposed projects would not combine with the proposed project in a manner that would result in a cumulatively considerable operational noise impact.

Traffic noise impacts associated with cumulative development in the city would incrementally increase noise levels along roadways. A "Cumulative Baseline plus Project" scenario was analyzed to assess traffic noise impacts associated with cumulative development in addition to the "Existing plus Project" scenario analyzed under Impact NOI-1. As shown in Table 4.10-10 on the following page, under a "Cumulative Baseline plus Project" scenario (which considers the adjacent seven-story office and retail development proposed at 1011 North Sycamore and the seven-story hotel and restaurant development at 1040 North La Brea Avenue), the traffic noise increase is 0.3 dBA L_{eq} on North La Brea Avenue between Santa Monica Boulevard and Romaine Street, and 2.5 dBA L_{eq} on Romaine Street east of North La Brea Avenue.

Table 4.10-10 Traffic Noise Increases (dBA L_{eq}) – Cumulative Scenario

Roadway/Segment	Existing ADT	Existing + Project ADT	Increase (dBA L_{eq})	Cumulative Baseline[1] + Project ADT	Increase (dBA L_{eq})
North La Brea Avenue between Santa Monica Boulevard and Romaine Street	20,010	20,840	0.2	21,280	0.3
Romaine Street east of North La Brea Avenue	3,320	4,670	1.5	5,870	2.5

ADT = average daily trips
[1] Cumulative Baseline ADT = Existing ADT + Adjacent Projects ADT (i.e., estimated ADT for 1011 North Sycamore Avenue and 1040 North La Brea Avenue)

Therefore, cumulative development, including the project, would not result in a traffic noise increase exceeding 3 dBA at any roadway segment near the project site. Cumulative traffic noise impacts would not be considerable.

4.11 Public Services

This section describes the existing environmental and regulatory setting pertaining to public services, which include fire and police protection services, and addresses the potential impacts upon these public services that would result from implementation of the proposed project.

The Initial Study (see Appendix B) concluded that the project would result in less than significant impacts related to schools, parks, or other public facilities, and therefore this section only evaluates project impacts related to the need for new or physically altered fire and police protection facilities.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

4.11.1 Setting

Fire Protection Services

Fire protection and emergency medical services are provided by the Los Angeles County Fire Department (LACFD) for the City of West Hollywood. The city is specifically located within LACFD's Battalion 1 service area, which provides fire, emergency medical, urban search and rescue, hazardous materials prevention and response, air operations, and other emergency response resources. The LACFD operates six fire stations within the Battalion 1 area, with two fire stations, Station 7 and Station 8, located within West Hollywood. Station 7 is located at 864 North San Vicente Boulevard, approximately 2.4 miles west from the project site, and serves as the Battalion 1 headquarters. Station 8 is located at 7643 Santa Monica Boulevard, approximately 0.75 mile west from the project site (LACFD 2024). The two stations within the city are staffed by 19 firefighters and a battalion chief who work 24-hour shifts. There are three shifts with a total staffing of 60 personnel (West Hollywood 2011). Station 7 is staffed with a paramedic engine company and a paramedic squad. Station 8 is staffed with an engine company, a paramedic squad, and a quint (Los Angeles County Fire Museum 2019). LACFD is also responsible for inspection/plan check services and for providing public education outreach and response training to schools, residents, seniors, and staff.

Police Protection Services

The Los Angeles County Sheriff's Department (LACSD) provides police protection services for the City of West Hollywood. Protection services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The LACSD has established the West Hollywood Sheriff's Station located at 780 North San Vicente Boulevard approximately 2.3 miles west from the project site. The West

Hollywood Sheriff's Station performs various law enforcement activities, including community policing, traffic enforcement, entertainment district management, special event management, investigative functions, and various administrative duties. According to the West Hollywood General Plan 2035 (General Plan) Final EIR, the city has a ratio of 3.6 sworn officers per 1,000 residents, which exceeds the average for cities in the western United States of 1.7 officers per 1,000 residents. The West Hollywood Sheriff's Station's citywide response time to emergency calls for service is 3.4 minutes and 6.6 minutes for priority calls for service. For routine calls, the station's goal is to respond to calls within 20 minutes. As such, the response times are within established norms for emergency and priority calls, according to the General Plan Final EIR (West Hollywood 2010).

4.11.2 Regulatory Setting

Regulations exist at federal, State, and local levels that guide the development and enforcement of codes to adequately provide public services to city residents and businesses, including, but not limited to, the following:

Federal Regulations

Uniform Fire Code

The Uniform Fire Code (UFC) contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the UFC include fire department access, fire hydrants, automatic storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire safety requirements for new and existing buildings and the surrounding premises. The UFC is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. These measures may include construction standards, separations from property lines, and specialized equipment.

State Regulations

California Fire Code

The 2022 California Fire Code (Title 24, Part 9 of the California Code of Regulations; CFC) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The CFC establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the CFC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The CFC includes regulations regarding fire resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

California Health and Safety Code

State fire regulations are also set forth in Section 13000 et seq. of the California Health and Safety Code, including regulations for building standards (i.e., the California Building Code [CBC]), and fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The City enforces

those portions of the California Health and Safety Code which it has adopted into its West Hollywood Municipal Code (WHMC).

Local Regulations

West Hollywood General Plan 2035

The Safety and Noise Chapter of the City's General Plan addresses fire and police protection services in the context of the city. Goals and policies of the General Plan Safety and Noise Chapter that relate to fire and police protection services and apply to the project include the following (West Hollywood 2011):

Goal SN-6: Maintain adequate levels of law enforcement, fire protection, and emergency medical services.

> **Policy SN-6.1:** Provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.

Goal SN-7: Utilize law enforcement, fire protection, and emergency medical services in a proactive way and preventative way.

> **Policy SN-7.1:** As appropriate, utilize urban design features to enhance public safety, to facilitate "eyes on the street" and to create defensible space in project design. As appropriate, utilize best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape to achieve improved public safety in project design.
>
> **Policy SN-7.5:** As feasible, require new development to incorporate appropriate safety monitoring features.

West Hollywood Municipal Code

As identified in Section 14.04.010 of the WHMC, the Fire Code of the City of West Hollywood (Fire Code) constitutes an amended Title 32, Fire Code, of the Los Angeles County Code, an amended CFC (2022), and an amended International Fire Code (2021). The City's Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. Notably, Chapter 14 of the WHMC includes regulations for high-rise buildings, such as training requirements for all building staff personnel related to the usage of portable extinguishers, high-rise fire survival, and earthquake preparedness. In addition, according to Section 13.04.010, the Building Code of the City of West Hollywood (as with their Fire Code) constitutes an amended Title 26, Building Code, of the Los Angeles County Code, and an amended CBC (2022). As such, the City's Building Code contains regulations for the appropriate and safe design, construction, and modification of buildings and other structures in tandem with the City's Fire Code.

Chapter 9 of the WHMC includes the City's regulations for maintaining public peace and safety in the city, including noise regulations (further discussed in Section 4.10, *Noise*), public conduct regulations, graffiti prevention, and other general nuisances.

4.11.3 Impact Analysis

Methodology

Impacts to fire and police protection services are assessed based on whether the revised project would generate the need for new or physically altered fire and police protection facilities to maintain acceptable performance objectives, the construction of which would potentially result in significant impacts. This analysis evaluates the project's future growth and demand upon existing fire and police protection services.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, the effects of the proposed project on public services are significant if the proposed project would:

1) Result in substantial adverse physical impacts associated with the provision of physically altered governmental facilities, or the 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:
    a. Fire Protection
    b. Police protection
    c. Schools
    d. Parks
    e. Other public facilities

The Initial Study (see Appendix B) concluded that the project would result in less than significant impacts related to checklist items (1.c) through (1.e) as the project would not result in a substantial increase in the city's population (including student population) requiring the need for new or physically altered schools, parks, or other public facilities. Impacts related to public facilities that facilitate stormwater conveyance and treatment are discussed further in Section 4.14, *Utilities and Service Systems*. Therefore, this section focuses on checklist items (1.a) and (1.b) and evaluates whether the project would generate the need for new or physically altered fire and police protection facilities.

Project Impacts and Mitigation Measures

Threshold 1.a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 THE PROPOSED PROJECT WOULD INCREMENTALLY INCREASE DEMANDS ON FIRE PROTECTION SERVICES; HOWEVER, DESPITE THE GROWTH ASSOCIATED WITH THE PROJECT, IT WOULD NOT CREATE THE NEED FOR NEW OR EXPANDED FIRE PROTECTION FACILITIES TO MAINTAIN THE LACFD'S PERFORMANCE OBJECTIVES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project involves the demolition of on-site buildings and structures for the construction and operation of a new 34-story, mixed-use residential and commercial building with 514 apartment

units and 30,000 sf of ground-floor commercial/retail use. The project site is in an already-developed urban area characterized by a mix of commercial and industrial uses that are currently serviced by the LACFD. The increased on-site building density and associated population would increase the frequency of emergency response calls and create a greater demand for fire protection services. However, the project would comply with all applicable code and ordinance requirements for construction, emergency access, water mains, fire flows, turning radii, automatic sprinkler systems, fire alarms, and fire suppression training. The project would also be subject to plan check review and approval by LACFD prior to building permit and certificate of occupancy. In their response to the Notice of Preparation (Appendix A), the LACFD indicated preliminary fire safety requirements for the project:

- **Fire Access.** Every building constructed shall be accessible to LACFD apparatus by way of access roadways, with an all-weather surface of not less than 28 feet in width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. The roadway shall provide approved signs and/or stripping stating "No Parking – Fire Lane" and shall be maintained in accordance with the Fire Code of the Los Angeles County Code.
- **Fire Hydrants and Fire Flow.** The fire hydrant spacing shall be 300 feet meeting fire flow requirements to be determined by LACFD upon formal plan check submittal.

The project would also be subject to the payment of development fees, which would offset the costs of increased personnel or equipment for LACFD to maintain acceptable service ratios, response times, and other performance objectives. Therefore, with compliance with all applicable fire, safety and building codes, and the payment of applicable development fees, the proposed project would not significantly impact fire protection services and would not result in the need for the construction of new or expanded fire protection facilities. Impacts related to the provision of new or physically altered fire protection facilities would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 1.b: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 THE PROPOSED PROJECT WOULD INCREMENTALLY INCREASE DEMANDS ON POLICE PROTECTION SERVICES; HOWEVER, DESPITE THE GROWTH ASSOCIATED WITH THE PROJECT, IT WOULD NOT CREATE THE NEED FOR NEW OR EXPANDED FIRE PROTECTION FACILITIES TO MAINTAIN THE LACSD'S PERFORMANCE OBJECTIVES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As with fire protection services, the increased on-site building density and associated population would increase the frequency of emergency and non-emergency calls and create a greater demand for police protection services currently provided by the LACSD. However, the project has been designed to improve public safety for future residents and visiting guests. Compared to existing conditions, the project would provide 30,000 sf of commercial/retail use on the ground floor with visually accentuating access areas that would provide shopping and employment opportunities,

attract more foot traffic, and thereby increase public safety. Moreover, the project would include exterior lighting on the building, in the entry plaza, and in outdoor common areas for both safety and wayfinding purposes per WHMC Section 19.20.100. The project would also be subject to other WHMC regulations related to public peace and safety in the city identified in Title 9 of the WHMC, including WHMC Chapter 9.04 governing general public conduct and offenses, WHMC Chapter 9.08 outlining the City's noise ordinance, WHMC Chapter 9.20 for graffiti prevention and removal, and other general nuisances.

As discussed under *Setting* of this section, the LACSD has a sworn personnel-to-population ratio of 3.6 sworn personnel to 1,000 population. This ratio is considered adequate, according to the City's 2010 General Plan EIR. As further described therein, the average full-time law enforcement officer-to-population ratio for cities in the western United States is 1.7 officers per 1,000 population. For cities with populations of 25,000 to 49,999 people, which is comparable to West Hollywood with an existing population of 34,793, the ratio is 1.4. As such, the city exceeds these average ratios and the project population of 756 residents would not have a significant effect on police protection services provided by LACSD (West Hollywood 2010).[1]

The payment of applicable development fees would also offset the costs of increased personnel or equipment for LACSD to maintain acceptable service ratios, response times, and other performance objectives. Therefore, with compliance with all applicable regulations, and the payment of applicable development fees, the proposed project would not significantly impact police protection services and would not result in the need for the construction of new or expanded police protection facilities. Impacts related to the provision of new or physically altered police protection facilities would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.11.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*, and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east).

Cumulative development would incrementally increase the demand for fire protection services and police protection services provided by the LACFD and LACSD, respectively. However, the cumulative demand for fire protection services would be addressed by compliance with LACFD fire inspections and development standards as well as general regulations from the CFC, CBC, and WHMC that are applicable to all development. For instance, compliance with these fire and emergency requirements would help prevent and/or assist response to fire emergencies (e.g., automatic sprinkler systems, fire alarms, fire suppression training) and would help facilitate effective emergency response (e.g., adequate fire flow, turning radii, emergency access). Furthermore, new development would be built in accordance with modern and more stringent standards for fire protection when compared to the buildings and structures they would replace, reducing the likelihood for contributing to an urban fire hazard. With respect to police protection services, all

[1] Based on the average household side for West Hollywood of 1.47 persons, the 514 proposed apartment units would generate a population of 756 persons (California Department of Finance 2023).

new development projects would be subject to the WHMC regulations related to public peace and safety in the city, including noise regulations, public conduct regulations, graffiti prevention, and other general nuisances. As with the proposed project, it is anticipated that all development in the city would incorporate design features, such as adequate exterior lighting or incorporation of security personnel, that would promote on-site safety and reduce each project's incremental effect on police protection services. Moreover, both the LACFD and LACSD evaluate their service needs and resources annually, including as part of their budgeting processes, to continue to meet service demands. Nonetheless, all new development projects in the City of West Hollywood would be subject to the payment of a development fees on a case-by-case basis that would help offset costs of increased fire and police service needs and aid the maintenance of their respective performance objectives. In the case of the proposed office and retail building development abutting the project site to the east located in City of Los Angeles (i.e., 1011 North Sycamore Street), this project would be subject to Los Angeles' development standards and separately evaluated by the Los Angeles Fire Department and Los Angeles Police Department. Therefore, through compliance with existing State and local regulations, required payment of development fees, and the nature of modern building standards, cumulative impacts to public services would be less than significant. Other cumulative impacts related to public facilities related to infrastructure (e.g., stormwater conveyance and treatment) are discussed further in Section 4.14, *Utilities and Service Systems*.

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4.12 Transportation/Circulation

This section analyzes the project's potential impacts related to transportation and circulation based on a Transportation Impact Study prepared by Fehr & Peers for the project, which is included as Appendix J to this EIR:

- *Fehr & Peers, CEQA Transportation Impact Study for 1000 N La Brea Avenue, January 7, 2025*

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

4.12.1 Setting

Existing Street System

Primary regional access to the project site is provided by Santa Monica Boulevard, which runs east-west; North La Brea Avenue, which runs north-south; U.S. Route 101 (US-101), which generally runs northwest-southeast approximately 1.5 miles northeast of the project site; and Interstate 10 (I-10), which runs east-west approximately 3.7 miles south of the project site. Local access to the project site is provided by Willoughby Avenue, Romaine Street, Formosa Avenue, and North Sycamore Avenue. Roadways that serve the project site include (Fehr & Peers 2024a):

- **Formosa Avenue:** Formosa Avenue is a north-south local street to the west of the project site. It provides one travel lane in each direction, along with turning lanes at some major intersections. Parking is generally allowed on both sides of the street. The prima facie speed limit is 25 miles per hour (mph).
- **Melrose Avenue:** Melrose Avenue is an east-west arterial street south of the project site. It provides two travel lanes in each direction, along with turning lanes at major intersections. Parking is generally allowed on both sides of the street. The posted speed limit is 35 mph.
- **North Highland Avenue:** North Highland Avenue is a north-south arterial street south of the project site. It provides two travel lanes in each direction, along with turning lanes at major intersections. Parking is generally allowed on both sides of the street. The posted speed limit is 35 mph.
- **North La Brea Avenue:** North La Brea Avenue is a north-south arterial that borders the west side of the project site. It provides two lanes in each direction during peak hours, along with turning lanes at major intersections. Parking is generally allowed on both sides of the street during non-peak hours. During peak hours, the on-street parking lane is used as a shared bus/bicycle lane. The posted speed limit is 35 mph.

- **North Sycamore Avenue:** North Sycamore Avenue is a north-south local street east of the project site. It provides one travel lane in each direction. On-street parking is generally allowed on both sides of the street. The prima facie speed limit is 25 mph.
- **Romaine Street:** Romaine Street is an east-west local street that borders the south side of the project site. It provides one travel lane in each direction, along with turning lanes at some major intersections. On-street parking varies but is generally allowed on both sides of the street. The posted speed limit is 25 mph.
- **Santa Monica Boulevard:** Santa Monica Boulevard is an east-west arterial north of the project site. It provides two lanes in each direction, along with turning lanes at major intersections. Parking is generally allowed on both sides of the street. The prima facie speed limit is 30 mph.
- **Sunset Boulevard:** Sunset Boulevard is an east-west arterial north of the project site. It provides two lanes in each direction, along with turning lanes at major intersections. Parking is generally allowed on both sides of the street. The posted speed limit is 30 mph.
- **Willoughby Avenue:** Willoughby Avenue is an east-west local street south of the project site. It provides one travel lane in each direction. Parking is generally allowed on both sides of the street. The prima facie speed limit is 25 mph.

Existing Transit Service

The Los Angeles County Metropolitan Transportation Authority (Metro), City of West Hollywood (CityLine and The PickUp), and the Antelope Valley Transit Authority (AVTA) provide the existing public transit services in the vicinity of the project site. Several bus routes serve the surrounding area, including municipal bus lines, Metro local service to and from downtown Los Angeles, east-west local services to other areas, north-south local services to other areas, and limited commuter service in peak hours. The transit routes serving the project site area include:

Metro Route 4

Metro Route 4 is generally a local east-west bus service route that travels from Santa Monica to downtown Los Angeles via Santa Monica Boulevard and Sunset Boulevard. Route 4 travels along Santa Monica Boulevard in the study area. In the peak a.m. hour, the bus operates with average seven-and-a-half minute headways in the eastbound direction and eight-minute headways in the westbound direction. In the peak p.m. hour, the bus operates with average seven-and-a-half-minute headways in the eastbound and westbound directions (Fehr & Peers 2024a).

Metro Route 212

Metro Route 212 is a local north-south bus service route that travels from Hawthorne to Hollywood via North La Brea Avenue and South Prairie Avenue. Route 212 travels along North La Brea Avenue through the project study area. In the peak a.m. hour, the bus operates with average 10-minute headways in the northbound and southbound directions. In the peak p.m. hour, the bus operates with average 10-minute headways in the northbound and southbound directions.

West Hollywood CityLine and The PickUp

CITYLINE LOCAL ROUTES

The West Hollywood CityLine Local is comprised of the Blue Route, which travels westbound from West Hollywood to Cedars-Sinai Medical Center, and the Orange Route, which travels eastbound

from Cedars-Sinai Medical Center to eastern West Hollywood. Both routes travel along Santa Monica Boulevard through the project site area. The closest Blue Route stop to the project site is located at the Santa Monica Boulevard and North La Brea Avenue intersection and the closest Orange Route stop is located at the Santa Monica Boulevard and Formosa Avenue intersection. The Blue and Orange Routes operate at 30-munute headways during the day and run from 9:00 a.m. to 5:00 p.m. Monday through Saturday.

CITYLINE COMMUTER ROUTE

The West Hollywood CityLine Commuter Route provides service between the City of West Hollywood and the Hollywood and Highland Metro B Line Station (formerly known as the Red Line). The CityLine Commuter Route runs along Santa Monica Boulevard through the project site area. The closest Commuter Route Stop is located at the Santa Monica Boulevard and North La Brea Avenue intersection. The Commuter Route operates at 15- to 20-minute headways from 7:00 a.m. to 9:00 a.m. Monday through Friday and 5:00 p.m. to 8:00 p.m. Monday through Saturday.

THE PICKUP

The West Hollywood PickUp provides services within the City of West Hollywood between Robertson Boulevard and North La Brea Avenue traveling primarily along Santa Monica Boulevard. The PickUp runs along Santa Monica Boulevard through the project site area. The closest PickUp stop to the project site is located at the Santa Monica Boulevard and North La Brea Avenue intersection. The PickUp runs at 15-minute headways from 8:00 p.m. to 3:00 a.m. on Friday and Saturday and 2:00 p.m. to 10:00 p.m. on Sunday.

Antelope Valley Transit Authority

AVTA BUS ROUTE 786

The AVTA Bus Route 786 is a north-south commuter bus route that runs from the City of Lancaster to western Los Angeles. Bus Route 786 travels on Santa Monica Boulevard through the project site area. The closest Bus Route 786 stop to the project site is at the Santa Monica Boulevard and North La Brea Avenue intersection. Bus route 786 runs four times in the morning and four times in the afternoon/evening Monday through Friday.

Existing Pedestrian and Bicycle Facilities

The project site area generally has a mature network of pedestrian and bicycle facilities including sidewalks, pedestrian safety features, Class III shared bicycle/bus lanes on North La Brea Avenue, and Class III bicycle lanes on Santa Monica Boulevard and Willoughby Avenue. Notably, the shared bicycle/bus lane on North La Brea Avenue does not operate as a bicycle facility outside of peak travel hours.

4.12.2 Regulatory Setting

State Regulations

Senate Bill 743

On September 17, 2013, Governor Brown signed Senate Bill (SB) 743 which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the CEQA process for

several categories of development projects including the development of infill projects in transit priority areas and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions. SB 743 adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Public Resources Code Section 21099). Section 21099(d)(1) provides that aesthetic 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. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation be developed for use instead of level of service (LOS) in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experienced at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a road or the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. SB 743 directed the California Governor's Office of Planning and Research (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents promoting the State's goals of reducing GHG emissions and traffic-related air pollution, promoting the development of multimodal transportation systems, and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis would shift from vehicle delay to vehicle miles traveled (VMT) within transit-priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised *CEQA Guidelines* in November 2017, recommending the use of VMT for analyzing transportation impacts for all projects. In addition, OPR released updates to Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance… recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (*CEQA Guidelines* Section 15064.7[c]).

In December 2018, the *CEQA Guidelines* were updated to add new Section 15064.3, Determining the Significance of Transportation Impacts, which describes specific considerations for evaluating a project's transportation impacts using the VMT methodology.

The OPR's regulatory text indicated that a public agency may immediately commence implementation of the new transportation impact guidelines, and that the guidelines must be implemented statewide by July 1, 2020.

Local Regulations

Southern California Association of Governments

On April 4, 2024, the Southern California Association of Governments (SCAG) Regional Council formally adopted the 2024-2050 RTP/SCS, also known as Connect SoCal 2024. The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2020-2045 RTP/SCS and presents the land use and transportation vision for the region (i.e., the counties of Imperial, Los Angeles, Orange, Riverside, San Bernadino, and Ventura) through the year 2050, providing a long-

term investment framework for addressing the region's challenges. The 2024-2050 RTP/SCS includes plan elements organized within the pillars of Mobility, Communities, Environment and Economy. The SCS implementation strategies include advancing the transition to clean transportation technologies, efficient, multimodal, and accessible transit networks, compact and mixed-use development patterns prioritizing walkability, urban greening, and transit-oriented development (SCAG 2024).

