Appendix A

Initial Study and Scoping Report

Appendix A-1

Initial Study

8850 Sunset Boulevard Project
Initial Study

Prepared by

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

Prepared with assistance from

DUDEK
38 North Marengo Avenue
Pasadena, California 91101

SEPTEMBER 2019

Printed on 30% post-consumer recycled material.

Table of Contents

SECTION **PAGE NO.**

ACRONYMS AND ABBREVIATIONS III

1 INTRODUCTION 1
- 1.1 Project Overview 1
- 1.2 California Environmental Quality Act 1
- 1.3 Project Location 1
- 1.4 Environmental Setting 2
- 1.5 References 5

2 PROJECT DESCRIPTION 7
- 2.1 Project Design 7
- 2.2 Construction 13
- 2.3 Operation 14
- 2.4 Sustainability Practices and Features 15
- 2.5 Sunset Specific Plan Amendment 15
- 2.6 Required Permits and Approvals 15
- 2.7 References 16

3 INITIAL STUDY CHECKLIST 17
- 3.1 Aesthetics 22
- 3.2 Agriculture and Forestry Resources 26
- 3.3 Air Quality 28
- 3.4 Biological Resources 30
- 3.5 Cultural Resources 34
- 3.6 Energy 36
- 3.7 Geology and Soils 37
- 3.8 Greenhouse Gas Emissions 41
- 3.9 Hazards and Hazardous Materials 42
- 3.10 Hydrology and Water Quality 46
- 3.11 Land Use and Planning 51
- 3.12 Mineral Resources 52
- 3.13 Noise 53
- 3.14 Population and Housing 57
- 3.15 Public Services 58
- 3.16 Recreation 60
- 3.17 Transportation 62
- 3.18 Tribal Cultural Resources 63
- 3.19 Utilities and Service Systems 64

PAGE NO.

3.20 Wildfire 67
3.21 Mandatory Findings of Significance 69

4 PREPARERS 71

FIGURES

1 Project Location 3
2a Conceptual Project Design 9
2b Project Elevations 11

TABLES

2-1 Hours of Operation 14
3.5-1 Historic-Age Buildings on the Project Site 35

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CAP	Climate Action Plan
CEQA	California Environmental Quality Act
CH_4	methane
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
DMP	Demolition Permit
DNL	day-night average sound level
DVP	Development Permit
ECP	Erosion Control Plan
EIR	Environmental Impact Report
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
GHG	sources of greenhouse gases
HFC	hydrofluorocarbon
IS	Initial Study
LADPW	Los Angeles County Department of Public Works
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	level of service
LSWPPP	Local Storm Water Pollution Prevention Plan
N_2O	nitrous oxide
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PFC	perfluorocarbons
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter equal to or less than 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PRC	Public Resources Code
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SF_6	sulfur hexafluoride
SPA	Specific Plan Amendment
SSP	Sunset Specific Plan
USFWS	U.S. Fish and Wildlife Services
VMT	vehicle miles traveled
VOC	volatile organic compounds
WHMC	West Hollywood Municipal Code

INTENTIONALLY LEFT BLANK

1 Introduction

1.1 Project Overview

The 8850 Sunset Boulevard Project (proposed project) consists of the demolition of existing buildings and the construction and operation of a new mixed-use hotel and residential building on a property along the south side of Sunset Boulevard, extending the full city block between Larrabee Street and San Vicente Boulevard, in the City of West Hollywood (project site). The existing buildings on the project site that would be demolished comprise approximately 21,000 square feet. The new mixed-use hotel and residential building would be approximately 369,000 gross square feet in size and 15 stories (approximately 200 feet) in height. The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, outdoor pools, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units with residential amenities including a gym, movie screening room, and an outdoor pool. The proposed project also would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). CEQA Guidelines Section 15367 states that a "Lead Agency" is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, the City of West Hollywood (City) is the lead agency responsible for compliance with CEQA for the proposed project.

The City has prepared an Initial Study (IS) in accordance with the CEQA guidelines to determine if the proposed project could have the potential to cause significant adverse environmental impacts. Based on the conclusions of the Initial Study evaluation (contained in Section 3 of this document), the City has determined that the proposed project may have a significant impact and, therefore, will prepare an Environmental Impact Report (EIR) pursuant to CEQA. Since the analysis in the Initial Study determined that the proposed project would not result in significant impacts for some environmental categories, the City proposes to eliminate the following topics from further evaluation in the EIR: aesthetics, agriculture and forestry resources, biological resources, mineral resources, recreation, and wildfire.

1.3 Project Location

The proposed project site is located on the Sunset Strip, in the City of West Hollywood. Below is a description of the regional location and project site, followed by a description of the environment that immediately surrounds the project site.

Regional Location

The project site is located in the City of West Hollywood. The City covers 1.9 square miles in the Los Angeles Metropolitan Area. The City is located within the County of Los Angeles (County), approximately 7.5 miles

northwest of downtown Los Angeles. Regional access to the project site is provided via U.S. Route 101 (US 101, Hollywood Freeway), located approximately 4.4 miles east of the project site. Figure 1 shows the regional location of the project site, as well as the project site within the context of Sunset Boulevard. Local access is provided via major north–south and east–west oriented roads including Sunset Boulevard, which forms the northern boundary of the project site; La Cienega Boulevard, located approximately 0.5 miles east of the project site; Santa Monica Boulevard, located approximately 0.3 miles south of the project site; and San Vicente Boulevard, which forms the western boundary of the project site.

Project Site

The approximately 39,983–square foot project site is bound by Sunset Boulevard to the north, Larrabee Street to the east, the London Hotel to the south, and San Vicente Boulevard to the west. The addresses associated with project site consist of 8850–8878 Sunset Boulevard and 1025–1029 Larrabee Street, West Hollywood. The project site is comprised of eight Assessor Parcel Numbers (APNs): 4339-017-001, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-006, 4339-017-007, and 4339-017-008.

1.4 Environmental Setting

Existing Land Uses

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

As shown on Figure 1, the project site is currently developed with four one- and two-story commercial buildings totaling approximately 21,000 square feet. The existing buildings are currently occupied by the Viper Room nightclub, two liquor stores, two restaurants, a barbershop, a professional office, and two retail stores. The project site also has existing surface parking lots totaling 27,450 square feet and four existing billboards. The existing commercial buildings appear to be one-story along Sunset Boulevard with the second story daylighting in the back (south side) due to the slope of the project site. The surface parking lots are located on the southern portion of the project site. On the east end of the project site, located above the liquor store at 8850 Sunset Boulevard, is a roof-mounted, east-facing 14-foot by 48-foot billboard. The billboard is 54 feet above Sunset Boulevard and is visible to westbound traffic. On the west end of the project site, there are three roof-mounted billboards. One east-facing 18-foot by 48-foot billboard is 54 feet above Sunset Boulevard, visible to westbound traffic on Sunset Boulevard. One west-facing 18-foot by 48-foot billboard is 45 feet above Sunset Boulevard, visible to eastbound traffic on Sunset Boulevard. One south-facing 14-foot by 48-foot billboard is 41 feet above Sunset Boulevard, visible to northbound traffic on San Vicente Boulevard.



Source: Google Earth (2019)

DUDEK

0 50 100 Feet

FIGURE 1

Project Location

8850 Sunset Boulevard Project

INTENTIONALLY LEFT BLANK

Surrounding Land Uses

Land uses surrounding the project site include commercial and residential uses. To the immediate north of the project site, on the north side of Sunset Boulevard, are commercial uses located in one- and two-story buildings. Multi-family residential buildings are further to the north of Sunset Boulevard, along Larrabee Street and North Clark Street. The multi-family residential buildings range in height from approximately two stories to five stories. However, the project area slopes up towards the north, and multi-family residential uses to the north appear greater in height from the project site level. At the northeast corner of Larrabee Street are a four-story office building, one-story commercial building, and surface parking lot. To the immediate east of the project site, there are several one- to two-story commercial buildings, and a four-story multi-family residential building. Further east, along Nellas Street, are several multi-story residential uses and a seven-story office building. The southern project boundary abuts the London Hotel, which is an 11-story luxury hotel with a rooftop pool. To the west of the project site is a gas station and mini-mart, one- and two-story commercial buildings, and two- and three-story multi-family residential buildings.

Existing Land Use and Zoning Designations

According to the City's General Plan, the project site is located within the Sunset Boulevard Commercial Subarea and has a zoning and land use designation of Sunset Specific Plan (SSP). The general intent of the SSP designation is to accommodate quality development that meets market demand while preserving the eclectic nature of the Sunset Strip. The SSP distributes the total allowable increase in development among eight specific geographic areas along the Sunset Strip, and each geographic area has been assigned a portion of the allowable development along the Sunset Strip. Density increases for each area are assigned based on the current and anticipated character of development envisioned for the SSP. The project site is located in Geographic Area 6-E (City of West Hollywood 1996, 2011).

Existing Stormwater Flows

Existing stormwater runoff from the project site is conveyed via sheet flow and curb drains to the adjacent streets. The existing site slopes mostly towards the south with an approximately 11% gradient. Additionally, there is an easterly slope of approximately 2.5% across the existing site. The project site is located within the Federal Emergency Management Agency (FEMA) Flood Zone X, which denotes an area where the potential for flooding is minimal. There are no surface water bodies in the project vicinity.

1.5 References

City of West Hollywood. 1996. *Sunset Specific Plan.* Adopted July 1996.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

INTENTIONALLY LEFT BLANK

2 Project Description

The proposed project would involve the demolition of the four existing one- and two-story commercial buildings on the project site totaling approximately 21,000 square feet, which are currently occupied by the Viper Room nightclub, two liquor stores, two restaurants, a barbershop, a professional office, and two retail stores. The proposed project would also involve demolition of the existing 27,450 square feet of surface parking and removal of the four existing billboards. Once the existing uses are removed, an approximately 369,000 square-foot mixed-use hotel and residential building would be constructed on the site. The building would have 15 aboveground stories and would be approximately 200 feet in height (including an emergency helipad), as measured from the lowest point of the site (the southwest corner of the site). This height equates to approximately 185 feet above Sunset Boulevard. The building would also have 4 below ground levels, extending 45 feet below grade. The aboveground portion of the building would be 239,868 square feet in size and the belowground portion of the building would be 128,932 square feet in size.

The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, outdoor pools, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units with residential amenities including a gym, movie screening room, and an outdoor pool (Figure 2). The building would have floor area ratio (FAR)[1] of 6:1. The building square footage used for the FAR calculation is 240,000 square feet.

2.1 Project Design

The lower portion of the proposed building would consist of an undulating one- to three-story transparent volume along Sunset Boulevard that would wrap around the east and west facades of the structure. This predominantly glass volume would include the hotel lobby, the entry to the Viper Room, and a restaurant/bar and café that would activate the street level during the day and night. Above this lower portion would be two separate rectilinear volumes that would house the residential uses and hotel uses, which would be set apart from each other by an approximately 120-foot opening. By locating these two separate volumes on the east and west sides of the building, the design provides a large view corridor between them in the center of the building (i.e., an open volume of approximately 166,150 square feet in area) allowing for north–south views through the site and providing an architectural element for the project. The focal point of the opening would be a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard. The building would be capped with a bridge connecting the residential volume and the hotel volume at the top floor (level 15). The bridge would house a publicly accessible restaurant, bar, and terrace (Figure 2). Two pools for hotel guests also would be located on the roof of the bridge component, while a separate pool for residents and their guests would be located on the roof of the residential volume.

[1] The City defines floor area ratio (FAR) as the ratio of floor area to total lot area. FAR restrictions are used to limit the maximum gross floor area allowed on a site (including all structures on the site). The maximum gross floor area of all structures permitted on a site is determined by multiplying the FAR by the total area of the site (FAR x Site Area = Maximum Allowable Gross Floor Area). Basement area is not included in calculation of floor area ratio.

The proposed uses within the building are described in more detail below.

Subterranean Levels & Street Level

- **Levels B4, B3, and B2**: These levels would provide subterranean parking for the proposed project, with approximately 189 parking spaces for the hotel and commercial uses and 80 spaces for the residents and their guests. Vehicle ingress for residents who elect to self-park would be provided from Larrabee Street at the B2 Level.
- **Level B1**: This level would be partially below grade on the north side of the project site and partially above grade (daylight) on the south side of the project site. Vehicle ingress to the site for hotel guests, commercial patrons, and residents and their guests who are using valet services would be provided at this level, off San Vicente Boulevard. Egress from the site would be onto Larrabee Street, also from this level. Valet areas, including hotel and residential reception lounges, would also be provided on this level. The reception lounges would be open air but completely covered by Level 1 above, which would create a roof overhang.
- **Level 1 (Sunset Level)**: Hotel lobby, a restaurant with outdoor dining, a café with outdoor dining, and the lobby for the Viper Room would all open onto Sunset Boulevard. This level would also include a hotel lounge, kitchens, and hotel back-of-house administration spaces.

Beyond Level 1, the building would divide into the two volumes described above (one with residential uses and the other with hotel uses). These volumes are thus described separately below.

Residential Portion (Eastern Volume)

The residential portion of the project would have approximately 15,400 square feet of common open space including 7,500 square feet of landscaping and 6,100 square feet of hardscape. The residential units would range in size from one-bedroom units to four-bedroom units. Each residential unit would have a balcony of at least 120 square feet in size. The levels of the residential portion of the building would include the following:

- **Level 2**: A terrace for the residents would be on this level, on the south side of the building.
- **Levels 3–14**: The residential units would be on these levels with the 10 income-restricted units located on the third level.
- **Level 15 and Roof**: The residential pool and pool terrace would be on the fifteenth level. The emergency helipad for the entire building would be located on the roof of the residential portion of the project.

Hotel Portion (Western Volume)

- **Level 2**: This level would contain a lounge and a pre-function lounge, a banquet hall that could accommodate up to 500 seats, four meeting rooms, the hotel spa and gym, back-of-house spaces, and an outdoor terrace for the ground-floor cafe.
- **Levels 3–13**: Hotel guestrooms would be located on these levels. The fourth level would also have a terrace cafe and an outdoor terrace for hotel guests.
- **Level 14**: The hotel restaurant and outdoor dining terrace would be on this level with an exterior stair continuing up to the rooftop pools and pool deck.
- **Level 15 and Roof**: This level would have the changing rooms for the hotel pools and mechanical space. The hotel pools and pool deck would be on the roof of the bridge component connecting the hotel portion of the project to the residential component.



Proposed project section (looking from the south)

Source: Morphosis Architects

FIGURE 2a

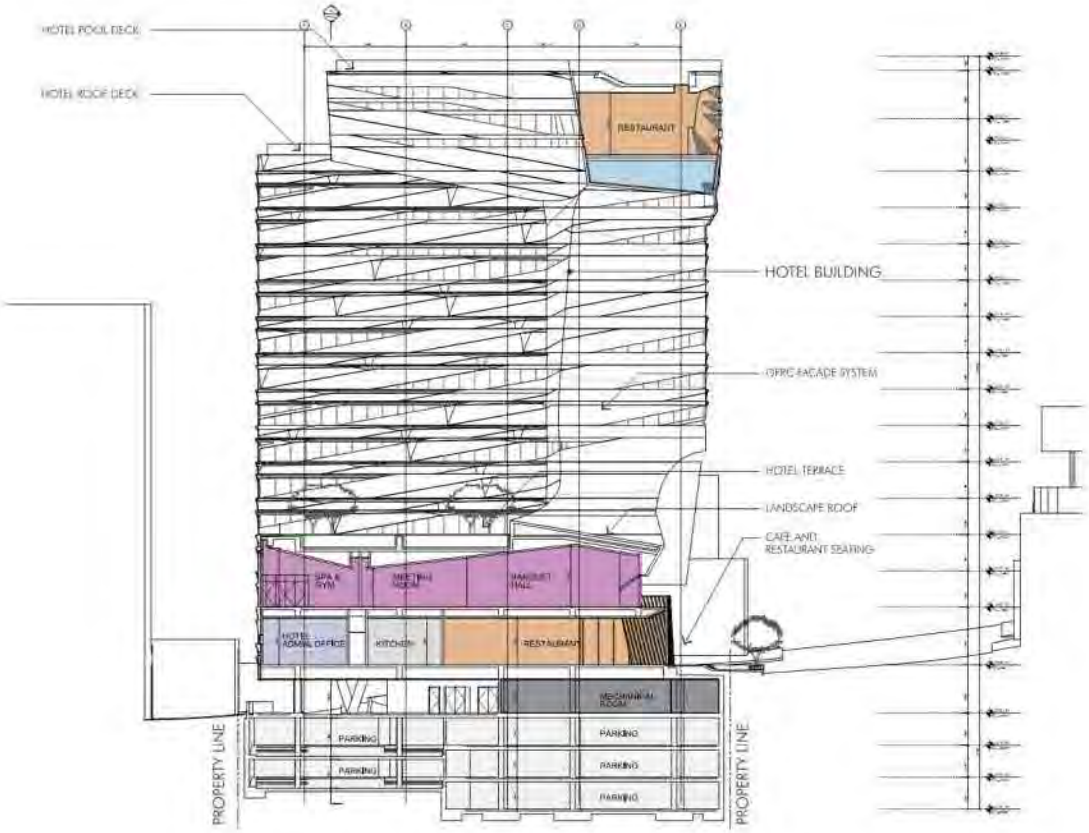
Conceptual Project Design

8850 Sunset Boulevard Project

DUDEK

Date: 6/6/2019 - Last saved by: rstanford - Path: Z:\Projects\113\8501\MAP\DOC\Project Description\Fig2a_Conceptual_Project_Design

INTENTIONALLY LEFT BLANK



Proposed project section (looking from the west)



Proposed project section (looking from the east)

Source: Morphosis Architects

FIGURE 2b
Project Elevations
8850 Sunset Boulevard Project

DUDEK

INTENTIONALLY LEFT BLANK

Landscaping

The plant pallet utilized as part of the proposed project would comply with the West Hollywood Municipal Code (WHMC) Section 19.26.060. The proposed project would provide 12,419 square feet of landscaped area on Levels B1, 1, 3, 4, and the roof. The proposed project would incorporate a privacy wall vine planting at the southern boundary of the project site on Level B1, adjacent to the London Hotel. At Level 1 (Sunset Level), the proposed project would incorporate street trees along the northern, eastern, and western project boundaries. On Levels 3 and 4, the approximately 120-foot opening would contain terraced landscaping with native plantings. The roof landscaping would consist of ground cover native plants and short palm trees near the pools.

Access, Circulation, and Parking

Vehicle ingress into the project site for hotel and commercial patrons and residents and their guests using valet services would be from San Vicente Boulevard at the B1 Level. Vehicle ingress into the project site for residents electing to self-park would be from Larrabee Street at the B2 level. All egress from the project site would be onto Larrabee Street at the B1 Level.

The WHMC requires 240 parking spaces for the proposed project, and the project would provide 267 parking spaces. The subterranean parking levels (Levels B4, B3, and B2) would provide 189 parking spaces for the hotel and commercial uses and 80 spaces for the residents and their guests.

Signage

The proposed project would demolish the four existing billboards on the project site, which may be replaced with digital signage along the proposed building's Sunset Boulevard frontage.

Stormwater Flows

Stormwater runoff from the project site would be conveyed to the public streets via roof downspouts, site area, and podium drains, in a similar manner to the existing conditions. However, the proposed storm drain design would include a capture and reuse system and other approved best management practices (BMPs) in order to treat stormwater runoff as required by the Los Angeles County Department of Public Works (LADPW) and the City.

2.2 Construction

Proposed project construction would entail demolition and grading of the entire project site, followed by construction of the proposed uses. Construction of the proposed project is anticipated to commence in May 2021 and would terminate in February 2024. Construction activities would include demolition, site preparation, grading/earthwork, building construction, paving, and architectural coating. Off-road construction equipment that would be used during construction would include an excavator, a skid steer loader, rollers, air compressors, fork lifts, and a crane.

It is estimated that the project would require excavation to approximately 45 feet below Sunset Boulevard. The total cut for the project would involve approximately 62,320 cubic yards of earthwork materials, which would be exported from the project site. No import of earthwork material is anticipated.

The likely haul route from the project site would be for construction vehicles to travel east on Sunset Boulevard, south on La Cienega Boulevard to I-10, and eastbound on I-10 for depositing soil. Empty trucks returning to the project site after dumping their loads would return from I-10 and travel north on La Cienega Boulevard, then west onto San Vicente Boulevard.

2.3 Operation

Hours of Operation

Table 2-1 presents the hours of operation for food and alcohol sales, services and consumption for each of the following areas of the proposed project.

Table 2-1
Hours of Operation

Location	Hours
Hotel Operations and Guestrooms	
Hotel Operations	24 hours, Daily
Banquet and Meeting Rooms – Operation and Food	24 hours, Daily
Banquet and Meeting Rooms – Alcohol	7:00 am to 2:00 am, Daily
Guestrooms Room Service – Food Service	24 hours, Daily
Guestrooms Room Service – Alcohol Sales & Service	7:00 am to 2:00 am, Daily (Minibars 24 hours, Daily)
Residential Units Service – Food Service	24 hours, Daily
Residential Units Service – Alcohol Sales & Service	7:00 am to 2:00 am, Daily
Level B1	
Viper Room	7:00 am to 2:00 am, Daily
Level L1 (Sunset Level)	
Hotel Lobby Lounge	7:00 am to 2:00 am, Daily
Restaurant – Interior Dining and Alcohol	6:00 am to 2:00 am, Daily
Restaurant – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Café – Interior Dining and Alcohol	6:00 am to 2:00 am, Daily
Café – Outdoor Dining and Alcohol (L1 & L2)	7:00 am to 2:00 am, Daily
Level L4	
Terrace Café – Indoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Terrace Café – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Level 14	
Hotel Pools and Pool Deck – Operation, Food and Alcohol	7:00 am to 2:00 am, Daily
Level 15	
Restaurant – Interior Dining and Alcohol	7:00 am to 2:00 am, Daily
Restaurant – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Residential Pool and Pool Deck - Operation, Food and Alcohol	7:00 am to 2:00 am, Daily

Population

The proposed project includes 41 residential units. According to the Southern California Association of Government's 2019 Local Profile for the City of West Hollywood, the average household size is 1.6 persons (SCAG 2019). Therefore, the residential portion of the proposed project is expected to have approximately 66 residents.

2.4 Sustainability Practices and Features

The proposed project would include energy saving and sustainability goals, aiming to optimize building performance and enhance interior environments to promote health and well-being. Targeted sustainable design strategies, in addition to meeting the requirements of California's Building Energy Efficiency Standards and Green Building Standards Code, would include LEED Gold Certification or equivalent green building standards, and a Green Star rating. Taking advantage of the mild climate of Southern California, natural lighting and airflow would be used whenever practicable to reduce energy use. Landscaping and the green roof would use water-saving native plantings and contribute to passive cooling strategies. Durable, locally sourced materials, such as cast in place concrete and precast concrete would be used to improve building longevity and reduce the energy footprint. Smart building systems would be utilized to monitor building performance to ensure sustainability systems are functioning and to optimize user comfort. The proposed project also would include 28 electric vehicle charging stalls.

2.5 Sunset Specific Plan Amendment

The proposed project is requesting an Amendment to the Sunset Specific Plan (SSP), specifically for Geographic Area 6-E. The amendment would establish development standards for the project site and would allow for greater height and density, as well as alternate parking requirements.

2.6 Required Permits and Approvals

A list of permits and approvals from the City that are required to complete the proposed project include, but are not necessarily limited to the following:

- **Specific Plan Amendment (SPA)** to establish development standards for Sunset Specific Plan Geographic Site 6-E for the proposed project.
- **Development Permit (DVP)** to allow development of a new mixed-use hotel and residential project of approximately 369,000 gross square feet (240,000 FAR square feet).
- **Demolition Permit (DMP)** to allow demolition of the four existing one- and two-story commercial buildings totaling approximately 21,000 square feet, in conjunction with the requested Development Permit and other entitlements.
- **Conditional Use Permit** for a hotel with ancillary alcohol sales, service, and on-site consumption throughout the hotel including lounges, associated outdoor hotel dining/lounge areas, outdoor pool deck, room service, and in-room mini-bars, and to also allow the sale of alcohol for off-site consumption (California ABC License Type 21) intended for the project's residential uses as an accessory use within the hotel from an approximately 100–square foot space adjacent to the ground floor restaurant.
- **Conditional Use Permit** for a nightclub for the Viper Room.
- **Minor Conditional Use Permit** for a restaurant with ancillary alcohol sales, service, and on-site consumption.

- **Administrative Permit** for outdoor dining, lounge terraces, and the pool deck.
- **Vesting Tentative Tract Map** to merge and re-subdivide the site for residential and commercial condominium purposes.
- **Sign Permit** to allow digital off-site signage on the building's Sunset Boulevard frontage, which may replace the four static billboard faces that currently exist on the property.

Approvals from other agencies may also be required and are listed as follows:

- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Los Angeles Regional Water Quality Control Board – Applicant must submit a Notice of Intent to discharge groundwater during construction and to comply with the General Permit
- Los Angeles County Fire Department – Plan approval
- Los Angeles County Sheriff's Department – Plan approval
- Utility providers – Utility connection permits

2.7 References

SCAG (Southern California Association of Governments). 2019. Profile of the City of West Hollywood. May 2019. http://www.scag.ca.gov/Documents/WestHollywood.pdf.

3 Initial Study Checklist

1. **Project title:**

   8850 Sunset Boulevard Project

2. **Lead agency name and address:**

   City of West Hollywood
   Community Development Department
   8300 Santa Monica Boulevard
   West Hollywood, California 90069

3. **Contact person and phone number:**

   Doug Vu, Senior Planner
   City of West Hollywood
   Community Development Department
   8300 Santa Monica Boulevard
   West Hollywood, California 90069
   323.848.6318
   dvu@weho.org

4. **Project location:**

   8850–8878 West Sunset Boulevard and 1025–1029 Larrabee Street
   West Hollywood, California 90046

5. **Project sponsor's name and address:**

   Silver Creek Commercial Development, LLC
   8872 Sunset Boulevard
   West Hollywood, California 90069

6. **General plan designation:**

   Sunset Specific Plan

7. **Zoning:**

   Sunset Specific Plan (SSP)

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 Chapter 2.0 of this Initial Study.

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

Refer to Section 1.4 of this Initial Study.

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

Refer to Section 2.6 of this Initial Study.

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

Refer to Section 3.18 of this Initial Study for details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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

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.



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 will 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 (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
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
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?	☐	☐	☐	☒

Pursuant to SB 743 (PRC Section 21099(d)(1)), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" as an area within 0.5 mile of a major transit stop. PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099(a) defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099(a) defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The proposed project would be a mixed-use residential project located on an infill site within a transit priority area that meets the criteria set forth in Section 21099(d)(1). The project is considered to be mixed-use residential because it would include residential and commercial uses. The project is considered to be on an infill site because the project area is highly urbanized and the site has been developed with commercial uses since the 1920s.

The project is within a transit priority area because the nearest "major transit stop" as defined under PRC Section 21064.3 is located within 0.5 miles at the intersection of San Vicente Boulevard and Santa Monica Boulevard. This transit stop is served by four Los Angeles Metropolitan Transportation Authority (Metro) bus routes, including the Metro Local 4 and 30/330, and Metro Rapid 704 and 105/705 lines. Service intervals for each of these four

Metro routes at this location are between 6 minutes to 20 minutes during morning and afternoon peak commute periods (Metro 2018). This intersection is also served by City of West Hollywood shuttles, including the CityLine Local La Brea (eastbound) and Cedars-Sinai (westbound), and CityLine Commuter Hollywood/Highland (eastbound) and West Hollywood (westbound) shuttles (CityLine 2018). Furthermore, the project is within a transit priority area as mapped by the Southern California Association of Governments (SCAG 2019).

Because the proposed project is considered a mixed-use residential project on an infill site within a transit priority area, aesthetic impacts of the project cannot be considered significant, pursuant to PRC Section 21099(d).

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

No Impact. The City's General Plan does not identify any designated scenic vistas. However, the Hollywood Hills lie just to the north of the City and are visible throughout the City. Views of the Los Angeles Basin and buildings in downtown Los Angeles are generally not visible at the street level but are visible from higher vantage points throughout the City (City of West Hollywood 2011). As described in the Sunset Specific Plan, public views of the Hollywood Hills and the Los Angeles Basin are available from the Sunset Strip through open spaces between buildings that provide unobstructed views from the ground to the sky ("view corridors"), from open plazas or patios accessible from the street level that provide expansive views ("view terraces"), and from openings through buildings that provide a clear view from street level ("view portals"). Preservation of public views is encouraged by the Sunset Specific Plan, and enhancement of views through incorporation of view corridors, view terraces, or view portals into the design of new development is required at 13 specified sites along the Sunset Strip, the nearest of which is located at a property approximately 400 feet west of the project site. As such, the project would not interfere with or be subject to the development of required view corridors, view terraces, or view portals. Nevertheless, the Sunset Specific Plan still encourages public view preservation and enhancement along all areas of the Sunset Strip, and the EIR will address the project's consistency with those goals.

The proposed project involves construction of a 15-story mixed-use hotel and residential building. Public views in the project area include views of the Hollywood Hills and the Los Angeles Basin, which are intermittently visible in the project area. However, public views of these resources are obstructed from many vantage points by existing topography, trees, and multi-story buildings. Pursuant to PRC Section 21099, no impact would occur and further analysis is not warranted.

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

No Impact. The project site is in a predominately urbanized area that does not contain scenic resources, such as trees and rock outcroppings. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 13 miles northwest of the proposed project site. Due to this distance, the proposed project site is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources within a state scenic highway would occur as a result of the proposed project, and this topic will not be further discussed in the EIR.

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

No Impact. The project site is located on Sunset Boulevard, one of West Hollywood's iconic commercial corridors that runs along the entire northern border of the City. The areas to the north and south of Sunset Boulevard are occupied by commercial, multi-family residential, and single-family residential uses. As such, the project site is located in an urbanized area. The project site has a land use designation and zoning designation of SSP. The SSP designation allows for commercial uses and mixed-use development generally at greater heights and densities than under existing conditions. The proposed project would require an amendment to the SSP, specifically for Geographic Area 6-E, in part to allow for the proposed height and density of the project. The visual character of the project area is diverse; the surrounding buildings have varying architectural styles, massing, and heights. Buildings immediately to the north, east, and west of the project site are generally one to two stories in height. To the south of the project site is the 11-story London Hotel. The Sunset Strip as a whole is interspersed with buildings rising over 100 feet above the street. The 9000 Sunset Boulevard building, located about 700 feet west of the project site, is approximately 14 stories (194 feet) in height. Further to the west, the building at 9229 Sunset Boulevard is 144 feet in height, the building at 9200 Sunset Boulevard is 195 feet in height, and the building at 9201 Sunset Boulevard is 140 feet in height. To the east of the project site, the Mondrian hotel building at 8440 Sunset Boulevard is 147 feet in height, and the Andaz West Hollywood hotel building at 8401 Sunset Boulevard is 150 feet in height. Additionally, several recently approved projects also rise over 100 feet above the Sunset Strip. The Edition Hotel, located on the corner of Sunset Boulevard and Doheny Drive (9040 Sunset Boulevard; about 1,000 feet west of the project site) is 14 stories in height. This project was approved in 2010 and is expected to open in December 2019. The Arts Club Project (8920 Sunset Boulevard) was approved in 2018 and will be 137 feet in height (9 stories). A hotel that would be approximately 248 feet in height (22 stories) is being proposed at 9034 Sunset Boulevard, between the 9000 Sunset Boulevard building and the Edition Hotel. As such, while the proposed project is immediately surrounded by low-rise structures to the north, east, and west, it is located in an area that is characterized by buildings ranging from one story in height to well over 100 feet in height. The proposed project, which would be 15 stories (200 feet) in height, would be generally consistent with the existing variability in building height and massing along the Sunset Strip. Pursuant to PRC Section 21099, no impact would occur and further analysis is not warranted.

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

No Impact. The project site is in an urbanized area with high levels of existing lighting. Primary sources of light on the project site include lighting associated with the existing commercial buildings including building mounted lighting and headlights from vehicles in the surface parking lots. The primary source of daytime glare on the project site is the sun's reflection from metallic and glass surfaces on vehicles parked in the surface parking lots. The adjacent commercial, residential, and roadway uses generate light and glare along all sides of the project site.

The windows and building materials proposed for the exterior of the proposed development could increase the reflected sunlight during certain times of the day. Further, the proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting, building mounted lighting, interior

lighting, safety related lighting, and off-site signage lighting. Because of the size of the proposed project and the digital signage that would be incorporated into the design, there would be new levels of lighting on the project site compared to existing site conditions. In addition, glass windows on the exterior facades of these structures could reflect light and add new sources of glare.

Project plans will be reviewed by the City for conformance with all applicable City requirements relating to lighting and glare. For example, to limit excessive light and glare, the WHMC includes development standards and design guidelines. Specifically, Article 19-3 "Site Planning and General Development Standards" provides development standards and design guidelines for outdoor lighting and sign illumination to address light and glare. These development standards and design guidelines provide requirements to limit light and glare to the extent feasible while providing standards to ensure sufficient light for safety and practicality, including maximum heights of lighting fixtures; design, installation, and maintenance of lighting fixtures; standards for new development and remodeling; lighting for parking areas; and sign illumination. Development projects are required to adhere to these requirements and standards. Further, new digital signage proposed as part of the project would be subject to the additional lighting regulations in the Sunset Strip Off-Site Signage policy, which limit light trespass at adjacent residentially zoned properties to 1.4 footcandles.

Pursuant to PRC Section 21099, no impact would occur and further analysis of this issue is not warranted.

References

Caltrans (California Department of Transportation). 2011. Caltrans Officially Designated Scenic Highways. Accessed June 10, 2019: http://www.dot.ca.gov/hq/LandArch/scenic_highways/langeles.htm.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

Metro (Los Angeles Metropolitan Transportation Authority). 2018. Bus and Rail System Map. June 2018. Accessed August 13, 2019. https://www.metro.net/riding/maps/system-maps/.

CityLine (City of West Hollywood). 2018. CityLine Local Route Map. September 2018. Accessed August 22, 2019 https://www.weho.org/services/public-transportation-transit-options/cityline-shuttle.

SCAG (Southern California Association of Governments). 2019. Transit Priority Areas (2016) and Transit Priority Areas (2045) – SCAG Region. Web mapping applications. Last updated June 2019. Accessed August 13, 2019. http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20_1.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Department of 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?	☐	☐	☐	☒

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

No Impact. The project site and surrounding areas are characterized by features typical of an urban landscape. As shown on the Los Angeles County Important Farmland map, the project site does not include any sites mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2017). Implementation of the proposed project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist on the project site or in proximity to the project site. Furthermore, the project site is already graded and highly disturbed. Therefore, the proposed project would not convert

Farmland to non-agricultural uses, and no impact would occur as a result of the proposed project. This issue will not be further analyzed in the EIR.

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

No Impact. The project site is located within the boundaries of the SSP and is zoned and designated as SSP (City of West Hollywood 2011). The SSP zoning district contains commercial and residential uses. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist on the project site or in the vicinity of the project site (California Department of Conservation 2016). For these reasons, implementation of the proposed project would not conflict with existing zoning for agricultural use, as none exist in the area, nor would it conflict with a Williamson Act contract, as none exist in the area. No impact to Williamson Act contract lands or land zoned for agricultural uses would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

No Impact. The project site is located within the boundaries of the SSP and is zoned and designated as SSP. The SSP zoning district contains commercial and residential uses (City of West Hollywood 2011). The list of allowable land uses contained in the City's Zoning Ordinance for commercial and residential zones does not include any timberland or forest land uses (City of West Hollywood Zoning Ordinance Section 19.10.030 and 19.06.030). No forest land, timberland, or Timberland Production areas are located within or adjacent to the project site. Therefore, the proposed 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. The project would be implemented on an existing developed site that is surrounded by fully developed areas. No impact to forest land or timberland would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

No Impact. As characterized above, no forest land is located within the project site or in the vicinity of the project site, as the area is urbanized and developed with commercial and residential uses. No forest land would be converted or otherwise affected by the proposed project, and no impact would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

No Impact. As characterized above, no farmland or forest land is located in the project site or within the vicinity of the project site, as the area is urbanized and developed with commercial and residential uses. No farmland or forest land would be converted or otherwise affected by the proposed project, and no impact would occur as a result of the proposed project. This issue will not be further analyzed in the EIR.

