
Initial Study/Negative Declaration

Open Space Element Update

JULY 2026

Prepared by:

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
CAAP	Climate Action and Adaptation Plan
CEQA	California Environmental Quality Act
CGS	California Geological Survey
EIR	Environmental Impact Report
IS	Initial Study
ND	Negative Declaration
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
TCR	tribal cultural resource
VMT	vehicle miles traveled

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1 Introduction

1.1 Project Overview

The City of West Hollywood (City) proposes a citywide General Plan amendment to update its existing Parks and Recreation Element and proposes to rename it the “Open Space Element.” The amendment is being prepared in response to Senate Bill (SB) 1425, which requires local jurisdictions to address equitable access to open space, climate resilience, and rewilding opportunities in the open space element of the general plan. Throughout this document, the proposed General Plan amendment is referred to as the “Project” or the “Open Space Element Update.” The Project addresses SB 1425 through updated background information, inventories, goals, policies, and implementation actions related to parks, recreation, and open space in West Hollywood. The Project includes information regarding disadvantaged communities, existing park service levels, current rewilding and urban greening efforts, and ongoing or planned parks and open space initiatives. The Project also includes revised and new policy direction intended to guide future decisions regarding parks, recreational facilities, and open space, with particular attention to equitable access, climate resilience, and rewilding.

The Project is a policy document and does not approve or authorize any site-specific park, recreation, or open space improvement projects. The Project does not approve land acquisition, rezoning, subdivisions, construction, or funding for any specific capital improvement. Any future physical improvement or discretionary actions that may be pursued to implement the Project would be subject to separate review under the California Environmental Quality Act (CEQA), as applicable.

In accordance with Section 15150 of the CEQA Guidelines, a Negative Declaration (ND) may incorporate by reference all or portions of another publicly available document. Where all or part of another document is incorporated by reference, the incorporated language is considered to be set forth in full as part of the text of the ND. This document incorporates by reference the City’s proposed Open Space Element Update document, which can be accessed online at this website: <https://engage.weho.org/openspace>.

1.2 California Environmental Quality Act Compliance

The CEQA compliance process applies to projects carried out, funded, or approved by state or local government agencies. The Open Space Element Update constitutes a project as defined by CEQA (California Public Resources Code, Section 21065). The City is the lead agency responsible for compliance with CEQA for the Project (CEQA Guidelines Section 15367). As lead agency, the City has prepared an initial study (IS) to evaluate potential environmental effects and to determine whether an Environmental Impact Report (EIR), an ND, or a Mitigated Negative Declaration should be prepared for the Project. Pursuant to CEQA Guidelines Section 15063(d), an IS must contain the following:

1. A description of the project including the location of the project; (see Section 2.1, Project Location and Section 2.3, Proposed Open Space Element Update)
2. An identification of the environmental setting; (see Section 2.2, Environmental Setting)
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as

an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found. (see Section 3.1, Aesthetics, through Section 3.20, Wildfire)

4. A discussion of the ways to mitigate the significant effects identified, if any; (not applicable)
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; (see Section 3.11, Land Use and Planning) and,
6. The name of the person or persons who prepared or participated in the IS. (see Section 4.2, List of Preparers)

Based on the results of the IS, the City has prepared an ND for the Project. CEQA Guidelines Section 15070 provides that an ND may be prepared when:

(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment. The IS contained herein demonstrates that the Project would not have a significant effect on the environment. As such, the Project would not result in potentially significant effects, and no mitigation measures are required. Therefore, the City has prepared an ND for this Project. This document constitutes the IS and ND for the Project, together referred to as the “IS/ND.”

As demonstrated in this document, the Project would not have a significant effect on the environment. Accordingly, no mitigation measures are required, and this document constitutes the City’s IS/ND for the Project.

The City’s decision makers will consider the IS/ND in connection with the discretionary actions required to approve the Project. The IS/ND will serve as the environmental document for adoption of the Open Space Element Update and does not constitute CEQA review for any potential future site-specific improvement projects that may be considered separately.

This document is organized into the following sections:

Chapter 1, Introduction, introduces and gives context to the Project, outlines CEQA compliance, and describes the document content and format.

Chapter 2, Project Description, describes the existing conditions within the City. This chapter also identifies the Project location and background and describes the Project components in further detail.

Chapter 3, Environmental Impact Analysis, presents the IS and an analysis of environmental impacts and the significance finding for each resource topic.

Chapter 4, References and Preparers, provides the list of informational sources used for this IS, and identifies the individuals who prepared and/or contributed to the IS.

2 Project Description

2.1 Project Location

The City of West Hollywood (City) is located in Los Angeles County, bounded by the City of Beverly Hills to the west and by the City of Los Angeles to the north, east, and south, including the neighborhoods of Hollywood Hills to the north, Hollywood to the east, Fairfax District to the southeast, and Beverly Grove to the southwest. The City is approximately 7.5 miles northwest of downtown Los Angeles and is one in a network of interconnected communities within the Los Angeles region. The Project would update the City's 2011 General Plan Parks and Recreation Element, which is intended to guide future direction on the development of the City's parks, open space, and recreational facilities. As a policy-level General Plan amendment, the Project establishes goals, policies, and implementation direction but does not commit the City to any specific capital or physical improvement project. Because the Project is a citywide General Plan amendment, the Project location is the entire City of West Hollywood (see Figure 1, Project Location).

2.2 Environmental Setting

The City covers approximately 1.9 square miles and is largely built out. The land uses within the City's various neighborhoods and commercial areas include residential housing, public spaces like parks and streets, a small amount of industrial activity, and commercial activities such as restaurants, retail stores, offices, hotels, and services. Key regional commercial, entertainment, and circulation corridors, including Sunset Boulevard and Santa Monica Boulevard, run east-west through the City, connecting it to the greater Los Angeles Region (City of West Hollywood 2011).

The City manages seven parks, two memorial plazas, and a variety of community facilities used for recreational purposes. The City's park system includes three park types, each serving a different community function. Community parks are designed to serve multiple neighborhoods, while neighborhood parks serve the recreational and social needs of residents living in their immediate neighborhood. Pocket parks are small public spaces, typically less than one acre in size, designed to provide walkable access to greenery, seating, and respite areas within dense neighborhoods. The City's parks are detailed in Table 2-1, Inventory of City Parks, below (City of West Hollywood 2026), and illustrated in Figure 2, Existing and Planned Parks and Open Space.

Table 2-1. Inventory of City Parks

Name	Address	Acres
Community Parks		
Plummer Park	7377 Santa Monica Boulevard	8.5
West Hollywood Park	647 San Vicente Boulevard	6.10
<i>Community Parks Subtotal (acres)</i>		<i>14.60</i>
Neighborhood Parks		
William S. Hart Park	8341 De Longpre Avenue	0.86
Kings Road Park	1000 Kings Road	0.59
<i>Neighborhood Parks Subtotal (acres)</i>		<i>1.45</i>

Table 2-1. Inventory of City Parks

Name	Address	Acres
Pocket Parks		
Havenhurst Pocket Park	1351 Havenhurst Drive	0.30
Formosa Pocket Park	1140 Formosa Street	0.11
Laurel Avenue Park	1343 Laurel Avenue	0.40
Crescent Heights Triangle and Matthew Shepard Memorial	Crescent Heights Boulevard and Santa Monica Boulevard	0.24
Sal Guarriello Veterans' Memorial	Santa Monica Boulevard and Holloway Drive	0.18
<i>Pocket Parks Subtotal (acres)</i>		0.93
Total (acres)		16.98

Source: West Hollywood Updated Open Space Element (Table OS-1).

As detailed in Table 2-1, above, the City maintains 16.98 acres of parkland. Based on the City's 2025 population of approximately 34,231 residents (U.S. Census Bureau 2026), the City's current park ratio is approximately 0.45 acres per 1,000 residents (City of West Hollywood 2026). This ratio is well below the Quimby Act standard of 3 acres per 1,000 residents and the regional average of 3.3 acres per 1,000 residents. However, lower parks ratios are very common in older, urban areas and small, densely occupied cities such as West Hollywood (City of West Hollywood 2026). While park service ratios provide one measure of park provision, walkability access, and distribution of open space also inform how residents experience park access in West Hollywood. The City is ranked as one of the most walkable cities in California. The Trust for Public Land has established a 10-minute walk standard and nationwide initiative to address park equity. According to the Trust for Public Land Park Serve rankings, 93% of West Hollywood residents live within a 10-minute walk to a park, and 98% of residents live within a 15-minute walk of a park (City of West Hollywood 2026).

Open space within the City is primarily located within parks, plazas, street medians, and parkways. The City does not contain large, contiguous natural areas or conservation easements, and most of the terrain within the City has been developed, paved, or landscaped. Hardscape (including buildings, sidewalks and roadways) comprises approximately 70% of landcover across the City. Softscape (including private gardens and public areas of parks, urban landscaping, vegetation, and tree canopy) comprises approximately 30% of landcover across the City. Publicly accessible landscaped areas (parks, parkways, street medians, and similar landscaped areas) account for approximately 7% of land area (City of West Hollywood 2026).

The City also maintains approximately 9,000 public trees, with the highest tree canopy coverage concentrated in the West Hollywood West, Tri-West, and a portion of the Eastside neighborhoods around Plummer Park and West Hollywood Park. Tree coverage is a key component of walkability, providing shade, cooler pedestrian environments, and improved air quality (City of West Hollywood 2026).