The City of West Hollywood participated extensively in the development of the 2024-2050 RTP/SCS by sharing best available data to be used for the modeling of demographic projections for households, population and employment. Priorities of the 2024-2050 RTP/SCS include increasing investment in transit and investing in transportation strategies and projects that will result in improved air quality, public health, and reduced GHG emissions. Implementation of the 2024-2050 RTP/SCS is expected to improve environmental sustainability and public health in West Hollywood (West Hollywood 2024b).

West Hollywood General Plan 2035

The Mobility Chapter of the City of West Hollywood General Plan sets forth strategies for many different components of the multi-modal transportation system, such as enhancements to the pedestrian and bicycle network, improvements to public transit, land use strategies to improve transit use, and transportation demand management measures. Together, these strategies were intended to discourage the use of single occupancy vehicles on city streets while creating a more efficient and healthy transportation system. Although many of the policies in the Mobility Chapter primarily involve City-wide actions or coordination on regional transportation solutions and collaboration with transit agencies, the following policies would be applicable to new development in the city, including the proposed project (West Hollywood 2011):

Goal M-3: Maintain and enhance a pedestrian-oriented City.

Policy M-3.2: Seek to prioritize space for pedestrians and bicycles in the design and improvement of public right-of-way.

Policy M-3.4: Where feasible, provide the following pedestrian amenities throughout the street network, consistent with the desired urban form and land use in this General Plan:

- Wider Sidewalks
- Street trees and landscaping
- Bulb-outs
- Seating areas
- Pedestrian-oriented lighting

Policy M-3.7: Limit the quantity and width of new curb cuts for vehicular access in order to improve the pedestrian network.

Policy M-3.8: Seek to minimize the negative impacts of parking for the pedestrian realm and accommodate bicycles, carpool and carshare vehicles, and other modes of transit wherever possible in the design of public parking.

Policy M-3.9: Require new commercial development to provide for the construction of pedestrian rights-of-way to allow convenient and unimpeded circulation to, though, and within the property being developed.

Goal M-4: Create a comprehensive bicycle network throughout the City.

Policy M-4.3: Where feasible, install bicycle amenities including parking, storage, dedicated bicycle lanes, and bicycle wayfinding/signage along planned bicycle routes, throughout commercial areas, and at public facilities.

Policy M-4.4: Explore the development of bicycle stations throughout the City and at major transit stops.

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

Policy M-5.5: Secure street dedication for pedestrian and bicycle facilities and/or street improvements

City of West Hollywood 2017 Pedestrian and Bicycle Mobility Plan

On May 1, 2017, the City of West Hollywood adopted the 2017 Pedestrian and Bicycle Mobility Plan (Mobility Plan), which is an update to the previous Plan adopted in 2003. The Mobility Plan provides a vision and set of prioritized strategies and tools to enhance the City's streets to be more comfortable, safe, and inviting to pedestrians and bicyclists of all ages and abilities. The Mobility Plan offers a balanced strategy for providing transportation alternatives (walking, bicycling, transit riding, driving, etc.) in the public realm, by using a "Complete Network Approach." The goal of the Mobility Plan is to enhance the City's street network to be comfortable, safe, and inviting to pedestrians and bicyclists of all ages and abilities (West Hollywood 2017).

4.12.3 Impact Analysis

Methodology

The CEQA Transportation Impact Study prepared by Fehr & Peers evaluated the proposed project against the criteria identified in the West Hollywood Transportation Impact Study Guidelines (TIS Guidelines), which includes guidance on VMT impact analyses consistent with that published in OPR's Technical Advisory. Per OPR's guidelines, development projects in West Hollywood that meet the following set of criteria are presumed to have a less-than-significant transportation impact, due to the proximity of high-quality transit corridors throughout the city (West Hollywood 2021; Fehr & Peers 2024b):

- Project has a Floor Area Ratio (FAR) equal to or greater than 0.75.
- Project does not have more than the required number of parking spaces, as specified by the West Hollywood Municipal Code (WHMC).
- Project is consistent with the SCAG RTP/SCS.
- Project does not replace affordable residential units with fewer affordable residential units, moderate-income residential units, or high-income residential units (i.e., must maintain the same number of existing affordable units or provide more).
- Project does not have potential for significant regional draw (commercial uses that may require specialized workforce, i.e., movie production studios).

Furthermore, under CEQA, a project does not conflict with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project

does not need to be in perfect conformity with each policy, rather any conflict with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect, and if the conflict itself would result in a direct physical impact on the environment. In alignment with the *CEQA Guidelines* and TIS Guidelines, the CEQA Transportation Impact Study evaluated the project in comparison to the following City and regional documents in addition to the WHMC (Fehr & Peers 2024b):

- City of West Hollywood General Plan 2035 Mobility Chapter (2011)
- City of West Hollywood Pedestrian & Bicycle Mobility Plan (2017)
- City of West Hollywood Eastside Community Priorities Plan (2017)
- City of West Hollywood Smart City Strategic Plan (2018)
- City of West Hollywood Climate Action and Adaptation Plan (2021)
- SCAG's Regional Comprehensive Plan (2008)
- SCAG's 2024-2050 RTP/SCS (2024)
- AVTA Comprehensive Long-Range Transit Plan (2010)
- Metro Long Range Transportation Plan (2020)

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have significant impacts related to transportation/circulation if the project would:

1) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2) Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b).
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4) Result in inadequate emergency access.

Project Impacts and Mitigation Measures

Threshold 1:	Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH ANY PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, OR BICYCLE AND PEDESTRIAN FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in the following analysis, and determined by the CEQA Transportation Impact Study, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities. Consistency with the City's adopted policies for roadway facilities (i.e., automobile traffic) is addressed in the VMT analysis under Impact TRA-2.

Existing and Planned Transit, Bicycle, and Pedestrian Facilities

EXISTING TRANSIT SERVICE

Metro Route 212 is the only transit route running directly past the project site. This bus route provides service along La Brea Avenue and stops on the east side of North La Brea Avenue just south of Santa Monica Boulevard; there are no bus stops along the project frontage. The curbside parking lane in each direction on La Brea Avenue turns into bus/bicycle priority and right-turn-only lane on weekdays between 7:00 a.m. and 10:00 a.m. and between 3:00 p.m. and 7:00 p.m. from Olympic Boulevard to Coliseum Street. Metro Route 4, AVTA Bus Route 786, and City-operated transit services (i.e., CityLine Local, CityLine Commuter, and The PickUp) also stop within 0.25 mile of the project site.

Based on the project applicant's coordination with the City's Department of Public Works, all roadway pavement from the centerline to the northerly gutter along the project frontage on Romaine Street would be replaced as part of project construction. Furthermore, all roadway pavement from the first northbound lane line to the easterly curb along the project frontage on North La Brea Avenue would also be replaced. Furthermore, all roadway pavement within the intersection would be replaced up to the intersection of the former two projection lines. Due to these improvements, roadway closures of the first northbound lane along North La Brea Avenue and the lane north of the centerline along Romaine Street are anticipated. However, such closures would be temporary and there are currently no bus stops along the project frontage that would be affected by project construction. Furthermore, as stated in Section 2, *Project Description*, the project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage.

There are currently three driveways associated with the former CEMEX concrete batch plant and another two driveways associated with the vacant warehouse building for a total of five existing driveways along North La Brea Avenue. The project would reduce the number of driveways on North La Brea Avenue from five driveways to only one located at the northwest corner of the site. This driveway would provide access to two subterranean levels of primarily non-residential parking. This driveway would be 20 feet wide and restricted to right-in/right-out due to its location relative to the median on North La Brea Avenue. All driveways no longer used would be closed to match the full height of the new curb and gutters. Since the project would reduce the number of driveways along North La Brea Avenue, implementation of the project would not impact transit circulation on North La Brea Avenue or Santa Monica Boulevard (Fehr & Peers 2024b).

There are no driveways at the project site along Romaine Street; however, the project proposes installing two new adjacent driveways along Romaine Street at the southeast corner of the site. The east driveway on Romaine Street would be 20 feet wide and provide access to five levels of aboveground residential parking, which would be separated from the subterranean parking levels. The west driveway on Romaine Street would be 20 feet wide and provide access to respective on-site residential and commercial loading areas. Transit services do not currently operate along Romaine Street between North La Brea Avenue and Sycamore Avenue; therefore, the project would not impact transit circulation along Romaine Street (Fehr & Peers 2024b).

PLANNED TRANSIT SERVICE

A review of available documents, including the City of West Hollywood's website, AVTA's Comprehensive Long-Range Transit Plan, and Metro's Long Range Transportation Plan, found a proposed Metro rail extension that would extend the K Line (formerly known as the Crenshaw/LAX Line) north through West Hollywood and connect to the B Line at the Hollywood and Highland Station (AVTA 2010; Metro 2020). The closest proposed K Line Station would be located at Santa Monica Boulevard and North La Brea Avenue, less than 0.25 mile from the project site.

Several other City plans also reference future transit improvements. The City's Eastside Community Priorities Plan includes a recommendation to promote first/last mile connections to transit centers through investments in bicycle and other infrastructure, whereas the City's Smart City Strategic Plan recommends exploring an on-demand transit pilot (West Hollywood 2017, 2018). The project would not interfere with any of these planned transit services or facilities (Fehr & Peers 2024b).

EXISTING BICYCLE NETWORK

The nearest bicycle facilities to the project site are the bus/bicycle priority lanes on North La Brea Avenue that run in each direction and permit parking during non-peak hours, and a signed bicycle route along Santa Monica Boulevard to the north of the project site between Flores Street and Sycamore Avenue. There are no existing bicycle facilities along Romaine Street at the project site. As discussed under *Existing Transit Service* in this analysis, project construction would include replacement of all roadway pavement from the first lane line to the easterly curb along the project frontage on North La Brea Avenue. Due to these improvements, roadway closure of the first lane along North La Brea Avenue is anticipated; however, such closures would be temporary and bicyclists would have the option to circumvent construction work using the remaining roadway network. Furthermore, as stated in Section 2, *Project Description*, the project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage.

Class III bicycle routes are also provided on Fountain Avenue and Willougby Avenue. The facility on Fountain Avenue starts west of the project site at Sweetzer Avenue while the facility on Willoughby Avenue starts on Hayworth Avenue. Both facilities run east to North La Brea Avenue and extend beyond the West Hollywood boundary into the City of Los Angeles. Implementation of the project would not affect any of these existing bicycle network facilities (Fehr & Peers 2024b).

PLANNED BICYCLE NETWORK

The City's Pedestrian & Bicycle Mobility Plan includes plans for a future shared bus/bicycle lane along North La Brea Avenue between Willoughby Avenue and Fountain Avenue, which has already been implemented as discussed under *Existing Bicycle Network* of this analysis (West Hollywood 2017).

Beyond this, there are no additional bicycle network facilities planned adjacent to the project site that would be impacted by implementation of the project (Fehr & Peers 2024b).

EXISTING PEDESTRIAN NETWORK

Pedestrian sidewalks are provided at the project frontage along North La Brea Avenue and Romaine Street. As part of project construction, the project would replace the curb, curb ramps, gutters, and sidewalks adjacent to the project site frontages on North La Brea Avenue and Romaine Street. Due to these improvements, sidewalk closures along the adjacent portions of North La Brea Avenue and Romaine Street are anticipated; however, such closures would be temporary and pedestrians would have alternative options to circumvent construction work (i.e., sidewalks along the western side of North La Brea Avenue and the southern side of Romaine Street). At operation, the pedestrian network would be maintained along the project frontages. Based on project plans, the project would also reduce the total number of driveways along the project frontage on North La Brea Avenue from three to one, reducing the possible points of vehicle/pedestrian conflicts. All driveways no longer used would be closed to match the full height of the new curb and gutters. The project also proposes adding two driveways along Romaine Street. The driveways along North La Brea Avenue and Romaine Street would conform with City of West Hollywood design standards and would provide adequate sight distance for vehicles to see pedestrians. Furthermore, the proposed textured median between the east and west driveways along Romaine Street in the site plan would be at grade with the driveway, so it would not create a barrier along the sidewalk on Romaine Street and would not result in a disruption to existing pedestrian facilities (Fehr & Peers 2024b). Furthermore, as stated in Section 2, *Project Description*, the project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. Therefore, implementation of the project would not impact existing pedestrian network facilities.

PLANNED PEDESTRIAN NETWORK

The City's Pedestrian & Bicycle Mobility Plan identifies network improvements at the intersection of Santa Monica Boulevard and North La Brea Avenue. The proposed improvements at this intersection include leading pedestrian intervals, automatic pedestrian signals, and bicycle signals. The project site is nearby but not directly adjacent to this intersection and would not interfere with these improvements being implemented. The WHMC also states that the minimum combined sidewalk and parkway widths shall be ten feet in all zoning districts (except as otherwise provided by the Sunset Specific Plan).[1] The existing sidewalk on the project frontage is approximately 10 feet wide on Romaine Street and 15 feet wide on North La Brea Avenue. The project does not propose to modify the current sidewalk width and, therefore, would not impact any planned pedestrian facilities (Fehr & Peers 2024b).

Adopted Programs, Plans, Ordinances, or Policies

The City's General Plan Mobility Chapter includes project-level policies supporting the development of alternative transit programs, a comprehensive bicycle network, and a pedestrian-oriented city, such as those related to Goal M-3 through M-5 listed under *Regulatory Setting* of this section. As discussed in Section 4.6, *Greenhouse Gas Emissions*, Sub-action TM-1F of Measure TM-1 of the City's Climate Action and Adaptation Plan encourages opportunities that improve surface bus transit and supportive seating and shading infrastructure. Expanding the transit network and increasing transit usage are also key goals of the following regional transportation plans and policies.

[1] The proposed project is not located in the Sunset Specific Plan area.

- The SCAG 2024-2050 RTP/SCS includes goals related to sustainable and equitable mobility. It recommends supporting mobility investments that result in improved air quality and that minimize greenhouse gas emissions and ensuring reliable, accessible, affordable, and appealing travel options are readily available (SCAG 2024).
- The SCAG Regional Comprehensive Plan includes an adopted policy supporting local jurisdiction programs that encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bicycle (SCAG 2008).

With respect to bicycle and pedestrian network facilities, the vision of the City's Pedestrian & Bicycle Mobility Plan is to "enhance the City's streets to be more comfortable, safe, and inviting to pedestrians and bicyclists of all ages and abilities." The Mobility Plan also includes objectives to eliminate barriers along pedestrian routes and enhance sidewalks and crossings, provide a convenient and connected walking network, and improve city streets and sidewalks to provide enjoyable community living spaces (West Hollywood 2017).

The proposed project would not disrupt existing transit service, interfere with planned transit facilities, and therefore would not conflict with adopted transit system programs, plans, ordinances, or policies. Moreover, because the project is providing 133 short-term bicycle parking spaces and 261 long-term bicycle parking spaces on-site (along with two showers and at least eight lockers for employee use), the project would meet WHMC bicycle parking requirements and would also not conflict with adopted bicycle network programs, plans, ordinances, or policies. As discussed under *Planned Pedestrian Network* of this analysis, the project would not conflict with the pedestrian-related WHMC standards. Moreover, the project supports improvements to the pedestrian environment by providing design elements such as ground level retail, street landscaping, and an outdoor entry plaza with an art feature. Therefore, the project would not conflict with adopted pedestrian network programs, plans, ordinances, or policies (Fehr & Peers 2024b).

Based on the preceding analysis, the project would not conflict with existing and planned transit, bicycle, and pedestrian facilities or programs, plans, ordinances, or policies governing these facilities and put in place to protect the environment. Impacts would be considered less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-2 THE PROPOSED PROJECT WOULD MEET CRITERIA OUTLINED IN *CEQA GUIDELINES* SECTION 15064.3, SUBDIVISION (B), AND IMPACTS RELATED TO VMT WOULD BE LESS THAN SIGNIFICANT.

As discussed under *Methodology* of this section, and per the TIS Guidelines, development projects in West Hollywood that meet a specific set of criteria are presumed to have a less-than-significant transportation impact, due to the proximity of high-quality transit corridors throughout the city (Fehr & Peers 2024b).[2] The TIS Guidelines indicate that all land use projects within West Hollywood would be within a half mile of a stop along an existing high-quality transit corridor, which is defined in California Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. The project is within a half

[2] Per *CEQA Guidelines* Section 15064.3(b)(1), projects within a half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

mile of Metro Line 4 and Metro Line 212 stops, both of which operate with service intervals of less than 15 minutes during peak commute hours. The remaining criteria, and a summary of how the project meets each criterion, are described as follows:

- Project has an FAR equal to or greater than 0.75.

  The project has a 9.85 FAR. Therefore, the project meets this criterion.

- Project does not have more than the required number of parking spaces, as specified by the WHMC.

  Based on WHMC requirements, the combined standard parking requirement across residential and non-residential land uses for the project would be 923 parking spaces (i.e., 68 non-residential plus 855 residential parking spaces). Because the project would provide a total of 674 parking spaces (i.e., 90 non-residential plus 584 residential parking spaces), it would not exceed the required number of parking spaces as specified by the WHMC. Therefore, the project meets the criterion.

- Project is consistent with the SCAG RTP/SCS.

  The SCAG 2024-2050 RTP/SCS is oriented toward four goals: build and maintain a robust transportation network; develop, connect, and sustain livable and thriving communities; create a healthy region for the people of today and tomorrow; and support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region. The project supports these goals by constructing new affordable and market-rate housing and local-serving retail within 0.25 mile of a high-quality transit corridor. The project supports SCAG's 2024-2050 RTP/SCS goal of creating human-centered communities through elements like ground level retail, street landscaping, and an outdoor entry plaza with an art feature. The project would not disrupt the existing transportation network, nor does it conflict with SCAG's mobility goals. Refer to Section 4.6, *Greenhouse Gas Emissions*, and Section 4.9, *Land Use and Planning*, for additional analysis regarding the project's consistency with the SCAG 2024-2050 RTP/SCS. The project meets this criterion.

- Project does not replace affordable residential units with fewer affordable residential units, moderate-income residential units, or high-income residential units (i.e., must maintain the same number of existing affordable units or provide more).

  The project would construct 128 affordable units. The site is currently used for retail and industrial uses, so the project would result in a net increase in affordable residential units on the site. Therefore, the project meets this criterion.

- Project does not have potential for significant regional draw (commercial uses that may require specialized workforce, i.e., movie production studios).

  The project proposes a mix of residential and commercial/retail uses. These land uses are similar to existing uses within the city, would not require a specialized workforce, and therefore would not have significant regional draw. Therefore, the project meets this criterion.

Per the TIS Guidelines, if a development project is in proximity to high-quality transit corridors and meets all impact criteria, it does not require more detailed VMT analysis. As shown in the preceding analysis, the project meets all impact criteria and impacts related to VMT would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 3:	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR INCOMPATIBLE USE. IMPACTS WOULD BE LESS THAN SIGNIFICANT

The project would not introduce new intersections to the project area and the project's geometric design features separate access to the site by travel mode. As discussed under Impact TRA-1, there are currently three driveways associated with the former CEMEX concrete batch plant along North La Brea Avenue, another two driveways associated with the vacant warehouse building along North La Brea Avenue, and no driveways at the project site along Romaine Street. The project would reduce the number of driveways on North La Brea Avenue from five driveways to only one located at the northwest corner of the site, reducing the possible points of vehicle/pedestrian conflicts along this roadway. The project would also implement two new adjacent driveways along Romaine Street at the southeast corner of the site, which has lower pedestrian volumes than North La Brea Avenue thereby reducing the likelihood of heavy-duty truck/pedestrian conflicts as well. Pedestrian entrances are separated from vehicular driveways as pedestrians would primarily access the project site through an entry plaza on the southwest corner of the project site. The pedestrian network would be maintained along the project frontage and the project would provide improved connections to the existing sidewalk network (Fehr & Peers 2024b).

The proposed project driveways were also evaluated in the CEQA Transportation Impact Study for sight distance compliance with WHMC Section 19.28.130(F) to determine if motorists have adequate visibility of pedestrians. The current site plans do not show raised obstruction within the visibility triangles along the Romain Street driveways. At the North La Brea Avenue driveway, there are two street trees shown within the visibility triangle; however, they are near the outer edge of the sidewalk and are not expected to block the view of passing pedestrians. Per the WHMC, the foliage of these trees would be trimmed to provide at least six feet of clear visibility from the sidewalk level. The project driveways would also not cross any existing bicycle facilities and would not require the removal or relocation of existing transit stops (Fehr & Peers 2024b).

The project's loading spaces along Romaine Street would also meet WHMC requirements. WHMC Section 19.28.160 states that non-residential loading spaces shall be at least ten feet in width and 20 feet in length. For retail land uses, the City requires one off-street loading space for every 20,000 sf or fraction thereof, which signifies the project is required to provide two off-street loading spaces for its non-residential land uses. The project currently proposes a 20-foot-wide commercial loading space that is greater than 20 feet in length, which meets the City's minimum requirements for non-residential loading spaces. The City also requires multi-family residential projects with more than 26 units to provide a minimum of 690 sf of off-street loading space with a minimum length of 19 feet. The project proposes an additional residential loading space that is approximately nine feet wide. This loading space would extend from the commercial loading space past the residential elevator entrance to the emergency electrical room. Because the non-residential loading space is shared between non-residential and residential uses, the proposed loading space would also meet the City's requirements identified in WHMC Section 19.28.160 for residential off-street service and delivery areas (Fehr & Peers 2024b).

Furthermore, the project's overall proposed land uses would be compatible with the site's land use designation and zoning and similar to the surrounding existing land uses in the City of West Hollywood. As discussed in Section 4.1, *Aesthetics*, and Section 4.9, *Land Use and Planning*, the site's Commercial, Regional Center (CR) land use designation and zoning are intended to create low-to high-intensity retail and mixed-use structures that provide diverse housing types and shopping and employment opportunities. By comparison, the proposed project is a high-density, infill development project involving the construction of a 34-story mixed-use residential and commercial building with up to seven billboards proposed to be a combination of static and/or full motion video with varied dimensions. Although the project would increase the massing and intensity of development on the project site compared to existing conditions, the building would be consistent with the site's land use designation and designed to look like a vertical L-shaped building with wall recesses.

Light and glare sources associated with the proposed building would also be similar to the surrounding development the project would comply with the policies and regulations in the City's General Plan and Zoning Ordinance related to signage, lighting, and illumination. Digital billboards associated with the proposed project have the potential to distract drivers. However, as discussed in the CEQA Transportation Impact Study, most research has not found compelling evidence in either direction on the question of whether digital signage worsens driver distraction or increases risk of collisions in urban environments, although relatively few studies have been carried out in a context comparable to the project site.[3] The Federal Highway Administration (FHWA) conducted an evaluation of driver distraction along freeways, highways and arterials with respect to digital (including video) or electronic billboards,[4] which demonstrated no significant differences in the amount of time drivers spent looking at digital versus standard billboards, except under nighttime, low visual complexity conditions, where the digital displays are high contrast with the surrounding environment. The roadway conditions along the Project site would be considered a high visual complexity environment with multi-modal travel, on-street parking, traffic signals, commercial and industrial activity and signage, among other elements drivers must visually process. The project, including the digital billboard components, would be consistent with the visually complex urban environment. Therefore, there is no data-based evidence that the project's digital billboard components would substantially increase safety hazards (Fehr & Peers 2024b).

As further discussed in Section 4.9, *Land Use and Planning*, the proposed project is also consistent with SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, and applicable planning goals and policies of the City's General Plan. Moreover, upon approval of the Development Permit, Development Agreement, and Zoning Map Amendment, the project would also be consistent with the City's zoning. The project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating and environmental effect, and impacts related to land use and planning would be less than significant.