References

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016.* [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed June 20, 2019. http://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx.

City of West Hollywood. 2011. *City of West Hollywood Zoning Districts Map*. November 3, 2011. Accessed June 20, 2019. http://www.weho.org/home/showdocument?id=5138.

FMMP (Farmland Mapping and Monitoring Program). 2017. *Los Angeles County Important Farmland 2016*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. July 2017. Accessed June 20, 2019. http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

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

Potentially Significant Impact. A significant impact may occur if the project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The project site is within the South Coast Air Basin, and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District. Construction and operation of the project could result in an increase in emissions by increasing the intensity of development at the project site, which has the potential to conflict with the Air Quality Management Plan. As such, further analysis of this issue will be provided in the EIR.

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

Potentially Significant Impact. Construction emissions associated with development of the proposed mixed-use hotel and residential uses would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 micros (PM_{10}), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), and sulfur oxides (SO_x) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).

Criteria pollutants under nonattainment in the SCAB are ozone and particulate matter (PM_{10} and $PM_{2.5}$) (SCAQMD 2017). The proposed project would generate VOC and NO_x emissions (which are precursors to ozone) and emissions of PM_{10} and $PM_{2.5}$. Further analysis will be required to determine the proposed project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. There are sensitive receptors (residences) located within 100 feet of the property line of the project site. The proposed project may generate toxic air contaminant emissions during construction of the project from construction equipment and diesel vehicles. Additionally, the operational emissions associated with the project could expose sensitive receptors to pollutant concentrations as well. Further analysis is required regarding the air pollutant emissions that would result from the proposed project, and whether it would be substantial. Therefore, this issue will be further analyzed in the EIR.

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

Odor Emissions

Less Than Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and would generally occur at magnitudes that would not affect substantial numbers of people.

Land uses and industrial operations associated with operational odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the proposed project would not entail any of

these potentially odor-causing land uses. Thus, there would be no operational activities associated with the project that would produce substantial odorous emissions. Therefore, the proposed project would not create any new sources of odor during operation, and impacts would be less than significant.

Asbestos Emissions

Less Than Significant Impact. Demolition activities could result in airborne entrainment of asbestos, particularly where structures built prior to 1980 (such as the existing structures on site) would be demolished. However, these materials would be removed in accordance with regulatory requirements (pursuant to South Coast Air Quality Management District Rule 1403 [Asbestos Emissions]), which establishes survey, notification, and work practice requirements to prevent asbestos emissions during building demolition. Upon compliance with all applicable federal, state, and local regulations, the potential for the proposed project to create a significant impact to the public or environment from emissions of asbestos would be low. Therefore, impacts related to asbestos emissions would be less than significant.

References

SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

SCAQMD (South Coast Air Quality Management District). 2017. *Final 2016 Air Quality Management Plan*. March 2017. Accessed June 10, 2019. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game 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 Game 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

Less Than Significant Impact. The project site is located in a developed part of the City and is surrounded by a predominantly urbanized mix of land uses, including residential and commercial uses. The proposed project involves demolition of existing commercial buildings and surface parking lots and the construction of a new mixed-use hotel and residential building. Under existing conditions, the project site supports limited, ornamental landscaping typical of an urban area. The project site has 10 on-site trees (9 eucalyptus trees and 1 palm tree), and 6 street trees are located along the boundaries of the site (4 magnolia trees, 1 Chinese flame tree, and 1 ficus tree). The site also has several small planters that support limited amounts of ornamental shrubs. The vegetation on site is ornamental in nature and does not include special-status plants. Furthermore, this vegetation would not be expected to serve as suitable habitat for special-status wildlife species. The base of the Hollywood Hills is located north of the project site. This portion of the Hollywood Hills is fully developed with residential uses, and, therefore, would not be expected to serve as suitable habitat for special-status species.

According to the City's General Plan EIR, the majority of West Hollywood has been developed, paved, or landscaped, and either denuded of vegetation or supports primarily ornamental and/or nonnative plant species. In general, suitable habitat for sensitive species in the region does not occur within the City. An electronic database review of the Beverly Hills Quandrangle and surrounding quadrangles in the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plans, and the U.S. Fish and Wildlife Services' (USFWS) Information for Planning and Consultation (iPAC) was conducted (CDFW 2019a; CNPS 2019; USFWS 2019a). While sensitive species are known to occur within the general vicinity of the project area, based on the disturbed and developed condition of the project site and the relative lack of suitable habitat, the potential for any known sensitive species to occur on the site is low. Furthermore, according to the database review, no candidate, sensitive, or special-status wildlife or plant species have the potential to occur on the project site.

However, the ornamental vegetation that is within and adjacent to the project site could provide potential nesting sites for birds that are protected under Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act (1918). The proposed project would require removal of several existing street trees that are currently located along the project site. In the event that a bird is nesting in the trees at the time they are being removed, the process of removing the tree could adversely affect the bird(s) by harming, harassing, or killing bird(s) or their eggs, in violation of protections for nesting birds. Construction activities would also elevate noise levels and could cause disturbance to nesting or roosting of protected species on site or adjacent to the site. Construction could occur during the nesting season (i.e., between February 1–August 31). Thus, there is potential for construction activities to negatively affect breeding or reproduction of protected nesting birds on or adjacent to the project site. If active bird nests are present, a protective buffer must be established to ensure that they are not disturbed until fledglings have left the nest. Compliance with the Migratory Bird Treaty Act and the California Fish and Game Code by avoiding disturbance of active bird nests would ensure that protected birds are not adversely affected during construction. No operational impacts to nesting birds are anticipated to occur. Any trees that are removed would be replaced as part of the proposed project's landscaping. As such, any nesting habitat that is temporarily affected during construction would be generally replaced by the proposed landscaping. During operation, the project site and the corridor on which it is located (the Sunset Strip) would remain areas of high pedestrian and vehicular activity, consistent with existing conditions. Due to the highly developed nature of the project area and upon required compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, impacts associated with nesting birds would be less than significant. For these reasons, special-status species are not expected to be adversely affected by the project. This issue will not be further analyzed in the EIR.

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

No Impact. The project site is currently developed with commercial uses and is surrounded by commercial and residential uses. The project site supports limited ornamental vegetation consisting of ornamental trees, grasses, and shrubs. Because the vegetation is ornamental in nature and is situated in an urban environment, it does not constitute a sensitive natural community in and of itself. Thus, riparian habitats and sensitive natural communities do not exist within the project area, and the proposed project would result in no impact on riparian habitats and other sensitive natural communities. This issue will not be further analyzed in the EIR.

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

No Impact. The project site does not support any wetland areas. Based on a review of the USFWS National Wetlands Inventory, the project site does not contain any blue-line streams or wetland habitats (USFWS 2019b). Due to the urbanized nature of the project area and its surroundings, as well as the absence of any wetlands within the project site, implementation of the proposed project would result in no impact to federally protected wetlands. This issue will not be further analyzed in the EIR.

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

No Impact. As described under Section 3.4(c), there are no wetlands or running waters within the project site, and therefore, the proposed project would have no potential to affect the movement of migratory fish. The project site is highly urbanized and surrounded by urban uses on all sides; therefore, the project site does not function as a wildlife movement corridor. As stated in the City's General Plan EIR, 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). Furthermore, the City is not recognized as an existing or proposed Significant Ecological Area that links migratory populations, as designated by the County of Los Angeles (Department of Regional Planning 2015). Additionally, as described under Section 3.4(a), the project site does not support native habitat. The project site is mostly paved and is located in a highly urbanized area with frequent disturbances. Vegetation is limited and ornamental in nature. As such, the project site would not serve as a native wildlife nursery site. No impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The WHMC provides regulations governing the treatment of street trees and trees on other public lands, as well as requirements under the City of West Hollywood Heritage Tree Program. No trees in the project area have been designated as Heritage Trees by the City (City of West Hollywood 2019). Street trees and trees on public property are protected under Chapter 11.36 of the WHMC. As stated in Section 11.36.010, it is unlawful for any person, firm or corporation (other than the city, or persons acting under the city's authority) to plant, trim, prune, cut, break, deface, destroy, burn or remove any shade or ornamental tree, hedge, plant, shrub or flower growing, or planted to grow upon any public highway, public ground or public property within the City of West Hollywood without a permit issued pursuant to the provisions of Chapter 11.36.". There are four street trees fronting the project site along the Sunset Boulevard sidewalk, and two street trees along Larrabee Street; the proposed project would involve removal of all of these trees. As such, the proposed project would be required to comply with Section 11.36.040 of the WHMC, which states that any tree located on public property that is removed is required to be replaced with another tree, at the discretion and specification of the Director of Public Works. Additionally, a permit would be required from the Director of Public Works prior to removing the street trees. The proposed project would include installation of several replacement street trees along the project site perimeter. The proposed project would comply with all applicable permit requirements prior to the removal of any trees or plantings located on public property. Therefore, implementation of the proposed project would not conflict with local policies or ordinances protecting trees or other biological resources. No impact would occur, and no further evaluation of this issue is required in the EIR.

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

No Impact. The City's General Plan EIR does not designate any areas of the City as being within a habitat conservation plan (City of West Hollywood 2010). Furthermore, the City is not within any of the regional conservation plans designated by the state (CDFW 2017b). Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan; natural community

conservation plan; or other approved local, regional, or state habitat plan, as none apply to the project site. No impact would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

References

CDFW (California Department of Fish and Wildlife). 2019a. List of California Natural Diversity Database (CNDDB) Species. Accessed June 10, 2019. https://www.wildlife.ca.gov/Data/CNDDB.

CDFW (California Department of Fish and Wildlife). 2019b. California Natural Community Conservation Plans. April 2019. https://www.wildlife.ca.gov/Conservation/Planning/NCCP.

City of West Hollywood. 2010. *Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan* (State Clearinghouse No. 2009091124). Adopted October 2010. https://www.weho.org/city-government/download-documents/-folder-626.

City of West Hollywood. 2019. Designated Heritage Trees. Accessed June 7, 2019. https://www.weho.org/home/showdocument?id=7043.

CNPS (California Native Plant Society). 2019. *Inventory of Rare and Endangered Plants* (online edition, v8-03). Sacramento, California: California Native Plant Society. Accessed June 10, 2019. www.rareplants.cnps.org.

Department of Regional Planning. 2015. Significant Ecological Area and Coastal Resource Area Policy Map. Accessed June 7, 2019. February 2015. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf.

USFWS (United States Fish and Wildlife Service). 2019a. Environmental Conservation Online System Information, Planning, and Conservation System (IPaC). Accessed June 10, 2019. https://ecos.fws.gov/ipac/.

USFWS. 2019b. National Wetlands Inventory, *Wetlands Mapper*. Accessed June 7, 2019. http://www.fws.gov/wetlands/Data/Mapper.html.

3.5 Cultural Resources

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

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

Potentially Significant Impact. The existing structures on the project site are at least 45 years of age, as shown in Table 3.5-1. The proposed project would involve demolition of these structures; as such, the EIR will evaluate potential impacts to historic resources.

Table 3.5-1
Historic-Age Buildings on the Project Site

Street Address	Existing use	Built date	Eligibility Status
8850–8860 Sunset Boulevard	Commercial (Terner's Liquor; The Viper Room; Sun Bee Liquor Store; Barcode Barbershop)	1921/1930	The City's 2016 commercial building survey resulted in a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation). The City's online preservation database lists a status code of 7N (needs to be reevaluated) and notes that the building may warrant consideration in local planning (6L) because it is one of the oldest buildings on the Sunset Strip.
8866–8870 Sunset Boulevard	Commercial (Ta-Ke Sushi restaurant; Amarone Kitchen and Wine; Glen Lerner Injury Attorneys)	1935/1958	The City's 2016 commercial building survey and the online preservation database list a status code of 6L (determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning).
8872–8878 Sunset Boulevard	Retail (Aahs! Gift store)	1937/1950	The City's 2016 commercial building survey does not address this building. The online preservation database lists a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation).

Source: City of West Hollywood 2019; GPA Consulting Inc. 2016

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

Potentially Significant Impact. The project site is located within an urbanized area and has been subject to disturbance in the past. PRC Section 21083.2(g) generally defines a unique archaeological resource as an artifact, object, or site that meets a number of criteria, including an ability to provide information needed to answer important scientific questions that have public interest; having a special and particular quality, such as being the oldest of its type; or, being directly associated with a scientifically recognized important prehistoric or historic event or person.

Any archaeological resources on the project site have likely been previously disturbed. However, ground-disturbing activities associated with construction of the proposed project, such as excavation of the four-level subterranean parking garage and grading of the site during site preparation, has the potential to

damage or destroy intact subsurface archeological deposits that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the proposed project and will identify mitigation measures to reduce impacts of the proposed project on any archeological resources that may be present. As such, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. As previously discussed, the project site is located within an urbanized area and has been subject to disturbance in the past. The project site is not part of a formal cemetery, and therefore, it is unlikely that human remains exist on or in the vicinity of the project site. No known burial sites have been identified within the project site or in the vicinity. Although it is unlikely, previously undiscovered human remains could be located within the project site and could be disturbed by construction activities. Therefore, this issue will be further analyzed in the EIR.

References

City of West Hollywood. 2019. City of West Hollywood Historic Preservation Database Search. Accessed March 2019. https://www.wehopreservation.org/database-search/.

GPA Consulting Inc. 2016. City of West Hollywood Commercial Historic Resources Survey. September 2016. https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_-Document.pdf.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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

Potentially Significant Impact. Construction of the proposed project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the proposed project would require electricity for building operation (appliances, lighting, etc.) and fossil fuels related to vehicular transportation to and from the project site. Project operation would also result in indirect energy consumption related to the supply, distribution, and treatment of water,

wastewater, and solid waste. Further analysis is required to quantify the total anticipated energy use and to determine the potential environmental impacts resulting from the consumption of energy resources. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The proposed project is subject to various regional and local plans guiding energy use, including the City's Climate Action Plan. The proposed project is required to be consistent with existing regulations and, therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. However, the EIR will include a more robust discussion of applicable plans and will provide a consistency analysis for the proposed project, to ensure that the project would comply with such plans.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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.	☒	☐	☐	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

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.

Potentially Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to reduce hazards associated with surface fault rupture. The act prohibits the location of most structures for human occupancy across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous. The project site is located within an Alquist-Priolo Earthquake Fault Zone associated with the Hollywood Fault (CGS 2018). Project construction and operation would not increase or exacerbate the potential for fault rupture to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects involving surface fault rupture. Nevertheless, because the project site is within a state-designated Alquist-Priolo Earthquake Fault Zone, detailed fault studies and analysis will be presented in the EIR.

ii) Strong seismic ground shaking?

Potentially Significant Impact. The project site is within close proximity to the Hollywood Fault and is also located within an area that could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the project site. Although the proposed project could be subject to severe seismic shaking, construction and operation of the project would not increase or exacerbate the potential for earthquakes to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Nevertheless, due to the project's location in proximity to the Hollywood Fault and in a seismically active region, this issue will be further discussed in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. 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. A portion of the project site is identified as

having the potential for liquefaction (CGS 2018; City of West Hollywood 2011). In the event of liquefaction at the project site, hazardous geotechnical conditions could result. Although the project site could be subject to liquefaction, project construction and operation is not anticipated to increase or exacerbate the potential for liquefaction to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically related ground failure, including liquefaction. The site's potential susceptibility to seismic-related ground failure is similar to soil conditions that exist throughout the region and can be addressed through the project's foundation design. Nevertheless, because of the site's location within a designated liquefaction hazard zone, this issue will be further discussed in the EIR.

iv) Landslides?

No Impact. The project site is not located within an area identified as being susceptible to earthquake-induced landslides on maps prepared by the state (CGS 2018). Additionally, the City's General Plan Safety Element does not identify the project site as an area with the potential for slope instability (City of West Hollywood 2011). There are no known landslides near the site, nor is the site in the path of any known or potential landslides. As such, landslides are unlikely to occur on the project site and would not expose people or structures to adverse risks associated with landslides. No impacts would occur, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. Temporary erosion could occur during project construction. However, the project applicant or its construction contractor would be required to comply with WHMC Section 15.56.090. This section requires stormwater runoff containing sediment, construction materials, or other pollutants from a construction site to be reduced to the maximum extent practicable. However, in order for the design and construction of the project to account for site-specific erosion potential, analysis of the results of site-specific geologic reports is required. Therefore, this issue will be further discussed in the EIR.

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

Potentially Significant Impact. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas or as a result of decomposition of natural organic materials. Soils that are particularly subject to subsidence include those with high silt or clay content and/or high organic content. The site is located outside the boundary of the area identified in the City's General Plan Safety Element as a former marsh (City of West Hollywood 2011). Therefore, the potential for subsidence at the project site is considered low.

As previously discussed, the project site is not located within an area susceptible to earthquake-induced landslides; however, a portion of the project site is identified as being susceptible to liquefaction (CGS 2018). Additionally, temporary slope instability could occur during construction. As such, this issue will be further discussed in the EIR.

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

Potentially Significant Impact. Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The proposed project would be required to comply with California Building Code requirements related to hazards involving potentially expansive soils. Additionally, project construction and operation would not increase or exacerbate the potential for expansive soils to create substantial direct or indirect risks to life or property. Nevertheless, further analysis of the on-site soils will be presented in the EIR based on site-specific geologic reports. Therefore, this issue will be further analyzed in the EIR.

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

No Impact. The project site is served by the existing municipal sewer system. The City has established utility services, and no septic systems are either proposed or required to serve the project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. As previously discussed, the project site is located within an urbanized area and has been subject to disturbance in the past. Any paleontological resources or unique geologic features on the project site have likely been previously disturbed. However, any grading, excavation, or other construction activities resulting from implementation of the proposed project could potentially disturb undiscovered paleontological resources or unique geologic features, in the event that any are present on the project site. The EIR will present the findings of a paleontological resources records search and will identify the potential for the project to adversely affect such resources. Mitigation measures will be presented if necessary. Therefore, this issue will be further analyzed in the EIR.

References

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

CGS (California Geologic Survey). 2018. *Earthquake Zones of Required Investigation – Beverly Hills Quadrangle*. Earthquake Fault Zones Released March 25, 1999. Revised January 11, 2018. http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

Climate change is the observed increase in the average temperature of the earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHG), which contribute to the "greenhouse effect," a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. This process is essential to support life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat and contribute to an average increase in Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs include fossil fuel burning (coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane generated by landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased over by 36%, 148%, and 18% respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition. Changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere (State of California 2019).

According to California's Fourth Climate Change Assessment, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snow pack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2019).

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

Potentially Significant Impact. The proposed project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the proposed project, as well as building energy and water usage. Further analysis is required to determine the estimated project-generated GHG emissions and their impact on global climate change. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The City adopted a Climate Action Plan in September 2011 (City of West Hollywood 2011). The CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. The CAP includes seven emission reduction strategies: 1) community leadership and engagement, 2) land use and community design, 3) transportation and mobility, 4) energy use and efficiency, 5) water use and efficiency, 6) waste reduction and recycling, and 7) green space. The proposed project would be consistent with the City's CAP if it includes provisions to implement the applicable CAP GHG reduction measures. Consistency with the applicable measures will be evaluated in the EIR.

References

City of West Hollywood. 2011. City of West Hollywood Climate Action Plan. Adopted September 6, 2011. https://www.weho.org/home/showdocument?id=7949.

State of California. 2019. California's Fourth Climate Change Assessment Statewide Summary Report. Published January 16, 2019. Report #: SUM-CCCA4-2018-013. Accessed August 15, 2019. http://www.climateassessment.ca.gov/state/.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

Potentially Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment.

The proposed project involves the demolition of four existing commercial buildings on the project site that were developed before 1950 (GPA 2016). These buildings may contain lead based paint and asbestos, as their construction predates regulation of these materials. Although it is not known whether the existing buildings contain these materials, precautions must be taken during demolition processes. As such, there is the potential for hazardous materials impacts associated with demolition of the existing structures on the project site. During operation, hazardous materials that could be used during operation of the proposed project would include chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, pool chemicals, oils, and miscellaneous organics and inorganics that are used as part of typical building maintenance, restaurant operation, and hotel operation. Upon compliance with applicant regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will included more details and analysis of the potential transport, use, and disposal of hazardous materials in association with construction and operation of the project.

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

Potentially Significant Impact. Construction activities would involve the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease, solvents, and other vehicle and equipment maintenance fluids. These substances would be used and stored in designated construction staging areas within the project site. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. However, as previously discussed, the proposed project involves the demolition of existing buildings, which could create a significant hazard to the public or the environment through the release of hazardous building materials (such as lead and/or asbestos) into the environment. Project operation is not expected to involve acutely hazardous materials. Rather, it would involve use of chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, pool chemicals, oils, and miscellaneous organics and inorganics that are used as part of typical building maintenance, restaurant operation, and hotel operation. Upon compliance with applicant regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will include more details and analysis of the potential for project construction or operation to result in release of hazardous materials into the environment.

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

Potentially Significant Impact. The schools that are closest to the project site include West Hollywood Elementary School, located approximately 0.06 miles southwest of the project site at 970 Hammond Street; and Tree Academy (6th through 12th grade), located approximately 0.2 miles east of the project site at 8628 Holloway Drive. While the proposed project would involve use of limited quantities of hazardous materials, the transportation, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Although there would be limited use of hazardous materials associated with the proposed project and the proposed project would comply with health and safety regulations, impacts to nearby schools will be further analyzed in the EIR.

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?

Potentially Significant Impact. Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. A review of Cortese List online data resources does not identify hazardous materials or waste sites on the project site and immediately surrounding area (DTSC 2019; RWQCB 2019). However, a site-specific hazardous materials database search will be presented in the EIR and will be used to determine whether the proposed project could create a significant hazard to the public or the environment related to a hazardous materials site. As such, this issue will be further analyzed in the EIR.

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

No Impact. The nearest public airport to the project site is the Santa Monica Municipal Airport, located approximately 5.8 miles southwest of the project site. According to the Los Angeles County Airport Land Use Commission, the project site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the project site is not within two miles of a public airport, and the project site is not located within an airport land use plan. Therefore, the proposed project would not create an airplane safety hazard for people residing or working in the project area. No impact would occur, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The City maintains the West Hollywood Emergency Plan, which is an all-hazards preparedness, emergency evacuation, response, and recovery plan. It addresses hazards including, but not limited to fires, earthquakes, flooding, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents (City of West Hollywood 2011). Prior to construction of the proposed project, the proposed site plans would be required to undergo review by the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access. However, the proposed project would involve increased traffic in the area during construction and operation. Increased traffic has the potential to affect emergency response and/or evacuation. While the proposed project is expected to provide for adequate emergency access, the potential for project-related traffic to affect emergency response and evacuation will be further analyzed in the EIR.

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

No Impact. The project site is located within an urban setting, surrounded by commercial and multi-family developments. Although the area to the north of the project site, at the base of the Hollywood Hills, is within a Very High Fire Hazard Severity Zone, the project site itself is not. The project site is approximately 300 feet from the border of the Very High Fire Hazard Severity Zone in the Hollywood Hills (CAL FIRE 2019). The City has also designated areas of wildland fire hazards in its General Plan. The project site is not within a City-designated wildland fire hazard area. As stated in the City's General Plan, a fire in the Hollywood Hills would have the potential to spread to the northern region of the City (City of West Hollywood 2011). The project site is located approximately 0.2 mile from the City's northern border. However, it is separated from the nearby Very High Fire Hazard Severity Zone by urban development, including numerous structures, ornamental vegetation, and a four-lane roadway (Sunset Boulevard). In the unlikely event of a fire emergency at the project site due to wildland fires, the Los Angeles County Fire Department, specifically Fire Station 7 (864 San Vicente Boulevard; 0.3 mile south of the project site) and Fire Station 8 (7643 Santa Monica Boulevard; 1.5 miles east of the project site), both located within the City, would provide fire protection services. Due to the urbanized nature of the area and the provision of nearby firefighting protection services, implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur, and this issue will not be further analyzed in the EIR.

References

CAL FIRE. 2019. "FHSZ Viewer." Accessed June 10, 2019. http://egis.fire.ca.gov/FHSZ/.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

DTSC (Department of Toxic Substances Control). 2019. EnviroStor. Accessed June 14, 2019. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=8850+sunset+boulevard.

GPA Consulting Inc. 2016. City of West Hollywood Commercial Historic Resources Survey. September 2016. https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_-Document.pdf.

Los Angeles County Airport Land Use Commission. 2003. Santa Monica Airport, Airport Influence Area. May 13, 2003. Accessed June 11, 2019. http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

SWRCB (State Water Resources Control Board). 2019. GeoTracker. Accessed June 14, 2019. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=8850+sunset+boulevard.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
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 off site;	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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

Surface Water Quality

Potentially Significant Impact. Short-term construction activities for the proposed project would have some potential to affect the quality of stormwater discharged from the project site. Land disturbance activities could result in erosion and sedimentation, and spills or leaks of petroleum products used by construction equipment could also affect the quality of stormwater. However, the WHMC prohibits discharges to the stormdrain system of any fuel, chemical wastes, or other materials that have potential adverse impacts on water quality (Section 15.56.060). The WHMC 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 15.56.070). Standard site management practices and typical equipment maintenance, in combination with implementation of WHMC requirements involving stormwater quality, would generally preclude leaks and spills of a magnitude that would adversely affect stormwater runoff. Construction-related water quality impacts can also occur if land disturbance activities result in erosion or sedimentation downstream. However, the WHMC has numerous requirements in place that would minimize and prevent sediments from contaminating stormwater runoff. These requirements include implementation of structural controls such as berms and plastic sheeting to minimize the escape of sediment and other pollutants; 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 (Section 15.56.090).

Additionally, the City requires a Local Storm Water Pollution Prevention Plan (LSWPPP) and preparation of an Erosion Control Plan (ECP), which would be approved by and filed with the City. The LSWPPP and ECP would identify potential pollutant sources that may be associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the entry of pollutants into the public storm drain system during construction.

During operation, permanent post-construction stormwater management would be implemented per the LADPW Low Impact Development Standards Manual, and the City of West Hollywood Low Impact Development Standards. Low Impact Development (LID) is a stormwater management strategy with goals to address the impacts of increased runoff and storm water pollution as close to its source as possible. Per the latest LID guidelines new construction developments must treat storm water through infiltration, capture and reuse, or biofiltration. Considering the proposed development's subterranean footprint and the existing slope of the site, the required LID volume of stormwater runoff would be treated using biofiltration systems. Biofiltration systems would consist of hard bottom biofilters with layers of mulch, soil, and gravel which treat storm water through biofiltration before discharging it into the street or the storm drain main pipe in Sunset Boulevard. These biofiltration systems could be located on podium decks on a multi-level building, as long as they are designed to accept concentrated drainage from levels above. The anticipated biofiltration systems for the proposed project would either be planter box(s) or proprietary devices. Compliance with the County's LID Manual, City's LID Standards, and other WHMC requirements pertaining to stormwater and non-stormwater runoff would reduce potential impacts relative to water quality standards and waste discharge requirements. However, the EIR will include more in-depth hydrologic information and details on the potential impacts. As such, this issue will be further analyzed in the EIR.

Groundwater Quality

Potentially Significant Impact. According to the City's General Plan, the existing historic high groundwater level at the project site can be approximated at 20 feet below ground surface (City of West Hollywood 2011). Due to the depth of excavation reaching below the historic high groundwater level, dewatering operations would likely be required during construction of the subterranean levels of the proposed project. If this is the case, some groundwater would be removed during excavation.

Regarding groundwater quality, BMPs required by the City's LSWPPP guidelines and included in the project's ECP would include spill prevention and cleanup guidelines, dewatering operations guidelines, and stormwater run-on prevention. These BMPs would protect the groundwater from contamination by construction activities. During normal building operations, groundwater quality would be protected, as the entire site would be covered by the impervious basement floor and walls, preventing opportunity of pollutant intrusion into the groundwater system. Although BMPs would be implemented to protect groundwater quality, the EIR will include further analysis of this topic to provide additional detail and evaluation.

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

Potentially Significant Impact. The proposed project involves the demolition of existing commercial buildings, surface parking lots, and billboards and the construction of a new mixed-use hotel and residential building. Project implementation would incrementally increase water consumption. The EIR will quantify the project's anticipated water demand and will address whether the increased demand would be accommodated, as well as whether the additional water demand would affect groundwater supplies. The proposed project would not increase the imperviousness of the project site compared to the site's existing and developed condition such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, the proposed project would not interfere with groundwater recharge; however, further analysis pertaining to groundwater supplies will be provided in the EIR.

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

i) result in substantial erosion or siltation on or off site;

Less Than Significant Impact. The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed with commercial buildings and surface parking. As discussed under Section 3.10(a), all construction activities would be required to comply with the City's water quality BMPs. No ground disturbance would occur during operation of the proposed project. Additionally, the project would be consistent with City and County LID standards (as described under Section 3.10(a)), ensuring that runoff from the site would be minimized to the extent feasible. As such, the proposed project would not have the potential to result in substantial erosion or siltation on or off site. Impacts related to erosion and siltation resulting from the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Less Than Significant Impact. The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed and within a highly urban area. As such, the proposed project would not result in the alteration of the course of a river or stream. As discussed under Section 3.10(a), the proposed project would be required to comply with the City's water quality BMPs, the County's LID Manual, and the City's LID standards. Through compliance with the stormwater management requirements described above, the proposed project would not result in substantial flooding on or off site. Impacts related to flooding resulting from the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. Under the existing conditions, stormwater runoff from the project site is conveyed via sheet flow and curb drains to the adjacent streets. The LADPW Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The existing site's peak flow generated from a 50-year storm event is approximately 3.16 cubic feet per second.

Stormwater from the project site would be conveyed in the same manner as the existing drainage. However, the proposed storm drain design would include capture and reuse systems or other approved BMPs in order to treat stormwater runoff as required by the LADPW and the City. The proposed development would also decrease the existing impervious area by adding planting and landscaping around the site and upper levels. The additional landscape area is insignificant for hydrology purposes, as the peak flow generated from a 50-year storm event will remain 3.14 cubic feet per second. Due to the additional stormwater treatment requirements and increase in landscape area, the proposed project is not expected to exceed the capacity of the existing stormwater drainage system or provide substantial sources of polluted runoff. Although there would not be an increase in impervious surfaces as a result of implementing the proposed project, further analysis and details regarding stormwater drainage will be provided in the EIR.

iv) impede or redirect flood flows?

No Impact. The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed and within a highly urban area. Additionally, the project site is located outside of the 100-year flood hazard zone (FEMA 2008). As such, the proposed project would not impede or redirect flood flows. Therefore, no impacts associated with impeding or redirecting flood flows would occur. This issue will not be further analyzed in the EIR.

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

No Impact. As previously addressed in Section 3.10(c)(iv), the project site is located outside of a flood hazard zone. As such, hazards related to flooding at the project site would not be expected. Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project site is located approximately 8.5 miles northeast of the Pacific Ocean at an elevation of approximately 1,000 feet above sea level. As such, the project area would not be susceptible to inundation by tsunami.

Seiches are oscillations generated in enclosed bodies of water, usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. The Franklin Canyon Reservoir is located approximately 1.5 miles northwest of the project site. However, the distance and geographic boundaries between the project area and this body of water eliminates the risk of a seiche affecting the project area. Therefore, the proposed project would result in no impacts associated with the release of pollutants due to project inundation. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. As previously addressed in Section 3.10(a), the proposed project would comply with the County's LID Manual, City's LID Standards, and other WHMC requirements pertaining to water quality. In addition, surface water would be conveyed to the public streets via roof downspouts and site area and podium drains, in a similar manner as existing conditions. The proposed storm drain design would include capture and reuse systems or other approved BMPs in order to treat storm water runoff as required by the LADPW and the City. As a result, the proposed project would not adversely affect downstream beneficial uses of surface waters.

The proposed project would increase demand for potable water supplies. The EIR will quantify the project's anticipated water demand and will address whether the increased demand would be accommodated, as well as whether the additional water demand would affect groundwater supplies. The proposed project would not increase the imperviousness of the project site, which could decrease groundwater recharge levels such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, the proposed project would not interfere with groundwater recharge; however, further analysis pertaining to groundwater supplies will be provided in the EIR.

References

FEMA (Federal Emergency Management Agency). 2008. Firm Panel No. 06037C1585F. Effective September 26, 2008. Accessed June 14, 2019. https://msc.fema.gov/portal/search.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

a) Would the project physically divide an established community?

No Impact. Implementation of the proposed project would not physically divide an established community. The project site is located in a developed urban area and is currently developed with existing commercial buildings, surface parking lots, and billboards. The project site is bordered to the north, east, and west by existing roadways. While there are residential neighborhoods in the vicinity of the project area, no neighborhoods would be removed or divided as a result of the proposed project. The proposed project includes the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. No new through streets are proposed, no streets are proposed to be closed, and all project development would be located within the project site. Therefore, the proposed project would not divide an established community, and no impacts would occur. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The proposed project would require City approval of an amendment to the SSP, major Conditional Use Permits (alcohol sales and consumption and nightclub use), an administrative permit, a vesting tentative tract map, and a sign permit. The specific plan amendment would permit greater height and density on the site than under the current regulations in the SSP. Further analysis that considers the proposed project's compliance with the applicable City land use regulations, General Plan Land Use Element policies, and the WHMC will be provided in the EIR.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells within the project area (DOGGR 2019). The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the majority of the project site as Mineral Resources Zone 1 for aggregate resources, and a small portion of the northeast corner of the project site as Mineral Resources Zone 3. 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. Mineral Resources Zone 3 is a designation given to areas containing mineral deposits of which the significance cannot be determined (Division of Mines and Geology 1979). Because the project site is not mapped as or known to contain an important mineral resource, the proposed project would not have the potential to cause a loss in availability of a known mineral resource that would be of value to the region and the residents of the state. The project site is developed with existing commercial buildings, surface parking lots, and four billboards, and is surrounded by commercial properties that do not involve mineral extraction. As such, the project site does not support mineral extraction activities, nor would it be expected to support such activities in the future. Furthermore, the proposed project involves constructing a new mixed-use hotel and residential building. As such, the project would not involve land use changes that would affect availability of mineral resources at the site. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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. According to the City's General Plan EIR, there are no designated mineral resources zones in the City (City of West Hollywood 2010). Furthermore, as discussed in Section 3.12(a), no active oil wells exist within the project area. The proposed project involves constructing a new mixed-use hotel and residential building in place of existing commercial buildings and surface parking lots. As such, the project would not involve land use changes that would affect availability of mineral resources at the site. Therefore, the

proposed project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur, and this issue will not be further analyzed in the EIR.

References

City of West Hollywood. 2010. *Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan* (State Clearinghouse No. 2009091124). Adopted October 2010. https://www.weho.org/city-government/download-documents/-folder-626.

Division of Mines and Geology. 1979. *Mineral Land Classification Map– Beverly Hills Quadrangle –Special Report 143 Plate 2.5.* [map]. Prepared May 25, 1979. Accessed June 7, 2019. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/Plate_2-5.pdf.