Existing/Ongoing Open Space Projects in the City

The City has several completed, ongoing, and planned public space initiatives that provide context for the updated Element. These initiatives include improvements to existing parks, planned public space projects, and pilot efforts involving plazas, shared streets, and underutilized sites. Alongside these efforts, the City has completed the West Hollywood Park Master Plan and continues implementation of the Plummer Park Comprehensive Improvement Plan

and implementation of the Accessible West Hollywood Plan (City of West Hollywood 2026). These initiatives are described for background context only and are not approved by the Project:

- **The Beverly Triangle Plaza.** This project remains in conceptual design and public outreach. The project is an active design effort building on the 2014 West Hollywood Design District Streetscape Master Plan. A Negative Declaration for the West Hollywood Design District Streetscape Master Plan was adopted by City Council on August 5, 2013. Any future discretionary approval for implementation would be subject to CEQA review, as applicable.
- **The Weaver's Walk.** Weaver's Walk advanced through City Council design and construction approvals under the Design District Streetscape program, with completion on February 17, 2026. The project builds on the 2014 West Hollywood Design District Streetscape Master Plan. A Negative Declaration for the West Hollywood Design District Streetscape Master Plan was adopted by City Council on August 5, 2013. The project developed a 7,200-square-foot strolling garden featuring an Americans with Disabilities Act accessible pedestrian path and a habitat garden at Melrose Avenue and Norwich Drive.
- **The Sky Sanctuaries: San Vicente Streetscape Plaza.** This initiative is conceptual in nature, and additional grant funding and technical studies would be needed before returning with a scope to develop construction drawings. The project would redevelop a section of North San Vicente Boulevard between Santa Monica Boulevard and Melrose Avenue into a flexible shared street and streetscape plaza (0.3 acres) integrated with West Hollywood Park. Any future discretionary approval of a developed project would be subject to CEQA review, as applicable.
- **West Hollywood Park Master Plan.** This plan was completed in 2025, adding a state-of-the-art library, 2.5 acres of new park space, the new ARC, sports and aquatic facilities, and the AIDS Monument to the park. The West Hollywood Park Master Plan received project-specific CEQA clearance under the West Hollywood Park Master Plan Mitigated Negative Declaration, which was adopted by City Council on October 4, 2004.
- **Plummer Park Comprehensive Improvement Plan.** Development of this plan began in 2025 and it would guide near- and long-term improvements to the existing, well-used programs and spaces while incorporating new goals relating to climate resilience, sustainability, and historic and cultural preservation. Future park improvements that move forward for approval would be subject to separate CEQA review, as applicable.
- **Accessible West Hollywood.** The Accessible West Hollywood initiative is a Citywide Americans with Disabilities Act self-evaluation and transition planning effort. A current implementing project under that initiative is the Hart Park Improvements Project. For Hart Park, the City processed a categorical exemption from CEQA pursuant to CEQA Guidelines sections 15301 and 15331, which was adopted by the City's Planning Commission on November 6, 2025.

The projects and initiatives described above are included for background context only and are not approved by this Project, although they are considered as part of the cumulative parks/recreation development scenario addressed in Section 3.21, Mandatory Findings of Significance. Some listed projects have undergone or will undergo separate discretionary review and CEQA review, as applicable. For other initiatives that remain in conceptual design, planning, outreach, or funding stages, project-specific CEQA review has not yet been identified in the City materials reviewed and would occur, if required, when a defined project is brought forward for approval.

2.3 Proposed Open Space Element Update

Background

The State of California requires general plans to include an open space element (California Government Code Sections 65561 and 65302[e]). The purpose of the required open space element is “to assure that cities and counties recognize that open space land is a limited and valuable resource which must be conserved whenever possible” (California Government Code Section 65561[a]).

The state requires that several types of open space be addressed in a city’s general plan. These are identified as open space for 1) the preservation of natural resources such as habitat, 2) the managed protection of resources, 3) outdoor recreation, 4) public health and safety, 5) supporting the missions of military installations, and 6) the protection of certain places or features (California Government Code Section 65560). Of these types of open space land, West Hollywood’s open space is primarily used for outdoor recreation provided by its park system as well as various landscape areas, medians, parkways, and memorials. Therefore, in West Hollywood, the existing Parks and Recreation Element primarily addresses outdoor recreation and accessibility, public health and safety, certain natural resource functions such as urban habitat and tree canopy, and the protection of culturally significant places and features. Managed production lands and military-support open space are not material open-space categories within City limits.

SB 1425 requires local jurisdictions to update their open space elements to address specified topics, including equitable access to open space, climate resilience, and rewilding opportunities. The City of West Hollywood’s existing open-space plan is the Parks and Recreation Element of the City’s General Plan and was adopted in 2011. SB 1425 requires the update to address the following, all of which are not currently included in the City’s existing Parks and Recreation Element:

1. Access to open space for all residents in a manner that considers social, economic, and racial equity, correlated with the environmental justice element or environmental justice policies in the general plan, as applicable;
2. Climate resilience and other co-benefits of open space, correlated with the safety element; and
3. Rewilding opportunities, correlated with the land use element.

Proposed Open Space Element Updates

The Project proposes an update to the City’s existing Parks and Recreation Element in accordance with SB 1425 and renames the element the Open Space Element. The updated element inventories parks, recreational facilities, and open space resources in and around the City, describes their current distribution and characteristics, and summarizes the policy and regulatory context that informs open space planning. The Project incorporates revised and new goals, policies, and implementation actions, including actions informed by prior City planning efforts such as the City’s 2021 Climate Action and Adaptation Plan (CAAP). The Project does not approve any site-specific capital improvements or projects.

The three key tenets of SB 1425 and the aspects of the Project that would address these tenets are described below.

- **Equitable Access to Open Space.** The Project describes the sociodemographic make-up of the City, including disadvantaged communities as defined by SB 1000¹. Several areas within the City have been identified as disadvantaged communities per the criteria outlined in SB 1000, based on income levels and exposures to environmental pollution and other hazards. The updated Open Space Element states that “future investment in parks, open space access, and other green space interventions in these areas... would result in multiple co-benefits associated with resilience to climate change, public health, and quality of life.” The Project sets forth several goals, policies, and implementation actions that would support equitable access to open space. Select examples are provided below:
 - Continue to ensure that parks, recreational facilities and open spaces continue to serve the needs of all residents with a particular focus on identified disadvantaged communities and populations with unique needs. (New goal)
 - Strive to locate new parks, recreational facilities and open spaces in areas that are currently underserved by park access, areas identified as underserved communities, and areas that may experience an increase in residential development, such as near planned transit stations. (New policy)
 - Design parks, trails and recreational facilities to be culturally relevant, age-inclusive and universally accessible, addressing the needs of children, seniors, people with disabilities or limited mobility, and multilingual communities. (New policy)
 - Maintain public parks and City facilities as formal and informal gathering spaces available to all community members and community groups at affordable and transparent rates where reservations are required. (New policy)
 - Establish and periodically update measurable open-space performance indicators, such as walk access, canopy coverage, shade access, universal accessibility, seating, programming distribution, and investment in underserved communities, to guide capital and program decisions. (New policy)
 - Explore opportunities to reduce physical and socioeconomic barriers to underrepresented communities’ access to parks and open space, such as specialized programming and discounted reservation fees. (New policy)
 - Inventory, standardize, and monitor privately owned public spaces, including signage, access hours, maintenance obligations, and design quality. (New implementation action)
- **Climate Resilience.** The Project integrates the City’s 2021 CAAP to address climate resilience, including key climate- and hazard-related conditions such as extreme heat, wildfire smoke and degraded air quality, and localized flooding. The City recognizes the importance of greening efforts, nature-based design, and parks and their associated co-benefits related to climate and public health. The Project sets forth several goals, policies, and implementation actions that would support climate resilience. Select examples are provided below:
 - Protect and expand the urban tree canopy; nurture green spaces, biodiversity, and wildlife habitat; and encourage green infrastructure. (New goal)

¹ SB 1000, the Planning for Healthy Communities Act, went into effect in 2018 and requires jurisdictions to clearly identify “disadvantaged communities” (DACs) and meaningfully address environmental justice throughout their General Plans. DACs are defined as (1) an area identified as being disadvantaged based on geographic, socioeconomic, public health, and environmental hazard criteria or (2) an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. The methodology for identifying DACs is set forth in SB 1000.

- Utilize parks, open space, and nature-based solutions to support climate adaptation, public health, and environmental sustainability. (New goal)
 - Develop universally accessible communications and outreach assets that address open space stewardship, climate adaptation, preparedness for climate-related emergencies, and tribal history and relations with people, places, and the land. (New policy –consistent with the CAAP)
 - Explore opportunities to expand aquatic facilities or water features in the Eastside neighborhood, such as a swimming pool, splash pad, or seasonal cooling play feature. (New policy)
 - Where feasible, prioritize shade, seating, water fountains, and cooling-oriented streetscape improvements along routes connecting parks, transit stops, schools, senior-serving facilities, and underserved communities. (New policy)
 - Encourage increased tree canopy coverage on private property through objective development standards, tree plantings on public and private property, and educational programming and community volunteer efforts. (New policy)
 - Continue coordinating and advertising cooling center operations, and seek opportunities to open additional cooling centers and expand their access in City facilities (including Kings Road Park) to serve vulnerable communities most impacted by heat, smoke, and other climate effects. (New policy)
 - Integrate innovative green infrastructure technologies, including tree-support, stormwater capture, and soil-volume systems, into parks, streetscapes, and public realm projects where they provide long-term environmental and life-cycle benefits. (New implementation action)
- **Rewilding.** The Project describes the City’s open space policies and initiatives designed to create pockets of green space within the public realm and to support the urban forest, native plants, pollinator and migratory species, and indigenous land management. The City has several existing or ongoing rewilding initiatives, described above under Section 2.2, Environmental Setting, including improvements to existing parks and establishment of several new pocket parks. Proposed rewilding goals, policies, and implementation actions from the updated Open Space Element that further support rewilding efforts include:
- Protect and expand the urban tree canopy; nurture green spaces, biodiversity, and wildlife habitat; and encourage green infrastructure. (New goal)
 - Integrate rewilding into park improvement and green infrastructure plans, leveraging native vegetation to provide shade, cooling, carbon sinks, and erosion control. (New policy)
 - Collaborate with the community and explore partnerships with environmental organizations, local businesses, or indigenous representatives to re-establish native plants and green spaces on parcels, streets, alleys, laneways, and interstitial spaces, and to incorporate soil restoration processes and climate-adaptive vegetation (New policy)
 - Develop community education and citizen stewardship programs to support city reforestation and rewilding efforts. (New policy)
 - As feasible, work with other agencies, including Southern California Edison, Los Angeles Department of Water and Power, Beverly Hills Water, Pacific Gas & Electric, the California Water Service, and the California Public Utilities Commission, to convert public easements, such as utility corridors or unused rights of way, into parks and trails. (New policy)
 - Connect habitat gardens, native planting, and pollinator-supporting landscapes across parks, medians, parkways, alleys, laneways, and other public-realm sites in coordination with community partners. (New implementation action)

As demonstrated above, the Project's proposed goals, policies, and implementation actions prioritize enhancing and maintaining existing parks, encouraging the improvement and expansion of parks and open space that serve all residents, ensuring equitable and accessible recreational opportunities, and creating a connected open space network enriched with nature, public art, and pedestrian amenities. The proposed goals and policies collectively focus on utilizing climate-resilient design, environmental sustainability, green infrastructure, biodiversity, and community partnerships to expand access to open space citywide.

Comparison to the Existing Parks and Recreation Element

Like the existing Parks and Recreation Element, the Project recognizes the City's limited vacant land and high land values, which constrain opportunities for acquisition of new parkland. The Project continues to emphasize maintenance and improvement of existing parks and facilities while also broadening the City's policy framework to address creative open space opportunities in the public realm, equitable access, climate resilience, and rewilding. Compared to the existing element, the Project includes expanded goals, policies, and implementation actions responsive to SB 1425 and community needs.