The proposed project would be compatible in use when compared to its existing land use designation and zoning and when compared to the surrounding area. The project would also not introduce hazardous geometric design features. The project would not result in roadway alterations or otherwise conflict with other uses near the project site due to incompatible use. Impacts would be less than significant.

[3] Fehr & Peers has reviewed literature ranging from 1980 to 2023 on billboard effects on driver attentiveness and traffic safety, particularly more recent research on the influence of digital video signage (Fehr & Peers 2024b).
[4] *Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs*, FHWA, March 2011.

Mitigation Measures

Mitigation measures would not be required.

Threshold 4: Result in inadequate emergency access?

Impact TRA-4 THE PROPOSED PROJECT WOULD NOT INCLUDE PERMANENT LANE OR STREET CLOSURES THAT WOULD IMPEDE EMERGENCY ACCESS TO NEARBY PROPERTIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project's preliminary site plan was reviewed for impacts to emergency access both at the site itself and along the public right-of-way adjacent to the project. As part of project construction, all roadway pavement from the centerline to the northerly gutter along the project frontage on Romaine Street would be replaced. Furthermore, all roadway pavement from the first lane line to the easterly curb along the project frontage on North La Brea Avenue would also be replaced. Due to these improvements, roadway closures of the first lane along North La Brea Avenue and the lanes north of the centerline along Romaine Street are anticipated. However, such closures would be temporary and emergency vehicles would have the option to circumvent construction work using the remaining roadway network. Furthermore, as stated in Section 2, *Project Description*, the project applicant and construction activities would also be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. While the precise location of construction staging and construction employee parking would be determined as part of the preparation of the Construction Traffic Management Plan, to be finalized prior to permit issuance, it is conservatively assumed that these activities would take place off-site within a half-mile radius of the project site.

At operation, access to the project site would be provided via a driveway on North La Brea Avenue and two driveways on Romaine Street. Emergency vehicles would be able to temporarily park along North La Brea Avenue and Romaine Street. The proposed project would also not include permanent lane or street closures that would impede emergency access to nearby uses. In addition, the project would not implement any medians or turn restrictions that would reduce access to the project site (Fehr & Peers 2024b). The project would not pose any barriers to emergency access and impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.12.4 Cumulative Impacts

The planned and pending projects within a one-mile radius of the project site are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). However, the geographic scope for considering cumulative impacts related to transportation is both regional and local.

As discussed under TRA-1 of this section, the project would not conflict with existing and planned transit, bicycle, and pedestrian facilities or programs, plans, ordinances, or policies governing these facilities. As part of project construction, the project would replace the curb, curb ramps, gutters, sidewalks, and select roadway lanes adjacent to the project site frontages on North La Brea Avenue and Romaine Street. Due to these improvements, roadway and sidewalk closures along North La Brea Avenue and Romaine Street are anticipated. However, such closures would be temporary and there are currently no bus stops along the project frontage that would be affected by cumulative project construction. Furthermore, bicyclists and pedestrians would have access to the remaining bicycle and pedestrian network to circumvent construction work under a cumulative scenario.

Implementation of the project in combination with other planned and pending projects is anticipated to increase the use of transit, bicycle, and pedestrian facilities in the area because the projects would increase land use intensity and would likely include design elements that encourage increased use of alternative transportation. With the adoption of SB 743 and a VMT metric for evaluating transportation impacts under CEQA, at the local and regional level, increased use and enhancement of alternative transportation modes is being encouraged and successfully implemented. Infill and redevelopment projects are anticipated to increase the use of alternative transportation modes by developing services and residential dwellings within the vicinity of existing and future alternative transportation facilities. Development in the area would be required to comply with applicable adopted policies, plans, or programs regarding public transit, roadway, bicycle, and pedestrian facilities. Due to the infill nature of the proposed project and related projects, the urbanized nature of the project area and existing access to high-quality transit corridors and facilities, as well as required compliance with applicable plans and policies pertaining to transit, roadway, bicycle and pedestrian facilities, cumulative impacts would be less than significant.

Due to the dense and diverse mix of uses in the city, high walkability, and frequent transit services including Metro and local shuttle services, the site is located within a high-quality transit area (SCAG 2021). As such, the proposed project is presumed to have a less-than-significant VMT impact. As discussed under TRA-2, the proposed project is in proximity to a high-quality transit corridor and meets each of the screening criterion; therefore, the proposed project's contribution to VMT impacts would not be cumulatively considerable. Furthermore, any proposed cumulative project that does not screen out for VMT analysis and has a potentially significant impact would be required to implement VMT reduction measures to reduce its VMT by 15 percent below the existing baseline VMT.

With respect to hazardous geometric design features, all cumulative development would be required to be designed in a manner that provides motorists with adequate visibility of pedestrians and bicyclists per WHMC Section 19.28.130(F). Moreover, all projects with non-residential and residential loading spaces would be required to comply with WHMC requirements regulating the length and width of these spaces. While the increased traffic and pedestrian activity associated with cumulative development may combine to increase overall pedestrian hazards in the area, the proposed project is not expected to significantly exacerbate any pedestrian hazards in the area. The proposed project would reduce the number of driveways on North La Brea Avenue from five driveways to only one located at the northwest corner of the site, reducing the possible points of vehicle/ pedestrian conflicts along this roadway. The project would also implement two new adjacent driveways along Romaine Street at the southeast corner of the site, which has lower pedestrian volumes than North La Brea Avenue thereby reducing the likelihood of heavy-duty truck/pedestrian conflicts as well. Overall, the existing sidewalk network, traffic signals at major

intersections, and the pedestrian-oriented nature of the project and surrounding neighborhood provide a safe local pedestrian travel network. As such, the proposed project in combination with nearby related projects would not increase roadway hazards or add incompatible uses, and cumulative impacts would be less than significant.

Although cumulative project construction could include roadway closures along North La Brea Avenue and Romaine Street, such closures would be temporary and emergency vehicles would have the option to circumvent construction work using the remaining roadway network. Furthermore, all projects would be required to comply with WHMC Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. Moreover, as with the proposed project, site plans of cumulative development would be reviewed by the City for emergency access at the site and along the public right-of-way adjacent to the project site. The proposed project in combination with nearby related projects would not impede emergency access, and cumulative impacts would be less than significant.

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4.13 Tribal Cultural Resources

This section analyzes the proposed project's potential impacts related to tribal cultural resources based on the findings from tribal consultation conducted by the City pursuant to Assembly Bill (AB) 52. A Sacred Lands File (SLF) search was obtained from the Native American Heritage Commission (NAHC) to further inform the analysis. For a detailed discussion of the project's natural and cultural setting, geoarchaeological sensitivity, methods and results of archival research and pedestrian survey, as well as potential impacts to cultural resources, including archaeological and built environment resources, refer to Section 4.3, *Cultural Resources*. The analysis provided in Section 4.3, *Cultural Resources*, references the Cultural Resources Technical Report prepared by Rincon Consultants in July 2024 (revised December 2024) for the proposed project, which is included as Appendix D to this EIR, and the Geotechnical Investigation prepared by Geocon West, Inc. for the project, which is included as Appendix F to this EIR:

- *Geocon, Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California, May 10, 2023*

At the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation and preparation of the Cultural Resources Technical Report (Appendix D) for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

4.13.1 Setting

Ethnographic Setting

The project site lies in the traditional territory of the Gabrielino (Gabrieleño)/Tongva. The name "Gabrielino" or "Gabrieleño" denotes those people, who were administered by the Spanish from the San Gabriel Mission. It includes people from the Gabrielino area proper, as well as other social groups nearby (Kroeber 1925, Plate 57, Bean and Smith 1978: 538). The term Gabrieleño was imposed upon the Tribe by Spanish Missionaries. Thus, descendants have chosen to use their original name, Tongva (King 1994). Today, the Tongva people are active in protecting their tribal cultural resources in the greater Los Angeles Basin and three Channel Islands: present-day San Clemente, San Nicolas, and Santa Catalina.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast. Houses constructed by the Tongva were large, circular, domed structures made of willow poles, thatched with tule and sheltered up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and

probable communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996: 27).

The Tongva used a wide variety of tools and implements to gather food resources. These included the bow and arrow, traps, digging sticks, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. The Tongva made oceangoing plank canoes (known as a ti'at) capable of holding six to 14 people and used for fishing, travel, and trade between the mainland and the Channel Islands. Tule reed canoes were employed for near-shore fishing (McCawley 1996: 117–127). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, *manos* and *metates*, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make *ollas* and cooking vessels (Kroeber 1925: 629, McCawley 1996: 129–138).

Deceased Tongva were either buried or cremated. Inhumation was more common on the Channel Islands and the neighboring mainland coast, and cremation was more predominate on the remainder of the coast and in the interior (Harrington 1942, McCawley 1996: 157). At the behest of the Spanish missionaries, cremation essentially ceased during the Post-Contact Period (McCawley 1996: 157).

According to the ethnographic research and/or the archaeological record, the Gabrielino village communities of Cahuenga (or *Cubeupet*) and Siutcanga (or *Siutcabit*) are the two closest villages to the project site (NEA and King 2004; Sutton 2009). The village site of Cahuenga (CA-LAN-110) was located just north of the Cahuenga Pass, near Universal City, over 3 miles north of the project site (NEA and King 2004). Archaeological excavations conducted in the mid-1980s resulted in the identification of a village site (CA-LAN-43) believed to represent the village of Siutcanga, located over 10 miles northwest of the project site, at Los Encinos State Historic Park (NEA and King 2004; Sutton 2009).

Today, the Tongva people continue to inhabit the Los Angeles Basin (Tongvar) and continue to advocate for the preservation and continued practice of their cultural heritage and language. At least five groups tie their ancestral lineage to the Gabrieleño/Tongva people: The Gabrieleño Band of Mission Indians - Kizh Nation, the Gabrieleño/Tongva San Gabriel Band of Mission Indians, the Gabrieleño/Tongva Nation of the Greater Los Angeles Basin, the Gabrielino-Tongva Tribe, and the Gabrielino Tongva Indians of California Tribal Council.

4.13.2 Regulatory Setting

State Regulations

California Assembly Bill 52 of 2014

As of July 1, 2015, AB 52 was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American

tribe" and that meets at least one of the following criteria, as summarized in *CEQA Guidelines* Appendix G:

1) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC 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 PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American Tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." California Native American Tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the NAHC within 24 hours of this identification.

California Public Resources Code Section 5097.98

Section 5097.98 of the PRC states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

4.13.3 Impact Analysis

Methodology

Sacred Lands File Search

The NAHC was contacted on September 28, 2023, to request a search of the SLF. The NAHC replied on November 15, 2023, stating that the results of the SLF search were negative indicating that no sacred lands have been previously identified in the vicinity of the project.

Assembly Bill 52 Consultation

The project is subject to compliance with AB 52 (PRC Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires the lead agency to

provide notification of the project to any California Native American tribes who are traditionally or culturally affiliated with the geographic area of the project and who previously requested notice of projects proposed within the jurisdiction of the CEQA lead agency. Pursuant to AB 52, the City sent project notification letters via United States Postal Service certified mailing on November 16, 2023, to all eligible tribal entities in the geographic area of the project that have formally requested AB 52 notification in writing from the City for eligible projects under their jurisdiction. In addition, the City received a list of California Native American tribal representatives from the NAHC who may have knowledge of cultural resources in the project site. The City also formally notified all NAHC-listed tribal representatives for the project that have not formally requested AB 52 notification for eligible projects under their jurisdiction. The letters included a project description, an invitation to consult on the project, an outline of AB 52 timing, contact information for the appropriate lead agency representative, and a project location map. AB 52 allows tribes 30 days after receiving notification to request consultation. If a response is not received within the allotted 30 days, it can be assumed consultation is declined.

The City received one response as a result of the AB 52 notification letters from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The Kizh Nation responded on December 1, 2023, and requested to engage the City in consultation. On February 13, 2024, the Kizh Nation provided documentation, including various literary sources, screen shots of historical maps, and explanatory text to the City demonstrating the tribe's associations and use of the vicinity of the project site, including the city of West Hollywood and generally, the greater Los Angeles area. A consultation meeting with the Kizh Nation took place on April 16, 2024. AB 52 consultation between the City and the Kizh Nation did not result in the identification of any potential tribal cultural resources within the project site. However, the Kizh Nation expressed concern with the potential to encounter archaeological resources potentially qualifying as tribal cultural resources during project-related ground disturbing activities within native sediments. To address the potential for discovery, the City and the Kizh Nation continued consultation to include agreement of mitigation measures that would provide for Native American monitoring during ground disturbing activities. The City mailed a consultation conclusion letter to the Kizh Nation on June 11, 2024.

The City did not receive a response from any of the other notified tribes within the allotted 30 days and as such, it is assumed that the invitation to consult on the project was declined. On June 11, 2024, a conclusion letter was mailed to all other tribes that were notified but did not respond or request to consult on the project. Table 4.13-1 on the following pages summarizes compliance with AB 52 and its implementing regulations.

Table 4.13-1 AB 52 Native American Tribal Outreach Results

Native American Tribal Representative	Response Received
Andrew Salas, Chairman Gabrieleño Band of Mission Indians – Kizh Nation	**December 1, 2023** Kizh Nation representative, Chloe Soto, responded to the City via email acknowledging receipt of the notification letter. Ms. Soto attached a formal receipt letter from Chairman Salas. **December 22, 2023** City Planner, Antonio Castillo, responded to the Kizh Nation via email concurring with the Tribe's request to conduct consultation via email. **February 13, 2024** The Kizh Nation provided their project concerns via email in lieu of an in-person meeting. Documentation provided by the Kizh Nation included screen shots of excerpts from various literary sources, screen shots of historical maps overlying the project location, and explanatory text in reference to rancherias/ranchos, traditional trade routes, and Gabrieleño communities and locations of villages. In addition to these materials, the Kizh Nation provided the City with proposed mitigation measures for the project. **March 19, 2024** The City emailed the Kizh Nation to continue consultation. Kizh Nation representative, Brandy Salas, Administrative Specialist, responded via email with available dates for the subsequent meeting. The City scheduled the meeting for April 16, 2024. **March 21, 2024** The City emailed the Kizh Nation informing them of the attendants to the April 16, 2024, meeting. Ms. Salas responded via email acknowledging receipt of the City's email. **April 15, 2024** The City called the Kizh Nation and left a voicemail to confirm the April 16, 2024, meeting. The City also followed up with an email. Ms. Salas responded via email acknowledging the email and confirming the scheduled consultation meeting. **April 16, 2024** Consultation between the City and the Kizh Nation was conducted via telephone conference at the request of the Kizh Nation. **May 9, 2024** The City followed up with the Kizh Nation via email and provided the preliminary mitigation measures for review. **May 14, 2024** The Kizh Nation responded via email acknowledging receipt of the City-sent files. The Kizh Nation reviewed the files and stated that they had one edit to the measures. Subsequently, the City reviewed the suggested edit provided by the Kizh Nation. No other comments have been received from the Tribe. **June 3, 2024** The City sent the Kizh Nation formal conclusion to consultation via email. **June 11, 2024** The City mailed a conclusion letter to the Kizh Nation.

Native American Tribal Representative	Response Received
Christina Swindall Martinez, Secretary Gabrieleño Band of Mission Indians - Kizh Nation	Secretary Martinez is from the same Tribe as Chairman Salas. Therefore, the results of the consultation record for this Tribe are summarized under the correspondence with Chairman Salas.
Anthony Morales, Chairperson Gabrieleño/Tongva San Gabriel Band of Mission Indians	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Sandonne Goad, Chairperson Gabrieleño/Tongva Nation	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Christina Conley, Tribal Consultant and Administrator Gabrielino Tongva Indians of California Tribal Council	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Robert Dorame, Chairperson Gabrielino Tongva Indians of California Tribal Council	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined
Charles Alvarez Gabrielino-Tongva Tribe	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Lovina Redner, Tribal Chair Santa Rosa Band of Cahuilla Indians	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Joseph Ontiveros Soboba Band of Luiseño Indians	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Isaiah Vivanco, Chairperson Soboba Band of Luiseño Indians	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Sam Dunlap, Cultural Resource Director Gabrielino-Tongva Tribe	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.
Jessica Valdez, Cultural Resource Specialist Soboba Band of Luiseño Indians	The AB 52 notification letter was sent via USPS certified mailing on November 16, 2023. The receipt for the certified mailing with a signature was received by the City on November 27, 2024, indicating that the letter was received by the Tribe. As no response was received during the 30-day window, it is assumed that the invitation to consult on the project was declined.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, a project would have a significant impact on tribal cultural resources if it would cause:

1. A substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:
   a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)
   b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. Both impact thresholds are addressed in the following impact discussion. However, the project's potential impacts to cultural resources are addressed in Section 4.3, *Cultural Resources*, and Appendix D of this EIR.

Project Impacts and Mitigation Measures

Threshold 1.a: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

Impact TCR-1 CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES THAT MAY HAVE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES LISTED OR ELIGIBLE FOR LISTING IN THE CRHR, OR OTHER LOCAL REGISTER OF HISTORICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The City obtained an SLF search from the NAHC which indicated the search was negative for the presence of sacred lands in the vicinity of the project area. The City also conducted an AB 52 notification process including: California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and that have requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; as well as Tribes identified on the NAHC's contact list. One Tribe, the Kizh Nation, requested and entered into consultation with the City. No tribal cultural resources as defined in PRC Section 21074(a) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k) were identified as a result of consultations.

However, the Kizh Nation expressed concern with the potential to encounter archaeological resources potentially qualifying as tribal cultural resources during project-related ground disturbing activities within native sediments. Such resources could be eligible for listing in the California Register of Historical Resources or for local listing and therefore could qualify as tribal cultural resources under CEQA and thus would constitute a potentially significant impact.

Mitigation Measures

As a result of the City's consultation with the Kizh Nation, the City determined that additional management strategies will be required. As such, in addition to the implementation of previously identified mitigation measures in Section 4.3, *Cultural Resources*, of this EIR, (Mitigation Measures CUL-1 through CUL-3), the following Mitigation Measures TCR-1 and TCR-2 are required to address concerns for the inadvertent discovery of resources that may potentially qualify as tribal cultural resources under CEQA.

TCR-1 Retention of a Native American Monitor and Native American Monitoring

Prior to the commencement of ground disturbing activities, the project applicant and/or subsequent responsible parties shall retain a Native American/Tribal monitor/entity from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe) to monitor all ground-disturbing activities within native sediments (generally those at a depth of 3 feet below ground surface or greater). A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground disturbing activities. Ground disturbing activities shall include, but are not limited to, grading, excavation, trenching, boring/drilling, potholing, augering, and tree or foundation removal.

A look-ahead construction schedule shall be provided to the Kizh Nation each week prior to work being performed, to provide guidance on when work will occur within native sediments. The schedule shall include, at a minimum, all planned construction activities involving ground disturbance, including location and the nature of the work, and depths of ground disturbance scheduled for the week.

The Native American monitor shall be responsible for completing monitoring logs on the days that they are on-site and monitoring ground disturbing activities within native soils. The monitoring logs will include descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations and depths of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Copies of the monitoring logs shall be provided to the project applicant/lead agency upon written request to the Tribe.

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

TCR-2 Inadvertent Discovery of Tribal Cultural Resources

In the event suspected tribal cultural resources are discovered during ground disturbing construction activities, all work shall cease within 50 feet of the find, or another distance, agreed to between the Kizh Nation and the City, based on the project area and nature of the find and shall not resume until the potential tribal cultural resource has been assessed in accordance with CUL-3 between the City, Qualified Archaeologist, and the Kizh Nation. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact qualifies as a tribal cultural

resource, appropriate treatment shall be developed by the City in coordination with the Qualified Archaeologist, and the Kizh Nation.

Significance After Mitigation

Mitigation Measures TCR-1 and TCR-2 would include the requirement for a Native American monitor from or approved by the Kizh Nation to conduct monitoring during all ground disturbing activities in native sediments. Any discoveries of potential tribal cultural resources would be appropriately addressed by Mitigation Measures CUL-1 through CUL-3 to minimize potential impacts to the resource and to facilitate the appropriate tribal treatment of the find, as necessary. With incorporation of Mitigation Measure CUL-1 through MM-CUL-3, and Mitigation Measures TCR-1 and TCR-2, potential impacts associated with tribal cultural resources that may be eligible for listing in the State or local register of historical resources as defined in PRC Section 5020.1(k) would be less than significant with mitigation.

Threshold 1.b: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is 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 PRC Section 5024.1?

Impact TCR-2 ALTHOUGH NO TRIBAL CULTURAL RESOURCES HAVE BEEN IDENTIFIED BY CALIFORNIA NATIVE AMERICAN TRIBES AS PART OF AB 52 NOTIFICATION AND CONSULTATION PROCESSES, CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES THAT MAY HAVE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Consistent with that described under Threshold 1.a above, consultations did not identify any tribal cultural resources 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 PRC Section 5024.1. However, as discussed under Impact TCR-1 of this section, the Kizh Nation have expressed concern regarding the potential to encounter archaeological resources potentially qualifying as tribal cultural resources during project-related ground disturbing activities within native sediments. Such resources could, based on substantial evidence and in the lead agency's discretion, qualify as tribal cultural resources under CEQA and thus would constitute a potentially significant impact.

Mitigation Measures

Mitigation Measures CUL-1 through CUL-3 (refer to Section 4.3, *Cultural Resources*, of this EIR) and Mitigation Measures TCR-1 and TCR-2 are required to help facilitate the proper treatment of tribal cultural resources that may be inadvertently encountered during ground-disturbing activities.

Significance After Mitigation

With incorporation of Mitigation Measures CUL-1 through CUL-3, and Mitigation Measures TCR-1 and TCR-2, potential impacts associated with unknown or yet identified tribal cultural resources would be less than significant with mitigation incorporated.

4.13.4 Cumulative Impacts

The planned and pending projects with the potential to contribute to cumulative effects when combined with the proposed project are identified in Section 3, *Environmental Setting*, and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). Although no tribal cultural resources have been identified for the proposed project, the potential exists for cumulative development projects to encounter subsurface archaeological resources that may be considered tribal cultural resources. The reduction of tribal cultural resources in traditional tribal territory caused by cumulative development in the region could result in a significant cumulative impact.

As discussed under Impacts TCR-1 and TCR-2, no tribal cultural resources have been identified at the project site. Potential impacts to previously unidentified tribal cultural resources would be reduced to a less than significant level with implementation of Mitigation Measures CUL-1 through CUL-3, and Mitigation Measures TCR-1 and TCR-2. As implementation of these mitigation measures would minimize adverse effects on any potential tribal cultural resources, the project's contribution to this impact would not be cumulatively considerable. It is anticipated that cumulative development projects would be required to comply with similar mitigation described herein for the project. Additionally, compliance with AB 52 and continued involvement by local Native Americans in regional planning would generally reduce the destruction of tribal cultural resources such that cumulative impacts would be minimized. As such, cumulative impacts to tribal cultural resources would not be significant.

4.14 Utilities and Service Systems

This section analyzes the proposed project's potential impacts related to utilities and service systems including water supplies, and wastewater, stormwater and solid waste facilities. This section references the Water Supply Assessment prepared by Rincon Consultants in July 2024 (revised December 2024) for the proposed project, which is included as Appendix H to this EIR. Project-specific water demand, wastewater generation, electricity demand, natural gas demand, and solid waste generation were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1, and integrated into the analysis to compare to existing utility services and capacity. CalEEMod results are included in Appendix C to this EIR.