DOGGR (California Department of Conservation, Division of Oil, Gas, and Geothermal Resources). 2019. DOGGR Well Finder. Accessed January 13, 2017. http://maps.conservation.ca.gov/doggr/index.html#close.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Other metrics for measuring noise include the day-night average sound level (Ldn or DNL), which is the average noise level over a 24-hour period with a 10-dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours; and the Community Noise Equivalent Level (CNEL), which is the average sound level over a 24 hour period, with a penalty of 5 dB added between 7:00 p.m.

and 10:00 p.m. and a penalty of 10 dB added for the nighttime hours of 10:00 p.m. to 7:00 a.m.. Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces noise levels by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (DOT 2006).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The sensitive receptors closest to the project site are residential uses to the southwest of the project site (across San Vicente Boulevard), to the southeast (across Larrabee Street), and to the north (across Sunset Boulevard), while the London Hotel is immediately adjacent to the south.

The City of West Hollywood adopted the 2035 General Plan Safety and Noise Element in September 2011. The Noise Element provides a description of existing noise levels and sources and incorporates comprehensive goals, policies, and implementing actions. The Noise Element includes several policies on noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.), and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). The Noise Element also establishes land use compatibility categories for community noise exposure. The maximum “normally acceptable” noise level for the exterior of residential areas is 60 dBA CNEL or Ldn. The maximum “normally acceptable” noise level for commercial and professional uses is 65 dBA CNEL or Ldn.

To implement the City’s noise policies, the City adopted a Noise Ordinance. The Noise Ordinance is part of the WHMC. The City of West Hollywood Noise Ordinance has no numerical standards but restricts unnecessary or excessive noise within the City limits. For example, the operation of any motor may not be audible at more than 50 feet from the source (Section 9.08.050[c]); loading and unloading activities are generally prohibited from 10:00 PM to 8:00 AM (Section 9.08.050[e]); and commercial activities may not be plainly audible at any residence between 10:00 PM and 8:00 AM (Section 9.08.050[k]).

The City has not adopted any thresholds or regulations addressing vibration. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

The most common sources of noise in the project site vicinity are transportation-related, such as automobiles, trucks, buses, and motorcycles. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to areas sensitive to noise exposure.

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

Potentially Significant Impact. Implementation of the proposed project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction and long-term noise during operation. Residential uses exist to the southwest (across San Vicente Boulevard), to the southeast (across Larrabee Street), and to the north (across Sunset Boulevard), while the London Hotel is immediately adjacent to the south. These land uses could be impacted by noise from project construction and operation.

Construction Noise

The City does not does not have quantitative construction noise standards. Rather, it 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 (WHMC Section 9.08.050). In the event that Sunday construction is necessary, City Manager approval and an extended hours construction permit is required. Construction activities attributable to the proposed project would create intermittent elevated noise levels at and near the project site due to construction equipment, delivery of materials, construction worker trips, and construction personnel. Construction activities would be required to comply with the construction requirements in the City's Noise Control Ordinance. Nonetheless, further evaluation will be conducted to determine potential construction noise impacts at nearby noise-sensitive land uses. Therefore, this issue will be further analyzed in the EIR.

Operational Noise

The proposed project would also be required to comply with standards for operational noise established in the City's Noise Control Ordinance and General Plan. Relevant standards include WHMC Section 9.08.040, which prohibits noises that are "so loud, prolonged and harsh as to be annoying to reasonable persons of ordinary sensitivity and to cause or contribute to the unreasonable discomfort or disturbance of any persons within the vicinity." Section 9.08.050 prohibits specific types of noises, including the following: amplified sound, radios, musical instruments, etc., that are audible at a distance of 25 feet or more from the source between the hours of 10:00 p.m. and 8:00 a.m.; sustained, continuous, or repeated operation of mechanical devices near a residential district; and, any electronically amplified signal intended for non-emergency purposes that makes noise for more than ten consecutive seconds in any hourly period. Section 9.08.060 exempts certain noise sources from the provisions of the Noise Control Ordinance. Relevant exempt noise sources include outdoor gatherings and shows, provided the events are conducted pursuant to a permit issued by the City Manager, and the operation of properly maintained mechanical equipment (such as air conditioning units) that are required by the Fire Code or the Building Code.

The General Plan Safety and Noise Element contains a table that outlines land use compatibility guidelines ("Table 10-2: Noise/Land Use Compatibility Matrix"). A project is considered compatible with the noise environment if the noise level generated by the project falls within specified ranges of community noise exposure (City of West Hollywood 2011). For residential land uses, a noise level of 50 to 60 Ldn or CNEL is considered normally acceptable, and a noise level of 60 to 70 Ldn or CNEL is considered conditionally acceptable. "Conditionally acceptable means that new construction or development can be undertaken only

after a detailed noise analysis is made and noise reduction measures are identified and included in the project design." For commercial land uses, a noise level of 55 to 65 Ldn or CNEL is considered normally acceptable, and a noise level of 60 to 75 Ldn or CNEL is considered conditionally acceptable.

Operations of the proposed project may be periodically audible at adjacent uses. Noise sources that are typical of hotel, restaurant, and mixed-use developments include background music, rooftop ventilation, heating systems, trash hauling, vehicles entering/exiting the site including loading/delivery trucks, and outside conversation from guests and visitors. Increased vehicle trips on the roadway system could also increase local traffic noise levels. In addition, the proposed project would have usable outdoor area, private open space, and outdoor pools, which would increase noise from outdoor conversations, background music, or other sources of outdoor noise. The proposed project would be required to comply with applicable regulations of the WHMC and the City's General Plan Safety and Noise Element. Nonetheless, as the proposed project would generate an increase in noise at the site during construction and operation, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. There are a variety of vibration-sensitive receptors within the vicinity of the project site, including residential uses to the southwest (across San Vicente Boulevard), to the southeast (across Larrabee Street), to the north (across Sunset Boulevard). Additionally, an existing hotel use is located adjacent to the project site's southern boundary. The EIR will quantify the anticipated vibration that could be produced by the project and will evaluate potential impacts to nearby sensitive receptors. As such, this issue be further analyzed in the EIR.

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 nearest public airport to the project site is the Santa Monica Municipal Airport, located approximately 5.8 miles southwest of the project site. According to the Los Angeles County Airport Land Use Commission, the project site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the project site is not located within 2 miles of a public airport, and the project site is not located within an airport land use plan. Additionally, project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels related to aircraft use. No impacts would occur, and this issue will not be further analyzed in the EIR.

References

City of West Hollywood. 2011. *West Hollywood General Plan 2035.* Adopted September 6, 2011. Accessed June 11, 2019. http://www.weho.org/city-hall/download-documents/-folder-155.

DOT (U.S. Department of Transportation Federal Transit Administration, Office of Planning and Environment). 2006. FTA-VA-90-1003-06. Transit Noise and Vibration Impact Assessment. (Prepared under contract by Harris, Miller, Miller and Hanson). Burlington, MA. Accessed August 20, 2019. transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf.

Los Angeles County Airport Land Use Commission. 2003. Santa Monica Airport, Airport Influence Area. May 13, 2003. Accessed June 11, 2019. http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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)?

Potentially Significant Impact. The proposed project includes development of a 115-room hotel and 41 dwelling units (31 market-rate units and 10 income-restricted units) on a site currently occupied by one- and two-story commercial buildings. These uses would lead to an increase in the number of employees and residents at the project site that could alter the population, employment, and housing characteristics for the area through a change in land uses and an increase in the number of jobs available on site.

Using the Southern California Association of Government's average household size of 1.6 persons for the City of West Hollywood, the proposed dwelling units are expected to accommodate 66 residents (SCAG 2019). The proposed project would also involve the construction of a 115-room hotel, along with restaurants, lounges and retail, and a new nightclub space for the Viper Room. The housing and employment opportunities available as part of the proposed project could induce population growth to the area. Therefore, this issue will be further analyzed in the EIR.

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

No Impact. The project site is located in a developed urban area and is currently developed with existing commercial buildings, surface parking lots, and billboards. While there are residential neighborhoods in the vicinity of the project site, the project site does not contain any neighborhoods or housing units. As such, implementation of the proposed project would result in displacement people or housing. Therefore, no impacts would occur and this issue will not be further analyzed in the EIR.

References

SCAG (Southern California Association of Governments). 2019. Profile of the City of West Hollywood. May 2019. Accessed June 11, 2019. http://www.scag.ca.gov/Documents/WestHollywood.pdf.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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?

Potentially Significant Impact. 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, located approximately 0.3 mile south of the project site at 864 San Vicente Boulevard and Fire Station 8, located approximately 1.6 mile east of the project area at 7643 Santa Monica Boulevard (City of West Hollywood 2011).

As identified in Section 14.04.010 of the WHMC, the City has adopted the Los Angeles County Title 32 (Fire Code), an amended California Fire Code (2016 edition), and an amended International Fire Code (2015 edition). The proposed project would be required to comply with applicable Fire Codes. However, the proposed construction of the new hotel, residential uses, and commercial uses would generate an increase in intensity of uses on the project site, which may increase the number of service calls for fire protection. Therefore, this issue will be further analyzed in the EIR.

Police protection?

Potentially Significant Impact. The Los Angeles County Sheriff's Department contracts with the City to provide police protection. The City is served by the West Hollywood Sheriff's Station, located at 720 San Vicente Boulevard, approximately 0.6 mile south of the project site (City of West Hollywood 2011).

The proposed project would lead to an increase in the number of employees and residents at the project site, which could increase the number of service calls for police protection. Therefore, this issue will be further analyzed in the EIR.

Schools?

Potentially Significant Impact. The City is served by the Los Angeles Unified School District. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause schools to be constructed or existing schools to be expanded. Because the proposed project has a residential component, this issue will be further examined in the EIR.

Parks?

Less Than Significant Impact. The proposed project would include recreational facilities and open space for project residents and hotel guests and, therefore, is not expected to result in the need for new or expanded recreational facilities. See Section 3.16 for further details. Impacts to recreational facilities would be less than significant, and this issue will not be further analyzed in the EIR.

Other public facilities?

Potentially Significant Impact. Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the West Hollywood Public Library, which is within the County of Los Angeles Public Library system. The West Hollywood Public Library is located approximately 1.0 mile south of the project site at 625 San Vicente Boulevard. The residents, employees, and customers of the proposed project could use the local library services. Increased use of library services is particularly associated with an increase in residents. Because the proposed project has a residential component, this issue will be further examined in the EIR.

References

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Less Than Significant Impact. The City contains six municipal parks totaling 15.31 acres. The nearest park facility to the project site is the West Hollywood Park & Dog Park, located approximately 0.6 miles south of the project site at 647 San Vicente Boulevard. Based on a current population of 36,723 residents, there are approximately 0.42 acres of parkland per 1,000 residents (SCAG 2019; City of West Hollywood 2011). The City's Parks and Open Space Background Report identifies that many cities throughout California use a standard of 3.0 acres of parkland per 1,000 residents as a benchmark for sufficient park space. The City's ratio of approximately 0.43 acres of parkland per 1,000 residents is well below this typical standard. As stated in the Parks and Open Space Background Report, the City is unlikely to significantly expand park property to meet this standard due to the City's size, the absence of vacant, undeveloped properties, and high land values (City of West Hollywood 2010). Therefore, the City will likely remain below typical parkland acreage standards. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, establishing innovative development agreements, and promoting community gardens. The proposed project would be consistent with these efforts, as it would incorporate a landscaped roof with publicly accessible terraces, rows of street trees, and private open space and recreational areas for residents and hotel patrons.

As previously discussed in Section 3.14, the residential portion of the proposed project is expected to accommodate approximately 66 people. Although residents could patronize existing neighborhood and regional parks, the residential portion of the proposed project would include approximately 7,854 square feet of common outdoor area and approximately 20,983 square feet of private outdoor area. Further, the proposed project would provide a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard on the second level, which would provide an additional open space amenity. Similarly, the proposed mixed-use hotel would include a spa/gym, outdoor pools, restaurants, lounges and retail space, and a new nightclub space for the Viper Room, all of which would serve as on-site recreational facilities for hotel guests. Further, popular tourist activities in the City are commonly

entertainment-oriented, and tourists would likely remain in the vicinity of the hotel for recreational uses. It is not anticipated that hotel guests would travel to public parks outside of the project vicinity. For these reasons, development of the proposed project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The proposed project would include approximately 7,854 square feet of common outdoor area and approximately 20,983 square feet of private outdoor area for the residential portion of the project. Further, the proposed project would provide a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard on the second level, which would provide an additional open space amenity. Additionally, the proposed mixed-use hotel would include a spa/gym, outdoor pools, restaurants, lounges and retail space, and a new nightclub space for the Viper Room, all of which would serve as on-site recreational facilities for the hotel guests. All recreational facilities associated with the proposed project would be developed on site and are evaluated as part of the proposed project. As described above, the proposed project would result in minor increases in demand on the City's recreational resources and is not expected to result in the need for expanded facilities or new facilities. Accordingly, impacts involving construction or expansion of recreational facilities would be less than significant. This issue will not be further analyzed in the EIR.

References

City of West Hollywood. 2010. *Parks and Open Space Background Report – West Hollywood General Plan*. March 2010. Accessed June 21, 2019. https://www.weho.org/city-government/boards-commissions/committees-and-task-forces/-folder-417.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

SCAG (Southern California Association of Governments). 2019. Profile of the City of West Hollywood. May 2019. Accessed June 11, 2019. http://www.scag.ca.gov/Documents/WestHollywood.pdf.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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

Potentially Significant Impact. The proposed project includes the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Project-generated traffic during operation would include employee-related vehicle trips, vehicle trips from restaurant and retail patrons, vehicle trips from hotel guests, vehicle trips associated with loading/delivery trucks, and vehicle trips from residents of the proposed 41 dwelling units. The trips generated as a result of the proposed project have the potential to conflict with City policies for the circulation system. As such, a traffic analysis will be prepared to analyze potential conflicts with applicable plans and policies addressing the circulation system. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts, facilitating a shift from the use of level of service (LOS) to evaluate traffic and transportation impacts. VMT is the amount and distance of automobile travel attributable to a project, while LOS is a measure of intersection and roadway operations based on vehicle delay and congestion. CEQA Guidelines Section 15064.3(b) describes specific considerations for evaluating the transportation impacts for several categories of development and is divided into subsections addressing land use projects, transportation projects, and projects warranting qualitative traffic analysis. For land use projects, Section 15064.3(b) states that "VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should

be presumed to cause a less than significant transportation impact." As explained in Section 3.1, the project site is located within one-half mile of an existing major transit stop. However, the provisions of Section 15064.3 apply statewide beginning July 1, 2020. Until that time, a lead agency may elect whether its projects are governed by Section 15064.3. The City has not elected to be governed by Section 15064.3. As such, until July 1, 2020, projects in the City will be evaluated for their impacts on traffic and transportation based on the City's LOS-based thresholds. The EIR will therefore contain a traffic and transportation study for the project that includes an impact analysis based on LOS.

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)?

Potentially Significant Impact. The proposed project involves ingress/egress locations for the parking garage along San Vicente Boulevard and Larrabee Street. As such, the proposed project would alter existing circulation leading to the project site and create new internal circulation patterns. The proposed project would also increase pedestrian activity in the area. As such, a traffic impact analysis will be conducted to analyze project site vehicular and pedestrian access, and this issue will be further analyzed in the EIR.

d) Would the project result in inadequate emergency access?

Potentially Significant Impact. Construction of the proposed project may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of construction traffic affecting the capacity of adjacent roadways. The proposed project could also alter the ingress/egress and emergency access locations for the project site. Therefore, this issue will be further evaluated in the EIR.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	☒	☐	☐	☐
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?	☒	☐	☐	☐

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

i) 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)?

Potentially Significant Impact. The project would involve ground-disturbing activities that would have the potential to disturb tribal cultural resources, in the event that any are present within the project site. Outreach to local tribes is currently being undertaken by the City. If any issues related to tribal cultural resources are identified as a result of the City's ongoing outreach activities, this issue will be further discussed in the EIR. If no tribal cultural resources are identified, no further analysis will be required.

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

Potentially Significant Impact. See the discussion in Section 3.18(a)(i).

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
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 wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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

Potentially Significant Impact. Because the proposed project would represent an intensification of use on the project site compared to existing conditions, project operation would increase on-site wastewater generation and water use. Further analysis is required to calculate the wastewater generation and water demand that may be associated with the proposed project to determine the adequacy of existing wastewater and water facilities.

The proposed project would be required to comply with Chapter 15.56 and Chapter 19.20.190 of the WHMC. These sections require stormwater runoff to be minimized to the extent practicable. The proposed project would also be required to implement BMPs to reduce runoff. Although there would not be an increase in impervious surfaces as a result of the proposed project, additional analysis will be provided in the EIR relative to stormwater drainage.

The proposed project would increase the demand for electricity, natural gas, and telecommunication on the project site relative to existing conditions. Because the proposed project's demand for electric power, natural gas, and telecommunications would be greater than under existing site conditions as it would increase the total amount of development on the project site, new facilities may be required to provide these services to the site, the construction of which could cause environmental effects. As such, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. The proposed project would represent an intensification of uses on the project site compared to existing conditions, which would generate an increase in on-site water use. Further analysis will be presented in the EIR to determine the sufficiency of existing water supplies relative to anticipated project demands. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. Because the proposed project would represent an intensification of use on the project site compared to existing conditions, project operation would increase on-site wastewater generation. Further analysis will be presented in the EIR to determine the sufficiency of existing wastewater treatment facilities relative to anticipated project demands. As such, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. The proposed project would intensify development on the project site compared to existing conditions, which would increase waste generation compared to existing conditions. While the proposed project would not be expected generate sufficient solid waste to impact regional landfill capacity, the EIR will study the proposed project's anticipated solid waste generation relative to landfill capacity and its consistency with applicable solid waste reduction standards and goals.

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

Potentially Significant Impact. Construction of the proposed project would result in the generation of solid waste such as demolition debris, scrap lumber, concrete, residual wastes, packing materials, and plastics. In accordance with City requirements, 80% of all demolition and construction materials would be recycled, and the applicant would prepare a Construction and Demolition Waste Management Plan to demonstrate compliance with this requirement (City of West Hollywood 2019). Compliance with this requirement would reduce the effect of the proposed construction activities on regional landfills. Operation of the proposed project would intensify development on the project site compared to existing conditions, and would likely be associated with increased generation of solid waste. Solid waste services would be provided by Athens Services, which has a Solid Waste Franchise Agreement with the City. Athens services is required to provide for recycling services, in compliance with Section 15.20.090 - Collection of Recyclables, set forth in the WHMC. It is expected that a substantial portion of the waste generated during operation of the proposed project would be recycled and that the proposed project would comply with all applicable federal, state, and local requirements involving solid waste. Nonetheless, the EIR will further characterize applicable solid waste management and reduction regulations and will present analysis to further demonstrate compliance.

References

City of West Hollywood. 2019. Construction and Demolition Waste Management Plan Form. Construction and Development Information. Accessed June 11, 2019. http://www.weho.org/city-hall/city-departments/public-works/environmental-services/construction-anddevelopment-information.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

Less Than Significant Impact. According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone maps and the City's General Plan Safety Element, the northern portion of the City contains Fire Hazard Severity Zones (CAL FIRE 2019; City of West Hollywood 2011). The project site is not located within a designated Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone. The project site and surrounding area is characterized as developed, which would not facilitate the spread of wildfires compared to vegetated areas. Additionally, the proposed project, including the access driveways, would be reviewed and approved by the City and the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access. Therefore, the proposed project would provide for emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

b) Due to slope, prevailing winds, and other factors, 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 project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The project site is located within a highly urbanized setting and the land uses surrounding the project site are predominantly commercial and residential uses. To the north of the project site is the base of the Hollywood Hills, which is a Very High Fire Hazard Severity Zone. However, project construction consists of demolition and building in an area of existing development. As a result, no incising of hillslopes or degradation of slope stability would occur because of project construction. The project site and immediately surrounding area do not contain slopes typical of exacerbating wildfire risks.

According to the City's General Plan, the project site is not identified as an area having potential slope instability (City of West Hollywood 2011). The areas upslope of the project site are developed with existing commercial and residential uses. As such, the surrounding areas do not contain extensive amounts of vegetation or wildland fuel. Additionally, there is existing pavement within the areas between the project site and Very High Fire Hazard Severity Zones to the north, which would provide a fire break between the project site and any wildland fuels.

Therefore, it is not anticipated that the proposed project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur, and this issue will not be further analyzed in the EIR.

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. As previously discussed, the project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The proposed project involves the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. The project site is currently developed, and the new building would connect to existing utilities. The proposed project would not require the installation or maintenance of roads, fuel breaks, power lines, or other utilities that would exacerbate fire risk. No impact would occur, and this issue will not be further analyzed in the EIR.

d) 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. As previously discussed, the project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The project site is currently paved and is developed with existing commercial buildings, surface parking lots, and billboards. Project construction consists of demolition and building in an area of existing development and infrastructure. As a result, no incising of hillslopes or degradation of slope stability would occur as a result of project construction. According to the City's General Plan, the project site is not identified as an area having potential slope instability (City of West Hollywood 2011). In addition, as discussed in Section

3.10, the project would decrease the existing impervious area by adding planting and landscaping around the site and upper levels of the proposed building. Since the project site is paved with existing development, it is unlikely that the project would expose people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur, and this issue will not be further analyzed in the EIR.

References

CAL FIRE. 2019. "FHSZ Viewer." Accessed June 10, 2019. http://egis.fire.ca.gov/FHSZ/.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. https://www.weho.org/city-government/download-documents/-folder-155.

3.21 Mandatory Findings of Significance

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

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

Potentially Significant Impact. Based on this Initial Study, the proposed project is not expected to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, further cultural resource investigations are required and will be conducted in the EIR to determine any potential impacts that the proposed project would have on important examples of the major periods of California history or prehistory. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. As described throughout this Initial Study, the proposed project has potentially significant impacts requiring further analysis in an EIR for all environmental issue areas except for aesthetics, agriculture and forestry resources, biological resources, mineral resources, recreation, and wildfire. It is anticipated that the proposed project may be developed while other projects in the area are being developed, and the incremental effects of this project may be cumulatively considerable. Therefore, potential cumulative impacts resulting from project construction or operations have the potential to be significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. As detailed throughout this Initial Study, the proposed project could result in potentially significant impacts related to air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems. These impacts could have potentially adverse effects on human beings. As such, further analysis of these impacts will be provided in the EIR.

4 Preparers

Lead Agency

City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, California 90069

John Keho, Planning & Development Service Director
Jennifer Alkire, AICP, Acting Planning Manager
Doug Vu, ASLA, Senior Planner

Dudek

Eric Wilson, Project Manager
Michele Webb, Environmental Analyst
Sabrina Alonso, Environmental Analyst
Nicholas Lorenzen, Air Quality
Mike Green, Noise
Chris Starbird, GIS Specialist

INTENTIONALLY LEFT BLANK

Appendix A-2

Scoping Report

Scoping Report

The City of West Hollywood (City) issued a Notice of Preparation (NOP) to prepare an Environmental Impact Report (EIR) for the proposed 8850 Sunset Boulevard Project (proposed project). Issuance of the NOP began the scoping process for proposed project. Scoping is the agency and public participation process used to assist lead agencies in determining the potential environmental issues and alternatives to be analyzed in an EIR for a project. This Scoping Report describes the scoping process undertaken by the City and provides attachments pertaining to the scoping process.

Notice of Preparation

CEQA Guidelines Section 15082 requires lead agencies to send an NOP to the State Clearinghouse and to each responsible and trustee agency stating that an EIR will be prepared. The issuance of the NOP begins the scoping period, during which responses to the NOP may be sent to the lead agency providing specific detail about the scope and content of the EIR. In accordance with CEQA Guidelines Section 15082, an NOP was prepared by the City and distributed to 35 agencies and organizations, filed with the State Clearinghouse, and posted at the County Clerk. The attachments to this report include the NOP with a stamp from the County Clerk (verifying that the NOP was posted at the County Clerk), the distribution list for agencies and organizations, and a copy of the State Clearinghouse's online posting of the NOP. In addition, the City mailed the NOP to addresses within a 500-foot buffer of the project site and posted the NOP in the *Park Labrea News/Beverly Press*.

Scoping Meeting

A scoping meeting for the proposed project was held on October 10, 2019, at 6:30 pm at the West Hollywood Park Library Community Meeting Room located at 625 San Vicente Boulevard in West Hollywood. The purpose of this meeting was to share information regarding the proposed project and environmental review process and to receive written comments regarding the scope and content of the environmental analysis to be addressed in the EIR.

Approximately 40 people attended the scoping meeting. The sign-in sheet from the meeting is included as an attachment to this report. A summary of the proposed project and the CEQA process was presented at the meeting. Afterwards, attendees spoke with representatives from the City, the applicant, and the consulting firm preparing this EIR (Dudek) to ask questions about the project and the environmental process and to provide comments on the scope and content of the EIR. (Verbal comments were not recorded at the meeting; only written comments were entered into the record.) Two written comment letters were turned in by meeting attendees and are included with the attached written comments in this Scoping Report.

Comment Letters

During the scoping process, approximately 120 comment letters were received from agencies, organizations, and individuals. These comment letters are included as an attachment to this report. Comments and concerns related to environmental issues are summarized below. (Note that this is not an exhaustive list of all comments received; rather, this list is representative of the key themes found in many of the letters. For the full text of the comment letters received, see the attachments to this report.)

Aesthetics. Concerns regarding aesthetics that are expressed in the comment letters are summarized as follows:

- The project could block views of the Hollywood Hills, even from West Hollywood Park.
- The project could obstruct views from Sunset Boulevard and from the areas north of Sunset Boulevard.
- The project could overly dominate the skyline.
- The project's massing and height would not be compatible with the project site or the surrounding area.
- The project's design is not appropriate for Sunset Strip; the project would dwarf other buildings on the Sunset Strip.
- Sunset Strip could become a "high-rise jungle."
- The project would be larger than the adjacent London Hotel.
- The project could cast shadows on surrounding land uses and change the natural light patterns of the area.
- The building materials could cause glare, resulting in hazards for nearby drivers.

Air Quality/Greenhouse Gas Emissions. Concerns were expressed regarding construction air emissions, increased dust, and increased pollution due to additional traffic. Concerns were also expressed regarding the project's proximity to West Hollywood Elementary School, which is considered a sensitive receptor for air pollution impacts. Concerns were also expressed regarding the project's potential to increase greenhouse gas emissions.

Cultural Resources. Concerns were expressed regarding loss of the Viper Room building and associated music history. More specifically, commenters stated that the Viper Room is a West Hollywood historical site with specific social significance, and the project would diminish the historic significance of the area by removing the Viper Room. Concerns were also expressed regarding the manner in which the proposed new Viper Room space would be styled. Specifically, a commenter stated that the new Viper Room should incorporate the same character and intimacy of the existing Viper Room. Concerns were also expressed regarding effects to the character of the overall project area: commenters stated that the project could block the availability of historic views from Sunset Boulevard and would adversely affect the history and charm of the area. A comment letter was also received from the Native American Heritage Commission, which described tribal consultation requirements and listed recommendations for cultural resources assessments.

Geology and Soils. Concerns were expressed regarding the potential for earthquake and liquefaction hazards at the project site. Concerns were expressed regarding the proximity of the project to a fault line and whether the proposed building would be stable. Concerns were also expressed that the proposed building could fall downhill in the event of an earthquake.

Hazards and Hazardous Materials. Concerns were expressed that the project would contribute to potential difficulties in evacuating the streets north of Sunset Boulevard, since Sunset Boulevard would likely be the main evacuation route for residents on those streets. Concerns were also expressed regarding potential safety issues associated with the emergency helipad. Concerns were also expressed regarding the potential for the proposed building to collapse.

Hydrology and Water Quality/Utilities. Concerns were expressed regarding potential water runoff from the site in the event of a flood. Concerns were expressed regarding the long-term impacts of the project's water, electrical, and gas demands. Concerns were expressed regarding the quantity of solid waste that would need to be removed from the site during operation.

Noise. Concerns were expressed regarding the potential for the project to generate increased long-term noise attributable to additional traffic, the proposed nightclub, and helicopter noise from the helipad. Concerns were expressed regarding noise that could be generated from the proposed driveway on Larrabee Street. Concerns were also expressed regarding the potential for construction noise from the project to affect West Hollywood Elementary School.

Population and Housing. Concerns were expressed that the project does not include enough affordable housing units and that there is a lack of need for market-rate housing.

Land Use and Planning. Concerns regarding land use and planning that are expressed in the comment letters are summarized as follows:

- The project would be out of scale with the project site and neighborhood.
- The project would conflict with the neighborhood character.
- There are too many hotels on the Sunset Strip, and some of the existing hotels are not full.
- The project has a focus on tourists and not local residents.
- The project is not in accordance with the Sunset Specific Plan.
- The project would have overall adverse effects on quality of life.
- The project would be located adjacent to an existing hotel. Two hotels located in such proximity could exacerbate neighborhood impacts such as increased traffic, increased noise, and loss of parking.

Public Services. Concerns were expressed regarding increased demands on police, fire, and emergency medical services. Concerns were also expressed regarding potential effects on emergency response.

Transportation. Concerns regarding transportation that are expressed in the comment letters are summarized as follows:

- The project would increase traffic congestion during construction and operation.
- The project would increase traffic accidents, pedestrian accidents, and accidents with parked cars.
- Construction activities could present safety hazards for pedestrians (specifically, these hazards could affect people walking to and from the nearby West Hollywood Elementary School).
- Construction activities could affect existing school bus routes for West Hollywood Elementary School.
- The project would present further strains on the availability of street parking along Larrabee Street, which is already limited. (Some residents do not have garages and rely solely on availability of street parking.)
- The project would result in the loss of metered parking on Larrabee Street, further reducing the availability of parking.
- The project's exit onto Larrabee Street would increase existing congestion on Larrabee Street.
- The project could affect the operation of nearby intersections. Specific concerns were expressed related to backups at the Sunset Boulevard/San Vicente Boulevard intersection and operation of the intersections of Santa Monica Boulevard with Doheny Drive, San Vicente Boulevard, and Holloway Drive.
- Project construction could affect bus service at nearby stops.
- Larrabee Street would not be able to accommodate the new traffic associated with the project.
- Where would construction workers park?
- The transit options in the vicinity of the project site are not viable—in the project area, walking is faster than taking the bus.

- The proposed parking is not sufficient for the proposed uses.
- The project could lead to increased ride share drivers in the area, who cause traffic issues and parking issues by waiting for customers along roadways.

In addition to the above concerns related to transportation, commenters also expressed a number of recommendations related to the project design and nearby transportation infrastructure. These recommendations are summarized below.

- Transportation demand management strategies should be incorporated into the project as an alternative to developing excessive parking.
- The project should include parking spaces for the residents on Larrabee Street that rely solely on street parking.
- One floor of the hotel should be eliminated and replaced with free parking for Larrabee Street residents who depend on street parking, employees for other businesses on Sunset Strip, and ride share cars.
- Parking at the project should be free, in order to discourage patrons and employees from using nearby street parking.
- The entrances and exits to the project should be redesigned. San Vicente Boulevard is wider and therefore should be the exit for the commercial portion of the project and for service trucks. Larrabee Street should be the exit for the residential portion of the project only.
- The project should include additional parking and improvements to surrounding streets.
- Traffic lights on Sunset Boulevard should be better timed to reduce backups.
- Left-turn lanes should be extended, especially at intersections near the project site.
- Sidewalks should be widened and street parking on Sunset Boulevard should be removed to make the area more pedestrian friendly.

Alternatives. A number of commenters included suggestions for alternatives to the proposed project. These suggestions are summarized in the list below:

- Reduced floor-area-ratio (one commenter specifically recommended a 50% reduction in size)
- Reduced height (one commenter specifically recommended 8 stories)
- Additional housing (particularly affordable units)
- Replace the hotel rooms with affordable housing units
- Remove the hotel component
- Alternative designs
    - Low-level, bungalow office park/boutique hotel with green space
    - Traditionally styled architecture
- A project that revitalizes the site while maintaining the history of the area. Projects by the "1933 Group" were cited as examples. (The 1933 Group revitalizes old buildings to create vintage-style bars in Los Angeles.)
- The new structure should be built around the existing Viper Room.
- Alternative sites
    - Southern portion of the City (near the Pacific Design Center or Cedars Sinai Medical Center, in the Melrose Avenue and Santa Monica Boulevard area)

Cumulative Impacts. Concerns were expressed regarding cumulative traffic increases, specifically along Sunset Boulevard, and potential cumulative impacts on aesthetics, air quality, and noise. Concerns were expressed that the project would encourage increased heights in the project area. Concerns were expressed regarding other projects being proposed and developed along Sunset Boulevard. Concerns were also expressed regarding two condominium projects that were recently approved along Larrabee Street and are scheduled to begin construction next year (2020). Generalized concerns were expressed regarding increased development in West Hollywood.

Miscellaneous Comments. A number of comments were received that do not pertain to environmental issues or to the scope and content of the EIR. However, these comments are summarized herein for informational and disclosure purposes.

- Loss of music history (i.e., removal of the existing Viper Room) may reduce tourism.
- Businesses in the area may begin to close down due to the reduced tourism.
- The project could discourage people from visiting the City and from living in the City.
- The project may cause the City to lose existing residents.
- The project would not benefit the City.
- There is little demand for new restaurants by local residents. The restaurants that occupy the proposed restaurant spaces could fail, leaving the spaces empty.
- Existing businesses at the site, including family-owned restaurants, would be removed without relocation assistance.
- Increased traffic could deter tourists and future residents.
- Overall support for the project and its design.
- Overall opposition to the project and its design.

INTENTIONALLY LEFT BLANK

ORIGINAL FILED

SEP 19 2019

LOS ANGELES, COUNTY CLERK

City of West Hollywood
Planning and Development Services Department

PUBLIC NOTICE

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

To: **All Interested Persons and Agencies**

From: **Department of Planning & Development Services**

Project Title: **8850 Sunset Boulevard Project**

Date: **September 19, 2019**

Lead Agency: City of West Hollywood
Planning & Development Services Department
8300 Santa Monica Boulevard
West Hollywood, California 90069

Project Applicant: Silver Creek Commercial Development, LLC
8872 Sunset Boulevard
West Hollywood, California 90069

Pursuant to California Public Resources Code Section 21165, the City of West Hollywood is the Lead Agency responsible for preparing an Environmental Impact Report (EIR) addressing potential impacts associated with the development of the proposed 8850 Sunset Boulevard Project (proposed project).

Purpose of Notice of Preparation

Under the requirements of the California Environmental Quality Act (CEQA) and its Guidelines, the City, as the Lead Agency, must evaluate the potentially significant environmental effects of the proposed project. The City has determined that an EIR will be prepared to assess the proposed project's effects on the environment, to identify significant impacts, and to identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts. An analysis of alternatives to the proposed project will also be included in the Draft EIR, including the No Project Alternative. The purpose of this Notice of Preparation (NOP) is to inform reviewers of the City's intent to prepare an EIR and to provide an opportunity for interested agencies and persons to comment on the scope and content of the EIR.

Project Location

The project site comprises a block fronting Sunset Boulevard in the City of West Hollywood, is approximately 39,983 square feet in size, and is bound by Sunset Boulevard to the north, Larrabee Street to the east, the London Hotel to the south, and San Vicente Boulevard to the west. The addresses associated with project site are 8850–8878 Sunset Boulevard and 1025–1029 Larrabee Street, West Hollywood. The project site is comprised of eight Assessor Parcel Numbers (APNs): 4339-017-001, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-006, 4339-017-007, and 4339-017-008. The project site is currently developed with one- to two-story commercial buildings totaling approximately 21,000 square feet and surface parking comprising 27,450 square feet. The commercial buildings are located in the northern portion of the site (fronting Sunset Boulevard) and are currently occupied by a nightclub (the Viper Room), restaurants, retail shops, and offices. The surface parking area is in the southern portion of the site, behind the businesses.