Future Activities

Implementation of the Project may involve future programs, partnership efforts, funding strategies, maintenance activities, ordinance updates, design standards, and, in some cases, future site-specific capital improvements related to parks, recreation, and open space. These activities would include park and open space initiatives and upgrades that integrate SB 1425's accessibility, climate resilience, and rewilding considerations. Select examples of potential future actions include the following:

- Activation and establishment of small-scale public open spaces (i.e., plazas and shared streets)
- Expansion of the open space network through additional pocket parks, parklets, and privately owned public spaces; use of vacant or underdeveloped parcels, utility corridors, or unused rights-of-way for parks, open space, and/or trails; and enhancement of roadside medians and parkways to create new green spaces
- Provision of pedestrian-oriented streetscape improvements (wider sidewalks, street trees and landscaping, bulb-outs, seating, pedestrian-oriented lighting)
- Enforcement of, and regular updates to, the City's tree ordinance
- Incentivize and encourage green roofs and roof gardens in existing buildings; use of native vegetation; and pollinator gardens
- Implement heat mitigation and cooling infrastructure (e.g., shade structures and drinking water access) as part of park and streetscape improvements
- Incorporate climate-adapted retrofitting as part of parks and public space projects (e.g., permeable walkways, green roofs, energy-efficient lighting, and roof gardens)
- Provide new and expanded recreational, cultural, and educational programming and signage
- Establish new and expanded partnerships with agencies, local institutions, tribal representatives, local businesses, and community-based organizations

Many future implementation activities would involve education, coordination, partnerships, programs, and policy initiatives that would not result in construction or operational activities with the potential to impact the environment. Some activities may involve actions on private property, such as native plant gardens, pollinator gardens, or green roofs, that would generally not be subject to CEQA unless undertaken as part of a discretionary approval. The

development of privately owned public spaces that are integrated into a larger development project would be analyzed as part of the CEQA review for that larger development project.

Other actions undertaken during Project implementation may result in construction and operational activities with the potential to affect the environment, such as the establishment of new pocket parks, installation of pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate at this time and would thus undergo separate analysis under CEQA. It is noted that many of the future activities described and encouraged by the updated Open Space Element are relatively minor in terms of physical impacts to the environment and may thus be eligible for various exemptions under CEQA, especially in consideration of the emphasis on small-scale public space improvements, such as pocket parks and pedestrian amenities. Future parks, recreation, and open space projects that do not require discretionary review would be ministerially exempt, as described in CEQA Guidelines Section 15002(i). Ministerially exempt activities that are encouraged under the Project include tree ordinance enforcement, replacement of damaged park equipment, new or improved signage, and general park maintenance. Other parks, recreation, and open space projects may be eligible for categorical exemptions under CEQA. For example, minor improvements to existing parks, improvements to existing streets and sidewalks, new gardening or landscaping, revegetation of disturbed areas with native plant species, and the acquisition of property to preserve lands for park purposes are all activities that may be categorically exempt under CEQA, depending on project-specific design and operational characteristics (see CEQA Guidelines Sections 15300 to 15332).

The likelihood that Project implementation would lead to a large-scale project having the potential to significantly impact the environment would be low, given the built-out nature of the City and the Project's focus on facilitating the development of small-scale public spaces and improving existing facilities. Nevertheless, as discretionary projects are proposed throughout implementation of the updated Open Space Element, each project would be evaluated by the City on a case-by-case basis to determine the appropriate level of review under CEQA. To the extent that non-speculative information is available at this time, it is provided herein. As appropriate, the information in this IS/ND may be incorporated by reference into future CEQA documents for parks, recreation, and open space projects.

As such, specific park, open space, and recreational projects would not be approved as part of the Project. While the Project would establish goals, policies, and implementation actions for site-specific improvements and expansion of open space and recreational resources, construction and operation of these resources would be approved separately and addressed under separate, project-specific CEQA review.

Accordingly, the Project does not approve the construction or operation of any specific park, open space, or recreation facility. Rather, it establishes policy direction to guide future decision-making.

2.4 Project Approvals

The following discretionary actions are required for the Project:

City of West Hollywood Planning Commission

- Conduct a public hearing and adopt a resolution recommending approval, approval with modifications, or denial of the General Plan Amendment.

City of West Hollywood City Council

- Conduct a public hearing on the General Plan Amendment.
- Adopt the Negative Declaration.
- Approve the General Plan Amendment updating and renaming the Parks and Recreation Element as the Open Space Element.

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3 Initial Study Checklist

1. Project title:

City of West Hollywood Open Space Element Update

2. Lead agency name and address:

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069

3. Contact person and phone number:

Emily Rotman, Assistant Planner
323.848.6802
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069

4. Project location:

City of West Hollywood, Los Angeles County, California

5. Project sponsor's name and address:

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069

6. General plan designation:

The Project would be implemented throughout the City and would occur in all City of West Hollywood General Plan land use designations. These plans would not alter any existing General Plan designations.

7. Zoning:

The Project would be implemented throughout the City and would occur in all City of West Hollywood zoning designations. The Project would not alter any existing zoning designations.

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

Refer to Section 2, Project Description, above.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

Refer to Section 2.1, Project Location, above.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

There are no other public agencies whose approval is required for the Project itself. Future site-specific implementation projects may require separate permits or approvals from other agencies, but those would not be approvals for this Project.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No tribal consultation has been requested; see Section 3.18 for details.

Environmental Factors Potentially Affected

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

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Emily Rotman

Signature

July 7, 2026

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated in the City's General Plan EIR (State Clearinghouse [SCH] No. 2009091124), there are no officially designated scenic vistas in the City. However, there are views of the Hollywood Hills and the Los Angeles Basin. Vista points can be found along Sunset Boulevard, both as viewed from urban areas toward the hills

and from Sunset Boulevard toward the Los Angeles Basin (City of West Hollywood 2010). As stated above, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Further, these future projects are more likely to improve rather than degrade the aesthetics of the City, such as tree planting, new and improved landscaping, integration of public artwork, and activation of underutilized sites. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Such development would be expected to conform to existing General Plan policies, Municipal Code, and zoning code development standards requiring view preservation, enhancement of the surrounding streetscape, and limiting adverse visual impacts on adjacent uses. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not have a substantial adverse effect on a scenic vista. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, as stated in the City's General Plan EIR (SCH No. 2009091124), there are no officially designated or eligible scenic highways within the City (City of West Hollywood 2010). Therefore, no impact on scenic resources within a state scenic highway would occur as a result of the Project.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts related to existing visual character. The Project would update the General Plan to ensure consistency with SB 1425. Once adopted, the updated Element would be consistent with State requirements and would not conflict with state law.

As stated in the City's General Plan EIR (SCH No. 2009091124), the City is a largely built-out, urbanized area with very limited availability of unconstrained vacant property (City of West Hollywood 2010). As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. These future projects are more likely to improve rather than degrade the aesthetics of the City, such as tree planting, new and improved landscaping, integration of public artwork, and activation of underutilized sites. Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the

potential environmental impacts and appropriate level of review under CEQA. Any such development would be expected to conform to existing General Plan policies, Municipal Code, and zoning code development standards regarding scenic quality such as landscaping, pedestrian amenities, architecture, and lighting. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact pertaining to the degradation of the existing visual character or conflicts with applicable zoning and other regulations governing scenic quality.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. According to the City's General Plan EIR (SCH No. 2009091124), the City is a largely built-out, urbanized area with many areas that are lit with artificial lighting during the daytime and nighttime (City of West Hollywood 2010). In the context of an already bright urban environment, park and recreational projects are unlikely to be substantial contributors to light and glare in the City. Importantly, the Project proposes an implementation action to develop lighting and operational design standards for parks and open spaces that support visibility, safety, accessibility, event use, and energy efficiency while minimizing light trespass on adjacent properties. These standards would ensure future park-related lighting is designed and operated in a manner that avoids adverse effects on nighttime views and surrounding land uses. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would also be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Further, each future project would be required to adhere to the policies and regulations set forth in the City's General Plan policies, Municipal Code, and zoning code development standards related to signage, lighting, and illumination. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would result in no impacts related to light and glare.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code.

Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

The City is completely built out and is located in an urbanized area of Los Angeles County. According to the City's General Plan EIR (SCH No. 2009091124), there is no designated farmland or agricultural zoning (City of West Hollywood 2010). Further, as shown on the California Department of Conservation's maps prepared pursuant to the Farmland Mapping and Monitoring Program, the City does not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2026). Instead, land within the City is designated entirely as Urban and Built-Up Land. Implementation of the Project would not result in the conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist within the City. Therefore, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, as detailed above in Section 3.2(a), the City does not contain any agricultural zoning (City of West Hollywood 2010). Implementation of the Project would not in conflict with existing zoning for agricultural use, as none exist, nor would they conflict with a Williamson Act contract, as none exist. As such, no impacts to lands zoned for agricultural use or Williamson Act contract lands would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, the list of allowable land uses contained in the City's Zoning Ordinance does not include any timberland or forest land uses for any of its zones. For this reason, no forest land, timberland, or Timberland Production areas are located within the City. Implementation of the Project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. No impact to forest land or timberland would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce

environmental impacts. Further, as characterized above in Section 3.2(c), no forest land is located within the City, as the City is urbanized and developed with commercial, residential, and public facilities uses. No forest land would be converted or otherwise affected by the Project, as none exist, and no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, as characterized above in Section 3.2(c) and 3.2(d), no farmland or forest land is located within the City, as the City is urbanized and developed with commercial, residential, and public facilities uses. No farmland or forest land would be converted or otherwise affected by the Project, as none exist, and no impact would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code.

Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The City is located within the South Coast Air Basin, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the South Coast Air Basin's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards and National Ambient Air Quality Standards. The most recently adopted AQMP for the South Coast Air Basin is the 2022 AQMP.

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP and if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction and operations of future projects could result in emissions of criteria air pollutants such as coarse and fine particulate matter (PM₁₀ PM_{2.5}, respectively), nitrogen oxides (NO_x), and volatile organic compounds from sources such as construction equipment exhaust, fugitive dust from ground disturbance, landscaping maintenance equipment, and vehicle trips to/from new park facilities. However, the specific locations, designs, construction details, and operational details of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. The Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, and no impact would occur. Regarding Consistency Criterion No. 2, the SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to develop the emission inventory for the 2022 AQMP (SCAQMD 2022). The RTP/SCS's forecasts are in turn based on General Plans for cities and counties in the South Coast Air Basin. The SCAG 2024 RTP/SCS and associated Regional

Growth Forecast are also generally consistent with the local plans. Therefore, the 2022 AQMP is generally consistent with local government plans through its use of information in SCAG's RTP/SCS. As stated below in Section 3.14(b), the implementation of the Project would not result in new housing that could directly result in population growth. New parks facilities or programs may result in additional employment growth. Such growth would likely be minor and would not be expected to exceed assumptions in the AQMP. Nevertheless, as stated above, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Therefore, the Project would not exceed the assumptions in the AQMP or increments based.