Furthermore, at the time of preparation of this EIR, the project site was developed with a concrete batch plant located at 1000 and 1014 North La Brea Avenue operated by CEMEX. However, to vacate the concrete batch plant prior to expiration of their lease by December 2024, CEMEX applied for and received a Demolition Permit from the cities of West Hollywood and Los Angeles allowing the disassembly and removal of its concrete batch plant equipment and demolition of its office building down to its foundation without any ground disturbance or excavation. Between September 2024 and December 2024 and preceding the circulation of this EIR for public comment, CEMEX ceased its operations and completed this work. To ensure consideration of project site conditions at the time of circulation of the Notice of Preparation for this EIR and to provide a conservative analysis of project impacts, the analysis in this section evaluates the site based on conditions prior to CEMEX vacating the concrete batch plant from the site.

4.14.1 Setting

Water

The Los Angeles Department of Water and Power (LADWP) provides water service to the eastern portion of West Hollywood and the project site. As discussed in the Water Supply Assessment prepared for the project (Appendix H), water for the project would be provided by LADWP from existing and planned water supply sources including groundwater, imported water, recycled water, and stormwater capture and release.

Groundwater

LADWP's service territory overlies multiple groundwater basins and includes the adjudication area for the Upper Los Angeles River Area (ULARA) watershed. The ULARA watershed, and four groundwater basins contained therein (i.e., San Fernando, Sylmar, Verdugo, and Eagle Rock basins), has been adjudicated since 1979 in accordance with the judicial decree of the Superior Court of the State of California for the County of Los Angeles in Case No. 650079, *City of Los Angeles v. City of San Fernando, et. al*., dated January 26, 1979 (ULARA Judgment) and subsequent Sylmar Basin Stipulations (Sylmar Stipulation). The ULARA Judgement identifies all parties with rights to use groundwater from the adjudication area and requires safe yield operations to ensure groundwater extractions over the long term do not create a condition of overdraft in any basin within the ULARA adjudication area. The court-appointed ULARA Watermaster produces an Annual Report that provides current information on the water rights of each party to the adjudication, as well as basin-specific information such as geologic conditions, local supply, groundwater extractions, changes in depth to groundwater or amount in storage, recharge operations, and water quality data. Through the ULARA Judgment, the City holds groundwater rights to 109,809 acre-feet per year (AFY) from

local basins. The majority of the City's groundwater rights are within the San Fernando Basin (i.e., 87,000-acre feet [AF]), which has an available storage capacity of 500,000 AF (Rincon Consultants 2024).

Imported Surface Water

In addition to production of its groundwater rights from the ULARA adjudication area, LADWP also uses portions of the adjudicated area for storage of imported water for future uses. LADWP provides water imported from several different sources, including Owens Valley water via the Los Angeles (LA) Aqueduct, State Water Project (SWP) water via the California Aqueduct, and Colorado River water via the Colorado River Aqueduct. The physical availability of imported surface water depends upon climatic (drought) conditions and varies throughout the year (Rincon Consultants 2024).

OWENS VALLEY – LOS ANGELES AQUEDUCT

LADWP uses the 233-mile-long LA Aqueduct to convey water from the Owens Valley in the Eastern Sierra Nevada mountains, south to the City of Los Angeles. The LA Aqueduct exports approximately 40 percent of Owens Valley water to Los Angeles. Reduced water deliveries from the Owens Valley (via the LA Aqueduct) increase the City's dependence on imported water purchased from Metropolitan Water District of Southern California (Metropolitan), through the SWP and the Colorado River (Rincon Consultants 2024).

STATE WATER PROJECT – CALIFORNIA AQUEDUCT

The State of California, via the California Department of Water Resources (DWR), owns and operates the SWP system, which conveys water originating as Sierra Nevada snowpack and surface runoff, through the Sacramento-San Joaquin Delta (Delta) to SWP contractors throughout Southern California. The DWR holds long-term water supply contracts with each of the 29 agencies contracted to receive SWP water, referred to as "SWP Contractors," to provide annual delivery of SWP water in amounts up to each contractor's "Table A" allocation. Metropolitan is one of the largest SWP contractors, and LADWP is one of Metropolitan's largest customers for SWP water. Metropolitan's maximum Table A allocation is 1,911,500 AFY, from which Metropolitan provides SWP water to its member agencies, including LADWP (Rincon Consultants 2024).

COLORADO RIVER – COLORADO RIVER AQUEDUCT

The United States Bureau of Reclamation (USBR) operates and maintains the Colorado River for water supply, diverting water in the form of snowmelt from headwaters in the Rocky Mountains in Colorado and Wyoming, along with portions of Utah, Nevada, New Mexico, and Arizona. USBR conveys Colorado River water to entitlement holders in the Upper Basin and Lower Basin of the Colorado River Watershed. The Lower Basin states, which include California, have a total allocation of 7.5 million AFY, of which the State of California holds a 4.4 MAFY normal apportionment. As such, California holds rights to roughly 59 percent of the Lower Basin states' total apportionment of 7.5 million AFY (Rincon Consultants 2024).

Recycled Water

Recycled water utilized by LADWP is highly treated and is approved for irrigation of golf courses, cemeteries, street medians, and other large landscapes, as well as other uses including street sweeping, industrial cooling, dust control, and environmental benefits. LADWP's distribution system

includes over 70 miles of purple pipe and is currently delivering over 11,000 AFY of recycled water. Existing recycled water facilities include two water reclamation plants operated by the City of Los Angeles Sanitation and Environment (LASAN), one operated by West Basin Municipal Water District (West Basin), and one operated by the City of Burbank:

- City of Los Angeles' Donald C. Tillman Water Reclamation Plant (DCTWRP)
- City of Los Angeles' Terminal Island Water Reclamation Plant (TIWRP)
- West Basin's Edward C. Little Water Recycling Facility (ELWRF), which receives secondary effluent from the City of Los Angeles' Hyperion Water Reclamation Plant (Hyperion)
- City of Burbank's Water Reclamation Plant (BWRP)

The City's goal is to increase the total amount of recycled water to 59,000 AFY by 2035. Currently, LADWP is expanding its recycled water program to include a purple pipe distribution system, as well as groundwater replenishment utilizing advanced treated purified recycled water. LADWP's recycled water use is projected to increase to approximately 50,900 AFY in 2025, further increasing to 67,600 AFY in 2045 (Rincon Consultants 2024).

Stormwater Capture and Release

Projects to capture and conserve stormwater runoff make up an important component of the City's water supply portfolio. LADWP's Stormwater Capture Master Plan provided data and analysis to determine that, in addition to existing capture rates, an additional 68,000 to 114,000 AFY of water supply could be developed through implementation of a suite of projects, programs, and policies over the next 20 years. LADWP recently estimated that between October 1, 2022, and January 10, 2023, nearly 32,500 AF of stormwater runoff water was captured, or approximately 10.6 billion gallons. Between 2015 and 2024, LADWP's total stormwater capture capacity increased from about 64,000 AFY to over 82,6000 AFY; this is more than 55 percent of the way to achieving the City's goal of achieving capacity to capture 150,000 AFY (48.9 billion gallons) of stormwater runoff by 2035 (Rincon Consultants 2024).

Wastewater

The City of West Hollywood collects wastewater generated within its boundaries and transmits it through the Los Angeles County Sanitation Districts (LACSD) sewer system. Sewer infrastructure within West Hollywood is made up of City-owned local sewers and County sewer lines. The sewer system within the city consists of 39 miles of gravity piping. This gravity sewer system includes over 850 pipe reaches and sewer holes, providing local sewer service to every parcel within the city. The wastewater flow originating from the proposed project will discharge directly to LACSD's La Brea Avenue Trunk Sewer, located in La Brea Avenue at Romaine Street. The LACSD's 12-inch diameter trunk sewer has a capacity of 2.7 mgd and conveyed a peak flow of 0.2 mgd when last measured in 2019. Wastewater generated in the city, including the project site, is ultimately treated at Hyperion in the City of Los Angeles. Hyperion is operated by LASAN and has a current daily capacity of approximately 450 million gallons per day (mgd) of sewage, and currently treats an average flow of 275 mgd, leaving an available capacity of 175 mgd (City of Los Angeles 2024). The City of West Hollywood requires developers to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction. The fee is based on net sewage unit of proposed land use for projects with new construction (LACSD 2024).

Stormwater

The storm drain infrastructure in the city is jointly owned and operated by the City of West Hollywood and the Los Angeles County Flood Control District (LACFCD). The LACFCD maintains the backbone flood control system which consists of a network of catch basins and underground storm drainpipes. The City owns and maintains a few catch basins and small storm drainpipes that directly flow into the LACFCD system. A network of underground storm drain lines, which reach north into Beverly Hills and West Hollywood, feeds Ballona Creek (West Hollywood 2024). Major tributaries of Ballona Creek include Centinela Creek, Sepulveda Channel, and Benedict Canyon Channel. The Ballona Creek watershed covers approximately 130 square miles in the coastal plain of Los Angeles Basin and is highly developed with 49 percent of the watershed covered by impervious surfaces (West Hollywood 2024). The watershed includes the cities of Beverly Hills, West Hollywood, portions of the cities of Los Angeles, Culver City, Inglewood and Santa Monica, unincorporated areas of Los Angeles County, and areas under the jurisdiction of the California Department of Transportation.

Water quality in Ballona Creek and its related tributaries is impaired by pollutants such as trash, metals, bacteria, and pesticides due to the watershed's large, dense population and its impervious ground surface that prevents urban runoff from infiltrating into underground aquifers (West Hollywood 2024). To address these impairments, the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB) has established water quality objectives called Total Maximum Daily Loads (TMDLs). A TMDL is the maximum amount of a specific pollutant, such as trash or bacteria, that can be discharged into a water body without causing impairment. The federal Clean Water Act drives the development of and compliance with TMDLs. They are an important step in cleaning up Los Angeles' waterways.

The City of West Hollywood runs a number of stormwater pollution prevention programs including installing trash capture screens over public storm drain inlets, ensuring certain land development projects capture or treat polluted stormwater, ensuring businesses and construction sites implement pollution prevention practices, and removing pollutants through services such as street sweeping, storm drain cleaning, and litter pick-up (West Hollywood 2024). The City maintains an Urban Runoff Management Plan which includes best management practices, design requirements, and a mitigation plan for new building projects and existing properties to reduce urban runoff water pollution (West Hollywood 2006).

The project site consists of existing buildings and parking lots and is entirely covered with impervious surfaces. The Los Angeles County Department of Public Works Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a stormdrain and street flow system accommodate flow from a 50- year storm event. The project site is generally flat with minimal slopes. Existing storm water runoff from the project site flows to existing storm drain facilities along North La Brea Avenue and Romaine Street.

Solid Waste

The City of West Hollywood contracts with Athens Services, a private company, to collect, transport, and dispose of solid waste for all residential and commercial uses (Athens Services 2022). In 2019, approximately 25,287 tons of municipal solid waste were generated by West Hollywood residents and disposed of primarily in the Mid-Valley Sanitary Landfill located in San Bernardino County and the Chiquita Canyon Sanitary Landfill in Los Angeles County (California Department of Resources Recycling and Recovery [CalRecycle] 2019).

As shown in Table 4.14-1, Mid-Valley Sanitary Landfill can process up to 7,500 tons of waste per day and has a remaining capacity of roughly 61,219,377 cubic yards through the year 2045. Chiquita Canyon Sanitary Landfill can process up to 12,000 tons per day and has a remaining capacity of roughly 60,408,000 cubic yards through the year 2047.

Table 4.14-1 Available Landfill Capacity

Landfill	Maximum Permitted Daily Throughput (tons per day	Remaining Permitted Disposal Capacity (cubic yards)	Anticipated Closure Date
Mid-Valley Sanitary Landfill	7,500	61,219,377	4/1/2045
Chiquita Canyon Sanitary Landfill	12,000	60,408,000	1/1/2047

Source: CalRecycle 2023a

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) requires each city or county's source reduction and recycling element to include an implementation schedule showing that a city or county must divert 50 percent of solid waste from landfill disposal or transformation on and after January 1, 2000. Senate Bill (SB) 1016, passed in 2008, now requires the 50 percent diversion requirement to be calculated in a per capita disposal rate equivalent. Target disposal rates are calculated using population (i.e., number of city residents) and employment numbers (i.e., number of employees in the city). Table 4.14-2 shows the city's employment diversion rates from 2020 through 2022.

Table 4.14-2 City of West Hollywood Employment Solid Waste Disposal

Reporting Year	Employment Disposal Rate (pounds/person/day)	Target Disposal Rate (pounds/person/day)	Disposal Target Met?
2020[1]	5	7.7	Yes
2021[1]	4	7.7	Yes
2022[1]	4.1	7.7	Yes

[1] The jurisdiction review status is awaiting approval.

Source: CalRecycle 2023b

Electricity and Natural Gas

Homes and businesses in West Hollywood use electricity from various sources, including wind, solar, hydroelectric, nuclear, coal, and natural gas. The main electricity provider in the region is Southern California Edison (SCE). Natural gas is primarily provided by Southern California Gas Company (SoCalGas). The project site is served by SCE and SoCalGas for electricity and natural gas, respectively.

Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2019). Telecommunications infrastructure within West Hollywood includes overground and underground telephone wires, underground optical fibers, cell towers, and standard phone equipment and internet routers. Telecommunications providers own and operate infrastructure, such as cellphone towers and fiber optic cables, within the city. The site would be served by existing telecommunications providers within the area, likely AT&T, Frontier, or Hughesnet.

4.14.2 Regulatory Setting

Federal Regulations

Title 40 of the Code of Federal Regulations, Part 258

Title 40 of the Code of Federal Regulations (CFR), Part 258, Resource Conservation and Recovery Act, Subtitle D, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria.

State Regulations

California Building Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, and energy efficiency.

PART 5 – CALIFORNIA PLUMBING CODE

The California Plumbing Code is codified in Title 24 California Code of Regulations (CCR) Part 5 and contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (SB 407 [2009] Civil Code Sections 1101.1 et seq.).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

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

Assembly Bill 341 and Senate Bill 1383

The purpose of AB 341 of 2011 (Chapter 476, Statutes of 2011) is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

In addition, SB 1383 of 2016 (Chapter 395, Statutes of 2016) established the following goals: a 50-percent reduction in the level of the statewide disposal of organic waste from 2014 levels by 2020, and a 75-percent reduction in the level of the statewide disposal of organic waste from 2014

levels by 2025. This bill also authorized CalRecycle to adopt regulations, to take effect on or after January 1, 2022, to achieve these targets.

Assembly Bill 939

AB 939 requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Assembly Bill 1826

AB 1826 of 2014 (Chapter 727, Statutes of 2014) requires businesses that generate a specified amount of organic waste per week to arrange for recycling services for that waste, and for jurisdictions to implement a recycling program to divert organic waste from businesses subject to the law, as well as report to CalRecycle on their progress in implementing an organic waste recycling program.

Senate Bill 1016

SB 1016 of 2007 (Chapter 343, Statutes of 2007) requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan.

Local Regulations

Los Angeles Regional Water Quality Control Board

The Los Angeles RWQCB protects ground and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, along with small portions of Kern and Santa Barbara Counties. It has constitutional, statutory, and regulatory authority to regulate discharges to waters of the state, to promote the beneficial use of water, and to prevent the waste of water. The Los Angeles RWQCB is one of nine Regional Boards statewide. These Boards are part of the California Environmental Protection Agency (CalEPA).

Los Angeles County Sanitation Districts

The LACSD adopted a Wastewater Ordinance effective April 1, 1972 (which was amended on July 1, 1980; July 1, 1983; November 1, 1989; and July 1, 1998) to protect and finance the operation of its wastewater conveyance, treatment, and disposal facilities. The LACSD also adopted a Connection Fee Ordinance in 1981 (which was amended in 1984, 1990, 1992, 1997, and 2007). Companies that discharge industrial wastewater to the sewerage system are governed by both the Wastewater Ordinance and the Connection Fee Ordinance. These legal mechanisms establish the Districts' Industrial Wastewater Discharge Permit, Connection Fee, and Surcharge Programs. The Industrial Wastewater Discharge Permit Program allows for the regulation of industrial wastewater dischargers to protect the public health, environment, and the public sewerage system. The Surcharge Program requires all industrial companies discharging to the Districts' sewerage system to pay their fair share of the wastewater treatment and disposal costs. The Connection Fee Program requires all new users of the Districts' sewerage system, as well as existing users that significantly

increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.

West Hollywood General Plan 2035

The Infrastructure, Resources, and Conservation Chapter of the City's General Plan identifies the City's goals for maintaining existing infrastructure and resources, while assuring an adequate supply to meet future needs. Goals and policies within the General Plan pertaining to water conservation, green building, recycling, wastewater and solid waste that are applicable to the proposed project include the following (West Hollywood 2011):

Goal IRC-3: Reduce water use and ensure a long-term water supply.

Policy IRC-3.1: Allow for construction of new development only when there is sufficient water to supply that development, as determined by the service provider.

Policy IRC-3.2: Require development projects with the water-use equivalent of 10 dwelling units or more to conduct a long-term water supply analysis as part of the development approval process.

Policy IRC-3.5: Take steps to reduce water use from municipal operations, which may include:

- Low-flow fixtures in all public buildings
- Where feasible, reductions of grass and turf in medians and planting strips in favor of water-efficient landscaping
- A centralized irrigation control system within public rights-of-way and on City-owned properties
- Water recapture systems in new buildings and major renovations
- Rainwater retention and reuse systems

Policy IRC-3.6: Require all new buildings to meet the following standards:

- Achieve a reduction of water use of 40 percent less than baseline for buildings as calculated by the Energy Policy Act of 1992. Single-family homes are exempt from this requirement but must still meet the other standards of the Green Building Ordinance.
- Reduce water consumption for outdoor landscape irrigation, consistent with the most recent City policy.
- Comply with all prevailing state laws and City regulations regarding indoor and outdoor water conservation and efficiency in new construction.

Policy IRC-3.7: Encourage existing residential and non-residential buildings to pursue strategies for water conservation, including:

- Drought-tolerant landscaping
- Drip irrigation systems for landscaping where appropriate
- Low-flow fixtures in bathrooms and kitchens

Goal IRC-8: Provide a wastewater system that protects the health, safety, ecology, and welfare of the community.

Policy IRC-8.2: Require development projects to pay for their share of wastewater system improvements necessitated by that development.

Policy IRC-8.3: Require development projects with a net increase of sewage flow equivalent of 10 dwelling units to prepare a sewer capacity analysis to demonstrate available capacity.

Policy IRC-8.4: Consider local options for wastewater and participate in regional wastewater recycling and utilization efforts.

Goal IRC-9: Provide safe, sanitary and environmentally sustainable storm water management.

Policy IRC-9.7: Encourage development projects to manage stormwater on-site in accordance with the City approved Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.

Policy IRC-9.9: Require that development projects pay for the cost of stormwater system improvements necessitated by that development.

Goal IRC-10: Use best practices to reduce and manage solid waste.

Policy IRC-10.1: Aggressively seek to reduce West Hollywood's rate of waste disposal per capita.

Policy IRC-10.2: Provide services for recycling and composting and expand these services over time, where appropriate.

Policy IRC-10.3: Encourage all construction projects (regardless of size) to divert 80% of the construction waste debris away from landfills.

Policy IRC-10.4: Provide ongoing education to residents and businesses about waste reduction, composting, and recycling.

Policy IRC-10.5: Support or sponsor regular e-waste and hazardous materials disposal events. 9-18 West Hollywood General Plan 2035.

Policy IRC-10.6: Where feasible, provide streetside recycling containers alongside public trash receptacles.

Policy IRC-10.7: Encourage the use of recycled building materials in public and private development projects.

West Hollywood Climate Action and Adaptation Plan

The City of West Hollywood adopted their 2021 Climate Action and Adaptation Plan (CAAP) in December 2021, an update to their 2011 Climate Action Plan. The CAAP, adopted in 2021, outlines the City's intended path to dramatically reduce greenhouse gas emissions and adapt to the impacts of a changing climate, while centering equity and quality of life outcomes for the West Hollywood community. It includes policy goals and strategies to reduce water use and reduce waste. Applicable measures include the following:

Measure NE-3A: Continue to promote water conservation measures (e.g., rain barrels, cisterns, limited outdoor water use) that reduce dependency on imported water, including stormwater reuse.

Measure NE-1B: Continue to develop educational and outreach programs and incentives to encourage tree planting/preservation, green roofs and roof gardens in existing buildings.

Measure ZW-2C: Implement curbside organics collection program.

West Hollywood Municipal Code

CHAPTER 15.52 - REGULATION OF OUTDOOR WATER USE PRACTICES

This chapter of the West Hollywood Municipal Code (WHMC) regulates irrigation practices, exterior washing practices, watering for ornamental or recreational uses, and miscellaneous uses. It also prohibits leaking plumbing facilities and sets penalties for conservation measure violations.

CHAPTER 15.56 - STORM WATER AND URBAN RUNOFF POLLUTION CONTROL

The purpose of this chapter is to safeguard the health, safety, and general welfare of the citizens of the city and protect the water quality of the County of Los Angeles and surrounding coastal areas. The chapter aims to achieve this by:

1. Reducing pollutants in stormwater discharges to the maximum extent practicable.
2. Regulating illicit connections and illicit discharges to minimize contamination of stormwater and urban runoff into the municipal separate storm sewer system (MS4).[1]
3. Regulating non-stormwater discharges to the MS4.

The intent is to protect and enhance the quality of watercourses, water bodies, and wetlands within the city, aligning with federal and state regulations such as the Clean Water Act and the California Porter-Cologne Water Quality Control Act. The chapter provides legal authority for the city to control discharges to and from its municipal stormwater system, holding dischargers accountable for their contributions of pollutants and flows. In addition, the chapter establishes requirements for the construction and operation of new developments, redevelopments, and other projects to ensure compliance with stormwater mitigation measures outlined in the municipal National Pollutant Elimination System permit.

SECTION 15.68.170 - STANDARDS FOR UTILITIES

This section states that all new and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate infiltration of flood waters into the systems and discharge from the systems into flood waters. In addition, it states that on-site waste disposal systems shall be located to avoid impairment to them, or contamination from them during flooding.

SECTION 19.20.060 - GREEN BUILDING ORDINANCE

This section establishes green building standards to reduce the use of natural resources, create healthier living environments, and promote environmental responsibility in building design and construction. The practice of green building can have meaningful beneficial impacts by reducing energy, water, and natural resource consumption, improving the well-being of occupants through better indoor air quality and comfort, and contributing to community-wide environmental initiatives. The program consists of mandatory provisions, requirements for specific plans and development agreements, and application requirements.

[1] 1 An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

SECTION 19.20.180 - SOLID WASTE AND RECYCLABLE MATERIALS STORAGE

This section provides requirements for solid waste and recyclable material storage areas in compliance with the California Solid Waste Reuse and Recycling Access Act.

CHAPTER 19.26 - LANDSCAPING STANDARDS

This chapter is designed to enhance the aesthetic appeal of developments across the city by establishing landscaping standards. It aims to foster compatibility between different land uses and public spaces through the implementation of screening or buffers. Additionally, the chapter seeks to conserve water resources by promoting efficient irrigation practices and maintaining landscaped areas. It prioritizes public health, safety, and welfare by preserving the positive visual experience of the built environment, ensuring smooth transitions between land uses, and enhancing pedestrian and vehicular traffic safety. The code also addresses environmental concerns by reducing urban runoff through the preservation of permeable surfaces and mitigating the urban heat island effect to enhance the local micro-climate.