Project Description

The proposed project consists of the demolition of the existing commercial buildings and surface parking on the project site and construction and operation of a new mixed-use commercial and residential building. The new building would be approximately 369,000 gross square feet in size and 15 stories (approximately 200 feet) in height (including an emergency helipad) as measured from the lowest point of the site (the southwest corner of the site). This height equates to approximately 185 feet above Sunset Boulevard. The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, an outdoor pool area, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units, and would include residential amenities such as a gym, movie screening room, and an outdoor pool. The proposed project also would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

Potential Environmental Impacts

An Initial Study has been prepared for the project and is available on the City's Current and Historic Preservation Planning webpage. The Initial Study contains a description of the project, its location, and preliminary determinations of the environmental resource topics to be addressed in the EIR. As determined by the analysis in the Initial Study, the potential environmental effects of the proposed project to be addressed in the Draft EIR will include, but may not be limited to the following: Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous

Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. These topics, together with other CEQA-mandated analyses including Alternatives, Cumulative Effects, and Growth Inducement, will be addressed in the EIR.

This NOP is being circulated pursuant to California Resources Code Section 21153(a) and CEQA Guidelines Section 15082. Public agencies and the public are invited to comment on the proposed scope and content of the environmental information to be included in the Draft EIR. A 36-day comment period is provided to return written comments to the City. All comments should be directed to the City at the following address:

Doug Vu, Senior Planner
Planning & Development Services Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216
E-mail: dvu@weho.org

Responses to this NOP should be sent at the earliest possible date, but not later than 36 days after issuance of this notice. **The response deadline is October 25, 2019**. This NOP and the Initial Study for the proposed project are available for review at the Planning and Development Services Department (8300 Santa Monica Boulevard, West Hollywood, CA 90069), at West Hollywood Library (625 North San Vicente Boulevard, West Hollywood, CA 90069), and on the City of West Hollywood website, www.weho.org.

Scoping Meeting

As part of the EIR scoping process, the City of West Hollywood will hold a public scoping meeting on **Thursday, October 10, 2019, from 6:30 p.m. to 8:00 p.m., at the West Hollywood Park Library Community Meeting Room (625 North San Vicente Boulevard, West Hollywood, CA 90069).** The purpose of the scoping meeting is to share information regarding the proposed project and environmental review process, and to receive written comments regarding the scope and content of the environmental analysis to be addressed in the EIR.

8850 Sunset Boulevard Project Environmental Impact Report
Notice of Preparation Distribution List - Agencies and Organizations

	FIRST NAME	LAST NAME	COMPANY/ORGANIZATION	ADDRESS	CITY	STATE	ZIP
	Doug	Vu	City of West Hollywood	8300 Santa Monica Boulevard	West Hollywood	CA	90069
	Matt	Gill, Library Manager	West Hollywood Library	625 North San Vicente Boulevard	West Hollywood	CA	90069
State			State Clearinghouse	1400 Tenth Street	Sacramento	CA	95814
State	Miya	Edmonson	Caltrans, District 7, Office of Regional Planning, IGR/CEQA Branch	100 S Main St MS 16	Los Angeles	CA	90012
State	Debbie	Pilas-Treadway	Native American Heritage Commission	1550 Harbor Blvd Ste 100	West Sacramento	CA	95691
State	Julianne	Polanco	Office of Historic Preservation	1725 23rd Street, Suite 100	Sacramento	CA	95816
State	Amy	Kronson	SWRCB, Storm Water Section	1001 I Street	Sacramento	CA	95814
Regional	Philip	Fine, Executive Officer	SCAQMD, CEQA Inter-Governmental Review	21865 Copley Dr	Diamond Bar	CA	91765
Regional			Southern California Association of Governments, Inter-Governmental Review	900 Wilshire Boulevard, Suite 1700	Los Angeles	CA	90017
Regional			Los Angeles Regional Water Quality Control Board (Region 4)	320 West 4th Street, Suite 200	Los Angeles	CA	90013
County			Los Angeles County Metropolitan Transportation Authority, Development Review	One Gateway Plaza MS 99-18-3	Los Angeles	CA	90012
County	Patricia	Hachiya	Los Angeles County Department of Regional Planning, Impact Analysis Section	320 W Temple St Fl 13	Los Angeles	CA	90012
County	Captain Ed	Ramirez	Los Angeles County Sheriff, West Hollywood Station	780 N San Vicente Blvd	West Hollywood	CA	90069
County	Tracey Jue, Director	Attn: Maynora G. Castro, Departmental Facilities Planner II	Los Angeles County Sheriff Headquarters, Facilities Planning Bureau	211 West Temple Street	Los Angeles	CA	90012
County	Chief Michael Y.	Takeshita	Los Angeles County Fire Department	5823 Rickenbacker Rd	Commerce	CA	90040
County			Los Angeles County Department of Public Works, Land Development Division	900 S Fremont Ave	Alhambra	CA	91803
County	Grace Robinson	Hyde	County Sanitation Districts of Los Angeles County	P.O. Box 4998	Whittier	CA	90607
LAUSD	Cheryl	Hildreth, Superintendent	LAUSD - Education Service Center West	11380 W. Graham Place	Los Angeles	CA	90064
City of Los Angeles	Vince	Bertoni, Director of Planning	City of Los Angeles, Department of City Planning	200 N Spring St	Los Angeles	CA	90012
City of Los Angeles			Los Angeles Department of Transportation	100 S Main St Fl 9	Los Angeles	CA	90012
City of Los Angeles			Los Angeles Department of Transportation, Metro Development Review	100 S Main St Fl 9	Los Angeles	CA	90012
City of Los Angeles		Development Review	Los Angeles Department of Water and Power	111 N. Hope Street, Room 1044	Los Angeles	CA	90012
City of Beverly Hills	Susan Healy	Keene, Director	City of Beverly Hills, Department of Community Development	455 N Rexford Dr Fl 1	Beverly Hills	CA	90210
City of Beverly Hills	Shana	Epstein, Director	City of Beverly Hills Public Works Department	345 Foothill Rd	Beverly Hills	CA	90210
Community organization	Adrian Scott	Fine, Directory of Advocacy	Los Angeles Conservancy	523 West Sixth Street, Suite 826	Los Angeles	CA	90014
Community organization	Roy Rogers	Oldenkamp	West Hollywood Preservation Alliance	PO BOX 46073	West Hollywood	CA	90046
Community organization	ELYSE	EISENBERG	West Hollywood Heights Neighborhood Association	1230 N HORN AVE #526	West Hollywood	CA	90069
Community organization	JOSEPH	GUARDARRAMA	Cynthia-Sunset Neighborhood Watch	906 N DOHENY DR #510	West Hollywood	CA	90069
Utility		Development Review	Southern California Edison	1721 22nd St	Santa Monica	CA	90404
Utility	Pedra	Reyes, Pipeline Planning Associate	Southern California Gas Company	701 N. Bullis Road	Compton	CA	90221
Tribal	Gloria	Cuevas, Director	LA City/County Native American Indian Community	3175 West 6th Street, Room 403	Los Angeles	CA	90020
Tribal	Bernie	Acuna, Co-Chairperson	Gabrielino-Tongva Tribe	PO Box 180	Bonsall	CA	92003
Tribal	John	Valenzuela, Chairperson	San Fernando Band of Mission Indians	PO Box 221838	Newhall	CA	91322
Tribal	John Tommy	Rosas, Tribal Administrator	Tongva Ancestral Territorial Tribal Nation	578 Washington Boulevard, #384	Marina Del Rey	CA	90292
Tribal	Andrew	Salas	Gabrieleno Band of Mission Indians – Kizh Nation	PO Box 393	Covina	CA	91723
Tribal	Rudy	Ortega, Tribal President	Fernandeno Tataviam Band of Mission Indians	1019 Second Street, Suite 1	San Fernando	CA	91340
Tribal	Anthony	Morales	Gabrieleno/Tongva San Gabriel Band of Mission Indians	PO Box 693	San Gabriel	CA	91778
Tribal	Sam	Dunlap, Cultural Resources Director	Gabrielino Tongva Nation	PO Box 86908	Los Angeles	CA	90086

8850 Sunset Boulevard Project

Summary

SCH Number	2019090447
Lead Agency	West Hollywood, City of *(City of West Hollywood)*
Document Title	8850 Sunset Boulevard Project
Document Type	NOP - Notice of Preparation
Received	9/19/2019
Project Applicant	Silver Creek Commercial Development, LLC
Present Land Use	Sunset Specific Plan

Document Description

The project would involve construction and operation of an approximately 369,000 square foot, 15-story mixed-use building (commercial and residential) on a 39,983 square foot site along Sunset Boulevard, between Larrabee Street and San Vicente Boulevard. The commercial portion would include 115 hotel rooms with ancillary uses such as meeting rooms, spa/gym, an outdoor pool area, restaurants, lounges, retail, and a nightclub. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units and would include amenities such as a gym, movie screening room, and an outdoor pool. The project would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces. Construction would involve demolition of the existing commercial buildings and surface parking on site.

Contact Information

Doug Vu
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Phone : (323) 848-6318

Location

Coordinates	34°05'25"N 118°23'06"W
Cities	West Hollywood
Counties	Los Angeles
Cross Streets	Sunset Boulevard, North San Vicente Boulevard, and Larrabee Street
Zip	90069
Total Acres	0.92
Parcel #	Numerous
State Highways	2
Schools	Numerous
Township	1S
Range	14W
Section	07

Notice of Completion

Review Period Start	9/19/2019
Review Period End	10/25/2019
Development Type	Residential (41 Units) · Other (Hotel - 115 rooms)
Local Action	Specific Plan
Project Issues	Aesthetic/Visual · Agricultural Land · Air Quality · Archaeologic-Historic · Biological Resources · Drainage/Absorption · Flood Plain/Flooding · Forest Land/Fire Hazard · Geologic/Seismic · Minerals · Noise · Population/Housing Balance · Public Services · Recreation/Parks · Schools/Universities · Septic System · Sewer Capacity · Soil Erosion/Compaction/Grading · Solid Waste · Toxic/Hazardous · Traffic/Circulation · Vegetation · Water Quality · Water Supply · Wetland/Riparian · Growth Inducing · Land Use · Cumulative Effects
Reviewing Agencies	Air Resources Board, Transportation Projects · California Department of Conservation · California Department of Fish and Wildlife, South Coast Region 5 · California Department of Parks and Recreation · California Department of Transportation, District 7 · California Highway Patrol · Department of Toxic Substances Control · Office of Historic Preservation · Resources Agency · State Water Resources Control Board, Division of Drinking Water · California Native American Heritage Commission

Attachments

Environmental Document	8850 OPR Summary Form PDF 228 K · 8850 Sunset Boulevard Project Initial Study PDF 4001 K · 8850 Sunset Boulevard Project Notice of Preparation PDF 500 K
NOC	8850 Sunset Boulevard Notice of Completion PDF 681 K · Letter PDF 169 K
State Comments	2019090447_NAHC_NOP 8850 Sunset Boulevard Project 9 PDF 239 K

Disclaimer: The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at state.clearinghouse@opr.ca.gov or via phone at (916) 445-0613. For more information, please visit OPR's Accessibility Site.

Enlightenment Plaza to create supportive housing

Plans are underway to construct the first phase of Enlightenment Plaza, which will provide 106 units of permanent supportive housing on a vacant lot north of Beverly Boulevard and east of Vermont Avenue.

Phase one is part of a larger project that will turn a surface parking lot into affordable units and a service center for homeless individuals, said Councilman Mitch O'Farrell, 13th District. Enlightenment Plaza will be built on a parcel of land on Juanita and Madison avenues north of Beverly Boulevard. The four-phase project is anticipated to provide 454 permanent supportive housing units and a service center for people experiencing homelessness. Flexible PSH Solutions is the developer.

O'Farrell recently introduced a motion to utilize approximately $1.3 million in tax and tax-exempt CRA/LA excess bond proceeds from the Wilshire Center/ Koreatown Redevelopment Project Area for the project.

"This project is transformative in both its purpose and function," said O'Farrell, who chairs the City Council's Homelessness and Poverty Committee. "Not only will this underutilized section of the district be put to better use, it will also help shelter the unhoused while helping to get their lives back on track."

Funds have been secured to institute many of the project's goals, including public infrastructure improvements, property acquisition, architectural services, permit fee and construction.

Committee OKs funding to house homeless individuals in Koreatown

A permanent supportive housing project proposed for 537-541 N. Western Ave. recently received approval in the Los Angeles City Council's Homelessness and Poverty Committee for $6.6 million in Proposition HHH funding.

The project would provide permanent housing to individuals currently experiencing homelessness and services provided by the Koreatown Youth + Community Center.

"Homelessness is felt in every neighborhood across our city, and we need solutions in every neighborhood across our city from the Valley to Hollywood to Mid-City," said Councilman David Ryu, 4th District.

The proposed project, called the Maple Apartments, would include 63 units of permanent supportive housing and one manager's unit. The proposal now heads to City Council for approval of the Measure HHH allocation.

CITY OF WEST HOLLYWOOD PUBLIC NOTICE

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

To: All Interested Persons and Agencies **From: Department of Planning & Development Services**

Project Title: 8850 Sunset Boulevard Project **Date: September 26, 2019**

Lead Agency: City of West Hollywood Planning & Development Services Department 8300 Santa Monica Boulevard West Hollywood, California 90069

Project Applicant: Silver Creek Commercial Development, LLC8872 Sunset Boulevard West Hollywood, California 90069

Pursuant to California Public Resources Code Section 21165, the City of West Hollywood is the Lead Agency responsible for preparing an Environmental Impact Report (EIR) addressing potential impacts associated with the development of the proposed 8850 Sunset Boulevard Project (proposed project).

Purpose of Notice of Preparation

Under the requirements of the California Environmental Quality Act (CEQA) and its Guidelines, the City, as the Lead Agency, must evaluate the potentially significant environmental effects of the proposed project. The City has determined that an EIR will be prepared to assess the proposed project's effects on the environment, to identify significant impacts, and to identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts. An analysis of alternatives to the proposed project will also be included in the Draft EIR, including the No Project Alternative. The purpose of this Notice of Preparation (NOP) is to inform reviewers of the City's intent to prepare an EIR and to provide an opportunity for interested agencies and persons to comment on the scope and content of the EIR.

Project Location

The project site comprises a block fronting Sunset Boulevard in the City of West Hollywood, is approximately 39,983 square feet in size and is bound by Sunset Boulevard to the north, Larrabee Street to the east, the London Hotel to the south, and San Vicente Boulevard to the west. The addresses associated with project site are 8850–8878 Sunset Boulevard and 1025–1029 Larrabee Street, West Hollywood. The project site is comprised of eight Assessor Parcel Numbers (APNs): 4339-017-001, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-006, 4339-017-007, and 4339-017-008. The project site is currently developed with one- to two-story commercial buildings totaling approximately 21,000 square feet and surface parking comprising 27,450 square feet. The commercial buildings are located in the northern portion of the site (fronting Sunset Boulevard) and are currently occupied by a nightclub (the Viper Room), restaurants, retail shops, and offices. The surface parking area is in the southern portion of the site, behind the businesses.

Project Description

The proposed project consists of the demolition of the existing commercial buildings and surface parking on the project site and construction and operation of a new mixed-use commercial and residential building. The new building would be approximately 369,000 gross square feet in size and 15 stories (approximately 200 feet) in height (including an emergency helipad) as measured from the lowest point of the site (the southwest corner of the site). This height equates to approximately 185 feet above Sunset Boulevard. The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, an outdoor pool area, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units, and would include residential amenities such as a gym, movie screening room, and an outdoor pool. The proposed project also would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

Potential Environmental Impacts

An Initial Study has been prepared for the project and is available on the City's Current and Historic Preservation Planning webpage. The Initial Study contains a description of the project, its location, and preliminary determinations of the environmental resource topics to be addressed in the EIR. As determined by the analysis in the Initial Study, the potential environmental effects of the proposed project to be addressed in the Draft EIR will include, but may not be limited to the following: Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. These topics, together with other CEQA-mandated analyses including Alternatives, Cumulative Effects, and Growth Inducement, will be addressed in the EIR.

This NOP is being circulated pursuant to California Resources Code Section 21153(a) and CEQA Guidelines Section 15082. Public agencies and the public are invited to comment on the proposed scope and content of the environmental information to be included in the Draft EIR. A 36-day comment period is provided to return written comments to the City. All comments should be directed to the City at the following address:

Doug Vu, Senior Planner
Planning & Development Services Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216
E-mail: dvu@weho.org

Responses to this NOP should be sent at the earliest possible date, but not later than 30 days after issuance of this notice. **The response deadline is October 25, 2019**. This NOP and the Initial Study for the proposed project are available for review at the Planning and Development Services Department (8300 Santa Monica Boulevard, West Hollywood, CA 90069), at West Hollywood Library (625 North San Vicente Boulevard, West Hollywood, CA 90069), and on the City of West Hollywood website, www.weho.org.

Scoping Meeting

As part of the EIR scoping process, the City of West Hollywood will hold a public scoping meeting on **Thursday, October 10, 2019, from 6:30 p.m. to 8:00 p.m., at the West Hollywood Park Library Community Meeting Room (625 North San Vicente Boulevard, West Hollywood, CA 90069).** The purpose of the scoping meeting is to share information regarding the proposed project and environmental review process, and to receive written comments regarding the scope and content of the environmental analysis to be addressed in the EIR.

Мы сообщаем вам об обсуждении проекта. Для дополнительной информации на русском языке звоните: 323-848-6826.

8850 Sunset Boulevard Project
Environmental Impact Report Scoping Meeting Sign-in Sheet

Name	Agency/Organization	Address	City, State, Zip Code
Jessica Flores	—	—	—
Steve Martin		1140 N. Poinsettia Dr.	WH 90046
David Goldschmid		960 Larrabee St.	WH 90069
Richard Lewis		1120 N Clark	WH 90069
Alessandra McAuley		1227 N. Larrabee St.	WH 90069
JAMES RATAY		968 LARRABEE ST #114	WH 90069
Nick Shaffer		1002 Larrabee St	W.H 90069
JONATHAN H. DOWLING		840 Larrabee ST 2230	WH 90069
MARCI GAYLE		840 LARRABEE STREET	WH 90069
ELAINE MORRISA		1209 Larrabee St #5	WH 90069
Richard Rothenberg		1209 Larrabee St.	WH. 90069
MARY REARDON		1217 LARRABEE	WH 90069
Cathy Waldman		1219 Larrabee St	WH 90069
SUSAN MIKRO		960 Larrabee #212	WH 90069
TINA VARTANIAN		7141 Santa Monica #325	W. H. 90046
RICHARD MAGGI		1230 Horn Ave. #415	W. Hollywood 90069
Dr Michael D. Vivian		8221 Delongpre #9	WH 90046
Scott Schmidt			
Anna Evans-Goldstein		464 S LUCAS AVE LOS ANGELES 90017	

8850 Sunset Boulevard Project
Environmental Impact Report Scoping Meeting Sign-in Sheet

Name	Agency/Organization	Address	City, State, Zip Code
Roberto R Gonzalez	Self. Resident	917 Larrabee St	West 90069
ELYSE EISENBERG	RESIDENT	1230 HOSS	West 90069
KATHRINE BAUMANN	RESIDENT	8787 SHOREHAM	W H, 90069
Tarv Gershenz	RESIDENT	1120 N. CLARK ST	W H 90069
Debra NASSIF	resident	959 Palm Ave #103	W L 90069

8850 Sunset Boulevard Project
Environmental Impact Report Scoping Meeting Sign-in Sheet

Name	Agency/Organization	Address	City, State, Zip Code
Gary LeGault	homeowner	8818 Betty Way	West Hollywood, CA 90069

From: Josh Kossack
To: Doug Vu
Subject: 15 story Sunset development
Date: Wednesday, October 23, 2019 10:26:34 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

This project looks horrifying....really out of place for the neighborhood. Please reconsider green lighting this.

Thanks,
Josh Kossack

From: Olivia Grigorjeva
To: Doug Vu
Subject: 8850 Sunset Blvd - Morphosis design proposal
Date: Friday, October 25, 2019 12:02:33 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello David,

I was unable to attend 10/10/19 meeting regarding this project, so please consider my opinion in writing. I feel very passionate about this project and plan to attend further meetings to voice my opinion in person.

I am a home owner – I live within 500 feet of this development. I am strongly opposed to this project. Here are the reasons:

1. Size and location – this massive block does not fit on this legendary part of Sunset Strip with so much legacy and historic designations in the works. It will break-up the look and feel of this neighborhood, and diminish its historic significance.

2. Height – 15 stories is enormously high!!! It will be an eye soar on Sunset – it does not belong in this area.

3. Purpose – more hotel rooms and condos??? There are too many hotels in this area now. We need affordable housing!! I would feel very differently if this was an apartment complex with more affordable units.

4. Design – Dubai or Vegas appropriate, not on Sunset Strip!!!

Sincerely,

Olivia Grigorjeva
1255 N Clark St
(310) 308-8153

From: Marc J. Robinson
To: Doug Vu
Subject: 8850 Sunset Blvd - New Development
Date: Saturday, October 26, 2019 8:12:27 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

Hopefully it's not too late to comment on this, but I was unable to attend the 10/10/19 meeting regarding this project.

I am strongly opposed to this project for the following reasons:

1. The project is too big and will not fit well alongside this historic part of the Sunset Strip, with all of its legendary landmarks.
2. The project looks like it belongs in Dubai or Las Vegas; it's obnoxious, with no class or sophistication.
3. Do we really need another hotel? How many do we have in the area? How many alone on the Sunset Strip? What this city needs is more affordable housing, and I think this project laughably provides for only 11 units. LOL. Is THAT how we best serve this community?

Please consider my opinion. As a neighbor and lifelong native of L.A., I'd hate to see this part of Sunset turn into another high-rise jungle.

Thanks,

MARC J. ROBINSON
Keller Williams Beverly Hills
(323) 304-0892
marcrobinsonrealestate.com
DRE# 01375831
Zillow Reviews: click here
10 Best L.A. Realtors: click here
Top Agent Magazine Cover Article: click here
Find out what your home is worth: click here

From:	Tim Healey
To:	Doug Vu
Subject:	8850 Sunset Blvd Project
Date:	Friday, October 25, 2019 1:04:50 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Attn City Senior Planner, Doug Vu,

The proposed 8850 Sunset Blvd Project will further complicate traffic, not only during it's extended construction period, but for decades to come.

The exit onto Larrabee will jam a street already plagued by confused and often inebriated drivers, plummeting downhill, as well as lines of idling Ubers, Lyfts and oversized SUVs with hired drivers which have replaced limos.

This bldg plan does not seem to fit the community very well. Its design is architecturally indistinct and awkward.

If the Sunset Strip plan by the City is that the strip become a corridor of high rise buildings, blocking any availability of the historic view form the Boulevard, then you are successful.

If you are seeking to build your resume for the next city administration where you seek employment as one who is able to further extend economic development of a city, particularly one that would like to drive out it's long term residents, whom you determine don't fit an upper income bracket that will spend locally, then you are successful.

Thank you

Tim Healey
310-490-7460

From:	Ramirez, Carlo@DOT
To:	Doug Vu
Cc:	Allen, Reece@DOT
Subject:	8850 Sunset Blvd. - Caltrans Response (Ref. GTS07-LA-2019-0282)
Date:	Friday, October 25, 2019 2:18:00 PM
Attachments:	Response - GTS07-LA-2019-02828(RA) 8850 Sunset Blvd..pdf

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good afternoon,

Attached, please find Caltrans official response to the "8850 Sunset Blvd." IS/NOP. A physical copy has been mailed as well.

If you have any questions or comments please contact us, reference GTS# 07-LA-2019-02828. Thank you.

Best,

Carlo Ramirez
Transportation Planner
Division of Planning - Caltrans District 7
100 S. Main St., MS#16
Los Angeles, CA, 90012
Phone: (213)-897-4230 | Fax: (213)-897-1337
Carlo.Ramirez@dot.ca.gov

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 25, 2019

Doug Vu
Planning and Development Services Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: 8850 Sunset Boulevard Project
Initial Study (IS) – Notice of Preparation of an Environmental Review (NOP)
GTS# 07-LA-2019-02828
Vic. LA-2/ PM 10.621

Dear Mr. Vu:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of the demolition of the existing commercial buildings and surface parking on the project site and construction and operation of a new mixed-use commercial and residential building. The new building would be approximately 369,000 gross sq.ft. in size and 15 stories (200 feet) in height (including an emergency helipad). The commercial portion of the project would include 115 hotel guestrooms with ancillary uses; and the residential portion would provide 31 market-rate condominium and 10 income-restricted units, and would include residential amenities. The proposed project would also include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

The nearest State facility to the proposed project is State Route 2 (SR-2) post mile 10.621, approximately 2.37 miles away. After reviewing the Notice of Preparation of an Environmental Review, Caltrans has the following comments:

Caltrans agrees with the submitted Initial Study's findings that the proposed project's generated traffic will potentially impact the State highways in the vicinity. As such, the Traffic Impact Study should include the appropriate Traffic Analysis Scenarios:

- Existing Conditions
- Build out year without project/ with project/ and with other projects in the area

- Future 20 years + build out without project/ with project/ and with other projects in the area

Additionally, please include the following intersections at Santa Monica Blvd. (SR-2):

- Doheny Drive
- San Vicente Boulevard
- Holloway Drive

The need and preparation of the TIS should be based on the latest Caltrans' Traffic Impact Study Guide and the Technical Advisory on Evaluating Transportation Impacts in CEQA by the Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

If the project creates a significant impact to a State facility, mitigation measures must be included in the TIS. This determines if the project's impacts can be eliminated or reduced. If the mitigation measure involves the expansion and/or modification (e.g. installation of a signal/STOP/Roundabout, adding a lane, etc.) of an intersection, an Intersection Control Evaluation (ICE) shall be done. The cost of implementing the mitigation measures shall be shared equitably between the responsible agencies.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

With regards to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building excessive parking.

Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. Such methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or TDM is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Mr. Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2019-02828.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

Cc: Scott Morgan, State Clearinghouse

From:	NICHOLAS SHAFFER
To:	Doug Vu
Cc:	Jennifer Alkire
Subject:	8850 Sunset Blvd. Project
Date:	Thursday, October 24, 2019 10:45:45 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Doug Vu, Senior City Planner

I have lived at 1002 Larrabee Street for 46 years. I have concerns & suggestions about the 8850 Sunset Blvd. Project.

1. From my understanding there are already 4 to 5 projects on Sunset Blvd. (from Doheny to Crescent Heights) that are currently under construction to others that have been approved and will start in the near future.
I feel this huge project should be put on hold until the last approved Sunset Project is completed and we see the impact that all these projects have on an already traffic jammed Sunset Blvd.

2. NO HOTEL!!! We live across the street from the London Hotel, a major hotel with all of its events,rooftop parties and increase in traffic and noise. We lose street parking to its employees and patrons of the Beauty Salon
and to guests attending Hotel events. It's too much to have another Hotel within feet of each other. It's not fair to us or to the London West. How many Hotels does this city need?

3. Street Parking: The cottages from 1008-1012 1/2 built in 1924 have no parking and depend 100% on street parking. The cottages and apt. building from 1000-1006 have only 6 garage spaces which mean some tenants
depend on street parking. Parking is already difficult on the 1000 block of Larrabee. Spaces are taken up by employees working on the Strip, hotel patrons, and Uber & Lyft drivers waiting for their next job.
When this project is completed I predict Street parking will be impossible! And please note that this project means that some meters on Larrabee will be taken away.

To guarantee that these tenants will have parking may I suggest that this project make parking spaces available for these cottages that have no option but to park on the street.

Suggestion: Eliminate one floor of the Hotel and make it a floor of free parking for other employees working on the Strip, residents who depend on street parking and Uber & Lyft drivers who are waiting for their next job.

Parking must be free to all employees and patrons of this project including the Hotel,the restaurant,The Viper room, offices etc. If you charge for parking it only forces the people to park on the street and since there's no parking on the 1000 block of San Vicente everyone will look for parking on the 1000 block of Larrabee.

4. TRAFFIC: Prediction...Larrabee will become a thoroughfare! According to this project's plan there will be an entrance on Larrabee and ALL cars and Service trucks will be exiting on Larrabee.
The London has its employee entrance on Larrabee and all of their cars (not Service trucks) exit on our street. Larrabee is a narrow street and will not be able to handle all this new traffic. Just today
at rush hour I counted over 20 cars backed up on Larrabee trying to get on Sunset Blvd. Larrabee is going to become a traffic NIGHTMARE!!!

The entrances and exits for this project need to be revisited. San Vicente is the wider street and should be the exit for the Hotel, the restaurant, the Viper Room and the Service trucks. When cars exit on
San Vicente they can make a right directly on to Sunset Blvd. unlike on Larrabee where they will have

to cross over through traffic to get onto Sunset. Traffic is going to get so backed up.
Larrabee could be the exit for the condo tenants & guests.

Thank you for your time!

Nick Shaffer

From: Bridget Baker
To: Doug Vu
Subject: 8850 Sunset Blvd.
Date: Saturday, October 19, 2019 7:15:38 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

8850 Sunset Blvd. is in a liquefaction zone. Is anyone considering this fact? I know a lot of questions are swept under the rug, but this one really needs an answer. Human lives should not be jeopardized in the name of "progress". These enormous buildings will become death traps when the ground becomes quicksand. How can this be prevented? What is the point of adding another hotel? This isn't Waikiki. There isn't an ocean view. Just a bunch of oversized hotels, staring at each other until "the big one" comes and knocks 'em down. Please, don't let this happen.

Thank you,

Bridget Baker

From:	Amaryllis
To:	John D"Amico; Lindsey Horvath; John Heilman; John Duran; Lauren Meister; Doug Vu
Subject:	8850 Sunset Boulevard Development
Date:	Thursday, October 10, 2019 11:40:36 AM
Attachments:	image001.png

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I'm writing to you – City Council Members & Planners – regarding the proposed development at 8850 Sunset.

As a long-time resident of West Hollywood I realize change happens – but this monstrous building project is not just "change."





Just looking at the size of this project compared to the London hotel, itself 9 stories, should be reason enough to reject the proposal.

I love avant-garde/modern architecture, but positioning must be considered. It will dwarf every

other building on the strip. Look at the dark pedestrian area on the right-hand photo (compressed from the original, but illumination unchanged) – who would want to walk there? And the shadow cast will extend across Sunset and beyond.

Aside from the physical aspects, this construction and its accommodations will add considerably to the already untenable traffic and congestion on the Sunset Strip, neighboring streets and West Hollywood. Are we that desperate for tourist/visitor dollars that we have to erect enormous eye-catching facades?

If this location is to be developed, please consider something of far less magnitude such as a low-slung, bungalow office-park/boutique hotel (with actual greenspace instead of a greenery-clad high-rise) that would maintain the small-city/trendy/hip West Hollywood vibe.

Thank you for your attention,

Amaryllis
1230 Horn Avenue

From: Curry, Donna
To: Doug Vu
Cc: Raza, Adriana
Subject: 8850 Sunset Boulevard Project
Date: Tuesday, October 22, 2019 1:05:39 PM
Attachments: image001.png
image006.png
image007.png

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

I'm working on the letter for the subject project and was hoping you could give me some breakdowns in size for the various uses. I reviewed the IS but there were no specifics. I want to make sure we calculate the most accurate amount of wastewater for the project. Thanks in advance!

Hotel Rooms = **115**
Meeting rooms = **need square footage**
Spa/Gym = **need square footage, w/ showers or w/o?**
Restaurants = **need square footage (total)**
Retail = **need square footage (total)**
Lounge area = **need square footage**
Nightclub = **need square footage**
Residential Condos = **41 total**
How many are 1 bdrm?
How many are 2 bdrm
How many are 3 bdrm?

Donna J. Curry
Customer Service Specialist-Annexations | Facilities Planning Department
562-908-4288 ext. 2708 | dcurry@lacsd.org

SANITATION DISTRICTS OF LOS ANGELES COUNTY
Converting Waste Into Resources | www.LACSD.org

From: marytreardon@juno.com
To: Doug Vu
Subject: 8850 Sunset Boulevard Project
Date: Tuesday, October 22, 2019 5:57:52 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

I am a long time resident of Larrabee Street in West Hollywood and I am writing to you to express my complete opposition to the proposed 8850 Sunset Boulevard Project.

Along with many of my neighbors, I find the design for the building to be incongruent with this section of Sunset Strip and with West Hollywood itself. The design is ostentatious and arrogant, more suited for the Las Vegas Strip than our historic Strip. Do we really need another (half occupied) hotel looming over the street, one that actually backs up against The London? Does the City believe that this project complements its unique and storied environment? Many of us find the architecture appalling; others feel it belongs in the desert of Dubai, or even Culver City, the home of its architect. What is inexplicable to us is that the aesthetics of the project do not merit discussion.

We all know that "something" will inevitably be built on this parcel. It is our consensus that the current design, at 15 stories and 369,000 square feet, has been deliberately aggrandized, so that the developer can easily pare down a story or two as a glib concession to local opposition. As you saw at the scoping meeting on October 10, there is great resistance to this project and its developers (and their unaccounted-for funding) and we do intend to make our voices heard.

The City has already given a green light to two large condo projects within a few hundred feet of each other on Larrabee Street, both scheduled to begin next year. The impact of two construction projects on our steep, narrow hill cannot be underestimated. We are dreading this. If the 8850 Sunset Boulevard Project is approved, this entire area will be crippled. Where will the construction workers park? How will the residents in our neighborhood be impacted, not just during the construction, but after this massive structure with its four levels of parking is built? What are the implications for the already congested traffic on Sunset, for emergencies involving police, ambulance and fire? What are the long term ramifications of this project's enormous drain on our water, electrical and gas resources, its pollutants and its noise? I can feel the heat radiating from it already.

Jeff Seymour, the lobbyist for the 8850 project, has also acted on behalf of one of the large condo projects that will soon be underway on Larrabee Street just north of Sunset. At one of the neighborhood meetings about this construction, I heard him say "Hey, it's zoned for it. It's there for the taking."

This is the cynical and opportunistic mindset that we are dealing with. It is my hope that the City planners will not sell West Hollywood off to the highest bidders. What are you willing to sacrifice for tax revenue? We love our city, we love living here, walking here and making our homes here. We are not tourists. While many of the area residents were unable to attend a meeting held at 6:30 pm, I can assure you that we are all engaged in our community, we give back to our community and we vote.

I urge the City to carefully consider these issues, our lives and our futures, and to hold out for a project WORTHY of the address.

Sincerely,

Mary Reardon
1217 1/2 Larrabee Street
West Hollywood, CA 90069

From: Nancy Cohen
To: Doug Vu
Cc: Nancy Cohen
Subject: 8850 Sunset EIR Comment
Date: Wednesday, October 23, 2019 9:47:05 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

8850 Sunset EIR Comment

Dear Doug,

Please include my comments in the EIR for 8850 Sunset.

Thank you,
Nancy Cohen
West Hollywood Resident

As a resident of West Hollywood who will be affected on a daily basis, I hope that you take my letter with upmost seriousness of concerns that I have.

There is no possibility to function with any quality of life when this happens- ignoring **RODENTS, pollution, traffic, dirt,noise, design and scale.**

During tear down, construction and afterwards, there will be a **huge RODENT problem** for all of the residents and business on Larrabee and San Vicente, it will cause an impossible problem to control for residents. HOW ARE YOU PLANNING TO HAVE THAT PREVENTED?!? I want to know a concrete, full proof plan and the city and developers must take responsibility!!!

Additional traffic will cause increased pollution and noise

Safety - the size of the building (it is a monstrosity) is a huge concern, it doesn't belong here. Just a few weeks ago the Hard Rock Casino Hotel in New Orleans **collapsed injuring and killing innocent people.** The enormity of this property doesn't not fit the landscape of this city, it is the perfect building for Las Vegas or Dubai per an article I read and agree with.