In addition to the AQMP, the City's General Plan Infrastructure, Resources, and Conservation Element and the City's CAAP contain goals and policies intended to improve air quality and reduce air and greenhouse gas emissions. Examples include General Plan Goals IRC-6 and IRC-7 and associated policies, which address air quality improvement and the reduction of air pollution emissions. Examples of CAAP Goals include CLG-1 through 3 and associated implementation actions, which encourage the integration of carbon reduction and climate resilience in City government, promote the reduction of greenhouse gas emissions in City facilities, and address consumption-based emissions. The Project does not propose any goals, policies, or implementation actions that would conflict with these existing regulations; rather, the Project integrates these policies and implementation measures into updated policies for parks and open space. Examples include tree canopy expansion, increasing permeable surfaces, and integration of green infrastructure technology, many of which can improve overall air quality. As such, based on the considerations presented for the two criteria, the Project would not conflict with or obstruct the implementation of the 2022 AQMP, and there would be no impact.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction and operations of these future projects could result in emissions of criteria air pollutants, as explained under Section 3.3(a). However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the proposed Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to net increase of criteria pollutants.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may be located in close proximity to sensitive receptors, which include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). These future projects may have the potential to expose sensitive receptors to substantial pollutant concentrations, particularly during construction. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not expose sensitive receptors to substantial pollutant concentrations. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects could result in temporary emissions of odors from construction activities such as use of diesel-powered construction vehicles and equipment. Operations could produce minor, temporary, highly localized sources of odors based on landscape maintenance activities, such as periodic fertilizer applications. However, parks, recreational facilities, and open spaces are not in the category of land uses typically associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Parks, recreation, and open space projects are also unlikely to produce other emissions that could adversely affect a substantial number of people. Nevertheless, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to odors.

3.4 Biological Resources

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code.

Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Many of the proposed goals, policies, and implementation measures support the protection of biodiversity and wildlife habitat and expansion of the urban tree canopy. According to the City's General Plan EIR (SCH No. 2009091124), due to the City's built out nature, the City does not have substantial sensitive vegetation or wildlife habitat, although protected species (such as migratory birds) may find nesting or foraging habitat within the City (City of West Hollywood 2010). Construction activities that may result from Project implementation could involve minor grading or other ground disturbance that would have the potential to temporarily affect nesting or foraging activities. However, construction activities would be required to comply with the Migratory Bird Treaty Act and existing local, state, and federal regulations that conserve, protect, and preserve special-status species, and their habitat. Further, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to special-status species.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts related to riparian habitats or sensitive natural communities. Further, as stated in the City's General Plan EIR (SCH No. 2009091124), no riparian or other sensitive habitats are known to occur in the City (City of West Hollywood 2010). As such, no impact to riparian habitats or sensitive natural communities from the Project would occur, as none exist in the City.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce

environmental impacts related to wetlands. Further, the City does not contain any federally protected wetlands (USFWS 2026). As such, the Project would not have a substantial adverse effect on state or federally protected wetlands, as no wetlands exist. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects in line with the updated Element would not be substantively different from projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Many of the proposed goals, policies, and implementation measures support rewilding efforts, including the protection and expansion of the urban tree canopy, nurturing of biodiversity and wildlife habitat, and the use of pollinator gardens and native vegetation. According to the City's General Plan EIR (SCH No. 2009091124), while some local movement of wildlife can be expected to occur throughout the City, the City is not recognized as an area that links migratory wildlife populations (City of West Hollywood 2010). Further, as stated above in Section 3.2(a) and 3.2(b), the City does not have substantial sensitive vegetation or wildlife habitat, although migratory birds may find nesting habitat within the City (City of West Hollywood 2010). Construction activities that may result from Project implementation could involve minor grading or other ground disturbance that would have the potential to temporarily affect nesting activities. However, construction activities would be required to comply with the Migratory Bird Treaty Act and existing local, state, and federal regulations that conserve, protect, and preserve wildlife and their habitat. Further, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to the movement of wildlife species, wildlife corridors, or the use of wildlife nursery sites.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The City's Municipal Code provides regulations governing the treatment of street trees and trees on other public lands, as well as requirements under the City's Heritage Tree Program. The Project does not propose any goals, policies, or implementation actions that would conflict with these existing regulations; rather, the Project would support the protection and expansion of biological resources, including trees, landscaping, and green spaces. The Project includes a policy to explore flexible development standards that favor tree canopy preservation, protection, replacement, and species diversity, as well as dedicated green spaces. The Project also includes an implementation action that specifically commits the City to maintain and periodically update a climate-adaptive plant palette for City parks and public spaces that emphasizes drought tolerance, biodiversity, pollinator support, tree diversity, native

species, and culturally meaningful planting where appropriate. As such, implementation of the Project may result in development projects intended to protect biological resources, such as expansion of the tree canopy and establishment of native vegetation and pollinator gardens. However, as stated above in the introductory paragraph of this section, the development of projects in line with the updated Element would not be substantively different from projects that could have been developed under the existing Element. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, and because the Project itself sets forth policies for the protection and furtherance of biological resources in the City, the Project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts related to biological resources. Further, as stated in the City's General Plan EIR (SCH No. 2009091124), there is no habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plans that apply to the City (City of West Hollywood 2010). While the Project itself sets forth policies for the protection and furtherance of biological resources in the City, it would not establish a habitat or natural community conservation plan. As such, the Project would not conflict with the provisions of any such plan, as no such plans exists in the City and no such plans are included as part of the Project. No impact would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space

and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

According to the City's General Plan EIR (SCH No. 2009091124), the City has several historical resources listed in the National Register of Historic Places and California Register of Historic Resources as well as locally designated resources (City of West Hollywood 2010). Some of these resources are located on or near Plummer Park, West Hollywood Park, Laurel Avenue Park, and William S. Hart Park. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to historical resources.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

According to the City's General Plan EIR (SCH No. 2009091124), there are no known archaeological sites within the City (City of West Hollywood 2010). Additionally, a search of the Native American Heritage Commission Sacred Lands File for the Project was completed on November 26, 2025, and returned with negative results. However, the City is located within the Los Angeles Basin, part of the Los Angeles–Santa Ana prairies, a sensitive setting that was originally home to indigenous peoples. While the area underwent extensive development in the 20th century, the City still possesses a high potential to contain buried cultural resources, including historic and prehistoric artifacts and features and human remains (City of West Hollywood 2010). As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this

time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction activities that may result from Project implementation could involve minor grading or other ground disturbance having the potential to uncover buried, previously unknown resources. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Such development would be required to conform with state and local regulations governing the protection of archaeological resources, as appropriate, including Public Resources Code Section 5097.5, which prohibits the unauthorized excavation or removal of archaeological resources. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to archaeological resources.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. As stated above under Section 3.5(b), the City possesses a high potential to contain buried cultural resources, including historic and prehistoric artifacts and features and human remains (City of West Hollywood 2010). Construction activities that may result from Project implementation could involve minor grading or other ground disturbance having the potential to uncover buried, previously unknown resources. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Such development would be expected to conform with state and local regulations and guidelines for disclosure, recovery, relocation, and preservation of human remains, as appropriate. These would include State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, which provide guidance with regard to the accidental discovery of human remains. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to the disturbance of human remains.

3.6 Energy

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Future projects may result in consumption of energy resources during project construction or operation. Demand for energy resources during construction of future projects would vary throughout the construction period and would generally cease upon completion of construction. Energy for operation of future development projects would vary but is expected to be minimal based on the neighborhood-serving nature of anticipated parks, recreational, and open space projects. A new large-scale recreational facility with high demands for electricity, natural gas, and/or petroleum resources is not anticipated or contemplated in the Project's goals, policies, or objectives. Further, the Project proposes goals, policies, and implementation actions that support energy conservation,

including the use of efficient lighting and opportunities for microgrids, solar, and battery storage in parks and open spaces. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

The City's 2021 CAAP 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 20 climate measures and 60 sub-actions organized into five areas of focus: (1) city leadership and governance; (2) energy; (3) transportation, mobility, and the public realm; (4) zero waste; and (5) natural environment (City of West Hollywood 2021). The Project does not propose any goals, policies, or implementation actions that would conflict with these existing regulations; rather, the Project integrates CAAP policies and implementation measures to address renewable energy and energy efficiency, including the use of efficient lighting and opportunities for microgrids, solar, and battery storage in parks and open spaces. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The City is located in a highly active seismic region of Southern California. According to the City's General Plan EIR (SCH No. 2009091124), the faults that are considered to most influence the seismic exposure of the City include the Hollywood Fault, Santa Monica Fault, Newport-Inglewood Fault, and the Upper Elysian Blind Thrust faults (City of West Hollywood 2010). There is one Alquist-Priolo Earthquake Fault Zones within the boundaries of the City, which is the Hollywood Fault Zone (CGS 2026a). The City has adopted a Fault Precaution Zone map that reflects the State's most recent Alquist-Priolo earthquake fault zones and designates Fault Precaution Zones (FP-1 and FP-2) where site-specific fault studies and/or additional engineering design features are required for development projects. Future projects may result in development located within a known earthquake fault zone. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Further, each project would be required to comply with the requirements of the City's fault precaution zones, General Plan policies and regulations, Municipal Code, and existing federal, state, and local laws and regulations concerning seismic safety. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to fault rupture would occur.

ii) ***Strong seismic ground shaking?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. As stated in the City's General Plan EIR (SCH No. 2009091124), the Hollywood Fault and a number of the regional faults are the main contributors to the seismic exposure of the City and the surrounding region (City of West Hollywood 2010). Construction of future projects could result in an increased risk of strong seismic ground shaking for any new recreational

facilities that may be developed and/or for visitors to those facilities. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would be required to comply with the requirements of the City's fault precaution zones, General Plan policies and regulations, Municipal Code, and existing federal, state, and local laws and regulations concerning seismic safety. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to seismic ground shaking would occur.

iii) *Seismic-related ground failure, including liquefaction?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. As stated in the City's General Plan Safety and Noise Element, the City is susceptible to liquefaction during seismic activity due to conditions of loose, granular alluvial soils and locally shallow water table (City of West Hollywood 2020). The City's Safety and Noise Element contains an illustrated hazard area that covers approximately half of the City, including areas along Sunset Boulevard and Santa Monica Boulevard (City of West Hollywood 2020). As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. New development or structures located in liquefaction zones could be at greater risk. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would be required to comply with the requirements of the General Plan policies and regulations, Municipal Code, technical guidelines, and existing federal, state, and local laws and regulations concerning seismic safety. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to seismic-related ground failure, including liquefaction, would occur.