4.14.3 Impact Analysis

Methodology

Impacts to utilities and services is based on review of site information and conditions, city information regarding utility-related issues, including water supply and facilities, wastewater facilities, electricity, natural gas, telecommunication facilities, and solid waste. Project-specific water demand, wastewater generation, electricity demand, natural gas demand, and solid waste generation were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1, and integrated into the analysis to compare to existing utility services and capacity. CalEEMod results are included in Appendix C to this EIR.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, projects impacts associated with utilities and service systems would be considered significant if implementation of the proposed project would:

1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments.
4) 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.
5) Conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
Threshold 3:	Would the project 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?

Impact UTIL-1 THE PROPOSED PROJECT WOULD NOT REQUIRE THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT OR STORM WATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES. THE PROPOSED PROJECT WOULD BE ADEQUATELY SERVED BY EXISTING FACILITIES TO MEET THE PROJECT'S PROJECTED DEMANDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in the following analysis, the project would not require construction of new or expanded water, wastewater treatment, or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Electric power, natural gas, and telecommunications facilities would be adequate in serving development facilitated by the proposed project. Therefore, impacts would be less than significant.

Water

The proposed project would connect to existing service lines for water service. Based on the findings of the Water Supply Assessment prepared for the project (Appendix H) which outlines planned water supplies available through conservation and future sources, the project would increase water demand upon LADWP. However, as discussed under Impact UTIL-2, sufficient water supply would be available for the proposed project under normal-, single-dry, and multiple-dry year conditions. Therefore, the project would be served by existing water infrastructure and supply, and no improvements to the existing off-site infrastructure would be required to meet the project's water demand. Impacts would be less than significant.

Wastewater

LACSD and the City of West Hollywood maintain a sanitary sewer collection system and pumping stations that transfer wastewater from West Hollywood to Hyperion. Wastewater from the proposed project will discharge directly to the LACSD La Brea Avenue Trunk Sewer, located in La Brea Avenue at Romaine Street. The project would connect to existing wastewater infrastructure and would not require the expansion or construction of new wastewater facilities. Furthermore, prior to permitting, the project applicant would be required to pay a connection fee to connect facilities to the LACSD sewer system or to increase the strength or quantity of wastewater discharged from the project. Hyperion has a current daily capacity of approximately 450 mgd of sewage, and currently treats an average flow of 275 mgd, leaving an available capacity of 175 mgd (City of Los Angeles 2024).

The amount of wastewater generated by the project was estimated based on the estimated water demand calculated through CalEEMod and included as Appendix C to this EIR. As shown therein, the project would generate approximately 19,158,733 gallons per year of wastewater for residential uses and approximately 2,222,176 gallons of wastewater per year for commercial uses. In total, the

project would result in roughly 21,380,909 gallons of wastewater per year. This would translate to approximately 58,538 gallons per day and would account for 0.03 percent of Hyperion's total available capacity of 175 mgd. No additional expansion of wastewater services would be required. Therefore, impacts would be less than significant.

Stormwater

As described within Section 3.8, *Hydrology and Water Quality*, the proposed project would not significantly increase impervious surfaces on the project site or the amount of stormwater runoff that enters the City's storm drain system. The proposed project includes onsite drainage improvements to the existing storm drain network including updated catch basins on the corner of North La Brea Avenue and Romaine Street, a 352-square-foot biofiltration planter, and a cistern in the proposed parking garage with a minimum 5,720 cubic foot storage capacity. The project would comply with relevant water quality standards and waste discharge requirements, including WHMC Chapter 15.56 (Storm Water and Urban Runoff Pollution Control), which includes the National Pollutant Elimination System Construction General Permit, and WHMC Section 15.56.095 which includes the Low Impact Development Technical Design Manual (LID Manual) for the City. The proposed project would meet these requirements through the design of the onsite stormwater drainage improvements. Compliance with applicable federal, State, and local policies would ensure that stormwater is adequately managed on site and no expansion of off-site stormwater facilities are required. Impacts would be less than significant.

Electricity and Natural Gas

SCE would provide electricity to the proposed project and SoCalGas would provide natural gas to the project. Existing electricity infrastructure is located along North La Brea and Romaine Street which may be utilized to provide electricity to the project site. In addition, the project would connect to existing SoCalGas natural gas infrastructure in the area. As discussed in Section 4.4, *Energy*, of this EIR, both SCE and SoCalGas have capacity to serve the project, and neither construction nor operation of the proposed project would result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. While the project would need to connect to existing service lines, no additional expansion of electricity or gas services would be required. Therefore, impacts would be less than significant.

Telecommunication

AT&T, Frontier, and/or Hughesnet would provide telecommunication service to the project. Infrastructure capable of supporting telecommunications is currently present in the project site area. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 THERE ARE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROPOSED PROJECT DURING NORMAL-, SINGLE-DRY, AND MULTIPLE-DRY YEAR CONDITIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would increase water demand at the project site. The proposed project would need to connect to existing service lines for water service. Construction and operation of the proposed project would require the use of potable and non-potable water. As discussed in Section 4.2, *Air Quality*, the proposed project would result in the addition of approximately 750 residents within the city. The population addition of 750 residents would represent approximately 12.7 percent of the total growth forecasted within the city by SCAG (i.e., an increase from 36,700 persons in 2016 to 42,600 persons in 2045 for an increase of 5,900 persons) (SCAG 2024). Nonetheless, this increase in population would result in a corresponding increase in the demand for additional water supplies.

As shown within Table 2 through Table 4e of the Water Supply Assessment (Appendix H) prepared for the project, LADWP anticipates having sufficient water supply to cover its entire service area demand under normal-, single-dry, and multiple-dry years over the range of five years. In addition, surplus water supply could be achieved through demand reduction by conservation.

Although the project would increase water demand, service demand would be within the available capacities of the LADWP. Compliance with existing regulations and inclusion of the proposed water-conserving project features (i.e., high efficiency plumbing and other water fixtures, drought-tolerant landscaping and biofiltration planters) would also help ensure that an adequate supply of water is provided to the proposed project during normal-, single-dry, and multiple-dry year conditions. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Threshold 4:	Would the project 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?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-3 THE PROPOSED PROJECT WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE, WOULD NOT IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS, AND WOULD COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Implementation of the proposed project would result in the addition of 514 apartment units and 30,000 square feet of commercial/retail use. The Mid-Valley Sanitary Landfill has a maximum capacity of 101,300,000 cubic yards and has a remaining capacity of 61,219,377 cubic yards (CalRecycle 2023a). Based on the solid waste generation estimated using CalEEMod for the project, and included in Appendix C, the proposed project would generate an estimated 412 tons of solid waste per year, or roughly 1.1 tons per day. According to CalRecycle, the Mid-Valley Sanitary Landfill

has a maximum daily throughput of approximately 7,500 tons per day and anticipated closure date of April 1, 2045 (CalRecycle 2023a). Therefore, the project's solid waste would account for approximately 0.01 percent of the daily throughput of the Mid-Valley Sanitary Landfill. The proposed project would not generate solid waste in excess of the capacity of local solid waste infrastructure.

Furthermore, AB 939 requires the diversion of 50 percent of solid waste from landfills. SB 1383 also requires a 75 percent reduction in statewide disposal of organic waste from 2014 levels by 2025, which would further reduce the amount of solid waste disposed at Mid-Valley Sanitary Landfill. In addition, the project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, impacts related to solid waste generation and compliance with solid waste management and reduction regulations would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

4.14.4 Cumulative Impacts

The planned and pending projects within a one-mile radius of the project site are identified in Section 3, *Environmental Setting,* and include a seven-story hotel and restaurant project at 1040 North La Brea Avenue (abutting the project site to the north) and a seven-story office and retail project at 1011 North Sycamore Street in City of Los Angeles (abutting the project site to the east). However, the geographic scope for cumulative analysis of utilities includes each of the respective utility's service boundaries. This geographic scope is appropriate because public utilities involve widespread distribution of centralized resource supplies, such as potable water.

As discussed under Impacts UTIL-1 and UTIL-2, the proposed project would have access to adequate water, wastewater, stormwater, electricity and natural gas facilities to meet project demands, and expansion of such facilities would not be required. Cumulative projects would increase demand for water, wastewater, stormwater, electricity, natural gas, and telecommunication services, and may require facilities improvements as a result. However, similar to the proposed project, cumulative projects would comply with all applicable regulations related to the serving utilities.

Cumulative projects would likely rely on LADWP for their water supply; water is expected to be available for normal-, single-dry, and multiple-dry year conditions. With respect to wastewater, Hyperion has a current daily capacity of approximately 450 mgd of sewage, and currently treats an average flow of 275 mgd, leaving an available capacity of 175 mgd. Because the project would result in less than one percent of Hyperion's total remaining available capacity, the project would not significantly contribute to cumulative impacts and the remaining available capacity at Hyperion would be sufficient to meet other projects' wastewater needs. Moreover, as with the proposed project, cumulative projects in West Hollywood would comply with relevant water quality standards and waste discharge requirements included in the WHMC and LID Manual for the City through the design of the on-site stormwater drainage improvements. Compliance with applicable federal, State, and local policies would ensure that stormwater is adequately managed on site for all cumulative projects and no expansion of off-site stormwater facilities would be required.

As discussed under Impact UTIL-3, and according to CalRecycle, the Mid-Valley Sanitary Landfill has a maximum daily throughput of approximately 7,500 tons per day and has a remaining capacity of roughly 61,219,377 cubic yards through the year 2045 (CalRecycle 2023a). The project's solid waste

would account for approximately 0.01 percent of the daily throughput of the Mid-Valley Sanitary Landfill and, therefore, the project's contribution to a cumulative impact would not be cumulatively considerable. In addition, cumulative projects would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Nonetheless, due to the significant amount of remaining capacity of the Mid-Valley Sanitary Landfill, cumulative impacts associated with solid waste disposal would be less than significant.

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, significant environmental effects that cannot be avoided , and significant irreversible environmental effects impacts that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

The proposed project involves demolition of on-site buildings and structures for construction and operation of a new 34-story mixed-use residential and commercial building with 514 apartment units and 30,000 square feet (sf) of commercial/retail space on the ground floor. The proposed building would include 128 affordable and workforce units and 386 market rate units within 28 floors. The following sections analyze the project's potential growth inducement effects relation to population, economics, and the removal of obstacles to growth.

5.1.1 Population Growth

As discussed in Section XIII, *Population and Housing*, of the Initial Study (Appendix B), the proposed project would not directly or indirectly induce substantial population growth. However, the Initial Study was drafted prior to 2024 using available 2023 population and household data from the California Department of Finance (DOF) and comparing it to the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population forecast for the year 2045. On April 4, 2024, the SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS, which is the used in the evaluation in this EIR. The California DOF has since also released population information for the year 2024. Therefore, the same methodology used to evaluate population growth in the Initial Study is used with the most up-to-date information to compare the project's population to SCAG's latest forecast.

Bason on the assumption of 1.46 persons per household in the City of West Hollywood and a total of 514 apartment units, the project would accommodate an estimated 750 residents on-site (DOF 2024). However, the proposed project would accommodate planned growth within the City of West Hollywood based on SCAG's forecast for the city's population to increase to approximately 42,600 by 2050, as reported in SCAG's 2024-2050 RTP/SCS. This would be a total increase of 7,525 persons compared to the City's 2024 population of 35,075 persons (SCAG 2024; DOF 2024). The addition of up to 750 residents represents approximately 10 percent of the city's projected population growth under SCAG's RTP/SCS projections. This figure assumes all the project's residents would come from outside the city, though some residents of the project may already live in West Hollywood. Therefore, a population growth of 750 residents would be accommodated within the City's growth projections.

Moreover, as discussed in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of the EIR, development and operation of the project would not generate air quality or greenhouse gas emission (GHG) emissions that would result in a significant impact. In addition, the project involves redevelopment within a fully urbanized area that lacks significant scenic resources, native biological habitats, known cultural resource remains, surface water, or other environmental resources. Therefore, any population growth associated with the project would not result in significant long-term physical environmental effects.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. The construction industry differs from most other employment sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the duration in which their specific skills are needed to complete a particular phase of the construction process.

Nonetheless, the proposed project would also add long-term employment opportunities associated with operation of the commercial/retail and residential uses. Although staff would likely come from the existing regional work force, it is possible that most staff members would be newly generated employees requiring little to no previous training or experience (e.g., unskilled laborers), which would contribute to the city's regional employment growth. However, not all long-term employment opportunities generated by the project uses would demand employees with prior training or experience. Therefore, employment growth associated with the project would not result in a substantial regional draw of individuals with a specific skillset to the project area.

Using the SCAG Employment Density Report with rates specific to Los Angeles County, the forecasted number of project employees for the commercial/retail component of the proposed project would be approximately 59 employees (30,000 sf divided by 511 sf per employee [Other Retail/Services land use category]) (SCAG 2001). For the residential component of the proposed project, the project applicant anticipates approximately 25 employees across property management, leasing, affordable housing specialists, maintenance, porting, and janitorial roles. As such, the project would staff an estimated 84 employees for operation of its commercial/retail and residential uses.

For employment in the city, SCAG estimates an increase to 44,300 jobs by 2050 in the 2024-2050 RTP/SCS forecast, an increase of 9,900 jobs from 34,400 jobs in 2019 (SCAG 2024). Therefore, employment is expected to increase by approximately 28.7 percent between 2019 and 2050. In addition, factoring in the employees associated with the former CEMEX concrete batch plant (i.e., an estimated 25 employees according to CEMEX), the proposed project would not be anticipated to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or

around West Hollywood would be addressed as part of the CEQA environmental review for such development projects.

5.1.3 Removal of Obstacles to Growth

The proposed project is in a fully urbanized area that is well served by existing infrastructure. As discussed in Section 4.14, *Utilities and Service Systems*, and Section 4.14, *Transportation/Circulation,* of this EIR, existing infrastructure in West Hollywood would be adequate to serve the project. Minor improvements to water, sewer, and drainage connection infrastructure could be needed, but would be sized to specifically serve the proposed project. Furthermore, the project does not propose to modify the existing vehicle capacity of surrounding roadways (i.e., widen) or current sidewalk widths to meet project site access needs and no new roads would be required. Because the project constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth.

5.2 Significant and Unavoidable Environmental Effects

Section 15126.2(c) of the *CEQA Guidelines* requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures, for decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would not result in a significant and unavoidable impact related to any of the evaluated environmental issue areas.

5.3 Irreversible Environmental Effects

The *CEQA Guidelines* require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The proposed project involves infill development on a currently developed lot in the City of West Hollywood. Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the overall building floor area of 426,656 gross sf (not including parking areas, elevator and stair shafts, rooms housing operating equipment or machinery, or rooftop lunchroom). Consumption of these resources would occur as part of any development in the region and are not unique to the proposed project.

As discussed in Section 4.4, *Energy*, the project would be served electricity by Southern California Edison (SCE). SCE's default power mix offers 33.2 percent renewable, and they offer customers options for 50 percent or 100 percent renewable power mixes (SCE 2022). Of note, the residential portion of the project would be 100 percent electric and would not utilize natural gas, whereas the non-residential commercial/retail portion of the project could potentially utilize natural gas for heating and cooling systems. Although the project would increase local demand for energy resources, including non-renewable energy, increasingly efficient building design would offset this demand to some degree by reducing overall energy demands of the project. As discussed in Section 2, *Project Description*, the building design would incorporate several sustainability elements to meet

the California Green Building Standards Code (Part 11, Title 24) of the California Code of Regulations, otherwise known as CALGreen, and the West Hollywood Green Building Ordinance (i.e., West Hollywood Municipal Code Section 19.20.060). The project would include an on-site solar photovoltaic (PV) system, installed electric vehicle (EV) charging stations, or other energy-efficiency measures (e.g., low emission glazing, daylit corridors) that would facilitate energy efficiency and renewable energy generation. In addition, the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6) of the California Code of Regulations. The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. Consequently, the project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slow renewable resources would be less than significant. To reiterate, consumption of these resources would occur as part of any development in the region and is not unique to the proposed project.

Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and GHG emissions. However, as discussed in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of the EIR, development and operation of the project would not generate air quality or GHG emissions that would result in a significant impact. In addition, as discussed in Section 4.14, *Transportation/Circulation*, of the EIR, long-term VMT impacts associated with the proposed project would be less than significant based on applicable thresholds.

The project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in Section 4.11, *Public Services*, and Section 4.14, *Utilities and Service Systems*, of the EIR, impacts to these service systems would not be significant.

6 Alternatives

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an EIR. The *CEQA Guidelines* (Section 15126.6[a]) state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." *CEQA Guidelines* Section 15126.6(a) also states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Other alternatives can be considered but are not required to satisfy the requirements of CEQA.

In defining feasibility of alternatives, the *CEQA Guidelines* state that among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1]).

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts. As discussed in Section 2, *Project Description*, the objectives for the proposed project are as follows:

1. Maximize the provision of multi-family dwelling units and commercial uses in West Hollywood, including a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels.
2. Maximize high density housing opportunities in a high-quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and vehicle miles traveled.
3. Redevelop and improve the visual character of the project site with an architecturally significant development that is compatible in use and design with the area's urban character.
4. Replace an incompatible, outmoded industrial manufacturing plant with a mixed-use residential community to reduce potential hazards to the community.
5. Develop a mixed-use residential building with an active street-level identity within an increasingly walkable urban center to contribute to the public realm and improve the pedestrian experience.
6. Contribute to the economic base of the City and expand the City's fiscal budget by concentrating residential density within a commercial core to spur economic activity and substantially increase sales and property tax revenue.

7. Employ transit-oriented development and smart growth principles by providing high density housing near multimodal transportation networks including the Metro Bus Priority Lane along La Brea Avenue, future Metro Rail Santa Monica/La Brea station, cycling lanes, and pedestrian walkways.[1]
8. Incorporate sustainable building design practices that comply with the City's Green Building Program in order to improve building performance, minimize energy consumption, and promote greater health and wellness.

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, which involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of feasible options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Commercial Base Density
- Alternative 3: Mixed-Use Base Density

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each of the alternatives considered and Appendix K provides renderings for Alternative 2 and Alternative 3. The following analysis includes detailed descriptions of each of the alternatives considered and evaluates their respective environmental impacts for comparison to the proposed project. The following analysis also includes a brief description of alternatives considered but rejected for their infeasibility.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	Alternative 1: No Project	Alternative 2: Commercial Base Density	Alternative 3: Mixed-Use Base Density
Lot Area	43,316 sf	43,316 sf	43,316 sf	43,316 sf
Floor Area[1]	426,656 sf	11,906 sf	51,700 sf	141,450 sf
Unit Count	514 units	N/A	N/A	184 units
Height[2]	34 stories 353 ft to roof 377 ft to helipad	2 stories (warehouse)	2 stories 40 ft to roof	7 stories 75 ft to roof
Parking Area	2 sub grade levels	No sub grade level	1 sub grade level	1 sub grade level
Parking Spaces	674 vehicle spaces 394 bicycle stalls	N/A	91 vehicle spaces	250 vehicle spaces
Floor Area Ratio (FAR)	9.85	0.27	1.2	3.27

sf = square feet; N/A = not applicable; ft = feet
[1] Represents the FAR floor area which does not include parking areas, elevator shafts, stair shafts, rooms housing building operating equipment or machinery rooms, rooftop lunchrooms, or areas outside the surrounding walls of a building or structure.

[1] According to the United States Environmental Protection Agency, "smart growth" refers to a range of development and conservation strategies that help protect human health and the natural environment and make communities more attractive, economically stronger, and more socially diverse. These strategies include mixed land uses; compact building design; a range of housing opportunities and choices; walkable neighborhoods; distinctive, attractive communities with a strong sense of place; preservation of open space, farmland, natural beauty, and critical environmental areas; development directed towards existing communities; a variety of transportation choices; predictable, fair, and cost effective development decisions; and community and stakeholder collaboration in development decisions.

6.1 Alternative 1: No Project

6.1.1 Description

The No Project Alternative assumes that the vacant 11,906-square-foot (sf) warehouse building located at 1020 and 1028 North La Brea Avenue and the foundation of the two-story office building at 1000 and 1014 North La Brea Boulevard associated with the former CEMEX concrete batch plant would remain without any additional site modifications. As discussed in Section 2, *Project Description*, CEMEX's tenant lease expired in December 2024. To clear the site prior to expiration of the lease, CEMEX pursued a Demolition Permit to disassemble and remove its concrete batch plant equipment (i.e., plant structure/machinery, water tanks) and demolish its 634-sf two-story office building down to its foundation, which spans West Hollywood and Los Angeles city limits.[2] The office building's foundation would remain on-site under this alternative without any additional site modifications. Because disassembly and demolition of equipment and the office building would have occurred regardless of approval and implementation of the proposed project, this alternative encompasses the effects of the limited construction work and assumes that actual "no project" conditions would consist of the warehouse building remaining as the only on-site structure.

The No Project Alternative would reduce all impacts analyzed in Section 4, *Environmental Impact Analysis*, when compared to the proposed project. However, the No Project Alternative would not fulfill any of the project objectives because it would not redevelop and improve the visual character of the project site by replacing an incompatible and outmoded industrial use with a mixed-use building. The No Project Alternative would not provide a range of affordable and market rate housing units to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks, nor would it contribute to the economic base of the city by concentrating residential density with serving commercial uses within a larger commercial core.

6.1.2 Impact Analysis

Aesthetics

The project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. Under the No Project Alternative, the visual character and quality of the project site would be described by the on-site warehouse building, which would remain as the only on-site structure. The remainder of the project site would remain a vacant lot. As such, the No Project Alternative would not have the potential to conflict with scenic vistas (including scenic public views of the Hollywood Hills and Los Angeles Basin, scenic resources within a State scenic highway, regulations governing scenic quality, or create new sources of light or glare. Therefore, the No Project Alternative would have no aesthetics effects and would result in less effects than those under the proposed project because it would not redevelop the site.

Air Quality

The No Project Alternative encompasses the limited construction work generating temporary criteria pollutants, pollutant concentrations, and odors; however, it would not involve long-term operational activities that would generate air quality emissions. Because the project site would be left as a mostly vacant lot, fugitive dust emissions (particulate matter $[PM]_{10}$ and $PM_{2.5}$) would

[2] Demolition of the office building was also separately processed by City of Los Angeles at the time of preparation of this EIR.

continue to occur when wind passes over the site and disperses dust. Short-term (construction related) air quality impacts would be drastically reduced and long-term air quality impacts would be avoided altogether under Alternative 1. Therefore, air quality impacts would remain less than significant but less under the No Project Alternative compared to the proposed project.

Cultural Resources

There are no historic resources on-site. Furthermore, the No Project Alternative would not include ground-disturbing activities and would therefore not involve the disturbance of any previously unknown archaeological resources or human remains. As such, the No Project Alternative would not require implementation of Mitigation Measures CUL-1 through CUL-4 to reduce impacts on unanticipated discoveries of archaeological resources and human remains compared to the proposed project. Impacts related to cultural resources would not occur and the No Project Alternative would result in less impacts compared to the proposed project.

Energy

This alternative encompasses the limited construction work requiring minimal energy, but it would not involve long-term energy or fuel use. As such, the No Project Alternative would not result in impacts associated with wasteful inefficient or unnecessary consumption of energy and no conflicts energy efficiency plans could occur. Impacts related to energy would remain less than significant but less under the No Project Alternative compared to the proposed project.