WHAT is West Hollywood going to do for the residents on Larrabee and San Vicente????????????? (SAFETY, RODENTS, HEALTH, TRAFFIC and dealing with the nightmare of this type of project.

11 affordable housing units is a small amount for creating this monstrosity, it is a drop in the pan, while important to have affordable units, this doesn't in any way make up for this 350,000 SF property. (??? how much $ is considered affordable???)

From: Zach Middleton
To: Doug Vu
Subject: 8850 Sunset EIR Comment
Date: Saturday, October 12, 2019 1:49:45 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug,

The design of the development proposed for 8850 Sunset are not only an out of place eyesore, it will destroy the history and character of the neighborhood. It also has an astonishingly trivial amount of affordable housing. Please stop approving these designs that are an abomination to the Sunset Strip that ruin the historical significance of the neighborhood.

Please include my comments in the EIR for 8850 Sunset.

Thank you,

Zach Middleton
West Hollywood Resident

Sent from my iPhone

From: Debbie Sadlouskos
To: Doug Vu
Subject: 8850 Sunset EIR Comment
Date: Saturday, October 12, 2019 1:26:39 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug, Please include my comments in the EIR for 8850 Sunset. Thank you, West Hollywood Resident

This project looks like a joke. I feel like this extreme design has been put forth by the developer so that the real design this developer has in mind , which is still probably too large for the block, will seem reasonable in comparison. I understand the desire to build memorable structures, like the Disney Hall, that become iconic and identified with Los Angeles. This is not one of those structures. It will become identifed with Los Angeles all right but not in way the designers have in mind. This ridiculous design is begging for parody.

Also, how in can anyone justify the increase in traffic that will occur with a building this size. We have yet to really experience the increase in traffic that will occur when the giant apartment complexes on Sunset and La Cienega are completed and fully occupied. Why not just make Sunset Blvd. a parking lot and be done with it.

I accept that fact that development of our city is inevitable. I recognize that we cannot live in the past and must accomodate an increase in population as well as provide additional business opportunities for our city to continue to prosper. However, city approval of this project as is is irresponsible and those who approve it will have the urban consquences on their shoulders for generations.

Deborah Sadlouskos
837 West Knoll Drive Unit 305
West Hollywood, CA 90069

From: Barbara Wulff
To: Doug Vu
Subject: 8850 Sunset EIR Comment
Date: Friday, October 11, 2019 7:10:26 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug,
I not sure if my comments will be considered because I worry at this point that our comments really don't matter but are just the city's way of saying "sure, we asked". Are our voices falling on deaf ears? Is this already happening because some people have gotten their pockets lined by developers so this is just a formality?
While I'm all about progress, I'm against this development. Sadly the Sunset Strip has a lost most of its original charm. Many cities, such as Austin, Portland and Nashville have restored their historical areas and this has not only kept a sense of community but has also generated money by attracting tourists. The sunset strip should be dedicated to the music and events that happened here, not torn down to build yet another hotel that is overpriced and will sit half empty. We are not Las Vegas or Dubai. I work with many tourists from over the world and they have dubbed our street as "The Sunset Stripped". When I ask these tourists what they came here to see they tell me that they wanted to see where the music and events all happened. We know why these hotels are being built. Someone is laughing all the way to the bank and you can be sure it is not the residents who live here.

Please include my comments in the EIR for 8850 Sunset.

Thank you,

West Hollywood Resident

From:	femscribes@aol.com
To:	Doug Vu
Subject:	8850 Sunset EIR Comment
Date:	Friday, October 11, 2019 4:09:00 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug, Please include my comments in the EIR for 8850 Sunset. Thank you, West Hollywood Resident

From Joyce Heftel, 8455 Fountain Ave. 406 West Hollywood.

This project is horrific in it's look and size.

The Hotels that exist don't have full occupancy. AKA is operating a hotel illegally and to permit another Hotel will not only hurt the other existing hotels it sends a message
to AKA they should continue to defy the development agreement.

Traffic on Sunset Blvd. is already beyond capacity, adding more cars and traffic eventually will cause visitors not to come to the strip and move to venues other than West Hollywood.

Eventually for the businesses in the area this will become a place they can not make a living and they will close down.

It is beyond time to stop this massive over-development of West Hollywood.

Joyce Heftel

From: Ruth Cohen
To: Doug Vu
Subject: 8850 Sunset EIR Comment
Date: Thursday, October 24, 2019 8:37:55 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

8850 Sunset EIR Comment

Dear Doug,

Please include my comments in the EIR for 8850 Sunset.

Thank you,
Ruth Cohen
West Hollywood Resident

As a resident of West Hollywood who will be affected on a daily basis, I hope that you take my letter with upmost seriousness of concerns that I have.

There is no possibility to function with any quality of life when this happens- ignoring **RODENTS, pollution, traffic, dirt,noise, design and scale.**

During tear down, construction and afterwards, there will be a **huge RODENT problem** for all of the residents and business on Larrabee and San Vicente, it will cause an impossible problem to control for residents. HOW ARE YOU PLANNING TO HAVE THAT PREVENTED?!? I want to know a concrete, full proof plan and the city and developers must take responsibility!!!

Additional traffic will cause increased pollution and noise

Safety - the size of the building (it is a monstrosity) is a huge concern, it doesn't belong here. Just a few weeks ago the Hard Rock Casino Hotel in New Orleans **collapsed injuring and killing innocent people.** The enormity of this property doesn't not fit the landscape of this city, it is the perfect building for Las Vegas or Dubai per an article I read and agree with.

WHAT is West Hollywood going to do for the residents on Larrabee and San Vicente????????????? (SAFETY, RODENTS, HEALTH, TRAFFIC and dealing with the nightmare of this type of project.

11 affordable housing units is a small amount for creating this monstrosity, it is a drop in the pan, while important to have affordable units, this doesn't in any way make up for this 350,000 SF property. (??? how much $ is considered affordable???)

From: Auni Chovet
To: Doug Vu
Subject: 8850 Sunset Project - Neighbor Remarks
Date: Friday, October 25, 2019 1:51:37 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

As a West Hollywood resident living in the English Village on Larrabee (1008-1012 1/2 Larrabee St), I'd like to share some thoughts on the project you are overseeing at 8850 Sunset Blvd. While I understand that the building will bring business to West Hollywood, Larrabee St is already extremely congested, and I heard that all of the building's car traffic will be exiting onto Larrabee. My husband and I rely *exclusively* on street parking, so this will make finding parking even more difficult than it already is. Uber and Lyft drivers for guests of the London Hotel and other Sunset businesses already park in our spots and make finding parking a nightmare. Additionally, our parked car has been hit several times over the past years by negligent guests of the Sunset businesses, each time without a note, creating a financial burden for us. So I am concerned that the additional traffic congestion and street parking use will negatively impact us. I would like to request that the city require a minimum of 5 permanent parking spots in this new hotel for the residents of 1008-1012 1/2 Larrabee St. (one each).

I'm available to discuss this further at your convenience.

Have a nice weekend,

Auni Chovet
(818) 235-6556

From: Steven Roussey
To: Doug Vu
Subject: 8850 Sunset
Date: Friday, October 11, 2019 3:08:12 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi!

I live a couple blocks away. I approve of the radical design. 9000 Sunset (and it’s parking structure!!!) is the real eyesore.

Sent from my iPhone

From: Kimberly Biehl Schmidt
To: Doug Vu
Subject: 8850 Sunset
Date: Thursday, October 24, 2019 11:03:59 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug,
Are you being paid big money by some contractor or builder?
If your answer is no, than WHAT ARE YOU THINKING?!
This is HORRIFIC and is not ok, for a million reasons!
For me, the primary one is THIS IS A VISUAL ASSAULT on our town.
MAKE IT STOP!!!!!
PROVE THAT YOU ARE WORTHY!
--
Kimberly
Kimberly Biehl Schmidt Interior Design
www.designkbs.com
www.hollywoodtreasurehunters.com

From: Kelly Dennis
To: Doug Vu
Subject: 8850-8878 project dispute
Date: Thursday, October 24, 2019 11:21:43 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello, I live at 1008 Larabee, and am disappointed and discouraged to hear about this project proposal. Not only do I find it an over the top design but that type of construction and monstrous size will be a very lengthy construction period, and cause parking and traffic nightmare (!!!) for we residence here right by the London Hotel and Sunset Blvd ...Which is already very difficult as we only having street parking, and it is hard to find parking... One cannot even imagine during the construction phase...(at the very least there should be designated permanent parking given for some of us most affected!) Best case scenario would be that this project does not even occur, but if it does at some level we hope that the people in charge of this monstrosity know how it affects we who have lived in this neighborhood long term. Thank you for your time. - K. Dennis

Sent from my iPhone

From:	neilkoe@aol.com
To:	Doug Vu
Cc:	elyse.eisenberg@gmail.com
Subject:	Building on Sunset Blvd..
Date:	Thursday, October 10, 2019 2:39:06 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug, I am a resident of 8787 Shreham Dr,,Shoreham Towers. What a tough place to navigate by car ,this Sunset Blvd. from Doheny East for at least 3 miles.. More and more building! And now this proposal to revamp the Viper Room area with more high rises which means a major disruptive construction period and then the finish with arrival of only more cars to this difficult area.
I protest this strongly and putting my voice out there via e-mail as I cannot be at the in person meeting.
Thank you for your consideration.
Sincerely, Neil Koenigsberg

From:	Ling, Shine
To:	Doug Vu
Cc:	Truong, Cassie; DevReview
Subject:	CEQA: 8850 Sunset Blvd.
Date:	Wednesday, October 23, 2019 9:30:47 AM
Attachments:	191023_8850 Sunset Blvd_MTA.pdf 180509_devrev_handbook.pdf

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Duong,

Attached please find Metro's comment letter for the NOP for the 8850 Sunset Boulevard project. Please reply to confirm receipt. Any questions please let me know. Thank you.

Best,
Shine

Shine Ling, AICP
LA Metro
Manager, Transportation Planning
Transit Oriented Communities
213.922.2671
lings@metro.net
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro's mission is to provide world-class transportation for all.

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

October 23, 2019

Duong Vu, Senior Planner
Planning and Development Services Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Sent by Email: dvu@weho.org

RE: 8850 Sunset Boulevard – Notice of Preparation of Environmental Impact Report (EIR)

Dear Mr. Vu:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 8850 Sunset Boulevard (Blvd.) Project (Project) located at 8850-8878 Sunset Blvd. and 1025-1029 Larrabee Street (St.) in the City of West Hollywood (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to provide the City with recommendations on topics regarding the Project's potential impacts on the Metro bus facilities and services, which should be analyzed in the Draft Environmental Impact Report (DEIR). In addition to the specific comments outlined below, Metro would like to provide the City and Silver Creek Commercial Development, LLC (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

Project Description

The Project is adjacent to Metro bus services and includes the demolition of the existing commercial buildings and surface parking on the project site and construction and operation of a new mixed-use commercial and residential building. The new building would be approximately 369,000 gross square feet in size and 15 stories in height as measure from the lowest point of the site. The commercial portion of the project would include 115 hotel guestrooms with ancillary uses. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units, and would include residential amenities. The proposed project would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

Comments

Bus Stop Adjacency

1. Service: Metro Bus Lines 2, 30, 105, 302, and 330 operate on West Sunset Blvd. and North Vincent Avenue. (Ave.) adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at North San Vicente Blvd. and Sunset Blvd. Other transit operators may provide service in this area and should be consulted.

2. Impact Analysis: With an anticipated increase in traffic during and after Project construction, the EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.

3. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

4. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the Project site.

6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

Transit Orientation

Considering the Project's proximity to the Metro bus stop, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit-Supportive Toolkit: Metro strongly recommends that the Applicant review the Transit-Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and. applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at https://www.metro.net/projects/tod-toolkit.

2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the station.

3. Transit Connections:
   a. Transfer Activity: Given the Project's proximity to the Metro bus stop, the Project design should consider and accommodate transfer activity between bus lines that will occur along the sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at https://www.metro.net/projects/systemwidedesign.

   b. Access: The Project should address first-last mile connections to transit, encouraging development that is transit-accessible with bicycle and pedestrian-oriented street design that connects transportation with housing and employment centers. The Applicant is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

4. Active Transportation: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project. These features can include the following:
   a. Walkability: The installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stop.

   b. Bicycle Use: The provision of adequate short-term bicycle parking, such as ground level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed.

5. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

6. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design. Please contact Lance Glover, Senior Manager for Signage and Environmental Graphic Design, at 213-922-2360 or GloverL@metro.net.

7. Transit Pass: Metro would like to inform the Project Sponsor of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, contact Vanessa Adlawan at AdlawanV@metro.net.

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at devreview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,

Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

MAY 2018



Metro

Table of Contents

Introduction **2**

Who is Metro? 2

Why is Metro Interested in Adjacent Development? 5

Metro Adjacent Development Handbook **6**

What are the Goals of the Handbook? 6

Who Should Use the Handbook? 6

How Should the Handbook be Used? 7

Types of Metro ROW and Transit Assets 8

Metro Adjacent Development Review **9**

Metro Review Phases 9

Metro Coordination **11**

Best Practices for Municipality Coordination 11

Best Practices for Developer Coordination 11

1: Site Planning & Design **14**

1.1 Supporting Transit Oriented Communities 15

1.2 Enhancing Access to Transit 16

1.3 Building Setback 17

1.4 Shared Barrier Construction & Maintenance 18

1.5 Project Orientation & Noise Mitigation 19

1.6 Sightlines at Crossings 20

1.7 Transit Envelope Clearance 21

1.8 Bus Stops & Zones Design 22

1.9 Driveway/Access Management 23

Table of Contents

2: Engineering **26**

2.1 Excavation Support System Design 27

2.2 Proximity to Stations & Tunnels 28

2.3 Protection from Explosion/Blast 29

3: Construction Safety & Monitoring **32**

3.1 Pre-Construction Coordination 33

3.2 Track Access and Safety 34

3.3 Construction Hours 35

3.4 Excavation/Drilling Monitoring 36

3.5 Crane Operations 37

3.6 Construction Barriers & Overhead Protection 38

3.7 Pedestrian & Emergency Access 39

3.8 Impacts to Bus Routes & Stops 40

3.9 Utility Coordination 41

3.10 Air Quality & Ventilation Protection 42

Resources **43**

Metro Contact Information 43

Metro Adjacent Development Review Tools 43

Metro Right-of-Way GIS Data 43

Metro Design Criteria & Standards 44

Metrolink Standards & Procedures 44

Metro Policies & Plans 44

Metro Programs & Toolkits 45

Useful Policies & Resources 45

Glossary **47**



Introduction

The Metro Adjacent Development Handbook provides guidance to local jurisdictions and developers constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities to support transit-oriented communities, reduce potential conflicts, and facilitate clearance for building permits. The Handbook should be used for guidance purposes only. The Metro Adjacent Construction Design Manual and Metro Rail Design Criteria are documents that shall be strictly adhered to for obtaining approval for any construction adjacent to Metro facilities.

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail and bus service throughout Los Angeles County. Metro moves close to 1.3 million riders on buses and trains daily, traversing many jurisdictions in Los Angeles County. With funding from the passage of *Measure R* (2008) and *Measure M* (2016), the Metro system will expand significantly, adding over 100 miles of new transit corridors and up to 60 new stations. New and expanded transit lines will improve mobility across Los Angeles County, connecting riders to more destinations and expanding opportunities for adjacent construction and *Transit Oriented Communities (TOCs).* Metro's bus and rail service spans over 1,433 square miles and includes the following transit service:



Metro Rail connects close to 100 stations along 98.5 miles of track and operates underground in tunnels, at grade within roadways and dedicated *rights-of-way (ROW),* and above grade on aerial guideways. The Metro Rail fleet includes *heavy rail* and *light rail* vehicles. Heavy rail vehicles are powered by a third rail through a conductor along the tracks and light rail vehicles are powered by an *overhead catenary system (OCS).* To operate rail service, Metro owns traction power substations, maintenance yards and shops, and supporting infrastructure.



Metro Bus-Rapid-Transit (BRT) operates accelerated bus transit, which serves as a hybrid between rail and traditional bus service. *BRT* operates along a dedicated ROW, separated from vehicular traffic to provide rapid service. Metro BRT may run within the center of a freeway or may be separated from traffic in its own corridor. BRT station footprints vary from integrated, more spacious stations to compact boarding areas along streets.



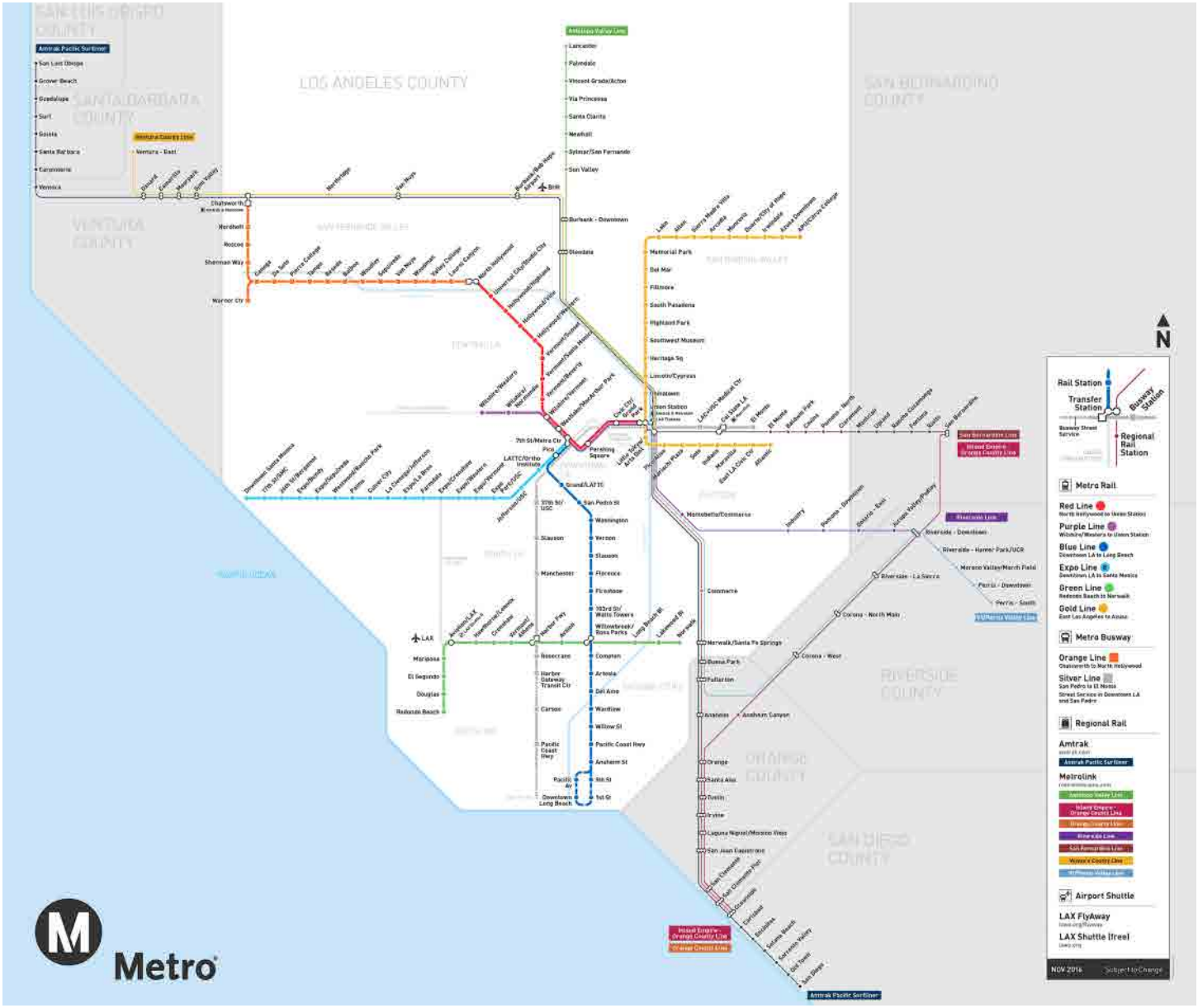
Metro Bus serves 15,967 bus stops, operates 170 routes and covers 1,433 square miles with a fleet of 2,228 buses. Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions.



Metrolink/Regional Rail: Metro owns much of the ROW within Los Angeles County on which the *Southern California Regional Rail Authority (SCRRA)* operates *Metrolink* service. Metrolink is a commuter rail system with seven lines that span 388 miles throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metrolink ROW.

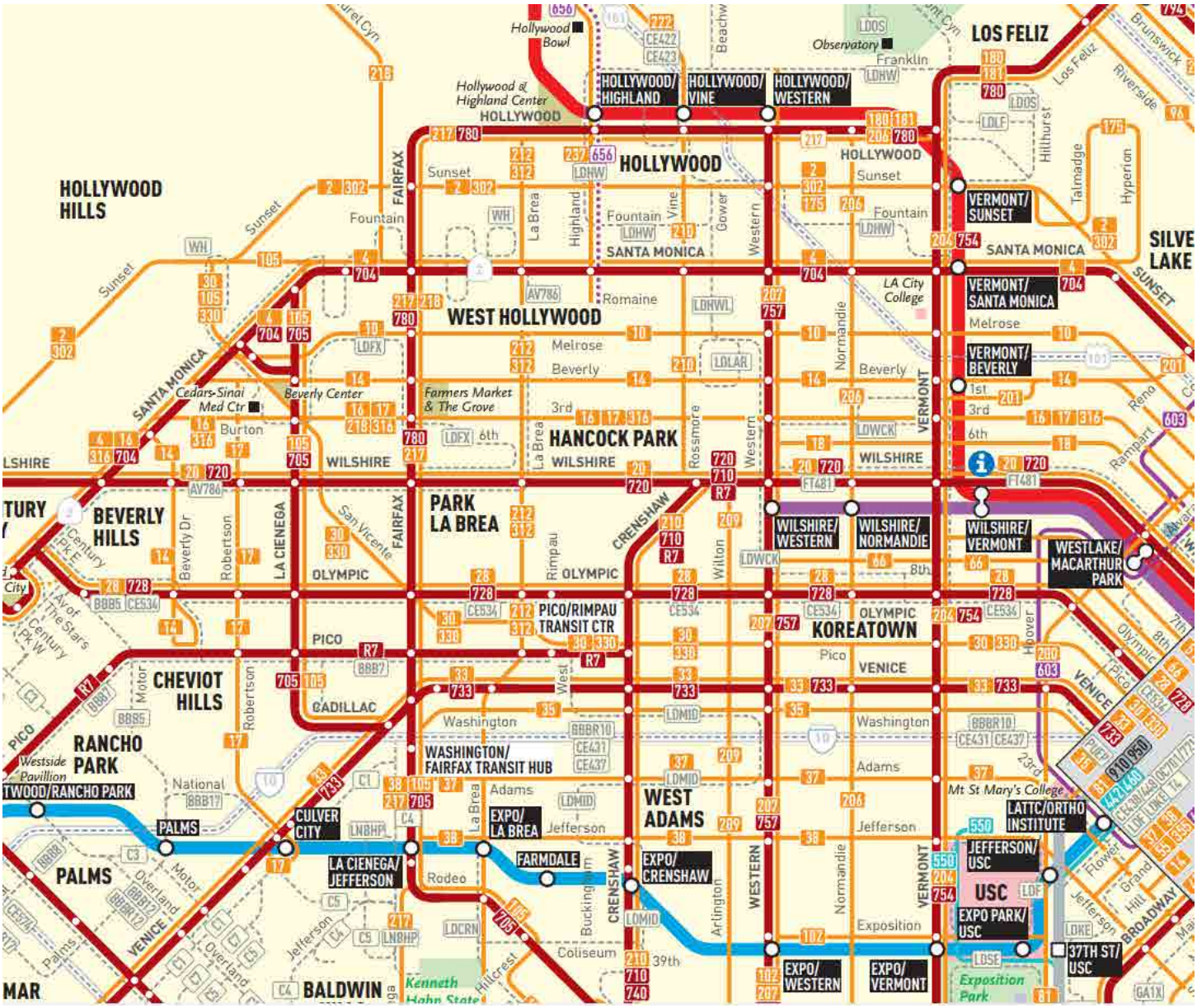
Introduction

Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing fixed guideway system presents new adjacency challenges, but also new opportunities to catalyze land use investment and shape livable communities along routes and around stations.

Metro Bus and Rail System Map (Excerpt)



As a street-running transit service, Metro's "Rapid" and "Local" buses share the public ROW with other vehicles, cyclists, and pedestrians, and travel through the diverse landscapes of Los Angeles County's 88 cities and unincorporated areas.

Introduction

Why is Metro Interested in Adjacent Development?

Metro Supports Transit Oriented Communities

Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout Los Angeles County. Leading in this effort is Metro's vision to create TOCs, a mobility and development approach that is community-focused and context-responsive at its core. The TOC approach goes beyond the traditional transit oriented development (TOD) model to focus on shaping vibrant places that are compact, walkable, and bikeable community spaces, and acknowledge mobility as an integral part of the urban fabric.

Adjacent Development Leads to Transit Oriented Communities

Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options for users of developments. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to reduce car dependency and greenhouse gas emissions; promote walkable and bikeable communities that accommodate more healthy and active lifestyles; improve access to jobs and economic opportunities; and create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Metro is committed to working with stakeholders across the County to support the development of a sustainable, welcoming, and well-designed environment around its transit services and facilities. Acknowledging an unprecedented opportunity to influence how the built environment throughout Los Angeles County develops along and around transit and its facilities, Metro has created this Handbook – a resource for municipalities, developers, architects, and engineers to use in their land use planning, design, and development efforts. This Handbook presents a crucial first step in active collaboration with local stakeholders; finding partnerships that leverage Metro initiatives and support TOCs across Los Angeles County; and ensuring compatibility with transit infrastructure to minimize operational, safety, and maintenance issues.



Metro Adjacent Development Handbook

What are the Goals of the Handbook?

Metro is committed to partnering with local jurisdictions and providing information to developers early in project planning to identify potential synergies associated with building next to transit and reduce potential conflicts with transit infrastructure and services. Specifically, the Handbook is intended to guide the design, engineering, construction, and maintenance of structures within 100 feet of Metro ROW, including underground easements, on which Metro operates or plans to operate service, as well as in close proximity to or on Metro-owned non-revenue property and transit facilities.

Metro is interested in reviewing projects within 100 feet of its ROW – measured from the edge of the ROW outward – both to maximize integration opportunities with adjacent development and to ensure the structural safety of existing or planned transit infrastructure. As such, the Handbook seeks to:

- Improve communication, coordination, and understanding between developers, municipalities, and Metro.
- Streamline the development review process by coordinating a seamless, comprehensive agency review of all proposed developments near Metro facilities and properties.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for patrons and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Make project review transparent, clear, and more efficient.
- Assist in the creation of overall marketable and desirable developments.

Who Should Use the Handbook?

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility
- Developers, Project sponsors, architects, and engineers
- Entitlement consultants
- Property owners
- Builders/contractors
- Real estate agents
- Utility owners
- Environmental consultants

Metro Adjacent Development Handbook

How Should the Handbook be Used?

The Handbook complements requirements housed in the *Metro Adjacent Construction Design Manual*, which accompanies the *Metro Rail Design Criteria (MRDC)* and other governing documents that make up the *Metro Design Criteria and Standards*. This Handbook provides an overview and guide related to opportunities, common concerns, and issues for adjacent development and is organized into three categories to respond to different stages of the development process:

1 Site Planning & Design

2 Engineering

3 Construction Safety & Monitoring

Each page of the Handbook focuses on a specific issue and provides best practices to avoid potential conflicts and/or create compatibility with the Metro transit system. Links to additional resources listed at the bottom of each page may be found under Resources at the end of the Handbook. Definitions for words listed in *italics* may also be found at the end of this Handbook in the Glossary.

Metro will continue to revise the Handbook, as needed, to capture input from all parties and reflect evolving Best Practices in safety, operations, and transit-supportive development.



Types of Metro ROW & Transit Assets

Conditions	Description	Common Concerns for Metro with Adjacent Development
 UNDERGROUND ROW	Transit operates below ground in tunnels.	• Excavation support/tiebacks • Underground utilities • Shoring and structures • Ventilation shafts and street/sidewalk surface penetrations • Appendages (emergency exits, vents, etc.) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement
 ELEVATED ROW	Transit operates on elevated structures, typically supported by columns.	• Upper level setbacks • Excavation support/tiebacks • Clearance from the OCS • Crane swings & overhead protection • Column foundations
 OFF-STREET ROW	Transit operates in dedicated ROW at street level, typically separated from private property or roadway by a fence or wall.	• Building setbacks from ROW • Travel sight distance/cone of visibility • Clearance from OCS • Crane swings & overhead protection • Storm water drainage for low impact development • Noise/vibration • Trackbed stability
 ON-STREET ROW	Transit operates within roadway at street level and is separated by fencing or a mountable curb.	• Setbacks from ROW • Travel sight distance/cone of visibility impeded by structures near ROW • Clearance from OCS • Crane swings & overhead protection • Driveways near ROW crossings • Noise/vibration • Trackbed stability
 ON-STREET BUSES	Metro buses operate on city streets. Bus stops are located on public sidewalks.	• Lane closures and re-routing • Bus stop access and temporary relocation
 NON-REVENUE/ OPERATIONAL ASSETS	Metro owns and maintains non-operational ROW and property used to support the existing and planned transit system (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride lots).	• Adjacent structure setbacks • Adjacent excavation support/tiebacks • Ground movement • Underground utilities • Drainage • Metro access

Metro Review Phases

To facilitate early and continuous coordination with development teams and municipalities, and to maximize opportunities for project-transit synergy, Metro employs a four-phase development review process for projects within 100 feet of its ROW and properties:



PRELIMINARY CONSULTATION

2 Weeks

Project sponsor submits Metro In-Take Form and conceptual plans. Metro reviews and responds with preliminary considerations.

1. Project information is routed to impacted Metro departments for review and comment.
2. Metro coordinates a meeting at the request of the project sponsor or if Metro determines it necessary following preliminary review.
3. Metro submits comment letter with preliminary considerations for municipality and/or project sponsor. Metro recorded drawings and standards are provided as necessary.



ENTITLEMENT

2-4 Weeks

Metro receives CEQA notice from local municipality and responds with comments and considerations.

1. If project has not previously been reviewed, Metro routes project information to stakeholder departments for review and comment. If Project has been reviewed, Metro transmits the correspondence to departments to determine if additional comments are warranted. Municipality and project sponsor are contacted if additional information is required.
2. Metro coordinates design review meetings at the request of the project sponsor or if Metro determines them necessary following drawings review.
3. Metro prepares comment letter in response to CEQA notice and submits to municipality. Metro Engineering coordinates with project sponsor as necessary to approve project drawings.



ENGINEERING & REFINEMENT

2-4 Weeks

Dependent on the nature of the adjacent development, project sponsor submits architectural plans and engineering calculations for Metro review and approval.

1. Metro Engineering reviews project plans, calculations, and other materials. Review fees are paid as required.
2. Metro Engineering provides additional comments for further consideration or approves project drawings.
3. If required, Metro and project sponsor host additional meetings and maintain on-going coordination to ensure project design does not adversely impact Metro operations and facilities.



CONSTRUCTION SAFETY & MONITORING

Varies

Dependent on the nature of the adjacent development, Metro coordinates with project sponsor to facilitate and monitor construction near transit services and structures.

1. As requested by Metro, project sponsor submits a Construction Work Plan for review and approval.
2. Project sponsor coordinates with Metro to temporarily relocate bus stops, reroute bus service, allocate track, and/or complete safety procedures in preparation for construction.
3. Metro representative monitors construction and maintains communication with project sponsor to administer the highest degree of construction safety provisions near Metro facilities.

Metro Coordination

Best Practices for Municipality Coordination

Metro suggests that local jurisdictions take the following steps to streamline the coordination process:

1. **Update GIS instruments with Metro ROW**: Integrate Metro ROW files into City GIS and/or Google Earth Files for all planning and development review staff.
2. **Flag Parcels**: Create an overlay zone through Specific Plans and/or Zoning Ordinance that "tags" parcels within 100' from Metro ROW to require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZIMAS)].
3. **Provide Resources**: Direct all property owners and developers interested in parcels within 100' from Metro ROW to Metro resources (e.g. website, Handbook, In-Take Form, etc.).

Best Practices for Developer Coordination

Metro suggests that developers of projects adjacent to Metro ROW take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies**: The Metro Adjacent Development Review webpage and Handbook provide important resources for those interested in constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities. Developers should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process**: Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval.
3. **Maintain communication**: Frequent communication with stakeholder Metro departments during project design and construction will reinforce relationships and allow for timely project completion.







1 Site Planning & Design

1 Site Planning & Design

1.1 Supporting Transit Oriented Communities

Adjacent development plays a crucial role in shaping TOCs along and around Metro transit services and facilities. TOCs require an intentional orchestration of physical, aesthetic, and operational elements, and close coordination by all stakeholders, including Metro, developers, and municipalities.

Recommendation: Conceive projects as an integrated system that acknowledges context, builds on user needs and desires, and implements elements of placemaking. Metro is interested in collaborating with projects and teams that, in part or wholly:

- Integrate a mix of uses to create lively, vibrant places that are active day and night.
- Include a combination of buildings and public spaces to define unique and memorable places.
- Explore a range of densities and massing to optimize building functionality while acknowledging context-sensitive scale and architectural form.
- Activate ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Prioritize pedestrian scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Provide seamless transitions between uses to encourage non-motorized mobility, improve public fitness and health, and reduce road congestion.
- Reduce and hide parking to focus on pedestrian activity.
- Prevent crime through environmental design.
- Leverage regulatory TOD incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Utilize Metro policies and programs supporting a healthy, sustainable, and welcoming environment around transit service and facilities.

Links to Metro policies and programs may be found in the Resources Section of this Handbook.



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. The project accommodates portal access into the Metro Rail system and on-street bus facilities.

1 Site Planning & Design

1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multimodal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit patrons as well as users of the developments.

Recommendation: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel intuitive and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Expo Line Station.

Additional Resources:
Metro Active Transportation Strategic Plan
Metro Complete Streets Policy
Metro First/Last Mile Strategic Plan
Metro Transit Supportive Planning Toolkit

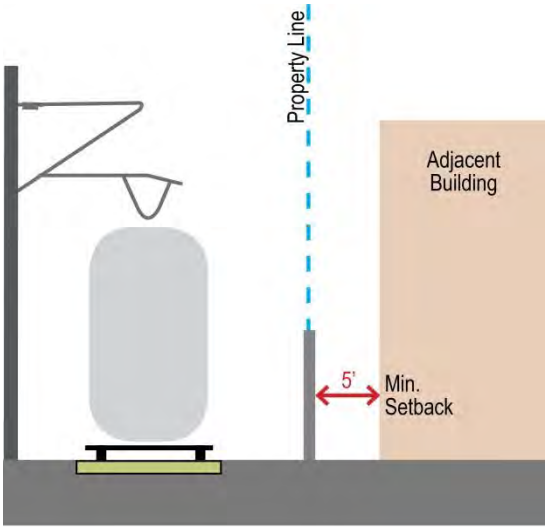
1.3 Building Setback

Buildings and structures with a zero lot setback abutting Metro ROW are of prime concern to Metro. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

Recommendation: Metro strongly encourages development plans include a minimum setback of five (5) feet to buildings from the Metro ROW property line to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro *Right of Entry Permit* must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Refer to Section 3.2 –Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged.