iv) *Landslides?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The City lies at the base of the Hollywood Hills, and the northwest portion of the City near Larrabee Street and Horn Avenue are at steeper grades, susceptible to landslides and mudslides (City of West Hollywood 2020). Future projects may result in development located on areas of the City more susceptible to landslides, including this portion of the City, although it is noted that this area is largely build-out with residential uses and thus is not expected to accommodate significant park, open space, or recreational development. Nevertheless, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would be required to comply with the requirements of the General Plan policies and regulations, Municipal Code, technical guidelines, and existing federal, state, and local laws and regulations concerning geotechnical safety. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to landslides would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. According to the City's General Plan EIR (SCH No. 2009091124), the northernmost portion of the City, adjacent to the Hollywood Hills, is susceptible to soil erosion due to the hilly topography (City of West Hollywood 2010). Construction of future projects may cause temporary soil erosion and loss of topsoil. Once a park, recreational, or open space project is completed, erosion is unlikely to occur, assuming landscape and/or hardscape is installed and maintained. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. The Project also includes new policies to incorporate soil health and restoration processes. Further, the City's Municipal Code has numerous requirements in place that minimize and prevent soil erosion. These requirements include implementation of structural controls such as berms and plastic sheeting to minimize the escape of sediment; situating excavated soils in a manner that minimizes the amount of sediment that runs off site; and covering of any soil piles during the rainy season (Municipal Code Section 15.56.090). Any larger projects with 1 acre or more of disturbance would also be required to obtain a Construction General Permit, which would entail preparation and implementation of a Stormwater

Pollution Prevention Plan. Such plans outline various construction best management practices to minimize erosion, sedimentation, and runoff contaminants. As such, required compliance with existing regulations and requirements would likely minimize erosion from potential future projects. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to soil erosion or the loss of topsoil would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Collapsible soils are known to exist within the City. According to the City's General Plan EIR (SCH No. 2009091124), the severity of this hazard in the City is only considered to be low to moderate (City of West Hollywood 2010). Future projects may result in development located on geologic units or soil that is unstable. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would also be required to comply with the requirements of the existing federal, state, and City laws and regulations concerning geotechnical safety. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to soil hazards would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Expansive materials may exist in various areas of the City. As stated in the City's General Plan EIR (SCH No. 2009091124), clay-rich soils are more prevalent in the southern part of the City, south of Santa Monica Boulevard (City of West Hollywood 2010). Future projects may result in development located on expansive soils. However, the exact locations, extent, construction scenarios, and operational scenarios of future projects are too speculative at this time. Each

future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would be required to comply with the requirements of the existing federal, state, and City laws and regulations concerning geotechnical safety, thereby ensuring maximum feasible stability. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to expansive soils would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, the Project does not propose any goals, policies, or implementation actions that could result in infrastructure development that includes septic tanks or alternative wastewater disposal systems. As such, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of future projects may be located on areas with unique paleontological resources or geologic features that could be damaged during minor grading, excavation, or other ground-disturbing activities. Given the City's built-out nature, it is likely that future project sites would have undergone disturbance in the past, which reduces the likelihood that previously undiscovered paleontological resources or unique geologic features would be unburied during construction. Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such project would be required to comply with the existing regulations regarding the preservation and protection of paleontological resources. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to the indirect or direct destruction of a unique paleontological or geologic feature.

3.8 Greenhouse Gas Emissions

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operations of these future projects would have the potential to generate greenhouse gas emissions. The Project establishes goals, policies, and implementation actions that are more likely to reduce vehicle trips through connections to trails and pedestrian- and bike-oriented routes, establishment of new pocket parks, and installation of pedestrian-oriented streetscape improvements. Vehicle trips are major contributors to greenhouse gas emissions, and a reduction in vehicle trips is thus typically associated with a reduction in greenhouse gas emissions. Additionally, implementation of policies for increased tree canopy would promote carbon sequestration. While the Project is generally expected to encourage greenhouse gas reductions, the locations, extent, construction scenarios, and operational scenarios of future projects that may result from Project implementation are nevertheless too speculative to evaluate in detail at this time.

Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Furthermore, because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impact related to the generation of greenhouse gas emissions would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operations of these future projects would have the potential to generate greenhouse gas emissions.

The City's 2021 CAAP 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 20 climate measures and 60 sub-actions organized into five areas of focus: (1) city leadership and governance; (2) energy; (3) transportation, mobility, and the public realm; (4) zero waste; and (5) natural environment (City of West Hollywood 2021). The Project does not propose any goals, policies, or implementation actions that would conflict with these existing regulations; rather, the Project integrates CAAP policies and implementation measures that address climate resilience and greenhouse gas reduction, as described in Section 2.3, Proposed Open Space Element Update. The Project incorporates goals, policies, and implementation actions specifically related to climate resilience, pursuant to SB 1425.

Other state plans include the 2022 California Air Resources Board Scoping Plan, which outlines how California will achieve 85% carbon greenhouse gas reduction and carbon neutrality by 2025 (CARB 2022), and SCAG's 2024-2050 RTP/SCS, also referred to as Connect SoCal 2024. Connect SoCal 2024 builds on the prior RTP/SCS and identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience (SCAG 2024). The primary objective of the RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region. As stated above, the Project includes goals, policies, and implementation measures that address climate resilience and greenhouse gas reduction, which are generally consistent with the California Air Resources Board's Scoping Plan and SCAG's 2024-2050 RTP/SCS targets and goals. Specifically, the Project includes goals, policies, and implementation measures for the protection and expansion of the urban tree canopy; encouraging native vegetation, pollinator gardens, and green roofs; and promoting environmental sustainability and conservation in the design of new parks and in the renovation, operation, and maintenance of existing parks. While the Project is generally expected to encourage greenhouse gas reductions, the locations, extent, construction scenarios, and operational scenarios of future projects that may result from Project implementation are nevertheless too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and

appropriate level of review under CEQA. Because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, and because the Project itself sets forth policies that may reduce greenhouse gas emissions and help implement the CAAP and the RTP/SCS, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact would occur.

3.9 Hazards and Hazardous Materials

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of future projects may involve hazardous materials. Operations of future projects would not typically involve hazardous materials, aside from small quantities commonly used for routine maintenance (e.g., landscaping supplies or cleaning materials). However, the locations, extent, construction scenarios, and operational scenarios of future projects that may result from Project implementation are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such project would be required to transport and handle hazardous materials in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally

anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. During construction of these future projects, limited amounts of ground disturbance may occur. In the event that subsurface contamination is present on a site, ground disturbance and excavation would have the potential to uncover contamination, exposing construction workers, the public, and/or the environment to contaminated soils or groundwater. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not 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. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may occur within one-quarter mile of existing or proposed schools. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to the use of hazardous materials near schools resulting from the Project would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may occur on

a site that is included on hazardous waste site lists, including the California Department of Toxic Substances Control EnviroStor database, the State Water Resources Control Board GeoTracker site, the Cortese list, the Superfund Site list, or other lists compiled pursuant to Section 65962.5 of the Government Code. As stated in the City's General Plan EIR (SCH No. 2009091124), review of the databases indicate that a number of sites within the City are included on the Cortese List developed according to Government Code Section 65962.5 (City of West Hollywood 2010). However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts related to the use of hazardous materials near schools resulting from the Project would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, according to the City's General Plan EIR (SCH No. 2009091124), there are no airports or private airstrips within the City, and the City is not subject to any airport land use plans (City of West Hollywood 2010). As such, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The City has an emergency plan (the City of West Hollywood Standardized Emergency Management System/National Incident Management System Emergency Plan) that is an all-hazards preparedness, emergency evacuation, response, and recovery plan. It addresses hazards such as fires, earthquakes, floods, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents. The plan also maps a number of evacuation routes through the City (City of West Hollywood 2017). Construction of future projects has the potential to require temporary sidewalk or lane closures. Once construction is completed, parks, recreation, and open space projects would be unlikely to interfere with an emergency response or evacuation plan. The Project also proposes a policy to establish resilience hubs in parks and City-owned facilities to serve as centers for preparedness, rapid response, and recovery from nature-based events, and an implementation action to formalize the role of parks and community facilities as cooling, respite, and emergency support spaces during extreme heat and smoke events. While the Project is thus expected to generally be supportive of emergency response and evacuation plans, the specific locations, extent, construction scenarios, and

operational scenarios of future projects are nevertheless too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not interfere with emergency response or evacuation plans, and no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operation of these future projects may have the potential to expose people or structures to wildland fire risk. The northern edge of the City, at the base of the Hollywood Hills, includes areas of moderate, high, and very high wildfire hazard severity. According to the City's General Plan EIR (SCH No. 2009091124), a fire in the Hollywood Hills would have the potential to spread to the northern region of West Hollywood (City of West Hollywood 2010). However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. These future projects would be required to comply with current local, state, and federal regulations; the policies of the proposed General Plan; and the City's existing building code procedures. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction of these future projects could involve ground disturbing activities that could contribute pollutants into the City's stormwater, including sediments from grading activities and contaminants associated with construction materials, construction waste, vehicles, and equipment, among others. Operations of future projects could also introduce pollutants into the City's stormwater system through routine maintenance activities, including the application of landscaping materials (e.g., fertilizers and pesticides), irrigation runoff, and the use of maintenance vehicles and equipment.

The City's General Plan includes a variety of actions aimed at protecting water quality, through reducing runoff of pollutants, and increasing on-site treatment or detention of stormwater (City of West Hollywood 2011). In addition, the City's Municipal Code prohibits discharges to the storm drain system of any fuel, chemical wastes, or other materials that have potential adverse impacts on water quality in accordance with Federal Clean Water Act (Municipal Code Section 15.56.060). The Municipal Code also requires implementation of best management practices, which "shall be used in areas exposed to storm water for the removal and lawful disposal of all fuels, chemicals, fuel and chemical wastes, animal wastes, garbage, batteries, or other materials which have potential adverse impacts on water quality" (Section 15.56.080). Any larger projects with 1 acre or more of disturbance would also be required to obtain a Construction General Permit, which would entail preparation and implementation of a Stormwater Pollution Prevention Plan. Such plans outline various construction best management practices to minimize erosion, sedimentation, and runoff contaminants.

Given the built-out nature of the City, ground-disturbing activities would generally occur in already disturbed, developed areas such as existing parks. Further, the Project proposes goals, policies, and implementation actions focused on stormwater management, including the incorporation of permeable surfaces and green technology such as stormwater capture within the City's parks and open spaces. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such project would be required to comply with the City's Municipal Code requirements and General Plan policies related to water quality standards and waste discharge requirements. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operations of future projects would not typically require direct groundwater extraction, as irrigation and maintenance are generally served by municipal water supplies. However, the water purveyors serving the City (the Los Angeles Department of Water and Power and the City of Beverly Hills) both obtain portions of their water supply from groundwater. As such, any increases in water demands associated with new or improved park/open space facilities may be partially met by groundwater. The Project proposes goals, policies, and implementation measures to increase stormwater capture and promote water conservation and reuse at park, recreation, and open space facilities. Nevertheless, the specific locations, extent, construction scenarios, operational scenarios, and resultant water demands of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to sufficient groundwater supplies and groundwater recharge.