Geology and Soils

Based on the high seismicity of Southern California and subsurface site conditions (i.e., expansive soils, high groundwater table), the project site is currently exposed to potential effects from seismic ground shaking and unstable geologic units/soils. However, Alternative 1 would not involve construction of a new development. Therefore, there would be no potential for this alternative to expose people or structures to safety risks associated with seismic or other geologic hazards and implementation of Mitigation Measure GEO-1 for incorporation of recommended geotechnical design features identified in the Geotechnical Investigation would not be required. Similarly, this alternative would not include ground-disturbing activities that could impact paleontological resources within a high sensitivity area, and therefore would not require implementation of Mitigation Measure GEO-2 to mitigate impacts to these resources through the recovery, identification, and curation of previously unrecovered fossils. Impacts would not occur and the No Project Alternative would result in less impacts related to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

The No Project Alternative encompasses the limited construction work generating temporary greenhouse gas (GHG) emissions; however, it would not involve long-term operational activities that would generate GHG emissions. As such, the No Project Alternative would not conflict with the City's Climate Action and Adaptation Plan (CAAP), the 2022 Scoping Plan, the City's General Plan, or the Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). While short-term (construction related) GHG emissions would be drastically reduced, long-term GHG emissions would be avoided altogether under Alternative 1. Impacts related to GHG emissions would remain less than significant but less under the No Project Alternative compared to the proposed project.

Hazards and Hazardous Materials

As with the proposed project, any use, transport, and release of hazardous materials (e.g., solvents, construction fuels, lead-based paints [LBPs], asbestos-containing materials [ACMs]), would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, including such handling within 0.25-mile of a school. Based on subsurface site investigations, there are known petroleum hydrocarbon and volatile organic compound (VOC) impacts in the soil, soil vapor, and groundwater at the project site at concentrations exceeding the applicable regulatory screening levels for residential use. However, because no ground-disturbing activities would occur on the project site, there would be no potential for construction activities to expose individuals to subsurface hazards and hazardous materials. Furthermore, construction of a new development would not occur under this alternative and it would not require implementation of Mitigation Measures HAZ-1 through HAZ-4 during grading, construction, and operation of the project to reduce hazardous materials impacts below applicable significance thresholds. Therefore, the No Project Alternative would result in less than significant impacts and less impacts related to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

The No Project Alternative encompasses the limited construction work to disassemble the concrete batch plant equipment and demolition the office building to its foundation, subject to the City's Storm Water Management and Discharge Control Ordinance. However, no other site modifications or ground-disturbing activities that would change the existing hydrology and drainage conditions would occur. As such, the No Project Alternative would avoid any potential project-related hydrology and water quality impacts and would not require mitigation (i.e., Mitigation Measures HAZ-1 through HAZ-4 to reduce impacts related to hazardous materials from subsurface conditions or Mitigation Measure GEO-1 for incorporation of recommended geotechnical design features). Therefore, the No Project Alternative would result in less than significant impacts and less impacts to hydrology and water quality compared to the proposed project.

Land Use and Planning

Under existing conditions, the project site is designated Commercial, Regional Center (CR) with a Mixed-Use incentive Overlay and is also zoned CR. Because construction of a new development would not occur, this alternative would not require a Development Agreement for the development of the mixed-use development or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement. No impact would occur and the No Project Alternative would result in less impacts related to land use and planning compared to the proposed project.

Noise

The No Project Alternative encompasses the disassembly of the concrete batch plant equipment and demolition of the office building; however, no other site modifications or construction of a new development would occur. Temporary construction-related noise and vibration associated with the limited construction work would be comparatively shorter in duration compared to construction associated with development. Furthermore, no new long-term sources of noise would be introduced on the project site for operational purposes (e.g., traffic noise increases from new vehicle trips). Impacts related to noise and vibration would remain less than significant but less under the No Project Alternative compared to the proposed project.

Public Services

Under the No Project Alternative, there would not be increased demands for police and fire protection services, because it would not generate any residents or employees that would create an additional demand upon these public services. No impact would occur, and the No Project Alternative would result in less impacts to public services compared to the proposed project.

Transportation – Circulation

The No Project Alternative encompasses the limited construction work to disassemble the concrete batch plant equipment and demolish the office building to its foundation. However, construction of a new development would not occur and the No Project Alternative would not generate any new daily traffic that would result in potential impacts associated with conflicts with applicable transportation plans or vehicle miles traveled (VMT). Furthermore, this alternative would not result in conditions that would create roadway hazards or impeded emergency access at the project site. Impacts would not occur and the No Project Alternative would result in less impacts to transportation compared to the proposed project.

Tribal Cultural Resources

No tribal cultural resources have been identified by California Native American tribes as part of the City's Assembly Bill (AB) 52 notification and consultation processes. Nonetheless, the No Project Alternative would not include ground-disturbing activities that would disturb any previously unknown tribal cultural resources. Implementation of the No Project Alternative would not require implementation of Mitigation Measures TCR-1 and TCR-2 to reduce impacts related to tribal cultural resources. Therefore, impacts would not occur and the No Project Alternative would result in less impacts to tribal cultural resources compared to the proposed project.

Utilities and Service Systems

No new domestic water, sewer, or stormwater drainage facilities would be needed under the No Project Alternative, and there would be no additional demands for domestic water or wastewater treatment services. Furthermore, the No Project Alternative would not result in an increased demand for solid waste collection and disposal services. No impact would occur and the No Project Alternative would result in less impacts related to utilities and service systems compared to the proposed project.

6.2 Alternative 2: Commercial Base Density

6.2.1 Description

Similar to the proposed project, this alternative would involve the demolition of on-site buildings and structures and removal of two mature trees.[3] However, the Commercial Base Density Alternative proposes to construct a two-story (40-foot-tall), 51,700-sf commercial building with one subterranean parking level with 91 vehicle parking spaces. This alternative would not include any billboards as part of the project. The Commercial Base Density Alternative would have a 1.2 FAR, which is below the maximum permitted (i.e., 3.0 FAR) in order to maximize financial feasibility. The

[3] As discussed under the No Project Alternative, disassembly and demolition of equipment and the office building have already occurred regardless of implementation of the proposed project. Therefore, project conditions prior to implementation of the proposed project would consist of the warehouse building remaining as the only on-site structure.

FAR density and building height are adjusted per construction costs and market demand, and the subterranean parking is limited to one level to reduce excavation costs. This alternative would be consistent with other commercial development along La Brea Avenue and would mirror a similar magnitude of retail commercial center across La Brea Avenue to the west.

Based on a decrease in building square footage from 426,656 sf to 51,700 sf, a reduction in subterranean parking levels from two levels to one level, a substantial reduction in building height from 34 stories to two stories, and elimination of a residential component in comparison to the proposed project, the Commercial Base Alternative would reduce all impacts analyzed in Section 4, *Environmental Impact Analysis*, when compared to the proposed project. However, Alternative 2 would not fulfill all project objectives because it would only consist of a commercial building and would not include a range of affordable and market rate housing units to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks. Of the identified project objectives, Alternative 2 would only meet Objective 8 since it would still replace existing uses with a building compliant with the City's Green Building Ordinance (i.e., WHMC Section 19.20.060).

6.2.2 Impact Analysis

Aesthetics

As discussed in Section 4.1, *Aesthetics*, Senate Bill (SB) 743 streamlines CEQA review for projects located within transit priority areas (TPA). Pursuant to SB 743, "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." The Commercial Base Density Alternative would involve a two-story, 51,700-sf commercial building located on an infill site within a TPA. Therefore, as an employment center project, Alternative 2 would also not result in significant aesthetics impacts similar to the proposed project.[4]

Nonetheless, the project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. The commercial building under this alternative would contain 374,956 sf less than the proposed project and would be 337 feet shorter than the proposed project. Similar to the proposed project, Alternative 2 would not conflict with scenic vistas or regulations governing scenic quality; however, Alternative 2 would introduce less light and glare on-site as there would be less windows and other reflective surfaces, less overall daytime lighting, no billboards, and a decrease in nighttime lighting. Furthermore, this alternative would be consistent with other commercial development along La Brea Avenue in terms of character and use. Under Alternative 2, development on the project site would be less in density, intensity, and aesthetic effects, including visual changes to the site. Aesthetic effects would be less than the proposed project.

Air Quality

Under Alternative 2, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, this alternative would result in less construction and operational air quality emissions, pollutant concentrations, and

[4] According to Section 21099(a)(1) of the California Government Code, an "employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA. The site is zoned Commercial, Regional Center (CR), as defined by the City's Zoning Ordinance and consistent with the CR land use designation of the General Plan. The project also has a 1.2 FAR. Therefore, the project is considered an "employment center project."

odors due to less intensive construction activities required, no residential uses, and an overall smaller building size. Although this alternative would increase the number of employees in the area more than the proposed project, overall growth would remain within Southern California Association of Governments (SCAG) growth projections and would be less than the proposed project since Alternative 2 does not include the development of 514 residential units. Air quality impacts would remain less than significant, but less under Alternative 2 compared to the proposed project.

Cultural Resources

Similar to the proposed project, the Commercial Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. However, there are no historic resources on-site that would be impacted by construction activities. In addition, Alternative 2 would only require excavation for one level of subterranean parking rather than two under the proposed project. Because this alternative would require less intensive grading and excavation activities, it would result in less impacts to previously unknown archaeological resources and human remains than the proposed project. Nonetheless, similar to the proposed project, Alternative 2 would still require implementation of Mitigation Measures CUL-1 through CUL-4 to reduce impacts on unanticipated discoveries of archaeological resources and human remains. Although impacts would remain less than significant with mitigation, Alternative 2 would result in less impacts to cultural resources compared to the proposed project due to less grading and excavation activities required.

Energy

Under the Commercial Base Density Alternative, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, this alternative would result in less consumption of energy resources due to less intensive construction activities required, no residential uses, and an overall smaller building size. While Alternative 2 would result in an increase in short-term and long-term energy consumption, it would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with energy efficiency plans, similar to the proposed project. Impacts related to energy would remain less than significant but less under Alternative 2 compared to the proposed project.

Geology and Soils

The commercial development under Alternative 2 would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Based on the high seismicity of Southern California and subsurface site conditions, the project site is currently exposed to potential effects from seismic ground shaking and unstable geologic units/soils. However, the project would still be subject to the California Building Code and any recommended geotechnical design features (including those related to dewatering, grading, foundation construction, and floor slab design) from a project-specific Geotechnical Investigation to address potential effects from seismic ground shaking, expansive soils, and the high groundwater table similar to the proposed project. In addition, due to the high paleontological sensitivity of the project area, the Commercial Base Density Alternative would also require implementation of Mitigation Measure GEO-2 to mitigate impacts to these resources through the recovery, identification, and curation of previously unrecovered fossils. However, due to a decrease in excavation activities and building height

compared to the project, Alternative 2 would result in less than impacts related to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

Under Alternative 2, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, this alternative would result in less construction and operational GHG emissions . Nonetheless, similar to the proposed project, Alternative 2 would not conflict with the City's CAAP, the 2022 Scoping Plan, the City's General Plan, or the SCAG 2024-2050 RTP/SCS. Due to less intensive construction activities required, no residential uses, and an overall smaller building size, Alternative 2 would result in less impacts related to GHG emissions compared to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, the Commercial Base Density Alternative would require the demolition of on-site buildings and structures and removal of two mature trees. As with the proposed project, any use, transport, and release of hazardous materials (e.g., solvents, construction fuels, LBPs, ACMs), would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, including such handling within 0.25-mile of a school. Based on subsurface site investigations, there are known petroleum hydrocarbon and VOC impacts in the soil, soil vapor, and groundwater at the project site at concentrations exceeding the applicable regulatory screening levels for commercial use. However, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Like the proposed project, Alternative 2 would be required to implement Mitigation Measures HAZ-1 through HAZ-4 during grading, construction, and operation of the project to reduce hazardous materials impacts below applicable thresholds of significance. Although impacts would remain less than significant with mitigation, Alternative 2 would result in less impacts related to hazards and hazardous materials under this alternative compared to the proposed project due to less grading and excavation activities required.

Hydrology and Water Quality

The Commercial Base Density Alternative would be subject to the same hydrology and water quality regulations as the proposed project. Although this alternative would only require excavation for one level of subterranean parking rather than two under the proposed project, it would still be subject to the requirements of the State Water Resources Control Board (SWRCB) Construction Stormwater General Permit and the City's Storm Water Management and Discharge Control Ordinance. The General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) to control the discharge of pollutants, including sediment, into surface water drainages. However, due to contaminated soils and a high groundwater table present on-site, and in compliance with water quality standards/waste discharge requirements, Alternative 2 would still require implementation of Mitigation Measures HAZ-1 through HAZ-4 to reduce hazardous materials impacts from subsurface conditions and Mitigation Measure GEO-1 for incorporation of recommended geotechnical design features (e.g., features related to the subterranean retaining wall). Upon operation, the project would also be required to comply with the requirements of the Los Angeles County and Ventura County Municipal Separate Storm Sewer System (MS4) Permit (and thus a Standard Urban Stormwater Mitigation Plan [SUSMP]) in addition to the City's Storm Water

Management and Discharge Control Ordinance. Alternative 2 would have a similar building footprint to the proposed project and would also not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative would impede sustainable groundwater management plans for the basin. Although the Commercial Base Density Alternative would still require mitigation, this alternative would result in less impacts related to hydrology and water quality compared to the proposed project due to less grading and excavation activities required.

Land Use and Planning

The project site is designated CR with a Mixed-Use Incentive Overlay and is also zoned CR. The Commercial Base Density Alternative would involve construction of a two-story 51,700-sf commercial building with one subterranean parking level. This alternative would have a 1.2 FAR, which is below the maximum permitted base density of 3.0 FAR. Because Alternative 2 is designed to be compliant with the base zoning and development regulations for strict commercial use, it would not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project. This alternative would be consistent with other commercial development along La Brea Avenue and would mirror a similar magnitude of retail commercial center across La Brea Avenue to the west.

Similar to the proposed project, this alternative would be consistent with SCAG's 2020-2045 and 2024-2050 RTP/SCS and applicable goals and policies of the City's General Plan Land Use and Urban Form Chapter. Although it would not include a residential component, Alternative 2 would still be infill development that would focus growth near multiple public transit options that would encourage walking and biking to and from the site and reduce the demand for motorized transportation, as with the proposed project. Impacts would remain less than significant similar to the proposed project. Nonetheless, because Alternative 2 would not require a Development Agreement or a Zoning Map Amendment, it would result in less impacts related to land use and planning compared to the proposed project.

Noise

Under Alternative 2, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Therefore, although this alternative would still result in temporary construction-related noise and vibration, such noise and vibration levels would be comparatively shorter in duration compared to construction associated with development and would also not result in significant impacts. Under long-term operational conditions, noise levels would also be less than the proposed project since Alternative 2 would not include a residential component and noise sources typically associated with residential uses (i.e., increased vehicle trips and outdoor conversations) nor would it include a development of comparable density and intensity as the proposed project. Impacts related to noise and vibration would remain less than significant under Alternative 2, but less compared to the proposed project.

Public Services

Alternative 2 involves the development of a commercial building totaling 51,700 sf, which would be 374,956 sf less than the proposed project. Similar to the proposed project, Alternative 2 would result in an increase in employees under this alternative, compared to the site's existing conditions, which would create an additional demand upon police and fire protection services. However, this

alternative would not include a residential component and overall growth would be less compared to the proposed project. Therefore, as with the proposed project, the Commercial Base Density Alternative would not lead to an increased demand for public services that would require the establishment of new or modified facilities for fire and police protection services. Impacts under Alternative 2 would remain less than significant; however, impacts to public services would be less than the proposed project.

Transportation – Circulation

Similar to the proposed project, the Commercial Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. Under this alternative, temporary and sidewalk closures along La Brea Avenue and Romaine Street are still anticipated similar to the proposed project, although for a shorter duration. Nonetheless, as with the proposed project, construction activities associated with Alternative 2 would be required to comply with West Hollywood Municipal Code (WHMC) Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. As such, impacts related to emergency access would also be less than significant as with the proposed project.

This alternative involves the development of a commercial building totaling 51,700 sf which would be 374,956 sf less than the proposed project. Under this alternative, vehicle access would be provided via an ingress/egress driveway on North La Brea Avenue at the same location as the proposed project; however, this alternative would not provide a second driveway along Romaine Street. Regardless, the driveway on La Brea Avenue would be designed to meet City standards and would provide adequate sight distance. Alternative 2 would be compatible in use when compared to its existing land use designation and zoning and when compared to the surrounding area. Similar to the proposed project, Alternative 2 would also not introduce hazardous geometric design features. Due to less intensive construction activities required, no residential uses, and an overall smaller building size, Alternative 2 would also not conflict with existing and planned transit, bicycle, and pedestrian facilities or programs, plans, ordinances, or policies governing these facilities, similar to the proposed project.

Per the WHMC parking requirements, Alternative 2 would be required to provide a minimum of 91 parking spaces, which would be met within the on-site parking garage. This alternative would also provide bicycle parking spaces. Based on the West Hollywood Transportation Impact Study Guidelines (TIS Guidelines), Alternative 2 would also result in less-than-significant impacts related to VMT because it would have an FAR greater than 0.75, would not provide more parking spaces required by the WHMC, would be consistent with the SCAG RTP/SCS, would not replace existing affordable housing units, and would not have potential for significant regional draw in a specialized workforce (similar to the proposed project). Alternative 2 would result in less than significant impacts to transportation similar to the proposed project; however, due to a decrease in building density, impacts would be less compared to the proposed project.

Tribal Cultural Resources

Similar to the proposed project, the Commercial Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. However, Alternative 2 would only require excavation for one level of subterranean parking rather than two

under the proposed project. No tribal cultural resources have been identified by California Native American tribes as part of the City's AB 52 notification and consultation processes. Because this alternative would require less intensive grading and excavation activities, it would result in less impacts on any previously unknown tribal cultural resources. However, as with the proposed project, Alternative 2 would still require implementation of Mitigation Measures TCR-1 and TCR-2 to reduce impacts related to tribal cultural resources. Impacts to tribal cultural resources would be less than significant with mitigation under Alternative 2; however, due to less grading and excavation activities required, impacts would be less compared to the proposed project.

Utilities and Service Systems

Alternative 2 involves the development of a commercial building totaling 51,700 sf, which would be 374,956 sf less than the proposed project. Alternative 2 would result in a demand for services including natural gas, electricity, water, wastewater treatments, and solid waste; however, demand would be less than the proposed project. Alternative 2 would tie into existing utility lines within the existing roadways and within the existing right-of-way adjacent to the project site. As with the proposed project, existing utilities would be extended and upgraded as needed during construction to serve the anticipated demand of commercial uses under Alternative 2. While this alternative would increase the overall demand for services compared to existing conditions, adequate capacity to serve this alternative is also anticipated because it would meet existing land use designation and zoning regulations and would have a less building density than the proposed project. Impacts would remain less than significant like the proposed project; however, Alternative 2 would result in less impacts related to utilities and service systems due to the smaller building size and density.

6.3 Alternative 3: Mixed-Use Base Density

6.3.1 Description

Similar to the proposed project, this alternative would involve the demolition of on-site buildings and structures and removal of two mature trees.[5] However, the Mixed-Use Base Density Alternative proposes to construct a seven-story (75-foot-tall), 141,450-sf mixed-use building consisting of 184 residential units and 13,000 sf of commercial/retail use. Of the 184 residential units, 20 percent of units would be affordable units consisting of 28 units for very low-income households and nine units for moderate-income households. The remaining 147 units would be market rate units. This alternative would include one subterranean parking level and two above-ground parking levels with 250 parking spaces. This alternative would not include any billboards as part of the project. The Mixed-Use Base Density Alternative would have a 3.27 FAR, which is below the maximum permitted (i.e., 4.85 FAR) in order to maximize financial feasibility.[6] The building height is limited to 75 feet to avoid high-rise constraints. Furthermore, subterranean parking is limited to one level to reduce excavation costs.

Based on a decrease in building square footage from 426,656 sf to 141,450 sf, a reduction in subterranean parking levels from two levels to one level, a substantial reduction in building height from 34 stories to seven stories in comparison to the proposed project, and a decrease from

[5] As discussed under the No Project Alternative, disassembly and demolition of equipment and the office building have already occurred regardless of implementation of the proposed project. Therefore, project conditions prior to implementation of the proposed project would consist of the warehouse building remaining as the only on-site structure.

[6] The 4.85 FAR calculation factors in an additional FAR of 0.5 as a development incentive for a mixed-use project in the Mixed-Use Incentive Overlay zone per WHMC Section 19.10.050 and an additional FAR of 1.35 as a development incentive for a project with affordable housing per WHMC Section 19.22.050.

524 residential units to 184 units, the Mixed-Use Base Density Alternative would reduce all impacts analyzed in Section 4, *Environmental Impact Analysis*, when compared to the proposed project. Furthermore, Alternative 3 would fulfill the same project objectives as the proposed project, albeit to a lesser degree than the proposed project, because it would still consist of a mixed-use building that would include a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks.

6.3.2 Impact Analysis

Aesthetics

As discussed in Section 4.1, *Aesthetics*, SB 743 streamlines CEQA review for projects located within TPAs. Pursuant to SB 743, "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." The Mixed-Use Base Density Alternative would involve a 141,450-sf mixed-use building consisting of 184 residential units and 13,000 sf of commercial/retail use located on an infill site within a TPA. Therefore, as a mixed-use residential project, Alternative 3 would also not result in significant aesthetics impacts similar to the proposed project.

Nonetheless, the project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. The mixed-use building under this alternative would contain 285,206 sf less than the proposed project and would be 302 feet shorter than the proposed project. Similar to the proposed project, Alternative 3 would not conflict with scenic vistas or regulations governing scenic quality; however, Alternative 3 would introduce less light and glare on-site as there would be less windows and other reflective surfaces, less overall daytime lighting, no billboards, and a decrease in nighttime lighting. Under Alternative 3, development on the project site would be less in density, intensity, and aesthetic effects, including visual changes to the site. Aesthetic effects would be less than the proposed project.

Air Quality

Under Alternative 3, the mixed-use building would be 285,206 sf less and 302 feet shorter than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, Alternative 3 would result in less construction and operational air quality emissions, pollutant concentrations, and odors due to less intensive construction activities required, a reduction in commercial/retail sf and residential units, and an overall smaller building size. Although this alternative would increase the number of employees and residents in the area, the overall increase would be less than the proposed project and still within SCAG growth projections. Air quality impacts would remain less than significant, but less under Alternative 3 compared to the proposed project.

Cultural Resources

Similar to the proposed project, Alternative 3 would involve the demolition of on-site buildings and structures and removal of two mature trees. However, there are no historic resources on-site that would be impacted by construction activities. In addition, Alternative 3 would only require excavation for one level of subterranean level parking rather than two under the proposed project. Because this alternative would require less intensive grading and excavation activities, it would

result in less impacts to previously unknown archaeological resources and human remains than the proposed project. Nonetheless, similar to the proposed project, Alternative 3 would still require implementation of Mitigation Measures CUL-1 through CUL-4 to reduce impacts on unanticipated discoveries of archaeological resources and human remains. Although impacts would remain less than significant with mitigation, Alternative 3 would result in less impacts to cultural resources compared to the proposed project due to less grading and excavation activities required.

Energy

Under the Mixed-Use Base Density Alternative, the mixed-use development be 285,206 sf less and 302 feet shorter than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, this alternative would result in less consumption of energy resources due to less intensive construction activities required, a reduction in commercial/retail sf and residential units, and an overall smaller building size. While Alternative 3 would result in an increase in short-term and long-term energy consumption, it would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with energy efficiency plans, similar to the proposed project. Impacts related to energy would remain less than significant but less under Alternative 3 compared to the proposed project.