Additional Resources:
Metro Adjacent Construction Design Manual

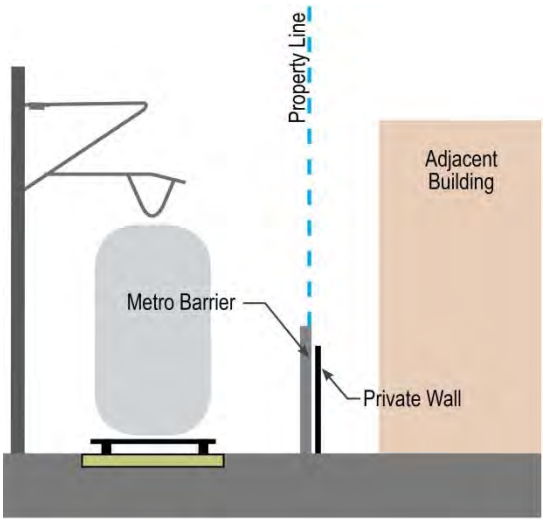
1.4 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can rise to be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

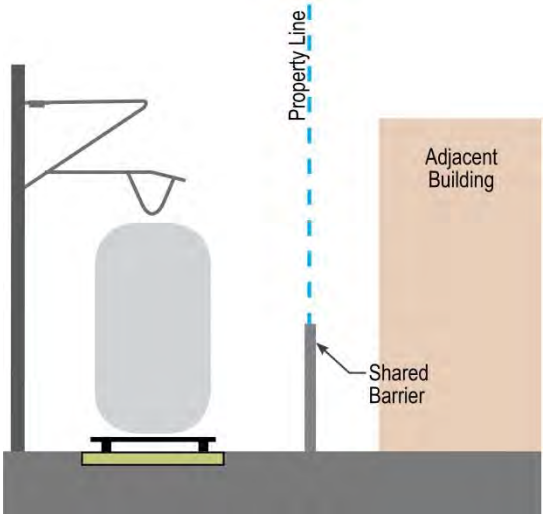
Recommendation: Metro strongly prefers a single barrier condition along its ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout Los Angeles County, Metro recommends the following, in order of preference:

1. Enhance existing Metro barrier: if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
2. Replace existing barrier(s): if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared-financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

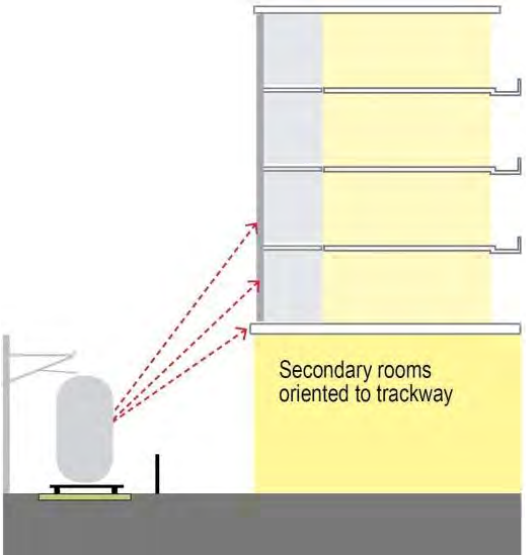
1.5 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, and can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

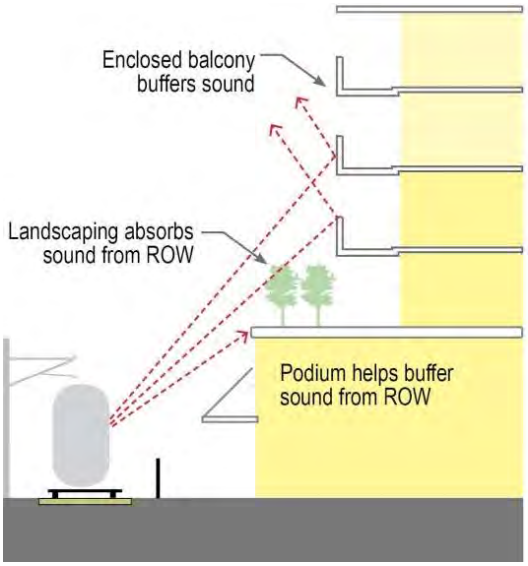
Recommendations: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate "back of house" rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than noise sensitive rooms (e.g. bedrooms and family rooms)
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease/sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded *Noise Easement Deed* in favor of Metro may be required for projects within 100' of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



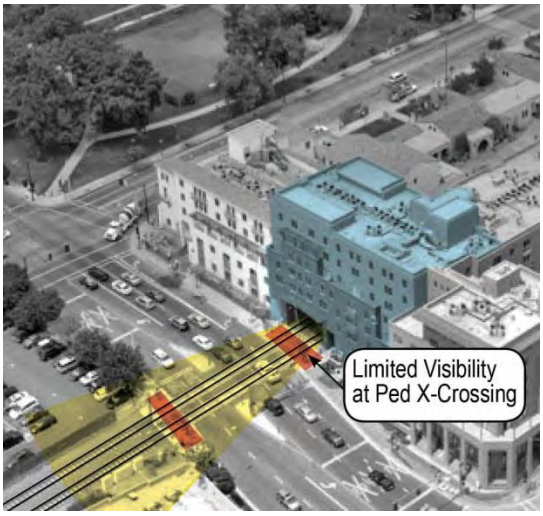
Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

Additional Resources:
Noise Easement Deed
MRDC, Section 2 – Environmental Considerations

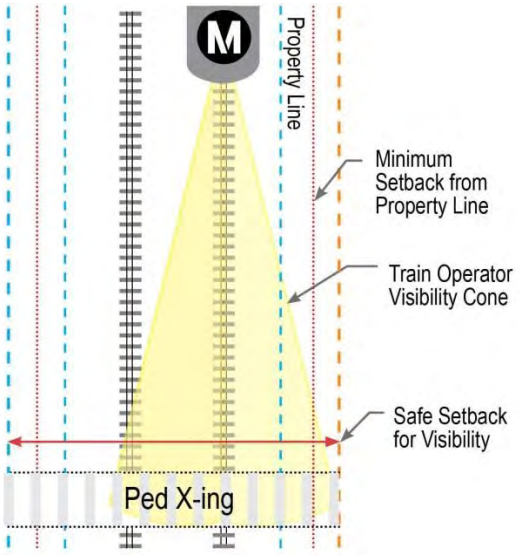
1.6 Sightlines at Crossings

Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sightlines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases the efficiency of transit service.

Recommendation: Design buildings to maximize transit service sightlines at crossings, leaving a clear *cone of visibility* to oncoming vehicles and pedestrians. Metro Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be needed to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sightlines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

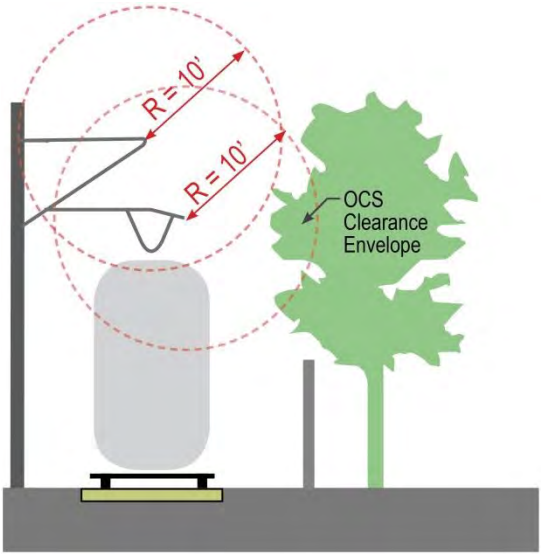
Additional Resources:
MRDC, Section 4 – Guideway and Trackwork
MRDC, Section 12 – Safety, Security, & System Assurance

1.7 Transit Envelope Clearance

Metro encourages density along and around transit service as well as greening of the urban environment through the addition of street trees and landscaping. However, building appurtenances, such as balconies, facing rail ROW may pose threats to Metro service as clothing or other décor could blow into the OCS. Untended landscaping and trees can also grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains.

Recommendation: Project elements facing or located adjacent to the ROW should be designed to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures.
- Plan for landscape maintenance from private property and not allow growth into the Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide direct access to ROW access.



Adjacent structures and landscaping should be sited to avoid conflicts with the rail OCS.

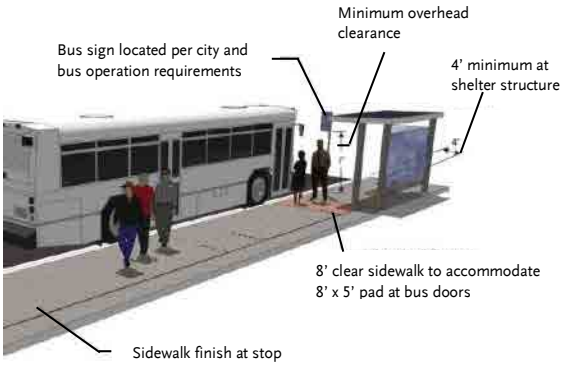
Additional Resources:
MRDC, Section 4 – Guideway and Trackwork
MRDC, Section 6 – Architectural
MRDC, Section 12 – Safety, Security, & System Assurance

1.8 Bus Stops & Zones Design

Metro Bus serves 15,967 bus stops throughout the diverse landscape that is Los Angeles County. Typically located on sidewalks within the public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdiction to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

Recommendation: When designing around existing or proposed bus stops, Metro recommends project teams:

- Review Metro's Transit Service Policy: Appendix D, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops. In particular, adjacent projects should:
  - Accommodate 6' x 8' landing pads at bus doors.
  - Install a concrete bus pad within each bus stop zone to avoid asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15' preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Ensure final design of stops and surrounding sidewalk allows passengers with disabilities a clear path of travel.
- Place species of trees in quantities and spacing that will provide a continuous shade canopy in paths of travel to access transit stops. These must be placed far enough away from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity.
- Locate and design driveways to avoid conflicts with on-street services and pedestrian traffic.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.

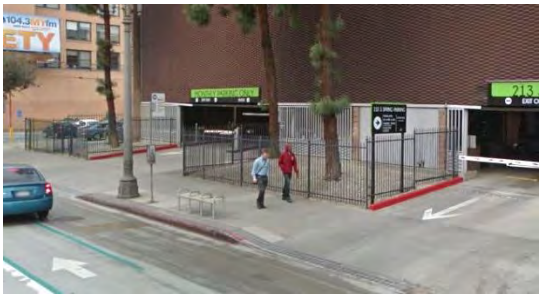
Additional Resources:
Metro Transit Service Policy

1.9 Driveways/Access Management

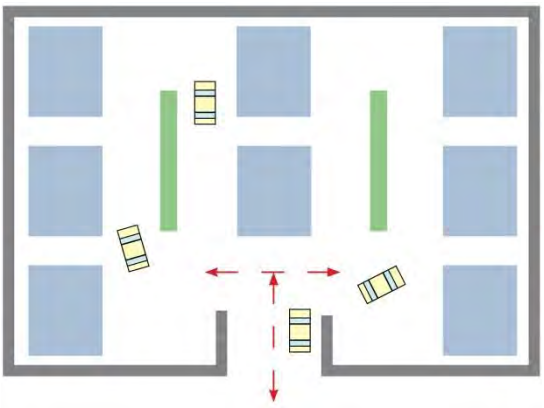
Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking and loading at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity with fast moving trains and buses.

Recommendation: Metro encourages new developments to promote a lively public space mutually beneficial to the project and Metro by providing safe, comfortable, convenient, and direct connections to transit. Metro recommends that projects:

- Place driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active tracks, transit vehicles, and people, as well as queuing on streets.
- Locate vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Program loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidate vehicular entrances and reduce width of driveways.
- Raise driveway crossings to be flush with the sidewalk, slowing automobiles entering and prioritizing pedestrians.
- Separate pedestrian walkways to minimize conflict with vehicles and encourage safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.



A consolidated vehicular entrance greatly reduces the possibility for vehicle-pedestrian conflicts.

Additional Resources:
Metro First/Last Mile Strategic Plan
MRDC, Section 3 – Civil


0019


To Union S



2 Engineering

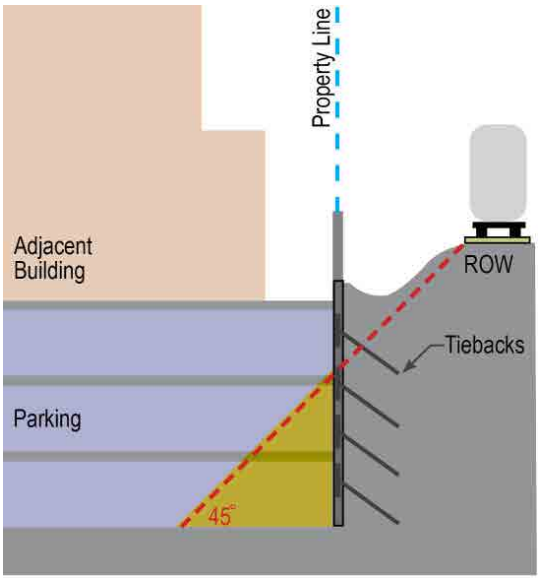
2 Engineering

2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize the support of existing Metro infrastructure. Any excavation which occurs within the geotechnical *foul zone* is subject to Metro review and approval. The geotechnical zone of influence shall be defined as the area below the track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and safety and triggers additional safety regulations.

Recommendation: Coordinate with Metro Engineering staff for review and approval of structural and support of excavation drawings prior to the start of excavation or construction. Tie backs encroaching into Metro ROW may require a tie back easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW would require compliance with Metrolink Engineering standards and guidelines.



An underground structure located within the ROW foul zone would require additional review by Metro.

Additional Resources:
Metrolink Engineering & Construction Requirements
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

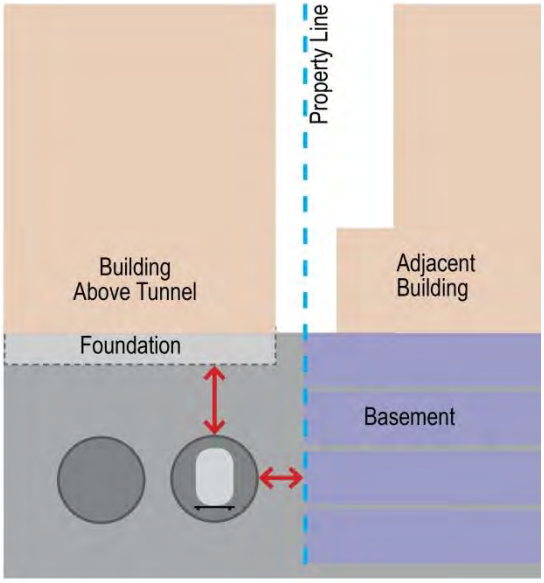
2 Engineering

2.2 Proximity to Stations & Tunnels

Metro supports development of commercial and residential properties near transit services and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. However, construction adjacent to, over, or under underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

Recommendation: Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety or continued efficient operation of Metro facilities.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. Additional information regarding monitoring requirements, which will be determined on a case-by-case basis, may be found in Section 3.4, Excavation Drilling/Monitoring.



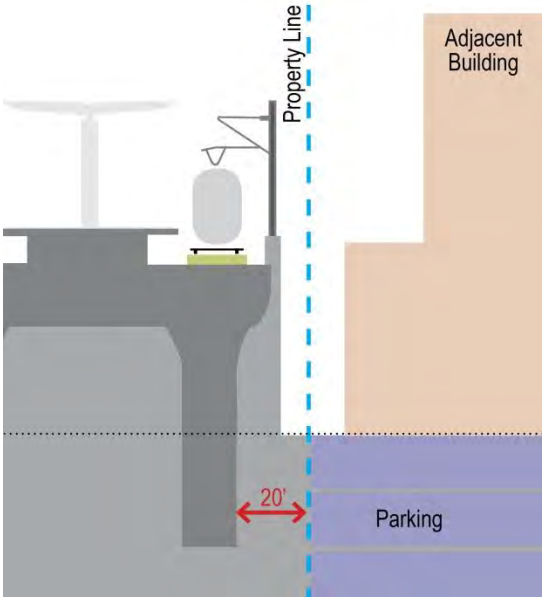
Underground tunnels in close proximity to adjacent basement structure.

Additional Resources:
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at grade locations, situated below elevated *guideways* or stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

Recommendation: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments which are within this 20-foot envelope may be required to undergo a *Threat Assessment and Blast/Explosion Study* subject to Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a threat assessment and blast/explosion study.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical


CULVER
113
M


SKANSKA TUNNEL SWEDEN
CAT
LIEBHERR
CAT



3 Construction Safety & Monitoring

3 Construction Safety & Monitoring

3.1 Pre-Construction Coordination

Metro is concerned with impacts on service requiring single tracking, line closures, speed restrictions, and *bus bridging* occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe operations and passenger wellbeing.

Recommendation: Following an initial screening of the project, additional coordination may be determined to be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of shutdown per contingency plan.
- Confirm a ROW observer or other safety personnel and an inspector from the parties.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts on Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a review fee may be assed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRA Engineering Standards and Guidelines.



Metro staff oversees construction for the Purple Line extension.

Additional Resources:

Metrolink Engineering & Construction Requirements

Metro Adjacent Construction Design Manual

3 Construction Safety & Monitoring

3.2 Track Access and Safety

Permission is needed from Metro to enter Metro property for construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

Recommendation: To work in or adjacent to Metro ROW, the following must be obtained and/or completed:

- Right-of-Entry Permit/Temporary Construction Easement: All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.

- Track Allocation: All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity.

- Safety Training: All members of the project construction team will be required to attend Metro Safety Training in advance of work activity.

- Construction Work Plan: Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and patrons.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

Additional Resources:
Metro Adjacent Construction Design Manual
Safety Training
Track Allocation

3 Construction Safety & Monitoring

3.3 Construction Hours

To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance. Metro may limit hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service.

Recommendations: In addition to receiving necessary construction approvals from the local municipality, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction that has the potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1:00a.m.-4:00a.m.) or during non-peak hours to minimize impacts to service. The project sponsor may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction as well as performance of Metro's transit service.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 10 – Operations
Track Allocation

3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

Recommendation: Excavation and shoring plans adjacent to the Metro ROW shall be reviewed and approved by Metro Engineering prior to commencing construction.

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's *geotechnical zone of influence,* where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Rakers and tiebacks provide temporary support during construction.



A soldier pile wall supports adjacent land during construction.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by cranes. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro patrons and operators.

Recommendations: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes operated near the OCS must maintain a twenty (20) foot clearance from the OCS. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review and possible work plan.



Construction adjacent to the Pico Rail Station in Downtown Los Angeles.



Construction adjacent to the Chinatown Rail Station.

Additional Resources:
Metro Adjacent Construction Design Manual
Cal/OSHA

3 Construction Safety & Monitoring

3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities, and pose a safety concern to the patrons accessing them.

Recommendations: Vertical construction barriers and overhead protection compliant with Metro and Cal OSHA requirements shall be constructed to prevent objects from falling into the Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



A construction barrier is built at the edge of the site to protect tracks from adjacent work.

Additional Resources:
Metro Adjacent Construction Design Manual

3 Construction Safety & Monitoring

3.7 Pedestrian & Emergency Access

Metro's ridership relies on the consistency and reliability of access and *wayfinding* to/from stations, stops, and facilities. Construction on adjacent developments must not obstruct fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, patrons, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained.



Sidewalk access is blocked for construction project, forcing pedestrians into street or to use less direct paths to the Metro facility.

Recommendations: The developer shall ensure pedestrian access to Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices and in coordination with Metro Art and Design Standards.
- Emergency exists shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.

Additional Resources:
California Manual on Uniform Traffic Control Devices
Metro Adjacent Construction Design Manual
Metro Signage Standards

3 Construction Safety & Monitoring

3.8 Impacts to Bus Routes & Stops

During construction, bus stops and routes may need to be temporarily relocated. Metro needs to be informed of activities that require removal and/or relocation in order to ensure uninterrupted service.

Recommendations: During construction, existing bus stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the transit service. Metro Bus Operations Control Special Events and Metro Stops & Zones Department should be contacted at least 30 days in advance of initiating construction activities



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators, and local jurisdictions.

Additional Resources:
Metro Transit Service Policy
MRDC, Section 3 – Civil

3 Construction Safety & Monitoring

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include but are not limited to: condenser water piping, potable/fire water, and storm and sanitary sewer lines, as well as electrical/telecommunication services.

Recommendations: Temporary and permanent utility impacts and relocation near Metro facilities should be addressed during project design and engineering to avoid conflicts during construction.

The contractor shall protect existing aboveground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be verified, used, interrupted, or disturbed.

When electrical power outages or support functions are required, the approval must be obtained through Metro Track Allocation.



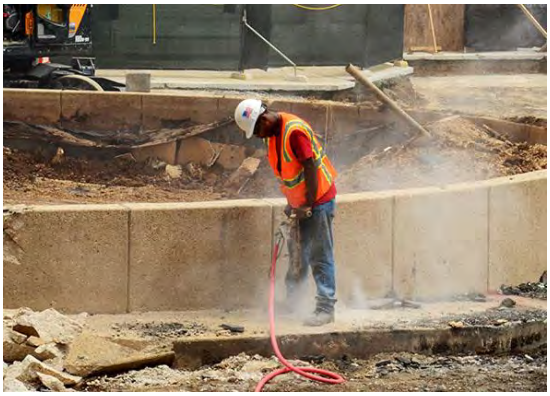
Coordination of underground utilities is critical.

Additional Resources:
Metro Adjacent Construction Design Manual

3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

Recommendation: Hot or foul air, fumes, smoke, and steam from adjacent facilities must not be discharged within 40 feet of existing Metro facilities, including but not limited to: ventilation system intake shafts or station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.

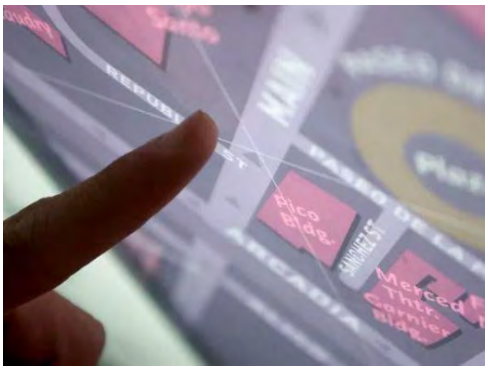


A worker breaks up concrete creating a cloud of silica dust.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 8 – Mechanical

Resources

The following provides Metro contact information and a list of programs, policies, and online resources that should be considered when planning projects within 100 feet of Metro ROW – including underground easements – and in close proximity to non-revenue transit facilities and property:



Metro encourages developers and municipalities to leverage digital resources and data sets to maximize opportunities inherent in transit adjacency.

Metro Adjacent Development Contact Information & Resources

Please direct any questions to the Metro Adjacent Development team at:

- 213-418-3484
- DevReview@metro.net

Metro Adjacent Development Review Webpage:
https://www.metro.net/projects/devreview/

Metro Right-of-Way GIS Data

Metro maintains a technical resource website housing downloadable data sets and web services. Developers and municipalities should utilize available Metro right-of-way GIS data to appropriately plan and coordinate with Metro when proposing projects within 100' of Metro right-of-way:
https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data/

Metro Design Criteria & Standards

Metro standard documents are periodically updated and are available upon request:

- Metro Adjacent Construction Design Manual
- Metro Rail Design Criteria (MRDC)
- Metro Rail Directive Drawings
- Metro Rail Standard Drawings
- Metro Signage Standards

Metrolink Standards & Procedures

Engineering & Construction
https://www.metrolinktrains.com/about/agency/engineering--construction/



Major construction at the Metrolink San Bernardino Station.

Metro Policies & Plans

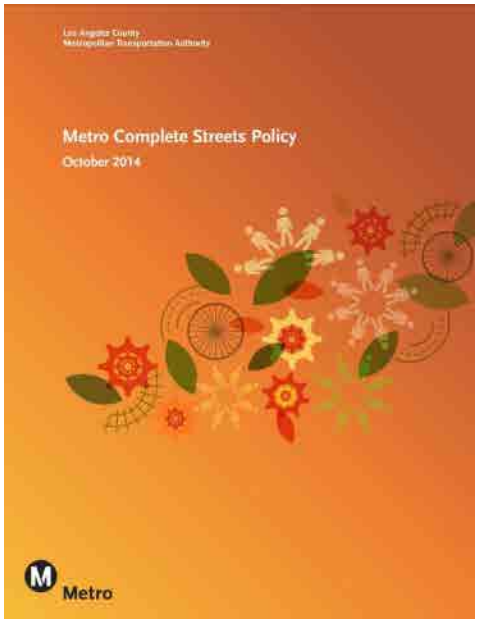
Active Transportation Strategic Plan, 2016
https://www.metro.net/projects/active-transportation-strategic-plan/

Complete Streets Policy, 2014
https://www.metro.net/projects/countywide-planning/metros-complete-streets-policy-requirements/

Countywide Sustainability Planning Policy & Implementation Plan, 2012
https://media.metro.net/projects_studies/sustainability/images/countywide_sustainability_planning_policy.pdf

First/Last Mile Strategic Plan, 2014
https://media.metro.net/docs/First_Last_Mile_Strategic_Plan.pdf

Transit Service Policy, 2015
https://media.metro.net/images/service_changes_transit_service_policy.pdf



Metro Complete Streets Policy

Resources



Metro Bike Hub at Los Angeles Union Station

Metro Programs & Toolkits

Bike Hub
https://bikehub.com/metro/

Bike Share for Business
https://bikeshare.metro.net/for-business/

Green Places Toolkit
https://www.metro.net/interactives/greenplaces/index.html

Transit Oriented Communities
https://www.metro.net/projects/transit-oriented-communities/

Transit Passes
Annual and Business Access Passes
https://www.metro.net/riding/eapp/

College/Vocational Monthly Pass
https://www.metro.net/riding/fares/collegevocational/

Transit Supportive Planning Toolkit
https://www.metro.net/projects/tod-toolkit/

Useful Policies & Resources

ADA Standards for Accessible Design, 2010
U.S. Department of Justice.
https://www.ada.gov/2010ADAstandards_index.htm

California Manual on Uniform Traffic Control Devices.
State of California Department of Transportation
http://www.dot.ca.gov/trafficops/tcd/signcharts.html

California Occupational Safety and Health Administration (Cal/OSHA)
State of California Department of Industrial Relations
http://www.dir.ca.gov/dosh/


Speak Up,
Listen Up!
Metro

Glossary

Cone of Visibility – a conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP) – project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman – person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone – area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway – a channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT) – Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Light Rail Transit (LRT) – Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R – half-cent sales tax for Los Angeles County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M – half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink – a commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority.

Metro Adjacent Construction Design Manual – Volume III of the Metro Design Criteria & Standards which outlines the Metro adjacent development review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus – Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT) – high quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all door boarding, and intersection crossing priority. Metro BRT generally runs within the center of freeways and/or within dedicated corridors.

Metro Design Criteria and Standards – a compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail – urban rail system serving Los Angeles County consisting of six lines, including two subway lines (Red and Purple Lines) and four light rail lines (Blue, Green, Gold, and Expo Lines).

Metro Rail Design Criteria (MRDC) – Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Project.

Metro Transit Oriented Communities – land use planning and community development program that seeks to

maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed – easement completed by property owners abutting Metro ROW acknowledging use and possible results of transit vehicle operation on the ROW.

Overhead Catenary System (OCS) – one or more electrified wires (or rails, particularly in tunnels) situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit – written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW) –the composite total requirement of all interests and uses of real property needed to construct, maintain, protect, and operate the transit system.

Southern California Regional Rail Authority (SCRRA) – a joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study – analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit – permit granted by Metro Rail Operations Control to allocate a section of track and perform work on Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding – signs, maps, and other graphic or audible methods used to convey location and directions to travelers.



Metro®


1010
M



From:	Evelyn Metts
To:	Doug Vu
Subject:	Dubai?
Date:	Saturday, October 12, 2019 1:49:47 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I grew up in the West Hollywood area in the 50's and 60's... it breaks my heart to see the glitzy glamour of those days, much of which had been preserved from the 30's and 40's, being destroyed by high rise buildings that clearly have no place in the Sunset Strip area. I worked on Holloway at Sunset and it was open and beautiful. My mother worked at the Bank of America next to the Villa Nova... we'd often share a ride home after work and enjoy the hills to our left and the views to the right (heading East).

It's bad enough that La Cienega has lost all those amazing restaurants, the quirky places throughout West Hollywood but now, to destroy the area further with monstrosities? Please, enough is enough!

Evelyn Metts

Sent from my iPhone

From:	Campomanes, Rochelle E.
To:	Doug Vu
Subject:	EIR - 8850 Sunset Boulevard (NOP-DEIR)
Date:	Wednesday, October 2, 2019 3:22:44 PM
Attachments:	FPB Letter 191002 (Executed).pdf
Importance:	High

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Mr. Jones,

Please see attached Sheriff's Department review comments (FPB Letter 191002…pdf) for the above project. Originals will be sent via regular mail.
We do appreciate your patience.

Thank you so much.

Rochelle Campomanes, LEED AP
Departmental Facilities Planner I
Facilities Planning Bureau
Tel: 323-526-5614

Los Angeles County Sheriff's Department

CONFIDENTIALITY NOTICE: This email message, including any attachments, from the Los Angeles County Sheriff's Department is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, attorney work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify the sender of this email immediately by reply email that you have received this message in error, and immediately destroy this message, including any attachments. Thank you in advance for your cooperation.

OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF

October 2, 2019

Doug Vu, Senior Planner
City of West Hollywood
Planning and Development Services Department
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

Dear Mr. Vu:

REVIEW COMMENTS
NOTICE OF PREPARATION
DRAFT ENVIRONMENTAL IMPACT REPORT
8850 SUNSET BOULEVARD PROJECT

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the September 2019 Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the 8850 Sunset Boulevard Project (Project). The proposed Project, a mixed-use commercial and residential development located along the south side of Sunset Boulevard, extending the full city block between Larrabee Street and San Vicente Boulevard in the City of West Hollywood (City), involves the development of 15-story-high mixed-use hotel and residential building of approximately 369,000 gross square feet in area. The commercial portion of the Project includes 115 hotel guestrooms with ancillary spaces including meeting rooms, spa/gym, outdoor pools, restaurants, lounges, retail, and a new nightclub for the Viper Room, whereas the residential portion would provide 31 market-rate condominiums and 10 income-restricted units with amenities including a gym, movie screening room, and outdoor pool. In addition, the proposed Project would include four subterranean levels of which three levels would primarily be used as a parking garage, providing 269 spaces.

The proposed Project is located within the service area of the Department's West Hollywood Sheriff's Station (Station). It may impact the current level of service provided by the Station due to the potential increase in resident population

proposed by the Project. In addition, the Department is equipped with a heliport at its northwestern property boundary. The Department recommends that the Draft EIR address the height and location of the emergency helipad and building for the proposed Project to verify whether it would interfere with Flight Approach and Take-Off pattern of the Station's heliport.

In addition, West Hollywood Library (County Library) serves the proposed Project and its surrounding area. The Department's County Services Bureau (CSB) provides law enforcement service to the County Library. Once the Project is completed and fully occupied, the law enforcement service requirements for the County Library would increase. The Department remains concerned that continued growth and intensification of multi-use land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. The Department will provide further comments on the Draft EIR during the public review period.

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF

Tracey Jue, Director
Facilities Planning Bureau

From: Rose Bruno Bailey
To: Doug Vu
Subject: Highly oppose
Date: Sunday, October 13, 2019 1:50:43 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

To whom it may concern,
My husband and I lived in West Hollywood twice, once off Santa Monica Blvd and the second time off Laurel and Fountain. We were walking distance to the Sunset Strip and spent much of our time there. We love West Hollywood so much that we consider it our adopted hometown. I'm originally from Cleveland, Ohio and my husband James is from Delaware. We have lived all over, San Francisco, NYC; but it's West Hollywood we call our adult home. Sadly, my husbands career took us away but I would do anything to move back again.

The Sunset Strip is such a wonderful place to be, a historical place for music lovers to visit. It's got a cool factor not found in most cities, and it would be devastating to see all of what makes it unique destroyed for a building that looks more at home in Las Vegas. We love Vegas, but such a architectural monstrosity is just not at home in West Hollywood. I understand progress, but this is just an eyesore of a building that's trying to hard to be modern but is grossly out of place. Please reconsider desecrating our beloved Sunset Blvd and take your design elsewhere, the Vegas Strip where the Stratosphere is located would be perfect.
With Sincerity
Rose Bruno Bailey

From: Bunni Wojnar
To: Doug Vu
Subject: Horrible new proposed Viper Room plans
Date: Friday, October 11, 2019 4:00:16 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello,

I have been a resident of the area for 18 years now and I am opposing the new proposed plans for the Viper Room. It doesn't even fit in with the architecture and landscape of the Sunset Strip area. Not sure why you can't see this (photo below in case you need it). It looks scary to drive by. It's not aesthetically pleasing as well as being a monstrosity at the top of little narrow streets. You are really trying to take the charm away from this area.

In the event that it gets built, I guess we can only hope for a really big earthquake to take it down. This is really disappointing.

Bunni Wojnar


CHASE

From: Crystal Vilaikeo
To: Doug Vu
Subject: I say give that architecture the boot! - Plans for new Viper Room mixed use design by Morphosis
Date: Monday, October 14, 2019 3:10:14 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Dong,

I wanted to write you after reading the LA Curbed article regarding the Morphosis designed redevelopment of the Viper Room. As a resident of WeHo for the past 10 years, now a homeowner living 1/2 block below the Sunset Strip, I urge you to please reconsider the horrendous plans for the new building. The futuristic looking monstrosity should be built next to the Petersen Auto Museum on Wilshire since they have a similar aesthetic. It should not be built on the historic Sunset Strip. Perhaps a more traditional structure would suit the neighborhood well.

Please feel free to reach out if you have any further questions.

Thank you,
Crystal Vilaikeo

From: Rocio Romero
To: Doug Vu
Subject: It belongs on Sunset BLVD
Date: Saturday, October 12, 2019 3:04:26 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello,

I believe this structure should really be in West Hollywood.
So many people come to LA from all over the world...this would continue to elevate our city as far as architecture. We need to be as open minded as we can, not just about race, sexuality etc. But also about what makes us different from the rest of the world. This building could be the start of more futuristic buildings designs.

-Rocio R.R.

From:	Mohammad Asadi
To:	Doug Vu
Subject:	Larrabee and sunset project
Date:	Saturday, October 12, 2019 9:46:02 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

We have lived on Larrabee street for 21 years , I like the design of the building but in terms of traffic and improvements of the streets around the project ,such as parking needs to be elevated to match the project.
Alex Asadi

Sent from my iPhone

From: Ian
To: Doug Vu
Subject: Letter in Support of Viper Room Re-Development
Date: Friday, October 11, 2019 12:29:59 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

To Doug Vu,

I'm a longtime Los Angeles resident writing a letter of support for the proposed redevelopment of the Viper Room site. I think the proposed buildings look awesome and would contribute tremendously to the aesthetics of the Sunset Strip.

Perhaps most importantly, the buildings would contribute much-needed housing supply to the area. My understanding is that 11 of the units would be set aside as affordable units.

I am not affiliated in any way to Plus Development, Morphosis, or any other stakeholder.

In your role as senior planner for the city of West Hollywood, I hope you consider my letter of support in weighing the merits of this project.

Cheers,

Ian Christian Blanche

Partner, prismatic.studio

From: Steve M
To: Doug Vu
Subject: Love the new building!
Date: Sunday, October 13, 2019 8:26:17 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Saw a post on Instagram complaining about this new buildings design and I just wanted to say I love the design and can't wait for it to light up the skyline.

Thank you for creating something new and exciting.