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

i) *Result in substantial erosion or siltation on- or off-site?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction of these future projects could involve ground disturbing activities with the potential to alter drainage patterns and result in erosion or siltation. Given the built-out nature of the City, ground-disturbing activities would generally occur in already disturbed, developed areas, such as existing parks or within existing medians and parkways. As discussed under Section 3.10(a), all construction activities would be required to comply with the water quality best management practices per City and state regulations. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or

indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to erosion or siltation on or off-site.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction of these future projects could involve ground disturbing activities with the potential to alter the drainage pattern of future project sites, which could increase the rate or amount of surface runoff. Given the built-out nature of the City, ground-disturbing activities would generally occur in already disturbed, developed areas such as existing parks or within existing medians and parkways. Further, the Project proposes goals, policies, and implementation actions aimed at increasing the amount of permeable surfaces within the City's parks and open spaces. The specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Each project would also be required to comply with the City's Municipal Code and General Plan policies related to water quality. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to surface runoff that would result in flooding.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction of these future projects could involve ground disturbing activities with the potential to alter the drainage pattern of future project sites. Given the built-out nature of the City, ground-disturbing activities would generally occur in already disturbed, developed areas such as existing parks. Further, the Project proposes goals, policies, and implementation actions focused on stormwater management, including the incorporation of permeable surfaces and green technology such as stormwater capture within the City's parks and open spaces. The specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Further, implementation of the City's Municipal Code requirements and General Plan policies would serve to reduce the potential

impacts of future projects related to runoff. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. No impacts would occur.

iv) *Impede or redirect flood flows?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The construction of these future projects could involve ground disturbing activities with the potential to alter the drainage pattern of future project sites. Some portions of the City are mapped within the Federal Emergency Management Agency Moderate Flood Hazard Area, which are areas determined to be outside the 0.2% annual chance floodplain, but no portions of the City lie within a Special Flood Hazard Area, which is an area within a 1% annual chance floodplain (City of West Hollywood 2024). As such, any changes in drainage patterns from future projects would be temporary, localized, and would not have the potential to lead to flooding. Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impact related to flood flows would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, according to the City's General Plan EIR (SCH No. 2009091124), no portions of West Hollywood lie within a Federal Emergency Management Agency Special Flood Hazard Area, tsunami hazard area, or seiche hazard area (City of West Hollywood 2010). Some portions of the City are mapped within a Federal Emergency Management Agency Moderate Flood Hazard Area, which are areas determined to be outside the 0.2% annual chance floodplain. As such, the Project would not risk release of pollutants due to project inundation. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Los Angeles Regional Water Quality Control Board has adopted the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) for its region of responsibility, which includes the City of West Hollywood (Los Angeles RWQCB 2014). The Basin Plan contains water

quality regulations and implementation programs for the region. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of future projects may conflict with the Basin Plan, if requirements for water quality protections are not properly adhered to. As discussed under Section 3.10(a), all construction activities would be required to comply the City's Municipal Code requirements and General Plan policies related to water quality standards and waste discharge requirements, which would reduce conflicts between the Basin Plan and future projects. However, the specific locations, extent, construction scenarios, and operational scenarios of future projects are nevertheless too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to conflict or obstruction of a water quality control plan or sustainable groundwater management plan.

3.11 Land Use and Planning

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

a) *Would the project physically divide an established community?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project establishes goals, policies, and implementation actions that promote walkability, a connected open space network integrated with the broader public realm, and equitable access to recreational opportunities. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. These types of projects encouraged by the updated Element are intended to enhance open space connectivity and support community cohesion, rather than create physical barriers between land uses. Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, and because the Project itself sets forth policies to support community connectivity and access, the Project would not physically divide an established community, and no impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project would update the currently adopted Parks and Recreation Element to reflect current park, open space, and recreational information and incorporate new goals, policies, and implementation actions that address SB 1425 requirements in compliance with state law. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Further, the Project does not propose any goals, policies, or implementation actions that conflict with or would change other General Plan elements or Municipal Code regulations. Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such development would be expected to conform to existing General Plan policies, Municipal Code, and zoning code development standards. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts would occur.

3.12 Mineral Resources

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

- a) ***Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts related to mineral resources.

The Project does not propose any goals, policies, or implementation actions related to mineral resource extraction. The California Geological Survey has mapped the City within Mineral Resource Zone 1 for aggregate resources. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (CGS 2026b). According to the City's General Plan EIR (SCH No. 2009091124), there are several existing wells in the Salt Lake oil field in the southern portion of the City, near Beverly Boulevard (City of West Hollywood 2010). However, all wells within the City are currently either plugged or idle (CalGEM 2026). The entirety of the City is built out with residential, commercial, and public services uses. As such, the establishment of future mineral extraction operations that could be precluded by park/recreational development is not anticipated. Therefore, the Project would not result in the loss of availability of a known mineral resource. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts related to mineral resources. Further, the City's General Plan and zoning ordinance do not include any designations for mineral resources or extraction operations, nor do they identify any locally important mineral resource recovery sites (City of West Hollywood 2011). Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site, as none exist. No impact would occur.

3.13 Noise

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

- a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The City is located in an urbanized and developed environment which is subject to numerous noise sources. The primary noise source in the City is vehicular traffic along major arterials, including Sunset Boulevard, Fountain Avenue, and Santa Monica Boulevard. The roadway noise represents a relatively steady, constant noise source. In addition, typical urban noise sources (e.g., hospitality businesses, entertainment venues, community events, construction activities, landscape equipment, and emergency vehicle sirens) also contribute to the overall noise environment, as stated in the City's General Plan (City of West Hollywood 2011).

The City's Municipal Code and General Plan provide guidance for acceptable noise levels in the City. The City's Noise Control Ordinance prohibits construction from occurring between the hours of 7:00 p.m. and 8:00 a.m. on weekdays or at any time on Saturday (except, between the hours of 8:00 a.m. and 7:00 p.m., interior construction is permissible); or at any time on Sunday or on a holiday (Municipal Code Section 9.08.050). Construction activities that occur Monday through Saturday between the hours of 8:00 a.m. and 7:00 p.m. are allowed. Based on the City's General Plan EIR (SCH No. 2009091124), a construction-related temporary increase in ambient noise levels of 10 A-weighted Equivalent Continuous Sound Level (dBA L_{eq}) or greater would be considered a significant noise impact (City of West Hollywood 2010). The General Plan Safety and Noise Element also includes a variety of actions to limit exposure of noise-sensitive land uses to excessive noise levels from sources such as construction activities. For operational impacts, according to the General Plan, normally acceptable noise levels range from 50-70 Day-Night Average Sound Level (L_{dn}) or Community Noise Equivalent Level (CNEL), normally unacceptable noise levels range from 70-75 L_{dn} or Community Noise Equivalent Level, and clearly unacceptable noise levels range from 75-80 L_{dn} or Community Noise Equivalent Level. It is noted that parks and open spaces are considered noise-sensitive receptors.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The Project also establishes goals, policies, and implementation actions that would promote use of alternative forms of transportation through increased tree canopy, connections to trails and pedestrian- and bike-oriented routes, and pedestrian-oriented streetscape improvements. These efforts to make multi-modal forms of transportation more desirable may serve to incrementally reduce roadway noise, as more residents and visitors to the City may choose to walk or bicycle.

Construction of park, recreational, or open space projects may generate temporary construction noise. While many of the park, recreational, and open space projects promoted under the updated Element are anticipated to be passive in nature (e.g., landscaped medians, pedestrian improvements, and tree plantings), certain recreational projects may also generate noise impacts during operation. For example, a new or relocated playground, sports court, or sports field may generate a new source of operational noise. The specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary

review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in excess of local standards. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. To date, the City does not have regulatory standards for construction or operational vibration sources. However, the Federal Transit Administration and Caltrans have published guidelines for the analysis of groundborne noise and vibration relating to transportation- and construction-induced vibration.

The City consists of an urban environment with groundborne noise and vibration generated by light industrial operations and traffic. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Construction processes used to build the types of projects supported by the updated Element (e.g., pocket parks, landscaped medians, pedestrian improvements, tree plantings) would be unlikely to generate substantial vibration levels. Operation of such passive park and open space areas would also be unlikely to generate substantial levels of vibration. Additionally, while substantial vibration impacts are not anticipated, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not result in generation of excessive groundborne vibration or noise levels. No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Further, as stated in Section 3.9(e), there are no airports or private airstrips within two miles of the City, and the City is not subject to any airport land use plans (City of West Hollywood 2010). As such, no impact would occur.

3.14 Population and Housing

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project does not propose any goals, policies, or implementation measures related to new housing that could result in direct population growth, nor would the Project require amendments to the City's zoning ordinance or other regulatory frameworks that could increase allowable development intensity. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Future projects such as new parks or expanded programs may create additional employment opportunities. Such employment growth would likely be minor and would not be expected to encourage growth outside of existing population

projections. Any increase in employment opportunities would likely be met by existing residents. Further, the City is built-out and the purpose of this Project is to serve the existing residential population and the City's future planned residential population, which is projected to expand regardless of the Project (SCAG 2024). The specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not directly increase the population or indirectly induce additional unplanned population growth. No impact would occur.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project is largely focused on establishing goals, policies, and implementation actions for improving existing parks and establishing new green spaces in small, available pockets (e.g., along street medians or within pocket parks) or on underutilized or vacant land. Further, the Project does not propose any goals, policies, or implementation actions that would result in future projects that would replace existing housing. As such, the Project would not displace any people or housing and no impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES – Would the project:

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

Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the

updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. According to the City's General Plan, fire services in the City are provided by the Los Angeles County Fire Department. Two Los Angeles County Fire Department stations are located within the City: Fire Station 7 and Fire Station 8 (City of West Hollywood 2011). For police protection, the Los Angeles County Sheriff's Department contracts with the City. The City is served by the West Hollywood Sheriff's Station, located at 720 North San Vicente Boulevard. Regarding schools, the City is served by the Los Angeles Unified School District.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Future projects would not result in the development of new residences or commercial development requiring increased fire, police, or school services. Additionally, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. As such, any potential park project that may lead to significant environmental effects would be evaluated separately under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. No impacts would occur.

3.16 Recreation

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Implementation of the updated Element would be expected to improve the conditions of the City's parks and recreational resources. As explained in Section 3.14, the Project is not expected to expand the City's population such that parks and recreational resources would become substantially taxed relative to existing conditions. For these reasons, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects

that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. As such, any potential park project that may lead to significant environmental effects would be evaluated separately under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park and recreation projects that could not otherwise have been developed under the existing Element, the Project would have no impact related to the provision of new or expanded recreational facilities.