Geology and Soils

The mixed-use development under Alternative 3 would be 285,206 sf less and 302 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Based on the high seismicity of Southern California and subsurface site conditions, the project site is currently exposed to potential effects from seismic ground shaking and unstable geologic units/soils. However, the project would still be subject to the California Building Code and any recommended geotechnical design features (including those related to dewatering, grading, foundation construction, and floor slab design) from a project-specific Geotechnical Investigation to address potential effects from seismic ground shaking, expansive soils, and the high groundwater table similar to the proposed project. In addition, due to the high paleontological sensitivity of the project area, the Mixed-Use Base Density Alternative would also require implementation of Mitigation Measure GEO-2 to mitigate impacts to these resources through the recovery, identification, and curation of previously unrecovered fossils. Nonetheless, due to a decrease in excavation activities and building height compared to the project, Alternative 3 would result in less than impacts related to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

Under Alternative 2, the mixed-use development would be 285,206 sf less and 302 feet shorter than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. As such, this alternative would result in less construction and operational GHG emissions. Nonetheless, similar to the proposed project, Alternative 3 would not conflict with the City's CAAP, the 2022 Scoping Plan, the City's General Plan, or the SCAG 2024-2050 RTP/SCS. Due to less intensive construction activities required

and an overall smaller building size, Alternative 3 would result in less impacts related to GHG emissions compared to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, the Mixed-Use Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. As with the proposed project, any use, transport, and release of hazardous materials (e.g., solvents, construction fuels, LBPs, ACMs), would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, including such handling within 0.25-mile of a school. Based on subsurface site investigations, there are known petroleum hydrocarbon and VOC impacts in the soil, soil vapor, and groundwater at the project site at concentrations exceeding the applicable regulatory screening levels for residential and commercial use. Like the proposed project, Alternative 3 would be required to implement Mitigation Measures HAZ-1 through HAZ-4 during grading, construction, and operation of the project to reduce hazardous materials impacts below applicable thresholds of significance. Although impacts would remain less than significant with mitigation, Alternative 3 would result in less impacts related to hazards and hazardous materials under this alternative compared to the proposed project due to less grading and excavation activities required.

Hydrology and Water Quality

The Mixed-Use Base Density Alternative would be subject to the same hydrology and water quality regulations as the proposed project. Although this alternative would only require excavation for one level of subterranean parking rather than two under the proposed project, it would still be subject to the requirements of the SWRCB Construction Stormwater General Permit and the City's Storm Water Management and Discharge Control Ordinance. The General Permit requires preparation and implementation of a SWPPP to control the discharge of pollutants, including sediment, into surface water drainages. However, due to contaminated soils and a high groundwater table present on-site and in compliance with water quality standards/waste discharge requirements, Alternative 3 would still require implementation of Mitigation Measures HAZ-1 through HAZ-4 to reduce hazardous materials impacts from subsurface conditions and Mitigation Measure GEO-1 for incorporation of recommended geotechnical design features (e.g., features related to the subterranean retaining wall). Upon operation, the project would also be required to comply with the requirements of the Los Angeles County and Ventura County MS4 Permit (and thus a SUSMP) in addition to the City's Storm Water Management and Discharge Control Ordinance. Alternative 3 would have a similar building footprint to the proposed project and would also not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative would impede sustainable groundwater management plans for the basin. Although the Mixed-Use Base Density Alternative would still require mitigation, this alternative would result in less impacts related to hydrology and water quality compared to the proposed project due to less grading and excavation activities required.

Land Use and Planning

The project site is designated CR with a Mixed-Use Incentive Overlay and is also zoned CR. The Mixed-Use Base Density Alternative would involve construction of a seven-story 141,450-sf mixed-use development with 184 residential units and one subterranean parking level. Alternative 3 would have a 3.27 FAR, which is below the maximum permitted base density of 4.85 FAR. Because

Alternative 3 is designed to be compliant with the base zoning and development regulations for a mixed-use development, it would not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project. Similar to the proposed project, this alternative would be consistent with SCAG's 2020-2045 and 2024-2050 RTP/SCS and applicable goals and policies of the City's General Plan Land Use and Urban Form Chapter. Alternative 3 would still be infill development that would focus growth, including housing and affordable units, near multiple public transit options that would encourage walking and biking to and from the site and reduce the demand for motorized transportation, as with the proposed project. Impacts would remain less than significant similar to the proposed project. Nonetheless, because Alternative 3 would not require a Development Agreement or a Zoning Map Amendment, it would result in less impacts related to land use and planning compared to the proposed project.

Noise

Under Alternative 3, the mixed-use development would be 285,206 sf less and 302 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Therefore, although this alternative would still result in temporary construction-related noise and vibration, such noise and vibration levels would be comparatively shorter in duration compared to construction associated with development and would also not result in significant impacts. Under long-term operational conditions, noise levels would also be less than the proposed project since Alternative 3 would reduce both on-site commercial and residential uses and thereby reduce noise sources associated with these uses (i.e., increased vehicle trips and outdoor conversations). Impacts related to noise and vibration would remain less than significant under Alternative 3, but less compared to the proposed project.

Public Services

Alternative 3 involves the development of a mixed-use building totaling 141,450 sf, which would be 285,206 sf less than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Similar to the proposed project, Alternative 3 would result in an increase in employees and residents in the area compared to the site's existing conditions, which would create an additional demand upon police and fire protection services. However, overall growth under this alternative would be less compared to the proposed project. Therefore, as with the proposed project, the Mixed-Use Base Density Alternative would not lead to an increased demand for public services that would require the establishment of new or modified facilities for fire and police protection services Impacts to under Alternative 3 would remain less than significant; however, impacts to public services would be less compared to the proposed project.

Transportation – Circulation

Similar to the proposed project, the Mixed-Use Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. Under this alternative, temporary and sidewalk closures along La Brea Avenue and Romaine Street are still anticipated similar to the proposed project, although for a shorter duration. Nonetheless, as with the proposed project, construction activities associated with Alternative 3 would be required to comply with West Hollywood Municipal Code (WHMC) Chapter 9.70 related to construction site management, which includes requirements for proper site maintenance, construction worker

parking restrictions, noise restrictions, traffic control provisions, fencing and security, community outreach, stormwater quality protections, erosion control measures, and construction site signage. As such, impacts related to emergency access would also be less than significant as with the proposed project.

This alternative involves the development of a mixed-use building totaling 141,450 sf, which would be 285,206 sf less than the proposed project. Under this alternative, vehicle access would be provided via three ingress/egress driveways on North La Brea Avenue and Romaine Street, totaling the same number of driveways as the proposed project. All driveways would be designed to meet City standards and would provide adequate sight distance. Alternative 3 would be compatible in use when compared to its existing land use designation and zoning and when compared to the surrounding area. Similar to the proposed project, Alternative 3 would also not introduce hazardous geometric design features. Due to less intensive construction activities required and an overall smaller building size, Alternative 3 would also not conflict with existing and planned transit, bicycle, and pedestrian facilities or programs, plans, ordinances, or policies governing these facilities, similar to the proposed project.

Per the WHMC parking requirements, Alternative 3 would be required to provide a minimum of 311 parking spaces; however, Alternative 3 would provide 250 parking spaces. This alternative would also provide bicycle parking spaces. Based on the TIS Guidelines, Alternative 3 would also result in less-than-significant impacts related VMT because it would have an FAR greater than 0.75, would not provide more parking spaces required by the WHMC, would be consistent with the SCAG RTP/SCS, would not replace existing affordable housing units, and would not have potential for significant regional draw in a specialized workforce (similar to the proposed project). Alternative 3 would result in less-than-significant impacts to transportation similar to the proposed project; however, due to a decrease in building density, impacts would be less than the proposed project.

Tribal Cultural Resources

Similar to the proposed project, the Mixed-Use Base Density Alternative would involve the demolition of on-site buildings and structures and removal of two mature trees. However, Alternative 3 would only require excavation for one level of subterranean parking rather than two under the proposed project. No tribal cultural resources have been identified by California Native American tribes as part of the City's AB 52 notification and consultation processes. Because this alternative would require less intensive grading and excavation activities, it would result in less impacts on any previously unknown tribal cultural resources. However, as with the proposed project, Alternative 3 would still require implementation of Mitigation Measures TCR-1 and TCR-2 to reduce impacts related to tribal cultural resources. Impacts to tribal cultural resources would be less than significant with mitigation under Alternative 3; however, due to less grading and excavation activities required, impacts would be less compared to the proposed project.

Utilities and Service Systems

Alternative 3 involves the development of a mixed-use building totaling 141,450 sf, which would be 285,206 sf less than the proposed project. This alternative would also include 330 fewer residential units than the proposed project. Alternative 3 would result in a demand for services including natural gas, electricity, water, wastewater treatments, and solid waste; however, demand would be less than the proposed project. Alternative 3 would tie into existing utility lines within the existing roadways and within the existing right-of-way adjacent to the project site. As with the proposed project, existing utilities would be extended and upgraded as needed during construction to serve

the anticipated demand of the commercial and residential uses under Alternative 3. While this alternative would increase the overall demand for services compared to existing conditions, adequate capacity to serve this alternative is also anticipated because it would meet existing land use designation and zoning regulations and would have a less building density than the proposed project. Impacts would remain less than significant like the proposed project; however, Alternative 3 would result in less impacts related to utilities and service systems due to the smaller building size and density.

6.4 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(c) requires that the "EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." Alternatives considered, and the reasons they were rejected, are summarized as follows.

Other alternatives considered included a variety of zoning-compliant alternatives with different commercial and residential use scenarios. However, factoring in the cost of construction and financing, operational complexities and margins across these scenarios compared to estimated revenue models rendered most financially infeasible and too risky for the project applicant. The rejected zoning-compliant alternatives would not achieve many of the project objectives, and the objectives that may be achieved are achieved to a greater degree by the project. Therefore, these scenarios were rejected from further consideration leaving Alternatives 2 and 3, which were determined to be financially feasible and were evaluated further in this section.

Consideration of developing the proposed project on an alternative site was also rejected as the project applicant does not own or control another suitable site in the project vicinity. Furthermore, there were no significant and unavoidable impacts identified for the proposed project that would further incentivize pivoting the project to an alternative site. Similarly, siting the project on an alternative site further distant from the City's commercial corridors and/or outside of a TPA could result in new significant and unavoidable impacts, such as those related to transportation. Therefore, this alternative was also rejected from further analysis.

6.5 Environmentally Superior Alternative

CEQA Guidelines requires that an environmentally superior alternative be identified among the project alternatives; that is, an alternative that would result in the fewest or least significant environmental impacts. Table 6-2 at the end of this section indicates whether each alternative's environmental impact is less than, greater than, or similar to that of the proposed project for each of the issue areas studied.

Alternative 1 (No Project Alternative) assumes that the vacant 11,906-sf warehouse building located at 1020 and 1028 North La Brea Avenue and the foundation of the two-story office building at 1000 and 1014 North La Brea Boulevard associated with the former CEMEX concrete batch plant would remain without any additional site modifications. Because disassembly and demolition of equipment and the office building would have occurred regardless of approval and implementation of the proposed project, this alternative assumes that actual "no project" conditions would consist of the warehouse building remaining as the only on-site structure.

Although the No Project Alternative would result in less impacts across all analyzed environmental issue areas compared to the proposed project, it would not fulfill any of the project objectives because it would not redevelop and improve the visual character of the project site by replacing an incompatible and outmoded industrial use with a mixed-use building. The No Project Alternative would not provide a range of affordable and market rate housing units to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks, nor would it contribute to the economic base of the city by concentrating residential density with serving commercial uses within a larger commercial core.

Alternative 2 (Commercial Base Density Alternative) would involve the demolition of on-site buildings and structures and removal of two mature trees, similar to the proposed project. However, the Commercial Base Density Alternative proposes to construct a two-story, 51-700-sf commercial building with one subterranean parking level with 91 vehicle parking spaces. This alternative would not include any billboards as part of the project. Under Alternative 2, the commercial development would be 374,956 sf less and 337 feet shorter than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Because Alternative 2 is designed to be compliant with the base zoning and development regulations for strict commercial use, it would also not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project.

Due to the substantial decrease in excavation activities, building height/size, and overall building density, the Commercial Base Density Alternative would result in less than impacts related to air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, public services, transportation-circulation, tribal cultural resources, and utilities and service systems compared to the proposed project. Of note, because Alternative 2 would be a base density-compliant development, it would not require a Development Agreement or Zoning Map Amendment and impacts related to land use and planning would also be less than the proposed project. Nonetheless, since this alternative would still require excavation for one subterranean parking level, it would still include implementation of all the same mitigation measures identified for the proposed project to reduce impacts related to cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. However, Alternative 2 would not fulfill all project objectives because it would only consist of a commercial building and it would not include a range of affordable and market rate housing units, to accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks. Of the identified project objectives, Alternative 2 would only meet Objective 8 since it would still replace existing uses with a building compliant with the City's Green Building Ordinance (i.e., WHMC Section 19.20.060).

Alternative 3 (Mixed-Use Base Density Alternative) would involve the demolition of on-site buildings and structures and removal of two mature trees, similar to the proposed project. However, the Mixed-use Base Density Alternative proposes to construct a seven-story, 141,450-sf mixed-use building consisting of 184 residential units and 13,000 sf of commercial/retail use. Of the 184 residential units, 20 percent of units would be affordable units consisting of 28 units for very low-income households and nine units for moderate-income households. The remaining 147 units would be market rate units. This alternative would include one subterranean parking level and two above-ground parking levels with 250 parking spaces. This alternative would also not include any billboards as part of the project. Under Alternative 3, the mixed-use building would be 285,206 sf less and 302 feet shorter than the proposed project. This alternative would also include 330 fewer

residential units than the proposed project. Furthermore, this alternative would only require excavation for one level of subterranean parking, rather than two under the proposed project. Because Alternative 3 is designed to be compliant with the base zoning and development regulations for a mixed-use development, it would not require a Development Agreement or a Zoning Map Amendment to create an overlay to the existing CR zoning district for the Development Agreement like the proposed project.

Similar to Alternative 2, due to the substantial decrease in excavation activities, building height/size, and overall building density, the Mixed-Use Base Density Alternative would result in less than impacts related to air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, public services, transportation-circulation, tribal cultural resources, and utilities and service systems compared to the proposed project. Because Alternative 3 would also be a base density-compliant development, it would similarly not require a Development Agreement or Zoning Map Amendment and impacts related to land use and planning would also be less than the proposed project. However, since this alternative would still require excavation for one subterranean parking level, it would still include implementation of all the same mitigation measures identified for the proposed project to reduce impacts related to cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. Nonetheless, the Mixed-Use Base Density Alternative would fulfill the same project objectives, albeit to a significantly lesser degree than the proposed project, because it would still consist of a mixed-use building that would include a range of affordable and market rate housing units. A difference between the proposed project and Alternative 3 would be the scale at which they each accommodate the need for a greater number of units at all income levels, particularly near multimodal transportation networks.

Because the No Project Alternative would lessen or altogether avoid project impacts, the No Project Alternative would be the environmentally superior alternative. However, if the “No Project” Alternative is the environmentally superior alternative, *CEQA Guidelines* Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project’s basic objectives be chosen as the environmentally superior alternative among the other alternatives. Therefore, because Alternative 3 would consistently reduce all analyzed environmental impacts while maintaining consistency with all eight of the project objectives, it is the environmentally superior alternative.

Table 6-2 Impact Comparison of Alternatives

Environmental Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Commercial Base Density	Alternative 3: Mixed-Use Base Density
Aesthetics	N/A[1]	-	-	-
Air Quality	Less than significant	-	-	-
Cultural Resources	Less than significant with mitigation	-	-	-
Energy	Less than significant	-	-	-
Geology and Soils	Less than significant with mitigation	-	-	-
Greenhouse Gas Emissions	Less than significant	-	-	-
Hazards and Hazardous Materials	Less than significant with mitigation	-	-	-
Hydrology and Water Quality	Less than significant with mitigation	-	-	-
Land Use and Planning	Less than significant	-	-	-
Noise	Less than significant	-	-	-
Public Services	Less than significant	-	-	-
Transportation – Circulation	Less than significant	-	-	-
Tribal Cultural Resources	Less than significant with mitigation	-	-	-
Utilities and Service Systems	Less than significant	-	-	-

N/A = Not Applicable; "-" means the alternative has reduced impacts compared to the proposed project; "+" means the alternative has increased impacts compared to the proposed project; "=" means the alternative has similar impacts compared to the proposed project

[1] As discussed in Section 4.1, *Aesthetics*, Senate Bill (SB) 743 streamlines CEQA review for projects located within TPA. Pursuant to SB 743, "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment."

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7 References

7.1 Bibliography

Executive Summary

National Park Service (NPS). 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. https://www.nps.gov/subjects/historicpreservation/upload/standards-guidelines-archeology-historic-preservation.pdf. Accessed July 2024.

Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed January 2025.

West Hollywood, City of. 2024. City of West Hollywood City Council Agenda. https://www.weho.org/home/showpublisheddocument/60257/638634670995570000. Accessed October 2024.

Project Description

West Hollywood, City of. 2011. General Plan Land Use and Urban Form Chapter. https://www.weho.org/home/showpublisheddocument/7939/635229037960770000. Accessed February 2024.

_____. 2024. City of West Hollywood City Council Agenda. https://www.weho.org/home/showpublisheddocument/60257/638634670995570000. Accessed October 2024.

Environmental Setting

Los Angeles, City of. n.d. Zone Information and Map Access System (ZIMAS). https://zimas.lacity.org/. Accessed February 2024.

_____. 2024. Case Reports and Mapping. Bi-Weekly Entitlement Case Filings Map. https://planning.lacity.gov/resources/case-reports. Accessed June 2024.

West Hollywood, City of. 2011. General Plan Land Use and Urban Form Chapter. https://www.weho.org/home/showpublisheddocument/7939/635229037960770000. Accessed February 2024.

_____. 2024. City of West Hollywood City Council Agenda. https://www.weho.org/home/showpublisheddocument/60257/638634670995570000. Accessed October 2024.

Aesthetics

Beverly Hills, City of. 2010. General Plan. Open Space Element. https://beverlyhills.org/DocumentCenter/View/5510/05-Open-Space-PDF. Accessed April 2024.

GoBuzzle. 2024. How Many Nits Do I Need: An Ultimate Guide to Display Brightness. https://gobuzzle.com/how-many-nits-do-i-need/. Accessed October 2024.

Los Angeles, City of. 2001. General Plan. Conservation Element. https://planning.lacity.gov/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed April 2024.

Los Angeles Metropolitan Transportation Authority (Metro). 2023. Metro Maps and Schedules. https://www.metro.net/riding/schedules-2/. Accessed April 2024.

Make Use Of. 2022. What Are Brightness Nits? Why Screen Brightness Matters. https://www.makeuseof.com/what-are-brightness-nits-why-screen-brightness-matters/. Accessed October 2024.

Southern California Association of Governments (SCAG). 2022. Transit Priority Areas Year (2016). SCAG Region. https://gisdata-scag.opendata.arcgis.com/datasets/transit-priority-areas-year-2016-scag-region/explore. Accessed February 2024.

West Hollywood, City of. 2011. General Plan Land Use and Urban Form Chapter. https://www.weho.org/home/showpublisheddocument/7939/635229037960770000. Accessed February 2024.

_____. 2024. City of West Hollywood City Council Agenda. https://www.weho.org/home/showpublisheddocument/60257/638634670995570000. Accessed October 2024.

Air Quality

California Air Pollution Control Officers Association (CAPCOA). 2022. California Emissions Estimator Model User's Guide Version 2022.1. https://caleemod.com/documents/user-guide/01_User%20Guide.pdf. Accessed June 2024.

California Air Resources Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. https://sfmohcd.org/sites/default/files/20%20-%20CARB%2C%20Air%20Quality%20and%20Land%20Use%20Handbook%202005.pdf. Accessed June 2024.

_____. 2024a. Summary: Diesel Particulate Matter Health Impacts. https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts. Accessed June 2024.

_____. 2024b. Top 4 Summary: Select Pollutant, Years, & Area. https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed June 2024.

_____. 2024c. National Ambient Air Quality Standards. https://ww2.arb.ca.gov/resources/national-ambient-air-quality-standards. Accessed June 2024.

_____. 2024d. California Ambient Air Quality Standards. https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards. Accessed June 2024.

California Department of Finance (DOF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State. https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/. Accessed October 2024.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0. Accessed June 2024.

San Joaquin Valley Air Pollution Control District. 2015. Brief for San Joaquin Valley Unified Air Pollution Control District as Amicus Curiae Supporting Respondents, Sierra Club, Revive the San Joaquin, and League of Women Voters Fresno v. County of Fresno and Friant Ranch, L.P. (2018), 6 Cal.5th 502, Case No. S219783.

Southern California Association of Governments (SCAG). 2001. Employment Density Study Summary Report. Document. October 31, 2001.

_____. 2020. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed June 2024.

_____. 2024. 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547. Accessed June 2024.

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Document. November 1993.

_____. 2008. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf. Accessed June 2024.

_____. 2009. Localized Significance Thresholds Appendix C: Mass Rate LST Look Up Tables. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2. Accessed June 2024.

_____. 2017. Risk Assessment Procedure for Rules 1401, 1401.1 and 212. Version 8.1. http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12. Accessed June 2024.

_____. 2019. South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25. Accessed June 2024.

_____. 2022. 2022 Air Quality Management Plan. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed June 2024.

United States Environmental Protection Agency (USEPA). 2013. Policy Assessment for the Review of the Lead National Ambient Air Quality Standards, External Review Draft. https://www3.epa.gov/ttn/naaqs/standards/pb/data/010913_pb-draft-pa.pdf. Accessed June 2024.

_____. 2015. Overview of EPA's Updates to the Air Quality Standards for Ground-Level Ozone. https://www.epa.gov/sites/default/files/2015-10/documents/overview_of_2015_rule.pdf. Accessed June 2024.

_____. 2024a. Criteria Air Pollutants. https://www.epa.gov/criteria-air-pollutants. Accessed June 2024.

_____. 2024b. Health and Environmental Effects of Hazardous Air Pollutants. https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants. Accessed June 2024.

_____. 2024c. NAAQS Table. https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed June 2024.

West Hollywood, City of. 2011. General Plan Infrastructure, Resources, and Conservation Chapter. https://www.weho.org/home/showpublisheddocument/7929/635229037960770000. Accessed June 2024.

Western Regional Climate Center. 2016. Culver City, California (042214) Monthly Climate Summary. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2214. Accessed June 2024.

Cultural Resources

Advantage Environmental Consultants (AEC). 2023. Phase I Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California 90038. Prepared for 1014 N La Brea Owner, LLC. May 17, 2023.

Arthur, Michael. 2004. The Dawn of the Ready-Mixed Concrete Industry. QM. July 2004.

Bancroft, Hubert How. 1885. History of California, Volume III: 1825-1840. San Francisco, California: A.L. Bancroft & Co.

Bean, Walton. 1968. California: An Interpretive History. New York: McGraw-Hill Book Company.

California Office of Historic Preservation (OHP). 1995. Instructions for Recording Historical Resources. Department of Parks and Recreation, Sacramento, California.

_____. 2011. California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register). California Office of Historic Preservation Technical Assistance Series #6. Department of Parks and Recreation, Sacramento, California

Citadel EHS (Citadel). 2022. Phase I Environmental Site Assessment Report, 1020 North La Brea Avenue, West Hollywood, California 90038. February 18, 2022.

Concrete. 1924. A Central Mixing Plant in Los Angeles. Vol 25 (September 1924). 110.

Dallas, S. F. 1955. The Hide and Tallow Trade in Alta California 1822–1848. Ph.D. dissertation, Indiana University, Bloomington.

Dumke, Glenn S. 1944. The Boom of the Eighties in Southern California. San Marino, CA: Huntington Library.