Like Comment Share

666

100 shares

Most Relevant



Steve McGill
Looks way better than any other large scale apartment/condo building. **Vintage Los Angeles**

Just now Like Reply

Vintage Los Angeles

Write a comment... GIF

6

From: Paul Franks
To: Doug Vu
Date: Friday, October 11, 2019 3:06:29 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

This is hideous. So what is considered affordable. $3500 a month for a one bedroom. And by transit corridor I gather you mean car. Don't see a subway station or even a Rapid bus line. You only have the local bus that due to the over development of Sunset you can walk faster. Greed should be the motto of West Hollywood. Truly very sad

From: +18083840468@tmomail.net
To: Doug Vu
Date: Friday, October 11, 2019 10:19:15 PM
Attachments: text_1570857113157.txt

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug, Please include my comments in the EIR for 8850 Sunset. Thank you, West Hollywood Resident This is STUPID!! How much more of West Hollywood to you guys want to destroy! We do not need another high rise apartment and retail in the neighborhood. If this keeps happening then you might as well tell all of the older crowd they have to leave so the young kids can move in. We as the older group hold the history. True it may be in books and it may be seen in a photo but there is no better form of knowledge then coming from someone that has lived in this area then it's local residents.

T-Mobile

This message was sent to you by a T-Mobile wireless phone.

From: Stan Tyler
To: Doug Vu
Subject: Mirphosis building
Date: Friday, October 11, 2019 7:53:23 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I'm wishing to send in my opinion on the amazing design of the Morphosis designed building to to up on the Viper Room property.
West Hollywood is finally becoming a city we can be proud to bring our out of state friends to , as we are getting new and remodeled high rise buildings, attractive modern designs. Yes it would be fabulous to have the awesome skyline designs of Vegas or Dubai. First class, memorable designs like the Pacific Design Center and Cedars Sinai.
Stan Tyler

From: William Lojkovic
To: Doug Vu
Subject: Morphosis designed redevelopment of the Viper Room
Date: Monday, October 14, 2019 4:20:30 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Vu,
LA Curbed said that you are looking for feedback on the Morphosis redevelopment of the Viper Room. I vote yes. It is a superb design that the city should embrace. A future landmark.

William Lojkovic
1222 n. kings Rd., 10
We Ho, Ca., 90069

Sent from my iPad

From:	Steve Bass
To:	Doug Vu
Subject:	Morphosis Viper Room Development
Date:	Sunday, October 13, 2019 5:39:38 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear City of West Hollywood,

I am writing in support of the design of the new building in West Hollywood. It's striking, forward-thinking, and iconic, all important qualities that define the essence of what memorable architecture is in Los Angeles. Our city needs more buildings that exude this type of considered, contemporary style.

While the public may be more comfortable with sterile condo mega-boxes popping up all over town, those developments are far more alarming. In thirty years, their lack of style will be our new strip mall blight.

All my best,

Steve Bass

Hasbas Entertainment Inc.
Cell • 323 833-1555
Skype• 323 274-2166 - hasbas1
www.hasbas.com

From:	Jayne Barnhart
To:	Doug Vu
Subject:	Morphosis-designed redevelopment of the Viper Room
Date:	Sunday, October 20, 2019 3:50:43 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good afternoon Mr. Vu:
Altho I am no longer in the West Hollywood area, I care greatly about old buildings being demolished and redevelopment taking place.
I am most unhappy with the pictures I've seen of the proposed Viper Room buildings. The style and look of them just doesn't fit in with the 'vibe' of the Sunset Strip. I desperately hope the committee will reconsider this plan.
At a recent meeting Richard Rothenberg said it best: "It's too tall, too massive and the design is grotesque."

jaynebarnhart@yahoo.com _____

From: sternlight@me.com
To: Doug Vu
Subject: New building design proposal
Date: Friday, October 11, 2019 7:14:32 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

That is the ugliest, most grotesque piece of architecture I have ever seen. It would be an insult even in Las Vegas or Dubai. The architect clearly had no idea of West Hollywood tradition or culture. Something understatedly sophisticated and elegant would be more appropriate to local culture than this eyesore, or even something in traditional Russian style as a nod to another important local minority. The insult is so egregious that the developer should be encouraged to find another architect.

From: Will Plyler
To: Doug Vu
Subject: New Building on Sunset
Date: Saturday, October 12, 2019 8:02:20 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Doug,

I don't live in WeHo, but I'm there frequently. Sunset Blvd. is my favorite street in all of Los Angeles. It encompasses everything great (and in a few spots not so great) about this city. It reaches from the ocean to downtown, and to me defines what this place is all about.

This entire city is quite frankly getting out of control with all the building. I hear all the comments about how LA needs more housing, but for whom? Where all these fairly wealthy people right now? Surely, they are not sleeping under the freeways. Surely we don't need to destroy the look over city's skyline nor overly cram more people into areas and create even worse traffic problems. But I digress.

I love architecture and design. One of my closet friends on the planet is an architect and interior designer. He taught at Sac State for like 20 plus years as a professor.

But this whole new building being planned for where the Viper Room was/is, is just not what the Strip needs. All the new buildings crammed in and around the top of La Cienega are bad enough as is. Please don't ruin the rest of the Strip by putting in this crazy design. It's clever and unique on paper, but that area doesn't need that, for sure.

Sincerely,

Will

From: c.beau bridges
To: Doug Vu
Subject: New development on sunset.
Date: Saturday, October 12, 2019 1:32:12 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Sir,
I am just writing to let you know that the new development planned for the Viper room block is something that will not add to the neighborhood & will quite possibly ruin the whole sunset strip area. The design is hideous.
Sincerely,
C.Beau Bridges

Sent from Yahoo Mail on Android

From: Jordan Summers
To: Doug Vu
Subject: New Viper Room Plans
Date: Saturday, October 12, 2019 2:21:11 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I was born and raised 6 minutes from the proposed site and the new plans are exactly the opposite of what the city and developers love about the location. Destroying the charm and history to make a selfish and garish architectural statement will prove alienating for future residents and tourists. Please consider something in keeping with the rich history (see 1933 Group) and revitalize the location instead of grandizing it.

Thanks for your consideration,

Jordan Summers

errjordan@gmail.com

From:	Anna Evans-Goldstein
To:	Doug Vu
Subject:	NOP Comments for Viper Room
Date:	Friday, October 25, 2019 12:15:47 PM
Attachments:	Viper Room 10.25.19 NOP.pdf

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello,

Please see the attached comments.

--
Anna E. Evans-Goldstein
Research Analyst
she/her/hers

UNITE HERE Local 11
464 S Lucas Ave
Los Angeles, CA 90017
Phone: 213-481-8530 x120
Fax: 213-481-0352

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

October 25, 2019

VIA EMAIL

Planning Commission
City of West Hollywood
c/o Doug Vu, Senior Planner
Community Development Department
8300 Santa Monica Blvd
West Hollywood, CA, 90069
dvu@weho.org

Re: Notice of Preparation for a Draft Environmental Impact Report for 8850 Sunset Boulevard

Dear Planning Commissioners:

On behalf of UNITE HERE Local 11 ("Commenters"), this office submits the following comments to the City of West Hollywood ("City") regarding the above-referenced Notice of Preparation ("NOP") for an Environmental Impact Report ("EIR") for the proposed project at 8850 Sunset Boulevard ("Project").

Pursuant to the California Code of Regulations Title 14 § 15082(a) the City has released the NOP with a solicitation of comments from the public. Commenters have the following concerns to be addressed in the EIR, including potential environmental impacts such as aesthetic, traffic, and air quality, presentation of alternative sites, and if found any significant but unavoidable impacts be addressed in a thorough statement of overriding considerations.

First, Commenters are concerned about several potentially significant environmental impacts and believe full studies must be completed. There is substantial development taking place in West Hollywood, particularly along Sunset Boulevard. The potentially significant environmental impacts of the Project for the City on aesthetics, air quality, traffic congestion, and noise each deserve careful consideration through studies. When taking the additional developments in the immediate as a whole, the Commenters are concerned with potentially cumulative impacts that need to be addressed.

Second, Commenters request a thorough analysis of alternative sites for the Project. CEQA Guidelines § 15126.6(a) states that the EIR "shall describe a range of reasonable

alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." In addition, pursuant to CEQA Guidelines § 15126.6(e), a "no project" alternative evaluating the environmental effects of the circumstance in which the project does not proceed should be prepared. The EIR should also take into consideration the cumulative impacts of the above-mentioned concentration of developments in the area.

Third, if any potentially significant but unavoidable impacts are found that cannot be mitigated, Commenters request that the EIR contain a Statement of Overriding Considerations pursuant to CEQA Guidelines § 15093 and Public Resources Code § 21081(b). Commenters acknowledge the competing objectives that will be weighed in the EIR by the lead agency. In light of any potentially significant environmental impacts that are found to be unavoidable, suitable social and community benefit must be provided.

Finally, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Anna E. Evans-Goldstein, 464 S. Lucas Ave, Los Angeles, 90017, agoldstein@unitehere11.org.

From: Dimitri Villard
To: Doug Vu
Subject: Objection to Morphosis design
Date: Friday, October 18, 2019 5:15:11 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am a resident of the Bird Streets above the Sunset Strip for over 30 years. I wish to register my strong objection to the design of the proposed building designed by Morphosis for the Viper Room location as being out of keeping with the style and spirit of our neighborhood.

Sincerely,
Dimitri Villard
--
Dimitri Villard 310-734-4551 Sent from iPhone

From: Elizabeth Barondes
To: Doug Vu
Subject: Opposition to Viper Room Development Project
Date: Sunday, October 27, 2019 10:10:57 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello Doug,

I have learned of the new development and would like to add my name to any list of local residents opposed to this.

Kindly advise if there is a form to sign.

Thank you for your time.

All the best,
Elizabeth Barondes

From: L A
To: Doug Vu
Subject: Planned Sunset and San Vicente development
Date: Saturday, October 12, 2019 7:18:41 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good morning,

I have been a resident of Los Angeles for over 20 years and have lived in WeHo for the past 9, the longest I've lived in any one part of this city.

West Hollywood is special as you likely know because it at the same time is a quite, safe, walkable neighborhood with amazing views and a lively place to hang out and have a fun night.

I believe that atmosphere is largely supported by the low building heights and understated architecture that does not distract from the natural beauty of the area.

The planned building is a work of futuristic art. It's cool. It's interesting. It's ENORMOUS and it will dominate the skyline and anyone's views who live above Sunset (which I of course do).

The building would be welcomed architecture in DTLA. Even just down the hill in the Melrose / SM Blvd area where it would add polish (like Pacific Design Center) but right there, towering over Sunset Blvd, it just simply DOMINATES.

If this addition to our city moves forward it will destroy the neighborhood feel.

It's just too tall. It's just too big. It would be a huge mistake to build it right there.

That's just my opinion.

Thank you,

Leila Arcieri

From: Kevin Elliot
To: Doug Vu
Subject: Please do not build this
Date: Sunday, October 13, 2019 12:06:58 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

It’s so ugly :(

From: Simone Gad
To: Doug Vu
Subject: Please don"t destroy our Sunset Boulevard iconic buildings.
Date: Saturday, October 12, 2019 4:03:45 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Sincerely, Simone Gad-this is our history and part of our beautiful West Hollywood/L.A.

From: Bruce Infante
To: Doug Vu
Subject: Project on Sunset.
Date: Sunday, October 13, 2019 7:36:24 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Doug Vu,

Project on Sunset. Good Morning... What are you thinking here? To allow such atrocities to be developed in this fashion. This does not belong on Sunset or any where in Los Angeles. Does this architect have taste in his feet? This gross statement should demand someone should go back to Art School.. I Love Modern but a little goes a long way. And Modern is a very high maintenance in cost. It can look old very quickly if not maintained regularly. This project is over built and making Los Angeles look like a bad Dubai night mare. Space is important. I do not see any brilliance here in space. Landscape on the building is not the way to go..... Landscape goes around the building not on the building.. Using land comfortably with proper layouts is important in space and living comfort..... In this Project we are losing that... Fearing Los Angeles will not be my Los Angeles that I once knew, so beautiful, so magnificent rich in culture and beauty, Los Angeles Architectural is known for Architectural Landscapes . Together the beauty of Real Estate creates the Arts & Dreams we love to live in, ….. now turning into a city that becoming raped by over developed land and bad ideas, is leaving its Gracious Architectural past and beautiful buildings with no future desire. This development will make that was once all good turn into a Disney Land exhibition in bad taste....Like a zit that will stay on your face forever you can't get rid of..... It will never go away. Don't let this to be continue of levels of gross negligence and irresponsible thinking that will pollute to the eyes of many, and give heavy noise, traffic, on a scale that will be a financial disaster on so many levels..... In closing.. The past does not equal the future.. But the past is the foundation to the future.. A rich future in tradition.. All roads in Tradition always comes back... I want to see a building and say (It's Home...) and to the eyes of the Los Angelenos The right building should be pleasing to many eyes for years to come.. And many eyes of the world and Los Angeles are looking at you... Lets make the right choice this time. Time waits for no one. .

Sincerely

Bruce M

From: Erica
To: Doug Vu
Subject: Proposed Development on Sunset/Viper Room
Date: Sunday, October 13, 2019 1:33:14 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Doug,

Please rethink what you are doing to our community. Please do not destroy crucial pieces of Hollywood history that make it the place it is today. There are so many wonderful locations for your proposed plan, it is disheartening to so many people to see our beloved history could be wiped away for something only few can enjoy.

Thank you for your time,
Erica

From: Kevin Spiehs
To: Doug Vu
Subject: Proposed Viper Room Project
Date: Saturday, October 12, 2019 8:01:58 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I've lived in LA nearly 20 years, and
I love this! Please move forward with it!

https://la.curbed.com/2018/12/18/18146581/sunset-strip-hotel-condo-viper-room-morphosis-silver-creek-development?_gl=1*12npk5y*

Kevin Spiehs
Studio City

From: Don Reeve
To: Doug Vu
Subject: Proposed Viper Room Redevelopment
Date: Saturday, October 12, 2019 12:54:13 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Mr. Vu,

Recently, I saw news articles and plans for the redevelopment of the Viper Room area on Sunset in West Hollywood. I've been a resident of West Hollywood for over 12 years and I am very impressed with this design. The aesthetics of it with the incorporation of greener and green spaces is very welcoming and reflective of the core values of West Hollywood (especially our city's projects and ordnances on tackling climate change and climate friendliness and supporting artistic expression and design).

Such designs are found even in city building projects but in my humble opinion are not as boldly and beautifully captured as in this design.

With that said, while there is a very public and forceful effort by some members of our community to push back on such expressive designs, I ask the city to approve these plans and thereby demonstrate the city's continued commitment to stand firm and stay true to our core values and to not cow-tow or otherwise acquiesce to opinions and comments that keep us from moving expeditiously and greenly forward.

Thank you for considering my comment.

Sincerely,

Don Reeve, Esq.

IMPORTANT: Privacy Notice -- This message and any accompanying documents are intended only for the use of the individual(s) or entity/entities to which it is addressed and may contain information or material that is privileged, confidential, and exempt from disclosure under applicable law. The information transmitted (including attachments) is covered by theElectronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any retransmission, dissemination, distribution, copying, other use of, or taking action(s) in reliance upon this transaction is strictly prohibited. If you received this communication in error, please notify the sender immediately and destroy all transmissions (including hard and soft copies).

From: KG Banwart
To: Doug Vu
Subject: Public Comment - 8850 Sunset Blvd. Project
Date: Monday, September 30, 2019 4:00:35 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

TO WHOM IT MAY CONCERN:

It is hard to overestimate the radical disaster that the proposed project represents for the neighborhood and the City as a whole. The edifice as designed - while a clear attempt to not be one more brown, white and orange box - literally looks like something that was thrown in the circular file at Hannah-Barberra while working on "The Jetsons." One need only read the online blogs from local architects to see that the project is largely being ridiculed by experts in the field.

The design OVERWHELMS the property and the neighborhood by leaps and bounds. The traffic congestion, the noise, and the carbon footprint of a structure that size on those parcels is literally inconceivable. The number of traffic accidents - and pedestrian accidents - on not only Sunset but also Larrabee - will skyrocket. The idea of an "emergency" helipad is almost laughable knowing the troubles that have occurred at a certain hotel just one mile away.

What the City needs is more HOUSING - especially AFFORDABLE HOUSING - NOT more hotel rooms. This design - for an immense monstrosity and eyesore ruinous to the quality of life of those of us in the Northwest corner of the City - does precious little to actually address that need. That the developers even came forward with such a plan is nearly inconceivable.

Restaurant space? The City cannot support the restaurants we have now as the recent closure of Cafe d'Etoile again demonstrates. Night Club space? It would not be needed if the Viper Room was left alone to begin with. Lounges? There is NO shortage on Sunset as is, and as the State continues to debate the 2:00am last call statute, this is no time for the City to be stepping forward to add more establishments which could end up serving until 4:00am with all of the noise, vandalism, and DUI issues involved.

Personally, I reject NIMBYism out of hand. There is no doubt that the current structures are soon to be leveled. That block is simply too valuable to be left as is. Any construction is going to be unpleasant for those of us who live nearby and any project is going to bring long-term consequences and inconveniences. That is certain. Nonetheless, this disaster in the making is WAY too much - WAY too unreasonable - WAY too unsafe (those support pillars holding up a structure of that size just blocks from the Sunset fault, really???) - and WAY OVER THE TOP in its expectations for those who already live here to accept.

Please, PLEASE, send the firm back to the drawing board for a FAR scaled back project focused on HOUSING. This proposal is simply inexcusable.

Sincerely,

KG Banwart, Jr.
1011 Palm Ave.
West Hollywood, CA 90069

(I regret that I cannot attend the October 10th meeting due to work, but ask that this letter be read into the record. Thank you.)

From: Jennifer Alkire
To: NICHOLAS SHAFFER
Cc: Doug Vu
Subject: Re: 8850 Sunset Blvd. Project
Date: Friday, October 25, 2019 12:03:02 PM

Mr. Schaffer,

Thank you for your email. This is to confirm that it has been received and will be included in the record.

Have a nice weekend,
Jennifer

Sent from my iPhone

> On Oct 24, 2019, at 10:45 PM, NICHOLAS SHAFFER <nicholasshaffer@sbcglobal.net> wrote:
>
> **CAUTION - EXTERNAL SENDER.** Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.
>
> Doug Vu, Senior City Planner
>
> I have lived at 1002 Larrabee Street for 46 years. I have concerns & suggestions about the 8850 Sunset Blvd. Project.
>
> 1. From my understanding there are already 4 to 5 projects on Sunset Blvd. (from Doheny to Crescent Heights) that are currently under construction to others that have been approved and will start in the near future.
> I feel this huge project should be put on hold until the last approved Sunset Project is completed and we see the impact that all these projects have on an already traffic jammed Sunset Blvd.
>
> 2. NO HOTEL!!! We live across the street from the London Hotel, a major hotel with all of its events,rooftop parties and increase in traffic and noise. We lose street parking to its employees and patrons of the Beauty Salon
> and to guests attending Hotel events. It's too much to have another Hotel within feet of each other. It's not fair to us or to the London West. How many Hotels does this city need?
>
> 3. Street Parking: The cottages from 1008-1012 1/2 built in 1924 have no parking and depend 100% on street parking. The cottages and apt. building from 1000-1006 have only 6 garage spaces which mean some tenants
> depend on street parking. Parking is already difficult on the 1000 block of Larrabee. Spaces are taken up by employees working on the Strip, hotel patrons, and Uber & Lyft drivers waiting for their next job.
> When this project is completed I predict Street parking will be impossible! And please note that this project means that some meters on Larrabee will be taken away.
>
> To guarantee that these tenants will have parking may I suggest that this project make parking spaces available for these cottages that have no option but to park on the street.

Suggestion: Eliminate one floor of the Hotel and make it a floor of free parking for other employees working on the Strip, residents who depend on street parking and Uber & Lyft drivers who are waiting for their next job.

Parking must be free to all employees and patrons of this project including the Hotel,the restaurant,The Viper room, offices etc. If you charge for parking it only forces the people to park on the street and since there's no parking on the 1000 block of San Vicente everyone will look for parking on the 1000 block of Larrabee.

4. TRAFFIC: Prediction...Larrabee will become a thoroughfare! According to this project's plan there will be an entrance on Larrabee and ALL cars and Service trucks will be exiting on Larrabee.

The London has its employee entrance on Larrabee and all of their cars (not Service trucks) exit on our street. Larrabee is a narrow street and will not be able to handle all this new traffic. Just today

at rush hour I counted over 20 cars backed up on Larrabee trying to get on Sunset Blvd. Larrabee is going to become a traffic NIGHTMARE!!!

The entrances and exits for this project need to be revisited. San Vicente is the wider street and should be the exit for the Hotel, the restaurant, the Viper Room and the Service trucks. When cars exit on

San Vicente they can make a right directly on to Sunset Blvd. unlike on Larrabee where they will have to cross over through traffic to get onto Sunset. Traffic is going to get so backed up.

Larrabee could be the exit for the condo tenants & guests.

Thank you for your time!

Nick Shaffer

From: ELAINE MORRISON
To: Doug Vu
Subject: Re: The Sunset Blvd. 15 Story Building Proposal
Date: Friday, October 11, 2019 5:29:04 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug

1. Aesthetics is #1

2. Height. To high. Maybe 8 stories high would work.
3. West Hollywood is to crowded now. Where do you really think all those cars from the this new project are going to fit in.

Thank you so much,

Elaine

Elaine Morrison, allied member ASID/LA, NKBA

Elaine Morrison Interiors

1209 Larrabee St. #5

West Hollywood, Ca. 90069

310-387-8778

eminteriors1@gmail.com

www.elainemorrisoninteriors.net

The Link to View My Video Remodels on my YOUTUBE Channel:

https://www.youtube.com/channel/UCvS6XzzGT3UoJ4QEN3DFzpw/feed

The Link to My Interior Design Projects on HOUZZ:
https://www.houzz.com/pro/elaine-morrison/__public

From:	Kimberly Bartscheck
To:	Doug Vu
Subject:	Re: viper room plans
Date:	Monday, October 14, 2019 1:31:42 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Vu,

I am writing to you as a concerned citizen of Los Angeles, regarding the utterly awful proposed building plans that were revealed for the Viper room in West Hollywood on Sunset.

This monstrosity is a TOTAL eye sore and despite being in a transit priority area the plans for this massive ugly structure should be scrapped for ANYTHING more appealing. This plan should NOT be allowed to move any further forward under the proposed terrible design.

I will be contacting my neighbors and voting members of the community to write in to you as well. I appreciate your time and attention in the matter.

K.C. Sterling

Sent from K.C.'s iPhone

From: SIBYL ZADEN
To: Doug Vu
Subject: Re: Vipor Room m0nstocity
Date: Friday, October 11, 2019 7:33:53 PM

You're welcome!

On Fri, Oct 11, 2019 at 4:51 PM Doug Vu <dvu@weho.org> wrote:

> Hello,
>
> -
>
> Your comments have been received; thank you.
>
> -
>
> Regards,
>
> Doug
>
> -
>
> Douglas Vu, ASLA
>
> Senior Planner
>
> City of West Hollywood
>
> 8300 Santa Monica Boulevard
>
> West Hollywood, CA 90069
>
> (323) 848-6318
>
> -
>
> 
>
> -
>
> -
>
> -
>
> ---
>
> **From:** SIBYL ZADEN [mailto:zaden@ucla.edu]
> **Sent:** Thursday, October 10, 2019 1:22 AM
> **To:** Doug Vu
> **Subject:** Vipor Room m0nstocity
>
> -

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

-

You are RUINING the skyline and landscape of the beautiful Sunset Strip! You are potentially creating a traffic NIGHTMARE.

I have lived here right by the Sunset Strip for 47 years. and loved it.

-

-

From: E
To: Doug Vu
Subject: Redevelopment of the Viper room
Date: Saturday, October 12, 2019 11:00:33 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear city council members of West Hollywood

It is sad that the people of California seem to have forgotten that California is the world trend setters, and now believe that such avant garde projects belong in Dubai.

Can I remind everyone that when the Eiffel Tower was built, the Parisians thought it was ugly and wanted it dismantled at the end of the World Fair. It went on to become a loved global symbol of Paris.

Please do not listen to the average Joe, but think that a potential landmark like this may become a symbol of the unrestricted California dream. The symbolism of the building far outweighs the ugly/beautiful argument which is inherently subjective.

No vision in history was realized by asking people what they wanted.

Respectfully,

E Duwaji

From: Georgina Moore
To: Doug Vu
Subject: Regarding the Morphosis design on Sunset
Date: Friday, October 11, 2019 7:09:41 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

First let me qualify myself as a 25 year resident 4 blocks from this project. Second let me share my experience and concerns about this project.

Historically projects on Sunset are glorious in the planning stages and often abandon in the long run because they are not practical. The list of abandon projects or those degraded into other uses are endless. The former House of Blues, Carlos and Charlie's etc. Even the 9000 building that housed The Playboy Club.

I am part of the history of this city and when Weho chose to celebrate the music clubs on the strip and memorialize them my life and youth (and financial success) became part of that process. The music festivals on the strip didn't evolve because of high rises and and NYC/Dubai style projects like this one.

The real musicians that built our industry would not chose to frequent a place like this the way David Geffen did The Whiskey. The whole project just screams greed and excess and I don't see how it benefits the city of Weho in any way.

If I wanted to see a looming monstrosity in my back yard everyday I would have stayed in any number of other cities. I believe many residents agree.

The small town neighborhood feel with behind the scenes exclusivity is our gift and forte. This project does not fit in our city, nor is it necessary. Our current traffic congestion is already excessive and we are losing residents because of it.

Please do not sell the comfort of our city to the highest bidder. Make this project conform to standards for long term use and fitting in with the community.

Send the obvious and offensive greed some where else.

Best Regards,

Georgina Moore

California Real Estate Broker and Property Manager.

906 N. Doheny Dr #221
West Hollywood, Ca 90069

310-779-7703

Bayou Blues of New Orleans
Broker/Property Manager
1000 Bourbon Street B407
New Orleans, La 70116
504-940-0434 or 310-779-7703

Owner

Playin Possum Music LLC

From:	Susan Milrod
To:	Doug Vu
Subject:	resident comments on 8850 Sunset Project Initial Study
Date:	Sunday, October 20, 2019 6:51:27 PM
Attachments:	Weho EIA October.docx

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Doug - I've attached my comments regarding this study. Please let me know if you need me to reformat them, etc. I know my name, address etc. fall on a separate page — but I wasn't sure if whoever receives this study from you should know my identity (including whether it goes to the builders).

Would appreciate a quick email letting me that this document is now in your wonderful hands. That way, won't get OCD about physically bringing a copy to City Hall to give you.

Thanks for everything and best your way,

Susan Milrod
310-867-5031

I live in a family-owned condo at 960 Larrabee Street which is approximately one block south of this proposed building complex.

Since I do not work in a field that is at all associated with this type of study, I am clearly an amateur who will be writing in non-technical terms. Also, although I've been trying to understand the difference between what is and what isn't specifically addressed in an EIA Report, please excuse me if my comments exceed or are not applicable to this situation.

From my estimate, there are at least 41 notations of Environmental Factors that might face Potentially Significant Impact. And that includes environmental effects which will cause substantial adverse effects on human beings. As a resident of this neighborhood, here are some of my more pressing concerns.

At present, 8850 is intended to be the tallest building along the West Hollywood section of the Sunset Strip. It will dwarf over the nearby London and the rest of the neighborhood to the south. Although the building will be separated into several distinctive towers, the overall VISUAL IMPACT remains of a massive building which overpowers the rest of the neighborhood.

Although Visual Aesthetics are not a factor in this study, the proposed Aesthetics do come complete with Symbolic Visual Implications that are troubling to me. If this building were to be situated at a lower street level – for example, where the PDC is – it would feel more harmonious with the rest of Weho. It would have an architectural conversation with both people and buildings.

<u>Height</u> –

From most of Weho, you would have to LOOK UP at a massively towering building. A gleaming "my tower is shinier and bigger than yours" which feels akin to the way in which ancient cities placed their castles at the highest point. In other words, it would be impossible to be in this neighborhood without always being aware that 8850 looms over us. And since this building is intended as a high end residential complex and hotel, this further reinforces the symbolic feeling that it's taken away the air vs. sharing it.

While the EIA study states that there is no impact on scenic view, I'd like you to consider this. Every time somebody drives north on Larrabee (which is a small street), this building will outpower everything around it.

I swim in the Weho pool. When I am doing the backstroke, I believe that the 8850 Building will be in my line of vision. Since the PDC is so close to the pool and park, it makes sense that you see the Red Building when swimming. But 8850 will BLOCK the public view of the hills from the pool and park – places where Weho citizens go for tranquility and a break from the hustle and bustle.

In addition, the Study does admit that there might be sunlight glare due to the materials used in this building. I did speak to the architect about this at the Recent Meeting. He said that they're hoping to ensure that this potential problem is fixed so that it won't be like a Disney Hall scenario where the building's materials had to be treated after the fact.

Here's my problem with this. Disney Hall is in the midst of a very packed area. This building will stand alone on the top of a hill. Any glare could lead to problems for drivers – especially given the proposed building's height. The same is true re the windows, etc.

In addition, the construction of this building will literally change the way that the natural light falls in this area. What I mean is this: I lived in downtown NYC on 9/11/2001. A mile or so north of the World Trade Center off of 6th avenue. After the Towers were gone and the dust cleared, it altered the way the light fell – especially the sunsets. Again, while this is true to an extent with any new building, it is especially true regarding an imposing tall and wide building. As proposed, 8850 Sunset WILL LITERALLY CHANGE THE NATURAL LIGHT PATTERN in this part of WEST HOLLYWOOD. It will cast huge shadows over this neighborhood of mainly low-rise buildings.

And when it comes to this "mine is taller than yours" height, I fear that 8850 will encourage other developers to attempt even taller buildings in Weho. Unlike the Las Vegas Strip, the Sunset Strip is part of a community – not a huge entertainment zone with wide streets. Nor is the Sunset Strip in a large open area which would allow this building to be seen as a whole. Perhaps this building would be gorgeous in a very different setting or locale. But here, it feels like glitzy King Kong has come to town.

<u>8850's intended purpose:</u>

Hotel Rooms – Weho already has an overabundance of hotel rooms. Even though the City does benefit from Hotel Tax revenues, booking percentages are down. Basic question: does Weho need more high-end hotels to compete, especially during a housing shortage.

Four restaurants, banquet hall and meeting rooms – 60-70% of new restaurants fail within a few years. So, if 8850 is proposing four restaurants, TWO OR THREE OF THEM WILL SOON BE EMPTY. But due to the architecture, will provide empty street floor vistas from the sidewalk and Sunset Blvd. Not an economically cheerful situation when it comes to attracting new visitors to that particular part of town.

As for residents, it's fairly easy to see that Locals haven't been clamoring for new restaurants here. Ironically, the only restaurants that are booming are State Social (which has long had a history as a busy venue, regardless of what specific restaurant has been in the building). The small, but in demand Dialog Café. And several fast food joints.

Very doubtful that Locals are going to abandon the Dialog for a sleek café in 8850 – the lovely restaurant in that office building of Palm and Sunset is already gone.

Regarding Meeting Rooms and a Banquet Hall – is this building intended to be a convention center? Or to host large events? If so….

Parking problems --

The 8850 plans include 269 parking spaces. While that might technically be more than the EIA law specifies, it is well below what a building of this size in this specific location would need. When you take away the proposed 80 dedicated condo parking spaces, that leaves 189 for the hotel and commercial use.

If you fill up 110 hotel rooms with one car each, that leaves 79 PARKING SPACES – for everybody coming to a banquet or large event (and that's without considering people who might also be going to the four restaurants). And this is in a venue that intends to build a BANQUET HALL with 500 SEATS

THERE ARE NOT ENOUGH NEARBY COMMERCIAL PARKING LOTS to deal with this type of overflow. Ditto re WEHO MUNICIPAL LOTS. And there is already a shortage of street parking in this area. Where do the owners propose putting all of those cars?

Traffic flow –

Since parking spaces won't be available, there will be lots and lots of Uber, Lyft and cab traffic. First problem: Lyfts and Ubers are already causing mayhem by constantly U-turning on Larrabee and Sunset.

Larrabee and Palm are both backed up with out-of-neighborhood drivers – including speeders who ignore the Larrabee/Cynthia round about and literally just zoom across the street.

It will be a major problem to have cars/trucks/vans (remember those hotel rooms) entering or exiting onto Larrabee. It will block up that street corner, a situation made worse by the builders desire to put a café on the corner of Sunset and Larrabee. It will create noise problems for the neighborhood.

And even if the Sunset Blvd side of the project will be "no parking", it will be overflowing with tourists who are coming to drive past the building, jump out and take selfies, etc. From my perspective, part of the reason for this type of building is to ATTRACT TOURISTS coming to gawk at the building.

Needless to say, traffic in this part of Weho will be a nightmare during the several year construction period – especially for anybody living on Larrabee as well as the London and boutique hotels that are already here.

Earthquakes and Flooding– Even if the builders have gotten building exclusions and licenses, etc. this is a massive building to place in a Fault Provision Zone that is at the top of a steep hill above a residential area. It took our condo building years to fix the balconies that were affected during the Northridge Earthquake.

Again, if this same building were being constructed at the "bottom of the hill" this wouldn't be as scary as having it on the top of a hill in terms of earthquake damage.

Water runoff during flooding is also a concern. Especially with increased traffic and/or massive construction.

The Viper Room –

If the owners are planning on building a "new Viper Room", I'm confused about why they seem to be asking for Operating Hours that begin at 7AM. Do they plan on using it as an all-day musical venue or club?

Since the Viper Room area of this lot was built in the 1920s and it has specific social significance, the Viper Room can be seen as a Weho Historical site akin to The Factory or the French Market Place. Unfortunately though, I question whether the new owners of that property will take the same approach as the owners of those two development sites in terms of honoring and preserving a beloved icon.

In an era in which we're all concerned about environmental impact, it's scary to consider allowing a project that could well have potentially negative effects on the people of this neighborhood in terms of

Air Quality
Noise Pollution
Greenhouse Gases
Construction Emissions.

Even the amount of garbage that will have to be removed from the property on a daily basis.

When the AIRB&B problem initially came to Weho, we found that it overwhelmed our Police, Fire Department, EMS, nearby hospitals etc. While new buildings must factor these problems into account, this report seems to imply that the current plans for 8850 Sunset are problematic for this neighborhood in terms of environmental concerns.

Susan Milrod
960 Larrabee Street
Apt 212
West Hollywood, CA 90069

sjmilrod@gmail.com
310-867-5031

From: Bella Mumma
To: Doug Vu
Subject: reveloping the Viper Room
Date: Monday, October 14, 2019 6:17:52 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

In regards to the LA CURBED piece that alerted me to the plan to redevelop the Viper Room I would like to state I am opposed to the project.

While I do support job creation, housing, and environmental benefits of the piece, its design is inconsistent with the neighborhood and be out of touch with what the community wants and needs.

Part of what makes that area of WeHo so incredible is the sense of community involvement and consideration for the residents which this piece does not uphold. I'm open to the idea of redevelopment but in manners that won't violate the soul of the neighborhood.

From: Lijin Sun
To: Doug Vu
Subject: South Coast AQMD Staff NOP Comments for the 8850 Sunset Boulevard Project
Date: Tuesday, October 8, 2019 7:26:48 AM
Attachments: LAC190918-03 NOP 8850 Sunset Boulevard Project_20191008.pdf

---

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of an Environmental Impact Report for the 8850 Sunset Boulevard Project (South Coast AQMD Control Number: LAC190918-03). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. Please contact me if you have any questions regarding these comments.

Thank you,
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Direct: (909) 396-3308
Fax: (909) 396-3324
Please note that the South Coast AQMD is closed on Mondays.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL: October 8, 2019

dvu@weho.org
Doug Vu, Senior Planner
City of West Hollywood, Planning & Development Services Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Notice of Preparation of an Environmental Impact Report for the Proposed 8850 Sunset Boulevard Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion and public release. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[2] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

[2] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD'S *CEQA Air Quality Handbook* South Coast AQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: http://www.aqmd.gov.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project's air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC190918-03
Control Number

From: Jason Little
To: Doug Vu
Subject: Sunset Blvd...where the sun sets at 3pm!
Date: Saturday, October 12, 2019 2:42:24 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

As a Brit living in LA I appreciate every chance I get to visit the historical Hollywood establishments of the past ...50, maybe even 100 years! Those selling off the town's past have no respect for its characterless future.