3.17 Transportation

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

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

The Project establishes goals, policies, and implementation actions that would promote use of alternative forms of transportation through increased tree canopy, connections to trails and pedestrian- and bike-oriented routes, establishment of new pocket parks, and installation of pedestrian-oriented streetscape improvements. These efforts to make multi-modal forms of transportation more desirable would be consistent with other policies and programs in the City addressing the circulation system, such as the City's General Plan Mobility Element, which establishes its own goals and policies focused on creating a pedestrian-oriented City and reducing vehicular traffic. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may generate additional vehicle trips or cause temporary obstructions to the circulation system. Increases in traffic during construction would be considered temporary and would not likely significantly impact the circulation system. Many of the park, recreational, and open space projects promoted under the updated Element are anticipated to be neighborhood-serving in nature (e.g., pocket parks, landscaped medians, pedestrian improvements, tree plantings) and thus are not anticipated to generate vehicle trips. While projects developed under the updated Element would not be expected to conflict with policies for the circulation system, the locations, extent of such projects, construction scenarios, and operational scenarios are nevertheless too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. These future projects may generate vehicle miles traveled (VMT). VMT is used to measure the performance of the transportation network and to evaluate potential transportation-related impacts on the environment. VMT is often expressed on an efficiency basis (i.e., per unit, per thousand square feet, etc.) to understand whether people are traveling more or less by vehicle over time, across different areas, or across different planning scenarios. As such, construction and

maintenance activities are not considered when determining VMT impacts as these trips do not represent permanent changes in the transportation network based on the proposed use.

Local-serving public facilities, such as parks, do not typically generate substantial VMT, as they primarily serve the surrounding community and either generate low VMT or redistribute existing trips from nearby facilities or shorten trips that might otherwise be made to more distant regional destinations. In addition, improvements to existing local-serving facilities are not anticipated to increase VMT. The City's transportation guidelines screen out development projects due to the proximity of high-quality transit corridors throughout the City. While the Project is not a typical development project, it would meet the City's VMT screening criteria because it would not have the potential to create a significant regional draw, as many of the park, recreational, and open space projects promoted under the updated Element are anticipated to be neighborhood-serving in nature (e.g., pocket parks, landscaped medians, pedestrian improvements, tree plantings). Employees and visitors associated with local and community parks would primarily originate from within the City, rather than from regional locations. Further, the Project establishes goals, policies, and implementation actions that promote alternative forms of transportation through increased tree canopy, connections to trails and pedestrian- and bike-oriented routes, establishment of new pocket parks, and installation of pedestrian-oriented streetscape improvements.

Nevertheless, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. In the unlikely event that a regional-serving recreational facility were to be proposed in the future, it would be evaluated for potential project-specific VMT effects at that time.

For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). No impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. The Project also includes policies that emphasize the use of traffic calming measures, such as wider sidewalks, bulb-outs, and enhancement of roadside medians as well as policies that promote universal access. Any such improvements would be reviewed and approved by the City's Public Works Department and Engineering Division, thereby ensuring that any such improvements would comply with applicable safety and design standards. Other types of park and recreational development would not be expected to result in changes to roadway geometry. Additionally, park, recreational, and open spaces would not be considered incompatible uses in the context of a built-out, urbanized city containing existing park resources. Furthermore, each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not

otherwise have been developed under the existing Element, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and no impacts would occur.

d) Would the project result in inadequate emergency access?

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these projects could require temporary sidewalk or lane closures. Inadequate emergency access may occur if emergency access is obstructed by these projects or if new driveways or fire truck turnaround areas are insufficient to accommodate the necessary emergency equipment. The locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Designs for future projects would also be reviewed by the City's Public Works Department, the City's Engineering Division, and/or by the Los Angeles County Fire Department as applicable, which would ensure compliance with applicable safety and design standards involving emergency access. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not result in inadequate emergency access, and no impacts would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As previously discussed in Section 3.5(a), the City has several historical resources listed in the National Register of Historic Places and California Register of Historic Resources as well as locally designated resources; however, all such resources are built environment resources (City of West Hollywood 2010). A search of the Native American Heritage Commission Sacred Lands File for the Project was completed on November 26, 2025, and returned with negative results. Additionally, the City's tribal outreach resulted in no tribal consultations. Two responses from one tribe were received, noting no objections to the Project. Additional details regarding tribal outreach and correspondence are presented in Section 3.18(b), below.

As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction activities that may result from Project implementation could involve minor grading or other ground disturbance having the potential to uncover buried, previously unknown tribal cultural resources (TCRs). The locations, extent of such activities, construction scenarios, and operational scenarios are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Specific future projects requiring CEQA review would also be subject to the requirements of Assembly Bill (AB) 52, allowing for consultation on specific project sites. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not adversely affect TCRs that are listed or eligible for listing in the state or local register, and no impacts would occur.

- 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 Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project is subject to the tribal notification requirements of AB 52 and SB 18. AB 52 requires consideration of impacts to TCRs as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications. SB 18 requires local governments to provide early notification and an opportunity for consultation with California Native American tribes during the adoption or amendment of general plans, including open space elements, to address impacts to TCRs.

The City notified all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list via email on January 26, 2026, and U.S. Postal Service certified mail on January 16, 2026, to provide notification of the proposed Project to groups that are traditionally or culturally affiliated with the geographic area of the Project. Each California Native American tribe has 30 days to request consultation under AB 52 and 90 days to request consultation under SB 18. No tribes requested formal consultation regarding the proposed Project. One tribe, the Gabrieleño Band of Mission Indians - Kizh Nation, responded to the City via email on January 26, 2026 and January 27, 2026. The tribe requested to be notified of any future ground-disturbing activities and stated that future projects implemented under the updated Element may require separate CEQA review, AB 52 consultation, and SB 18 consultation where applicable. The City would continue to adhere to the requirements of AB 52 and SB 18 throughout implementation of the updated Element.

Specific future projects requiring CEQA review would be subject to the requirements of AB 52 (and SB 18, if applicable), allowing for consultation on specific project sites. Therefore, the Project would not adversely affect TCRs determined to be significant, and no impacts would occur.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the waste water 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?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

- a) ***Would the project require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project proposes goals, policies, and implementation measures aimed at increasing stormwater capture, water reuse and conservation, and efficient lighting in parks and recreational facilities. Nevertheless, park, recreational, and open space projects may require utilities, particularly water for landscaping and electricity for lighting and likely from existing utility infrastructure. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Nevertheless, the locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would result in no impacts associated with the relocation or construction of new or expanded facilities, the construction or relocation of which could cause significant environmental effects.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project proposes goals, policies, and implementation measures to increase stormwater capture and promote water conservation and reuse in parks and recreational facilities. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may require water supplies for activities such as dust control and establishment of landscaping. Operation of future projects may also require ongoing water use, primarily for landscape irrigation, park maintenance, and park amenities such as drinking water. The locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to sufficient water supplies.

- c) ***Would the project result in a determination by the waste water 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?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project proposes goals, policies, and implementation measures to promote water conservation and reuse in parks and recreational facilities.

Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operation of future parks and recreational facilities projects may involve construction or expansion of restrooms and other maintenance activities that would generate wastewater. Parks and recreational uses typically generate relatively low wastewater flows and would not be expected to substantially increase wastewater flows. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Nevertheless, the locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to wastewater capacity.

- d) ***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?***

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operation of these future projects may generate solid waste and debris. Given the Project's emphasis on small-scale public space improvements, such as pocket parks and pedestrian amenities, future projects would not be anticipated to produce substantial amounts of solid waste. However, the locations, extent of such activities, construction scenarios, and operational scenarios, are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such project would be required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would have no impacts related to generation of solid waste in excess of local standards, capacity of local infrastructure, or impairment of solid waste reduction goals.

e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. The Project does not propose any goals, policies, or implementation actions that conflict with federal, state, or local regulations related to solid waste. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction and operation of these future projects may generate solid waste and debris. However, given the Project's emphasis on small-scale public space improvements, such as pocket parks and pedestrian amenities, future projects would not be anticipated to produce substantial amounts of solid waste. However, the locations, extent of such activities, construction scenarios, and operational scenarios are too speculative to evaluate at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. Any such project would be required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, no impacts would occur.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Implementation of the Project's goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City's initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. According to CAL FIRE, the City is not within a State Responsibility Area. Instead, the City is within a Local Responsibility Area, meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a Local agency. The north portion of the City near the base of Hollywood Hills is designated as very high, high, and moderate fire hazard severity zones (CAL FIRE 2026). Additionally, as stated in Section 3.9(f), the City has an emergency plan (the City of West Hollywood Standardized Emergency Management System/National Incident Management System Emergency Plan) that is an all-hazards preparedness, emergency evacuation, response, and recovery plan. The plan also maps a number of evacuation routes through the City (City of West Hollywood 2017). As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may be located within a very high fire hazard severity zone and has the potential to require temporary sidewalk or lane closures. Once construction is completed, parks, recreation, and open space projects would be unlikely to interfere with an emergency response or evacuation plan. The Project also proposes a policy to establish resilience hubs in parks and City-owned facilities that serve as centers for preparedness, rapid response, and recovery from nature-based events, and an implementation action to formalize the role of parks and community facilities

as cooling, respite, and emergency support spaces during extreme heat and smoke events. While the Project is thus expected to generally be supportive of emergency response and evacuation plans, the specific locations, extent, construction scenarios, and operational scenarios of future projects are nevertheless too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not interfere with emergency response or evacuation plans, and no impacts would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may be located within a very high fire hazard severity zone. Once construction is completed, parks, recreation, and open space projects would be unlikely to exacerbate wildfire risks, as they involve maintained landscaping and generally do not introduce new ignition sources. Nevertheless, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not expose project occupants to pollutant concentrations from wildfire, and no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may be located within a very high fire hazard severity zone. Once construction is completed, parks, recreation, and open space projects would be unlikely to exacerbate wildfire risks, as they involve maintained landscaping and generally do not introduce new ignition sources. Nevertheless, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would