Encyclopedia.com. 2023. RCA-Victor Company. https://www.encyclopedia.com/history/encyclopedias-almanacs-transcripts-and-maps/rca-victor-company. Accessed November 2023.

Galvin Preservation Associates (GPA). 2016. City Of West Hollywood Commercial Historic Resources Survey. Prepared for the City of West Hollywood. September 2016. https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_-Document.pdf. Accessed February 2024.

Geocon West, Inc (Geocon). 2023. Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California. May 10, 2023.

Glassow, Michael A., Lynn H. Gamble, Jennifer E. Perry, and Glenn S. Russell. 2007. Prehistory of the Northern California Bight and the Adjacent Transverse Ranges in California Prehistory: Colonization, Culture, and Complexity. Terry L. Jones and Kathryn A. Klar, eds. Pp. 191–213. Lanham, Maryland: AltaMira Press.

Gumprecht, Blake. 1999. The Los Angeles River: Its Life, Death, and Possible Rebirth. Baltimore, Maryland: Johns Hopkins University Press.

Hollywood Media District. 2023. History—Hollywood Media District. https://mediadistrict.org/history/. Accessed November 2023.

Jones, Terry L., and Kathryn A. Klar. 2007. California Prehistory: Colonization, Culture, and Complexity. Berkeley, California: AltaMira Press.

Kyle, Douglas E. 2002. Historic Spots in California. Stanford, California: Stanford University Press.

Lee, Archie. 1953. Square Dance Revival Frosts Profit Pie of Califone Corp. Los Angeles Daily News. November 2, 1953.

Livingston, M.M. 1914. The Earliest Spanish Land Grants in California. Annual Publication of the Historical Society of Southern California 9(3): 195–199.

Los Angeles, City of. 2015. Historic Resources Survey Report – Hollywood Community Plan Area. Revised by Historic Resources Group, November 2015.

_____. 2018. SurveyLA-Historic Resources Survey: Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850-1980. Prepared September 2011, revised February 2018.

_____. 2021. SurveyLA-Historic Resources Survey: Los Angeles Citywide Historic Context Statement, Context: L.A. Modernism, 1919-1980. Prepared August 2021.

Los Angeles County Assessor. 2023. Assessor Porta. Parcel data related to the project site. https://portal.assessor.lacounty.gov/. Accessed December 2023.

Los Angeles Evening Citizen News. 1960. Classified advertisement. July 8, 1960. www.newspapers.com. Accessed December 2023.

Los Angeles Evening News. 1924. Advertisement for Uniform Mix Concrete Company, April 12, 1924. www.newspapers.com. Accessed October 2023.

Los Angeles Illustrated Daily News. 1936. Classified advertisement. June 18, 1936. www.newspapers.com. Accessed April 2024.

Los Angeles Times. 1997. Switzer, Howard. January 9, 1997. www.newspapers.com. Accessed April 2024.

National Park Service (NPS). 1997. National Register Bulletin-How to Apply the National Register Criteria for Evaluation. https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. Accessed July 2024.

_____. 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. https://www.nps.gov/subjects/historicpreservation/upload/standards-guidelines-archeology-historic-preservation.pdf. Accessed July 2024.

Nationwide Environmental Title Research, LLC (NETR Online). 2023. HistoricAerials: Viewer [historical aerial imagery and topographical maps online]. www.historicaerials.com. Accessed October 2023.

Masters, Nathan. 2011. How the Town of Sherman Became the City of West Hollywood. KCET:Social Focus, History, LA as Subject. December 1, 2011. https://www.pbssocal.org/shows/lost-la/how-the-town-of-sherman-became-the-city-of-west-hollywood. Accessed April 2024.

Moratto, Michael. 1984. California Archaeology. Orlando, Florida: Academic Press, Inc.

PCA. 2023. Ready Mixed Concrete. https://www.cement.org/cement-concrete/products/ready-mixed-concrete. Accessed July 2024.

ProQuest. 1926. Sanborn Fire Insurance Map, Los Angeles, Including Sherman. Vol. 20. Accessed via Digital Sanborn Maps, 1867–1970.

_____. 1950Sanborn Fire Insurance Map, Los Angeles, Including West Hollywood. Vol. 20. Accessed via Digital Sanborn Maps, 1867–1970.

Rincon Consultants, Inc (Rincon). 2024. Cultural Resources Technical Report. July 2024. Revised December 2024.

Rolle, Andrew. 2003. California: A History. Revised and expanded sixth edition. Harlan Davidson, Inc., Wheeling, Illinois.

South Gate Press. 1959. Rheem Mfg. Co. Buys Califone Corp. of LA. October 22, 1959. www.newspapers.com. Accessed December 2023.

United States Geological Survey (USGS). 2023. Get Maps: topoView [topographical maps online]. https://ngmdb.usgs.gov/topoview/viewer/#4/40.01/-100.06. Accessed December 2023.

Waugh, John C. 2003. On the Brink of Civil War: The Compromise of 1850 and How it Changed the Course of American History. Wilmington, Delaware: Scholarly Resources Inc.

West Hollywood, City of. 2011. General Plan Historic Preservation Chapter. https://www.weho.org/home/showpublisheddocument/7935/635229037960770000. Accessed July 2024.

Energy

California Air Resources Board (CARB). 2022. Scoping Plan Documents. https://ww2.arb.ca.gov/resources/documents/2022-scoping-plan-documents. Accessed January 2024.

California Department of Finance (DOF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State. https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/. Accessed October 2024.

Energy Star. 2024. About Energy Star Webpage. https://www.energystar.gov/about. Accessed January 2024.

United States Environmental Protection Agency (USEPA). 2018a. Exhaust and Crankcase Emission Factors for Nonroad Compression Ignition Engines in MOVES2014b. https://nepis.epa.gov/Exe/ZyNET.exe/P100UXEN.txt?ZyActionD=ZyDocument&Client=EPA&Index=2016%20Thru%202020&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&UseQField=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5CZYFILES%5CINDEX%20DATA%5C16THRU20%5CTXT%5C00000008%5CP100UXEN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=3. Accessed January 2024.

_____. 2018b. NHTSA and EPA Proposed SAFE Vehicle Rule. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100V26O.pdf. Accessed January 2024.

California Energy Commission (CEC). 2019. 2019 Building Energy Efficiency Standards. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed January 2024.

_____.2023a. Draft 2023 Integrated Energy Policy Report. file:///C:/Users/ysamsamshariat/Downloads/TN253086_20231113T161932_Draft%202023%20Integrated%20Energy%20Policy%20Report.pdf . Accessed January 2024.

_____. 2023b. 2022 California Annual Retail Fuel Outlet Report Results (CEC-A15). https://www.energy.ca.gov/media/3874. Accessed January 2024.

_____. 2024a. Electricity Consumption by County. http://www.ecdms.energy.ca.gov/elecbycounty.aspx. Accessed January 2024.

_____. 2024b. Gas Consumption by County. http://www.ecdms.energy.ca.gov/gasbycounty.aspx. Accessed January 2024.

California Public Utilities Commission (CPUC). 2022. Natural Gas and California. https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california. Accessed January 2024.

National Highway Traffic Safety Administration (NHTSA). 2022. NHTSA Advances Biden-Harris Administration's Climate & Jobs Goals. https://www.nhtsa.gov/press-releases/nhtsa-advances-biden-harris-administrations-climate-jobs-goals. Accessed January 2024.

Schremp, Gordon. 2015. PADD 5 & California Transportation Fuel Overview. https://www.naseo.org/Data/Sites/1/schremp-1.pdf. Accessed January 2024.

Southern California Edison (SCE). 2022. 2022 Power Content Label. https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed February 2024.

United States Department of Transportation (USDOT). 2018. National Transportation Statistics. https://www.bts.gov/product/national-transportation-statistics. Accessed January 2024.

2023. Bureau of Transportation Statistics. https://www.bts.gov/. Accessed January 2024.

United States Energy Information Administration (EIA). 2023. California - Profile Overview. https://www.eia.gov/state/?sid=CA#tabs-2 . Accessed January 2024.

West Hollywood, City of. 2011. General Plan. https://www.weho.org/city-government/download-documents/-folder-155. Accessed January 2024.

_____. 2021. 2021 Climate Action Plan and Adaptation Plan. https://www.weho.org/home/showpublisheddocument/56508/638197540766270000 . Accessed February 2024.

Geology and Soils

California Building Code (CBC). 2016. Chapter 18 Soils and Foundations. https://codes.iccsafe.org/public/chapter/content/1836/. (Accessed January 2018)

California Geological Survey (CGS). 2002. Note 36: California Geomorphic Provinces. http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_36/Documents/note_36.pdf. Accessed January 2024.

West Hollywood, City of. 2018. Hazard Mitigation Plan. https://www.weho.org/city-government/city-departments/community-safety/public-safety/emergency-preparedness/hazard-mitigation-plan. Accessed January 2024.

_____. 2020. General Plan. Safety and Noise Chapter. https://www.weho.org/home/showpublisheddocument/56534/638198543045770000. Accessed January 2024.

Geocon West, Inc (Geocon). 2023. Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California. May 10, 2023.

Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

Greenhouse Gas Emissions

California Air Resources Board (CARB). 2008. Climate Change Scoping Plan. Sacramento, CA. December 2008. https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf (accessed August 2023).2023. 2000-2021 GHG Inventory (2023 Edition). https://ww2.arb.ca.gov/ghg-inventory-data. Accessed February 2024.

_____.2014. AB 32 Scoping Plan Website. Updated June 2014. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2013-scoping-plan-documents. Accessed February 2024.

_____.2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed February 2024.

_____. 2022b. The 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf. Accessed February 2024.

California Climate Change Center. 2006. Climate Scenarios for California. March 2006. https://research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/united-states/west-coast-amp-hawaix27i/california---statewide/CCCC.--2006.--Climate-Scenarios-for-California.pdf. Accessed February 2024.

California Department of Food and Agriculture. 2022. California Agricultural Production Statistics. September 1, 2022. https://www.cdfa.ca.gov/Statistics/. Accessed February 2024.

California Department of Water Resources. 2023. California's Snowpack is Now One of the Largest Ever, Bringing Drought Relief, Flooding Concerns. April 3. https://water.ca.gov/News/News-Releases/2023/April-23/Snow-Survey-April-2023#:~:text=The%20manual%20survey%20recorded%20126.5,of%20DWR's%20water%20supply%20forecast. Accessed February 2024.

California Natural Resource Agency. 2019. California's Fourth Climate Change Assessment Statewide Summary Report. January 16, 2019. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed February 2024.

_____. 2021. Draft California Climate Adaptation Strategy. October 2021. https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Climate-Resilience/SAS-Workshops/Draft-CA-Climate-Adaptation-Strategy-ada.pdf. Accessed February 2024.

Intergovernmental Panel on Climate Change (IPCC). 2007. Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed February 2024.

_____. 2014. "Climate Change 2014 Synthesis Report." Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland. https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf. Accessed February 2024.

_____. 2018. "Summary for Policymakers. In: Global warming of 1.5°C." An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. https://www.ipcc.ch/site/assets/uploads/sites/2/2022/06/SPM_version_report_LR.pdf. Accessed February 2024.

_____. 2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)] Cambridge University Press. https://report.ipcc.ch/ar6/wg1/IPCC_AR6_WGI_FullReport.pdf. Accessed February 2024.

National Aeronautics and Space Administration. 2023. "Global Climate Change – Vital Signs of the Planet – Sea Level." Last modified: January 12, 2023. https://climate.nasa.gov/vital-signs/sea-level/. Accessed February 2024.

National Oceanic and Atmospheric Administration. 2023. Annual 2022 Global Climate Report. January 2023. https://www.ncei.noaa.gov/access/monitoring/monthly-report/global/202213/supplemental/page-1. Accessed February 2024.

Parmesan, C. 2006. Ecological and Evolutionary Responses to Recent Climate Change. August 2006. https://courses.washington.edu/cfr590/climatechange/Parmesan%202006.pdf. Accessed February 2024.

Southern California Association of Governments (SCAG). 2024. 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Demographics and Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839. Accessed October 2024.

United States Environmental Protection Agency (USEPA). 2022. Climate Change Indicators: Global Greenhouse Gas Emissions. https://www.epa.gov/climate-indicators/climate-change-indicators-global-greenhouse-gas-emissions. Accessed February 2024.

_____. 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021. April 15, 2023. https://www.epa.gov/system/files/documents/2023-04/US-GHG-Inventory-2023-Main-Text.pdf. Accessed February 2024.

West Hollywood, City of. 2011. General Plan. https://www.weho.org/city-government/city-departments/community-development-department/general-plan-2035. Accessed February 2024.

_____. 2021. 2021 Climate Action Plan and Adaptation Plan. https://www.weho.org/home/showpublisheddocument/56508/638197540766270000 . Accessed February 2024.

World Meteorological Organization. 2013. " A Decade of Extremes." July 2013. https://public.wmo.int/en/meteoworld/decade-extremes. Accessed February 2024.

Hazards and Hazardous Materials

Advantage Environmental Consultants, LLC (AEC). 2019. Phase I Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California. July 9, 2019.

_____. 2019. Phase II Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California, August 23, 2019.

_____. 2023. Phase I Environmental Site Assessment, 1000 N La Brea Avenue, West Hollywood, California, May 17, 2023

_____. 2024. Phase I Environmental Site Assessment (Revised), 1000 N La Brea Avenue, West Hollywood California, March 19, 2024.

Citadel EHS (Citadel). 2022. Phase I Environmental Site Assessment Report, 1020 North La Brea Avenue, West Hollywood, California 90038. February 18, 2022.

_____. 2022. Limited Phase II Site Assessment Report, 1020 North La Brea Avenue. March 18, 2022.

_____. Limited Phase II Site Assessment Report (Revised), 1020 North La Brea Avenue, West Hollywood, California. April 4, 2024.

West Hollywood, City of. 2018. Hazard Mitigation Plan. https://www.weho.org/city-government/city-departments/community-safety/public-safety/emergency-preparedness/hazard-mitigation-plan. Accessed January 2024.

Hydrology and Water Quality

California Department of Conservation (DOC). 2021. California Tsunami Maps. Accessed October 2023. https://www.conservation.ca.gov/cgs/tsunami/maps.

California Department of Water Resources (DWR). 2004a. Coastal Plan of Los Angeles Groundwater Basin, Hollywood Subbasin. California's Groundwater Bulletin 118. February 27, 2004. https://www.water.ca.gov/LegacyFiles/groundwater/bulletin118/basindescriptions/4-11.02.pdf. Accessed February 2024.

_____.2004b. San Fernando Valley Groundwater Basin. California's Groundwater Bulletin 118. Sacramento, CA. https://www.water.ca.gov/LegacyFiles/groundwater/bulletin118/basindescriptions/4-12.pdf. Accessed February 2024.

Federal Emergency Management Agency. 2008. Map No. 06037C1605F. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.36423499432588,34.08026926596712,-118.32269294110213,34.09803978981847. Accessed February 2024.

Los Angeles, City of. n.d. "Ballona Creek Watershed." City of Los Angeles Stormwater Program. http://www.lastormwater.org/about-us/about-watersheds/ballona-creek/. Accessed February 2024.

Los Angeles, City of, Department of Water and Power (LADWP). 2016. Los Angeles Department of Water & Power Urban Water Management Plan 2015. https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased. Accessed February 2024.

Los Angeles, County of. 2007. "Ballona Creek & Other Urban Watersheds." [map]. Tabular digital data and vector digital data. http://dpw.lacounty.gov/wmd/watershed/bc/docs/BallonaCreeketc_wtrshed.pdf. Accessed February 2024.

Los Angeles, County of, Department of Public Works. n.d. Los Angeles County Storm Drain System. [map]. Tabular digital data and vector digital data. Los Angeles, CA. http://dpw.lacounty.gov/fcd/stormdrain/index.cfm. Accessed February 2024.

Los Angeles Regional Water Quality Control Board (LARWQCB). 2000. Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_rbfinal.pdf

_____.2016. Order No. R4-2012-0175 as amended by State Water Board Order WQ 2015-0075 and Los Angeles Water Board Order R4-2012-0175-A01 NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except for those Discharges Originating from the City of Long Beach. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/los_angeles_ms4/2016/OrderR4-2012-0175_corrected_120216.pdf

Los Angeles Department of Water and Power (LADWP). 2021. Urban Water Management Plan. 2020. https://ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf. Accessed February 2024.

Rincon Consultants, Inc (Rincon). 2024. Water Supply Assessment. July 2024. Revised December 2024.

United States Environmental Protection Agency (USEPA). 2018. 2012 Waterbody Report for Santa Monica Bay Offshore/Nearshore. https://ofmpub.epa.gov/waters10/attains_waterbody.control?p_au_id=CAB405130001999092116431 8&p_cycle=2012&p_state=CA&p_report_type=. Accessed February 2024.

Upper Los Angeles River Area (ULARA) Watermaster. 2019. Directory: Annual ULARA Watermaster Report. http://ularawatermaster.com/public_resources/WY-2017-18-ULARA-WM-Rpt-12-2019.pdf. Accessed February 2024.

West Hollywood, City of. 2010. Final Program Environmental Impact Report, City of West Hollywood General Plan and Climate Action Plan, Volume 1. West Hollywood, CA. October 2010. Accessed February 2024.

_____. 2011. General Plan. https://www.weho.org/city-government/city-departments/community-development-department/general-plan-2035. Accessed February 2024.

Land Use and Planning

Los Angeles, City of. N.d. Zone Information and Map Access System (ZIMAS). https://zimas.lacity.org/. Accessed February 2024.

Southern California Association of Governments (SCAG). 2020. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed February 2024.

West Hollywood, City of. 2011. General Plan. Land Use and Urban Form Chapter. https://www.weho.org/city-government/download-documents/-folder-155. Accessed January 2024.

Noise

California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. (CT-HWANP-RT-13-069.25.2) https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_10-Noise/Caltrans_2013a_Tech_Noise_Supplement.pdf. Accessed June 2024.

_____. 2020. Transportation and Construction Vibration Guidance Manual CT-HWANP-RT-20-365.01.01. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed June 2024.

Crocker, Malcolm J. Crocker (Editor). 2007. Handbook of Noise and Vibration Control Book, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). http://www.fhwa.dot.gov/environment/construction_noise/handbook. Accessed June 2024.

_____. 2011. *Highway Traffic Noise: Analysis and Abatement Guidance.* December 2011. https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf. Accessed June 2024.

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed June 2024.

Fehr & Peers. 2025. CEQA Transportation Impact Study for 1000 N La Brea Avenue. January 7, 2025.

Kinsler, Lawrence E. and R. Frey, Austin and B. Coppens, Alan and V. Sanders, James. 1999. Fundamentals of Acoustics, 4th Edition. ISBN 0-471-84789-5. Wiley-VCH, December 1999.

West Hollywood, City of. 2020. General Plan. Safety and Noise Chapter. https://www.weho.org/home/showpublisheddocument/56534/638198543045770000. Accessed June 2024.

Transportation

Fehr & Peers. 2025. CEQA Transportation Impact Study for 1000 N La Brea Avenue. January 7, 2025.

Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation impacts in CEQA. April 2018. https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed June 2024.

Public Services

County of Los Angeles Fire Department (LACFD). 2024. Search Results. Fire Stations. https://locator.lacounty.gov/fire/Search?find=Fire+Stations&near=1000+North+La+Brea+Avenue%2C+West+Hollywood%2C+CA%2C+90038&cat=86&tag=&loc=&lat=34.0891460882114&lon=-118.34365337928513. Accessed January 2024.

Los Angeles County Fire Museum. 2019. LACoFD Stations and Apparatus. https://www.lacountyfiremuseum.com/stations-and-apparatus/. Accessed January 2024.

West Hollywood, City of. 2010. FINAL Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan Volume II. https://www.weho.org/home/showpublisheddocument/9822/635240156301830000. Accessed January 2024.

_____. 2011. General Plan Safety and Noise Chapter. https://www.weho.org/home/showpublisheddocument/7918/638060293545300000. Accessed January 2024.

Tribal Cultural Resources

Bean, Lowell John and Charles R. Smith. 1978. Gabrielino. In "California," edited by Robert F. Heizer, pp. 538–549. *Handbook of North American Indians,* Vol. 8, W.C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Geocon West, Inc (Geocon). 2023. Geotechnical Investigation, Proposed Mixed-Use High-Rise Development; 1000, 1014, & 1020 North La Brea Avenue, West Hollywood, California. May 10, 2023.

King, Chester D. 1994*. Native American Placenames in the Santa Monica Mountains National Recreation Area, Agoura Hills.* Topanga Anthropological Consultants, California.

Kroeber, Alfred J. 1925. *Handbook of the Indians of California.* Bureau of American Ethnology, Bulletin 78. Originally published 1925, Smithsonian Printing Office, Washington, D.C. Unabridged reprint 1976, Dover Publications, Inc. New York.

McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum/Ballena Press Cooperative Publication, Banning or Novato, California.

Northwest Economic Associates (NEA) and Chester King. 2004. Ethnographic Overview of the Angeles National Forest: Tataviam and San Gabriel Mountain Serrano Ethnohistory. Prepared for the U.S. Department of Agriculture.

Rincon Consultants, Inc (Rincon). 2024. Cultural Resources Technical Report. July 2024. Revised December 2024.

Sutton, Mark. 2009. People and Language: Defining the Takic Expansion into Southern California. Pacific Coast Archaeological Society Quarterly. 41.

Utilities and Service Systems

Athens Services. 2022. City of West Hollywood. https://athensservices.com/residential-services/west-hollywood/. Accessed January 2024.

CalRecycle. 2019. Jurisdiction Disposal and Alternative Daily Cover Tons by Facility. https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility. Accessed January 2024.

_____. 2023a. SWIS Facility/Site Activity Details. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037. Accessed January 2024.

_____. 2023b. Countywide, Regionwide, and Statewide Jurisdiction Diversion/Disposal Progress Report. Accessed November 2018 at: https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DiversionDisposal. Accessed January 2024.

Los Angeles, City of. 2024. Hyperion Water Reclamation Plant – Treatment Process. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp/s-lsh-wwd-cw-p-hwrp-tp?_afrLoop=22875340736447802&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8nul59bgu_667#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D22875340736447802%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8nul59bgu_671. Accessed January 2024.

Los Angeles County Sanitation District (LACSD). 2024. Revenue Program & Rates. https://www.lacsd.org/services/wastewater-programs-permits/wastewater-revenue-program/revenue-program-rates. Accessed January 2024.

Rincon Consultants, Inc (Rincon). 2024. Water Supply Assessment. July 2024. Revised December 2024.

Southern California Association of Governments (SCAG). 2024. 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Demographics and Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839. Accessed October 2024.

West Hollywood, City of. 2006. Urban Runoff Management Plan. https://www.weho.org/home/showpublisheddocument/2341/635229037960770000. Accessed January 2024.

_____. 2011. General Plan Infrastructure, Resources, and Conservation Chapter. https://www.weho.org/home/showpublisheddocument/7929/635229037960770000. Accessed January 2024.

_____. 2024. Stormwater and Urban Runoff Pollution Control. https://www.weho.org/city-government/city-departments/public-works/environmental-services/stormwater-and-urban-runoff-pollution-control. Accessed January 2024.

Other CEQA Required Discussions

California Department of Finance (DOF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State. https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/. Accessed October 2024.

Southern California Association of Governments (SCAG). 2001. Employment Density Study Summary Report. Document. October 31, 2001.

_____. 2024. 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Demographics and Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839. Accessed October 2024.

Southern California Edison (SCE). 2022. 2022 Power Content Label. https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed February 2024.

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