be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment, and no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As stated above in the introductory paragraph of this section, the development of projects consistent with the updated Element would not be substantively different from the types of projects that could have been developed under the existing Element. Although future projects cannot be known at this time, it is generally anticipated that they may consist of new pocket parks, pedestrian-oriented streetscape improvements, and/or infrastructure improvements at existing parks. Construction of these future projects may be located within a very high fire hazard severity zone. Once construction is completed, parks, recreation, and open space projects would be unlikely to exacerbate wildfire risks, as they involve maintained landscaping and generally do not introduce new ignition sources. Further, the Project does not propose any goals, policies, or implementation actions that would result in habitable structures. Nevertheless, the specific locations, extent, construction scenarios, and operational scenarios of future projects are too speculative to evaluate in detail at this time. Each future development project that requires discretionary review would be evaluated by the City on a case-by-case basis to determine the potential environmental impacts and appropriate level of review under CEQA. For these reasons and because the Project would not directly or indirectly facilitate new park projects that could not otherwise have been developed under the existing Element, the Project would not expose people or structures to significant risks from post-fire slope instability or drainage changes. No impact would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Implementation of the Project’s goals, policies, and implementation measures would not change any General Plan land use designations or zoning designations, would not establish or alter any goals for park service ratios, and would not otherwise change the density or intensity of allowable development under the Municipal Code. The updated Element provides new policy direction to guide the City’s initiatives for parks, recreation, and open space and consider equitable access, climate resilience, and rewilding. It may encourage projects that align with the updated Element, but those projects would not be newly enabled or approved by this updated Element, and such projects could also happen otherwise under the existing Element. Future development projects would be subject to the same land use and zoning restrictions as currently applicable through the General Plan and zoning code. Similarly, any future projects or physical improvements would be subject to separate approval and review under CEQA, as applicable.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As discussed throughout the IS/ND, the Project would not degrade the quality of the environment; reduce wildlife species habitat, populations, or rare or endangered species; threaten a plant or animal community; or eliminate important examples of history or prehistory. As discussed more in Section 3.4, Biological Resources, and Section 3.5, Cultural Resources, the Project would result in no impacts related to biological and cultural resources. As such, no impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. As discussed throughout the IS/ND, implementation of the Project would not result in potentially significant impacts and, therefore, would not be expected to result in cumulatively considerable impacts when combined with other development or activities in the City. As described in Section 2.2, Environmental Setting, the City has several completed, ongoing, and planned public space projects and initiatives. These include the Beverly Triangle Plaza, the Weaver’s Walk, the Sky Sanctuaries: San Vicente Streetscape Plaza, the West Hollywood Park Master Plan, the Plummer Park Comprehensive Improvement Plan, and the Accessible West Hollywood Plan. These projects have undergone or will undergo separate discretionary review and CEQA review, as applicable. Similar projects that may be proposed in the future under the updated Element would likewise be required to undergo discretionary review and CEQA review. As such, the Project would not result in cumulatively considerable impacts. No impact would occur.

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

No Impact. The Open Space Element Update is a policy document and does not propose or authorize any specific park, recreational, or open space project. Adoption of this updated Element would not produce environmental impacts. Impacts to human beings are typically associated with aesthetics, air quality, hazards and hazardous materials, noise, public services, transportation, wildfire, and—indirectly—greenhouse gas emissions. As detailed throughout this IS/ND, the Project would not result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings. Rather, the Project would encourage projects that improve the built and natural environments for the City’s residents, workers, and visitors. The Project would therefore have no impact related to potential for adverse effects on human beings.

4 References and Preparers

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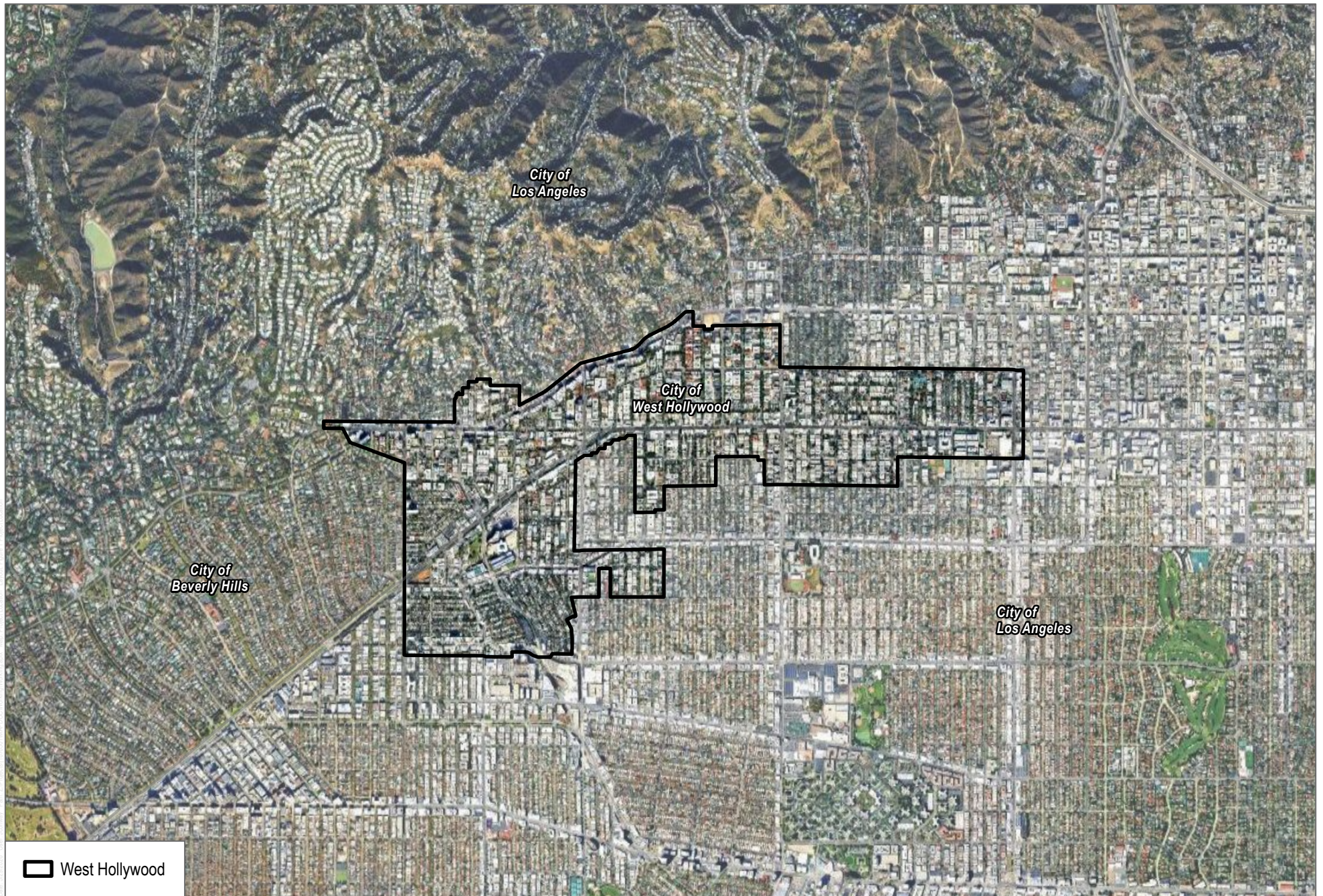
4.2 List of Preparers

City of West Hollywood

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SOURCE: Google Imagery 2026, and Los Angeles County 2026

DUDEK



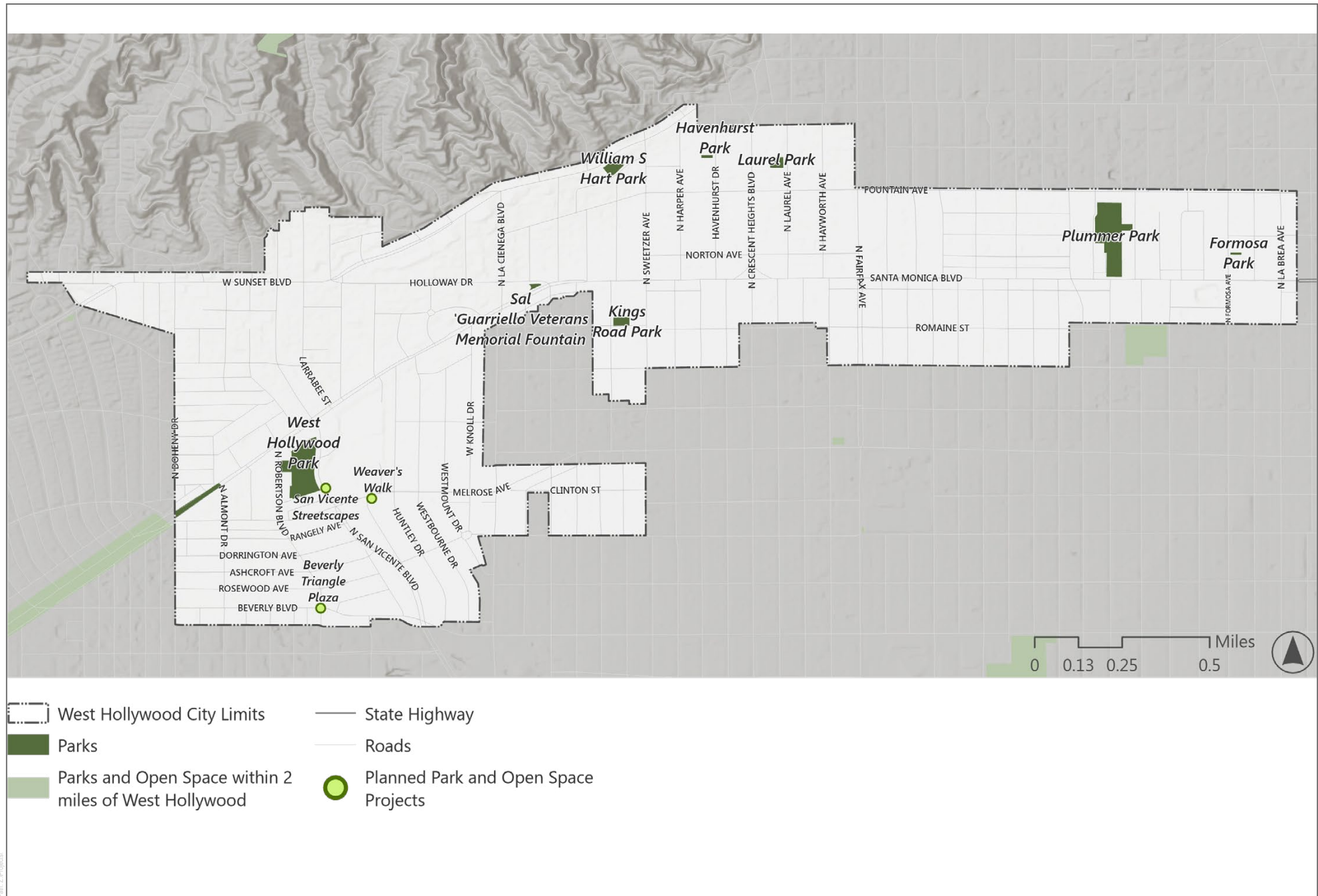
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FIGURE 1

Project Location

Open Space Element Update

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SOURCE: ESRI 2026, City of West Hollywood 2026, and Dudek 2026

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