"They paved paradise and put up a parking lot". Will you do it again?

--



From: Jonnie0129
To: Doug Vu
Subject: Sunset Blvd
Date: Tuesday, October 15, 2019 11:45:55 PM
Attachments: Image-1.png

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

This is absolutely ridiculous!
Hideous. Do not let this happen!!



From: Mark Cappelletty
To: Doug Vu
Subject: Sunset Boulevard Disaster
Date: Friday, October 11, 2019 2:44:07 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

I wasn't able to attend the meeting about the Plus Development project on Sunset Boulevard last night, but would like to chime in on my reaction.

The Plus Development / Morphosis design is not only aesthetically hideous — in a region where anything of historic value is being torn down and replaced with modernist eyesores, this is surely the worst — but it also denigrates the Sunset Strip, a major tourist draw for West Hollywood. People come to Los Angeles because of the history of the Strip— the Rainbow, the Whiskey, the Viper Room. Razing this block to put yet another hotel and yet another overpriced series of condos is incredibly short-sighted. After all, what's going to be left to draw tourists to the area if all of the destinations are razed to the ground?

NO ONE wants this. Nobody, save for the developers and those who must be getting kickbacks for letting this move forward. If you want your legacy as Senior Planner for the City Of West Hollywood to be known as "The Guy Who Ruined Sunset Strip," well, this is definitely a move in that direction.

Please reconsider this misguided effort.

Sincerely,

Mark Cappelletty
100 South Wetherly Dr. #2
Los Angeles, CA

From: Maisie Robinson
To: Doug Vu
Subject: Sunset Development - Objection
Date: Sunday, October 13, 2019 7:30:27 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug Vu,

I would like to object the plans to build the monstrous complex on Sunset Strip in LA. The street holds so much history and this building does nothing to contribute to the surrounding community or honour any of the history of the area.

It is a shame that history, culture and creativity are being bulldozed away in favour of ugly buildings for the sake of money.

Regards,
Maisie Robinson

From: Leslie Bray
To: Doug Vu
Subject: Sunset Mixed Use Development Project
Date: Sunday, October 13, 2019 11:00:14 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Mr. Vu,

I'm sure you've been bombarded with emails about the project, but here's another one. Please don't let this eyesore be built. LA is not Vegas. For those who want a Vegas experience, they can hop on a plane or in a car and be there in no time.
Los Angeles is a cool and quirky city that loses a little bit of its soul everyday due to cash grabs from developers who lack the creativity or care to mesh classic with modern and preserve this city's gorgeous views. Sunset has already been highly developed skyward and really doesn't need this monstrosity.

The thought of losing The Viper Room and Terner's just breaks my heart. Sunset used to be synonymous with a certain lifestyle that most people could only dream about. Now it feels like an upscale strip mall.

I'm not sure what the environmental impact of a structure like this would be, but the emotional impact is saddening. Please keep our city beautiful by preserving the beauty that nature gave us. Majestic views that are not encumbered by architectural novelty and bric-a-brac.

Thank you,

Leslie Bray

Sent from my iPhone

From: Joshua Fagen
To: Doug Vu
Subject: Sunset strip building proposal
Date: Saturday, October 12, 2019 9:10:35 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi. I'm a West Hollywood resident and have been for a decade. The building discussed in the article below which is intended to be built on the sunset strip is a hideous eyesore. Why build that when you could build literally anything else?

Also — literally who needs more hotel rooms in West Hollywood?

https://la.curbed.com/2019/10/11/20909841/viper-room-sunset-strip-development-residents?sfns=mo

From: Mark Gmail
To: Doug Vu
Subject: Sunset strip development - 8852
Date: Monday, October 14, 2019 10:14:44 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Doug

I was unable to make it to the community meeting on the development.

Can I get a copy of the presentation.

I personally believe that Los Angeles and West Hollywood should be at the forefront of development unique project. I work in the mass transit field and for our region to grow properly we need to think vertical. Additionally we need to have unique vertical development so we can stay relevant with the world regarding our architecture.

Mark Van Gessel, PE

Sent from my iPad

From:	orange blossom
To:	Doug Vu
Subject:	Sunset Strip development..
Date:	Sunday, October 13, 2019 3:43:28 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

I write to you concerning the Morphosis-proposed structure on Sunset.

My home is Los Angeles, but I'm currently working in San Francisco. Every day I see the sad, imbalanced reality between the Salesforce building (and other, extremely tall, more futuristic structures) ..and the lasting, iconic architecture of San Francisco. Honestly it's heartbreaking.

The rendering of the proposed Morphosis building in Weho gives me an agitated and sinking feeling.

I dearly hope Los Angeles won't perpetrate that San Francisco-style ruin upon our Sunset Boulevard. Consider the Boulevard first, then conceive, plan and create the building.

Thanks for your time and consideration.

Marcie

Sent from my iPhone

From: Tina Madden
To: Doug Vu
Subject: Sunset Strip
Date: Saturday, October 12, 2019 1:32:18 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Although your plan sounds like the way the future of big cities are going, you are going to take down a piece of rock and roll history and try replacing it with some effed up infrastructure that not only is an eyesore but an insult to a community.

Stop the madness.

Tina Madden

Sent from my iPhone

From: Alison Martino
To: Doug Vu
Subject: Sunset Strip
Date: Saturday, October 12, 2019 3:51:29 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I couldn't be at the city council meeting because I'm currently traveling, but I'm one of those WeHo residents who also HATE'S this new mixed-development. This is the biggest slap across the soul, history and beauty of this community. There is no possibility to function with any quality of life if this happens. This grotesque decision have has chosen to ignore pollution, traffic, noise, design, & scale.

I'm not the only one who agrees with my sentiments. Please read this

https://www.facebook.com/121097987946929/posts/2590722794317757?sfns=mo

Alison Martino

From:	Dan Rubin
To:	John D"Amico; Lindsey Horvath; John Heilman; John Duran; Lauren Meister; Jennifer Alkire; Doug Vu
Subject:	Support for 8850 Sunset Boulevard project
Date:	Sunday, September 29, 2019 10:28:34 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello to you all;

Thank you for taking the time to read this email.

I am a home owner and landlord in West Hollywood on Betty Way, a block 200 yards south of the proposed development on the corner of Sunset and Larrabee. I own 3 homes in the area and pay taxes in excess of $30,000 a year on them.

I STRONGLY support the redevelopment of this particular block of Sunset Boulevard and the "Pac Man" building. The rendering is absolutely beautiful. It will be a world renowned site to see if it is done in its entirety. West Hollywood needs more beautiful developments like this and more hotels will bring in more tax dollars and thus make our city better.

PLEASE take note that I am a home owner that is not part of the inappropiately named "Sensibility on Sunset" crowd. This group of quacks send out flyers without putting their names on them and hide behind the anonymity of the internet and blind email accounts.

I have met the members of that group and they are largely miserable anti-development anti-progress nut jobs who are trying to sound bigger than they really are.

PLEASE SUPPORT THE DEVELOPMENT OF THESE BUILDINGS.

I am putting my name, my tax dollars, and my full financial support of the politicians who support this project and I hope I am being heard.

Sincerely,
Dan Rubin

From: Lynn Tarbox
To: Doug Vu
Subject: Support for 8850-8878 Sunset Blvd
Date: Friday, October 11, 2019 3:32:11 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good Afternoon Mr. Vu,

I am writing to express my support for the proposed new developed located at 8850-8878 Sunset Blvd. The design is stunning and perfectly suits the vibrant and eclectic Sunset Strip. Though I am a local I would happily take a “stay-cation” in the proposed hotel.

Thank you for your time,

Lynn Tarbox
2369 S Beverly Glen Blvd
Unit 302
LA CA 90064

From: Rodrigo Rodarte
To: Doug Vu
Subject: Support for Viper Room redevelopment project
Date: Friday, October 11, 2019 1:09:20 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am writing in support of the Viper Room redevelopment project on the Sunset Strip in West Hollywood.

The project will add much needed hotel and housing stock. The design is in-line with the provocative character of the Sunset Strip and the direction of premier building architecture world-wide.

For a handful of naysayers to put their personal aesthetic tastes above the greater good is selfish and shortsighted.

As a nearby resident and employee, and an urban planning and design professional, I strongly support the project.

Thank you for reading.

Rodrigo

Rodrigo R Rodarte
Project Manager

Biederman Redevelopment Ventures
925 N La Brea Avenue, 5th Floor
Los Angeles, CA 90038
(323) 533-6535 (direct + mobile)

www.brvcorp.com

From: Cameron Lelonek
To: Doug Vu
Subject: Terrible building plans
Date: Sunday, October 13, 2019 5:57:59 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Just dont. There is literally no one, except yourself and maybe a few of your constituents that want this done. Take these plans for your monstrous buildings elsewhere.
Sincerely,
Cameron Lelonek

From: Jill & Ben
To: Doug Vu
Subject: That new building in WeHo
Date: Sunday, October 13, 2019 2:11:37 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu:

I've just seen the picture of the proposed building in West Hollywood and I wanted to let you know my thoughts about it. I find it ugly beyond words! And dangerous since the Sunset Strip is right on a major earthquake fault. In fact, the Strip actually IS an earthquake fault! Plus, you're pushing it as "affordable housing," but a scant 11 units that are "affordable" hardly qualifies.

Please reconsider this monstrosity and do something else. This is just awful!

Thank you,
Jill D'Aubery

From: Richard Rothenberg
To: Doug Vu
Cc: Lauren Meister
Subject: The 15 Story proposed Sunset Blvd. Hotel,etc.
Date: Wednesday, October 9, 2019 9:49:59 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug, I am a 28 year resident of WeHo on Larrabee St. North of Sunset. This proposed Monstrosity is the ugliest project I have ever seen come before the City. Aside from not being in accordance with The Sunset Specific Plan it poses many unmanagable and negative impacts to the community. The design belongs in a City on a planet in another galaxy and is WAY TOO BIG! NO on this project!!!!!!!! Respectfully, Richard Rothenberg 1209 Larrabee St. #5

From: ELAINE MORRISON
To: Doug Vu
Subject: The Sunset Blvd. 15 Story Building Proposal
Date: Thursday, October 10, 2019 9:21:45 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu, I am 31 year resident of West Hollywood living on Larrabee St. North of Sunset. From the rendering I find this proposed structure OVERWHELMING! Sunset Blvd. is two lanes each way. The mass, and height are way out of line for our residential community and there are plenty of hotels that still do not have high occupancies. The design does NOT belong in this environment. I am opposed to this project.

Thank you so much,

Elaine

Elaine Morrison, allied member ASID/LA, NKBA

Elaine Morrison Interiors

1209 Larrabee St. #5

West Hollywood, Ca. 90069

310-387-8778

eminteriors1@gmail.com

www.elainemorrisoninteriors.net

The Link to View My Video Remodels on my YOUTUBE Channel:

https://www.youtube.com/channel/UCvS6XzzGT3UoJ4QEN3DFzpw/feed

The Link to My Interior Design Projects on HOUZZ:
https://www.houzz.com/pro/elaine-morrison/__public

From: Eduardo Mellone
To: Doug Vu
Subject: The Viper Room/Others
Date: Monday, October 14, 2019 8:48:07 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi there

Does The Viper Room really need to be demolished? Can't the new structure be built surrounding the Viper Room?
It's senseless to make a new The Viper Room inside, nobody will care because it's going to be gone.
Two other concerns are:
1 - The Sunset Strip will be changed forever. LA is in constant mutation, growing... and many other historical places and sites are gone for progress. But does it need to be like this? Do we need to destroy our history and our landmarks? For what price? Yes, I know it's a huge number but is it worth it? The skyline of NY will never be the same again after 9/11. Do we need to have the same fate as far as not having the same view ever again? The difference is that we are doing it, not the bad guys. We are doing their job - to destroy the memory and the soul of LA - the Sunset Strip looks like a horrible cheap copy of Dubai or Vegas in the image of this project. LA is LA because it's unique. Don't turn this city into just another city. There's no other Sunset Strip or no other The Viper Room in this planet but there are thousands of structures that are similar to the one you want to build. This project has nothing to do with the Sunset Strip - there's a reason places like The Rainbow Bar & Grill and the Roxy (and hopefully soon enough) The Whisky A Go Go are now untouchables: Because it's part of the heart and soul of the city, it's its history, it's a landmark - and so is The Viper Room, even if it's not officially. If there's no way to avoid the construction of this behemoth, can't you at least try to save the original site of The Viper Room and do it with it there?
2 - Traffic. Seems like the powers that be who are behind this project either don't care about LA or aren't familiar with the city. To have this monster construction in the middle of the Sunset Strip will not only make an once historical place to be turned into a horrible regular place but also will increase the traffic in numbers I'm afraid of even wonder about.

PLEASE take the people's consideration. Listen to the neighbors.
Don't be like others in the past.
Be the hero. Not the villain.
Angelinos, tourists, workers, this city and the world deserve to keep on having the ORIGINAL The Viper Room and the Sunset Strip the way it's now.

Eduardo Mellone

From: Linda Lasater
To: Doug Vu
Subject: Thom Mayne"s Morhosis
Date: Monday, October 21, 2019 6:17:44 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Doug Vu:

You asked for comments from the public concerning the design for 8850 Sunset Blvd. I am an artist and a psychoanalyst. Just looking at the renderings of the Thom Mayne design, I am filled with horror about the day it will collapse in one of our earthquakes. Rather than creating visual excitement, I am unsettled by this design.
Perhaps contained in Disneyland, it might signal fun times and an experience that will thrill and chill. Having to look at it everyday would/could induce an uneasiness in the viewer that would not elicit confidence in the citizens of West Hollywood, or visitors to our city.
A no-vote from this person.
Linda Lasater, PhD.

From: Michael Kelley
To: Doug Vu
Subject: Thoughts on Plus Devolopment Viper Room project
Date: Saturday, October 12, 2019 12:50:53 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

Happy Monday. Just finished reading the LA Curbed article. I am just writing in support of the project. My partner and I have lived in this area for the past 13 years (near Sunset and Sunset Plaza). We all know that The Strip desperately needs revitalized in order to survive. Well designed futuristic-style buildings are a step in the right direction. We are not going to bring life back by continuing to build 80s looking hotels like the Edition. This project is worth considering. I'm sure there was plenty of nea-sayers who questioned the design of the new Oculus transit center at Ground Zero in NYC, but look at it now. It fits and it helps draw visitors to the area.

Knowing this will add more cars to Sunset, the only thing we ask is that the city continue to consider traffic issues. The lights need to be better timed and left turn light times BADLY need extended, especially in the blocks that surround this development. Sidewalks need widened in places. The city may need to bite the bullet and consider getting rid of street parking on Sunset. Lets make this area more pedestrian walker friendly.

We also suggest that the developer carefully consider the opening between the structures, allowing for as much light and north/hills facing view as possible from the perspective of the London Hotel room. I would imagine this is a neighbor they will need on their side, if they want to get this project approved and completed in the next decade. ;-)

Michael & Ed

From: Aileen Silverstone
To: Doug Vu
Subject: Vehemently opposed!
Date: Sunday, October 13, 2019 1:13:54 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I do not want this type of architecture in my neighborhood. Vehemently opposed. I did not move her to live in this type of environment.

Aileen Silverstone
West Hollywood resident

From:	Shima Andre
To:	Doug Vu
Subject:	Viper room
Date:	Wednesday, October 9, 2019 6:48:56 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

You cannot continue to change the Sunset Strip and the rock n roll vibe. Leave us alone. People come here as tourists to SEE places like the Viper Room. Demolish it and why would they come?

You're trying to take everything! The Whisky, House of Blues etc! STOP IT AND LEAVE US ALONE!!!! WE ARE NOT NEW YORK OR LAS VEGAS!

You can bet me and my husband and EVERYONE AT SHOREHAM TOWERS will fight you every step of the way!

Sincerely,
Shima Andre

Sent from my iPhone

From: Matej Purg
To: Doug Vu
Subject: Viper Room Block Development
Date: Sunday, October 13, 2019 11:02:44 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am writing to protest the building of yet another hotel/condo development in the Strip. Not only is the design hideous, I am very concerned as to how it will affect traffic during and after construction. I live on San Vicente and it is almost impossible to take a right turn onto Sunset during rush hour. Cars are standing lined up way down San Vicente, blocking driveways. what is the traffic plan for this area/intersection? It surely would have had to be a consideration.

Additionally I am shocked at the revelation that there's be a heli pad atop the construction. The noise pollution in this area is already severe. Helicopters landing and taking off here will make living in this area unbearable. This surelyshould have been a consideration.

In closing, as a resident of 960 N San Vicente I feel ignored and railed over by the city council and their developer friends. We're merely collateral damage in this ridiculous push to erect as many empty hotel rooms as possible.

Sincerely,

Matej Purg

Sent from my iPhone

From: Iain Ohkura
To: Doug Vu
Subject: Viper room building
Date: Saturday, October 12, 2019 5:02:58 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

The new building design is amazing. 30 people at a meeting with nothing better to do shouldn't get to decide what looks good. I love it.
iain ohkura

From: Johnny Lopez
To: Doug Vu
Subject: Viper Room development
Date: Friday, October 11, 2019 12:24:34 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am a resident of West Hollywood and find the proposal for the Viper Room redevelopment completely ridiculous.

That structure looks obscene and so over-the-top for the neighborhood. This is not Vegas. Another hotel? Really? Because that's what the Sunset Strip needs?!

It seems like everything is done for tourists and nothing for residents.

This project needs to be scaled down. The traffic & congestion that it will bring is unnecessary. And 11 "affordable" apartments is not enough.

-Johnny Lopez

From: Thomas Adelson
To: Doug Vu
Subject: Viper Room Hotel
Date: Monday, October 14, 2019 9:53:07 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Vu,

I'm a resident of West Hollywood and support this design. I think it will be great for the City.

https://la.curbed.com/2019/10/11/20909841/viper-room-sunset-strip-development-residents

Thanks,

From: S O
To: Doug Vu
Subject: Viper Room plans are ridiculously ugly
Date: Monday, October 14, 2019 11:58:13 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

What a tacky eyesore! We'll be the laughingstock of California! The part of the 'building' inside the claw looks like the dilapitated Hard Rock New Orleans with dirt packed in it. The claw of the building looks like a flamboyant cruise ship structure! No. Just no.

https://la.curbed.com/2019/10/11/20909841/viper-room-sunset-strip-development-residents

From: George Papanikolas
To: Doug Vu
Subject: Viper Room project.
Date: Friday, October 11, 2019 1:43:30 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Please don’t listen to all those angry grouches who are afraid of any change. Most of us encourage innovative to see architecture and art seven about this new project. If anything I think it should be taller. I live in the hills above and am totally for it. I love seeing all the new developments on sunset. Adding a lot of value to our community.

George Papanikolas
Mobile: 1-323-547-2347
www.GeorgePapanikolas.com
Instagram/Facebook: @georgepapanikolas

From: Kim Gregory
To: Doug Vu
Subject: Viper Room Project
Date: Saturday, October 12, 2019 9:03:20 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear City of WeHo,

I think the build is cool, I would like to more rendering of the space and where The Viper Room is going to be. The Viper Room is a LA Iconic space, outdated, by a new Viper Room should be there. LA history and River Phoenix death, I think a River status would be great as well. He loved music and also was a original investor in House of Blues. Build on WeHo, you have your problems, but building a future city and and creating a city where all people are welcome has been the city goals for years. Keep building and keep up with human rights for all people. I love your safe city.

Kim Gregory
9 year Resident 2000 to 2010
3104290901

From: Tim Rattel
To: Doug Vu
Subject: viper room redevelopment
Date: Saturday, October 12, 2019 7:57:28 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Having read the article re: the Viper room redevelopment plan in Curbed LA today i just want to add my voice that I think the building is beautiful and can't wait to go see it in person. The mixed use, especially building the affordable housing part, is important to me. Aesthetically, and as an architecture buff, I think LA needs more interesting buildings.

From: Brian Griffith
To: Doug Vu
Subject: Viper Room Redo
Date: Sunday, October 13, 2019 5:47:51 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dude, that building is laaaaaaaaame. Keep it modernized, Hollywood old school. Have your boys at Morphosis try again.

From:	Michael Hayes
To:	Doug Vu
Subject:	Viper Room Replacement - Support for Project
Date:	Friday, October 11, 2019 10:43:29 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello Doug,

I'm writing to you in support of the replacement of the storied venue with the newly proposed Morphosis-designed building.

I've been a lifelong fan of classic rock and I really admire the history of the club, I'd hope that the new building can somehow incorporate the same feel and intimacy of the Viper Room, but I don't think that's up for debate...

Either way, the property along Sunset blvd is a prime location, and as it stands very much underutilized for such a well-connected and amenitized location. The proposed use would be much more appropriate for the future of the strip. The design is certainly zaney and wild, but much preferable to any of the other generic boxes going up all over the region.

I speak in support of this project, not as a resident of West Hollywood, but as a frequent visitor and one who relies solely on the often slow moving buses (302 or 2) that transport me from my home in Echo Park to any number of establishments along the strip.

Best of luck in your review of this project!

--

Michael Hayes
michaelhayes.la

From: Jeff Hartig
To: Doug Vu
Subject: Viper room
Date: Saturday, October 12, 2019 2:59:37 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr Vu,

The story states: "Projects like this one that are within a “transit priority” area, meaning it’s close to a significant transit corridor, CAN EXCLUDE AESTHETICS under state regulations. The aesthetics were reviewed in an initial study.

Your admitting your project can be a piece of trash by your very explanation and the state can't stop you "...Can exclude aesthetics...." Well the council certainly excluded them. Thus proving my point. Who reviewed and with a clear conscious approved it? Was it a myopic babboon? Because they clearly didn't have residents in mind when they did.

Jeff Hartig
Weho resident
884 palm ave #104

From: Jim McKenna
To: Doug Vu
Subject: Viper
Date: Friday, October 11, 2019 3:52:36 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I love the plan to replace the Viper with two new interesting buildings!

Jim McKenna



Virus-free. www.avast.com

From: SIBYL ZADEN
To: Doug Vu
Subject: Vipor Room m0nstocity
Date: Thursday, October 10, 2019 1:21:58 AM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

You are RUINING the skyline and landscape of the beautiful Sunset Strip! You are potentially creating a traffic NIGHTMARE.
I have lived here right by the Sunset Strip for 47 years. and loved it.

From: Chris Dower
To: Doug Vu
Subject: Vu
Date: Friday, October 11, 2019 8:48:35 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I live and work in the area, I think the new viper room building looks good and will be a nice addition to the strip. Please keep the interesting design.

From: Matt Rosen
To: Doug Vu
Subject: Weho Viper Room Project
Date: Saturday, October 12, 2019 5:14:11 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Unlike many others who find the building's design to be ugly and horrific, I personally find it quite good looking. I like buildings that are different, with some balls, and yours certainly meets the criteria.

But holy macaroni, that location is not the right spot.

LA is a big enough city here I am sure you can find a better suited spot. I would highly consider it, less the ghosts of fallen rock stars haunt you forever more.

From: Tarin Wilson
To: Doug Vu
Subject: West Hollywood Project - Morphosis Design
Date: Saturday, October 12, 2019 1:27:18 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Doug,

I live in the Bird Streets off of Doheny Drive.
After hearing about the meeting that just took place and being asked to send our comments to you, I felt obliged to communicate and express my concerns.

I have lived in the neighborhood for 15 years and the rampant development of residential properties up the Doheny hill is already overwhelming so to hear about more commercial density on Sunset Blvd. is frustrating.
The stretch of road from Cory Avenue through Sunset Plaza and beyond is constantly backed up and heavily trafficked most every weekday. The Edition hasn't even opened yet so to consider another hotel and residential project before the impact of the Edition has been seen and experienced seems unwise and thoughtless.

Additionally, the monstrous design would be an eyesore on the community. The Edition has been designed with a simple, luxurious aesthetic but this new project would be a downgrade and it's just plain awful.
While design is subjective, SO many people are opposed to what this project looks that the City of West Hollywood should take this into consideration. Does the city not value and listen to its own community or is it just about development for higher revenue for the city?

Please do us all the favor and revisit this project in terms of overdevelopment, grotesque design and impact on the neighborhood.

Tarin Wilson

Tarin Wilson

1409 Bluebird Avenue
Los Angeles, CA 90069
C: 310.849.0296

From: SCG-ComptonUtilityRequest [mailto:SCG-ComptonUtilityRequest@semprautilities.com]
Sent: Friday, September 20, 2019 1:34 PM
To: Doug Vu
Subject: Atlas map 43-19-0937 8850 Sunset Blvd Project

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello, I am sending you a Atlas map for your project 8850 Sunset Blvd in West Hollywood. If the map is not needed, please disregard. I have assigned your project to a lead planner. That lead planner will contact you to provide Gas Company information you need to help you complete you project.

Please contact SCG-COMPTONUTILITYREQUEST@SEMPRAUTILITIES.COM for any Will Serve Letters, Atlas Maps, and Paving Clearance future requests.

Thank you,
Sincerely,

William Perez
Pipeline Planning Assistant
Wperez@Semprautilities.com
Northwest Region
(310) 687-2011



701 N. Bullis Rd.
Compton, CA 90224-9099

September 20, 2019

City of West Hollywood
8300 Santa Monica Blvd
West Hollywood, CA 90069
Attn: Doug Vu

Subject: Maps - 8850 Sunset Blvd West Hollywood, CA 90069

Enclosed is the information you requested relating to the location of gas facilities within the area of your project. The information we have provided was obtained from a search of all our available records and are approximate in nature. Due to numerous factors, the depths of our facilities vary and should not be taken for granted. If exact depth location and information is required at points of possible interference, it will be necessary to physically check the facility in question.

It is extremely important that you furnish us with **"signed"** final plans and subsequent plan revisions as soon as they are available. A minimum of twelve (12) weeks is needed to analyze your plans and to design required alterations due to any conflicting facilities. Depending on the magnitude of the work involved, additional time may then be required to clear the conflict. Please keep us informed of construction schedules, preconstruction meetings, etc., so that our work can be scheduled accordingly.

Upon request, at least two (2) working days prior to the start of construction, we will locate and mark our active underground facilities for the contractor at no cost. Please call Underground Service Alert (USA) at (800) 422-4133.

You will also have to contact our Transmission Department regarding the above-mentioned request. CPUC Regulations require notification of both SoCal Gas Distribution and Transmission of all work being conducted. Please contact SoCal Gas Transmission, at 9400 Oakdale Avenue, Chatsworth, CA 91313, **socalgastransmissionutilityrequest@semprautilities.com**. They will need a notification letter and plans.

If you have any questions or require additional information please contact me at (310) 687-2011

Sincerely,

William Perez

William Perez
Pipeline Planning Assistant
SoCalGas-Compton HQ

50
Feet

Map Type: **Gas Asset Map**

Printed By: **Perez, William**

LIABILITY STATEMENT
The facilities and their depiction on these maps are believed to be reasonably accurate, but the maps are not to be used in lieu of field verification or calling USA at 800-422-4133. NO WARRANTY expressed or implied (including of merchantability or of fitness for particular purpose) is made as to any matter, including but not limited to, the design, size, type or location of the facilities, their presence of absence, the accuracy of the maps, the means used to transmit the data, absence of viruses (if transmitted electronically, by disk or diskette), data translation or transmission errors or omissions, compatibility with the user's system or its ability to interpret the data correctly or at all, or any other matter. The Gas Company has no liability for damages (direct, indirect, consequential, incidental or punitive) arising from the transmission, receipt or use by others of the maps or information contained in the maps.

SoCalGas
Sempra Energy utility

50 0 50 100 150 200
Feet

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
dvu@weho.org
Doug Vu, Senior Planner
City of West Hollywood, Planning & Development Services Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

October 8, 2019

Notice of Preparation of an Environmental Impact Report for the Proposed 8850 Sunset Boulevard Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion and public release. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[2] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

[2] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD'S *CEQA Air Quality Handbook* South Coast AQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: http://www.aqmd.gov.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project's air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC190918-03
Control Number

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

BOARD OF SUPERVISORS

HILDA L. SOLIS
FIRST DISTRICT

MARK RIDLEY-THOMAS
SECOND DISTRICT

SHEILA KUEHL
THIRD DISTRICT

JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

October 17, 2019

Doug Vu, Senior Planner
City of West Hollywood
Planning and Development Services Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. Vu:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "8850 SUNSET BOULEVARD PROJECT," CONSISTS OF THE DEMOLITION OF THE EXISTING COMMERCIAL BUILDINGS AND SURFACE PARKING ON THE PROJECT SITE AND CONSTRUCTION AND OPERATION OF A NEW MIXED-USE COMMERCIAL AND RESIDENTIAL BUILDING, LOCATED AT 8850 SUNSET BOULEVARD, WEST HOLLYWOOD, FFER 2019005533

The Notice of Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We will reserve our comments for the draft EIR analysis.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. Proposed structures greater than 30 feet (measured from finished grade to the eve, or top of parapet) in height shall provide a minimum unobstructed width of 28 feet, exclusive of shoulders, except for approved security gates in accordance with Section 503.6 and an unobstructed vertical clearance "clear o sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high or the building is more than three stories.

2. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2. Cross hatch the Fire Department vehicular access on the site plan and clearly depict the required width.

3. The proposed development shall comply with the County of Los Angeles Fire Code Appendix D105.3 proximity to building. At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572mm) and a maximum of 30 feet (9144mm) from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official preferably the longest side of the building.

4. Structures and outdoor storage underneath High Voltage Transmission Lines (66 kilovolts or greater) shall comply with Fire Code 316.6 and the County of Los Angeles Fire Department Regulation 27. Any proposed construction or land use within 100 feet of the drip line of High Voltage Transmission Lines shall be subject to review by the Fire Marshal.

5. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Fire Code 504.1 revise the site plan to show the required firefighter walking access.

6. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

7. Buildings and facilities: Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirements of this section and shall extent to within 150 feet (45 720 mm) of all

portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility. 2016 County of Los Angeles, Fire Code Section 503 and Section 503.1.1.

8. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan/exhibit, tentative map, and Final Map along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.

9. Fire Department vehicular access roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.

10. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

11. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.

12. Maintain a minimum unobstructed width of 28 feet, exclusive of shoulders, except for approved security gates in accordance with Section 503.6 and an unobstructed vertical clearance "clear o sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high, or the building is more than three stories.

13. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2. Cross hatch the Fire Department vehicular access on the site plan and clearly depict the required width.

14. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 37 ½ tons and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface. Fire Code 503.2.3.

15. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.

16. Fire Apparatus Access Roads shall not be obstructed in any manner, including the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

WATER SYSTEMS REQUIREMENTS:

1. For all occupancies other than one and two family dwellings and Group R-3 buildings including commercial, industrial, multi-family dwellings, private schools, and institutions, fire hydrant spacing shall be 300 feet ((91.44m). No portion of lot frontage shall be more than 200 feet (60.96m) from, via vehicular access, a public hydrant. No portion of a building shall be more than 400 feet (121.92m) from, via vehicular access, a properly spaced public hydrant.

2. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.

3. The required fire flow for the public fire hydrants for this project is 8,000 gpm for at 4 hour duration at 20 pounds psi. Actual fire flow for the proposed development will be determined at the County of Los Angeles Fire Department Fire Prevention Land Development tentative map review.

4. All required public fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.

5. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,

Michael Y. Takeshita

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

PLANNING DIVISION
OCT 25 2019
RECEIVED
CITY OF WEST HOLLYWOOD

City of West Hollywood
Planning & Development Services Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Att: Doug Vu, Senior Planner
Re: 8650 Sunset Blvd. Project
Environmental Impact Report / Public Scoping Meeting

October 25, 2019

Dear Mr. Vu:

While I found yourself, and support staff very cordial and polite, and showing a willingness to help, please take my comments as a professional criticism of the structure and planning of your first Public Scoping Meeting (PSM). As a retired professor emeritus, I used to tell my sociology students that the worse grade one could get in college is a "D." Anyone can fail with an "F," but a "D" looks like you tried. I grade the PSM a "D."

My comments will first focus on the meeting itself, then I will add my feedback about specific aspects of the 8650 Sunset Blvd. Project (SBP).

Public meetings should start on time. Yours started 10 minutes late. I left my home at Horn Plaza at 6 p.m. and it took over 20 minutes during our West Hollywood "rush hour" to drive what should have taken 5 minutes. While there was a sign-in table, there was no staff member encouraging people to use it. There was an empty basket to take feedback letter forms, which were only haphazardly and belatedly distributed to those in attendance in the middle of the so-called "Break-Out Sessions."

I counted 40-45 community residents in the small meeting room, several did not stay long. When the meeting was called to order, it quickly became apparent that the bright lighting in the room made it extremely difficult, if not impossible, to make sense of the power-point presentation. (Several days later I was able to pick up a hardcopy from City Hall—thank you.) When some of the lights were dimmed or turned off, the problem still remained because of the *detail* of some of the slides (e.g., Project Location, Project Overview, Conceptual Project Design – north, the EIR Process, and Environmental Issues). For over

forty years, I've taught in rooms the size of this meeting room, and it does no good to race through overly complex slides. Heaven forbid we'd waste a little paper with an actual handout.

The structural problem of the meeting became evident to many of us in attendance when instead of asking public questions so the entire audience could hear the answer(s). The audience was being pushed in the direction of the Break-Out Sessions / Stations. What struck me as a weak and paternalistic excuse was given that some members in attendance would be too shy or uncomfortable to speak in public. To put it mildly, there was a distinct lack of shyness in the room. But that raised another structural problem: One had to made a *choice*—either speaking to the W.H. City staff about the CEQA process and environmental issues or speaking to the Project Description folks, the proposed builders. You can't be in two places at the same time!

The community residents in the room clearly wanted to hear answers from both, and enjoy the collective benefit of hearing an answer to an informed resident's question. The W.H. Planning staff resisted this idea. It struck me that purpose of the information flow was *not* to inform the local community but to provide an atomized-type of feedback to the City and the Developers. (I felt "cooled out," a term I'll return to later.)

The argument spilled over in the room when the Environmental Issues slide, containing 20 bullet points, jumped to the next slide—Issues not to be evaluated in the EIR—which deleted 6 out of 20. "Aesthetics" was at the top of the list, and the room erupted like a wildfire (which, ironically, was also on the list). Given that a 200-foot building is being proposed on Sunset, traffic already bumper-to-bumper at key times—why take it off the list? Another twenty minutes was spent arguing about the format of the meeting, not seriously addressing the question.

As an aside, the meeting was covered by a smart local journalist, Mr. Cameron Kiszla of the Beverly Press, who provided an answer in their October 17, 2019 (Vol 29, No. 42) edition. [I am attaching a copy of this article and ask that it be included in the EMI.]

While I did speak to Mr. Mick Unwin, Project Director; Mr. Charles Essing, Managing Director; Ms. Katie Mangin, Project Manager; Ms. Barbar Grover, Visual Communications—all connected to the Project "Station" during Breakout—the information I received was friendly but very limited. I didn't feel the least bit informed. In sociology there's a term, "cooled out," which is an ethnographic term that come out of studies on being hustled. I felt "cooled out." I would have liked to have heard my concerns responded to by *both* the developers and the City—not at Stations—but at meeting, as happens when our City Council meets.

This particular PSM meeting should *not count in your planning process*. It should be conducted in an organized, professional manner. You need to start again and do it right (e.g, Learn proper lighting for Power Point.) **I request that you need to re-do the meeting.** "Do Not Pass Go; Do Not Collect $200," as the Monopoly Game card says. This was an embarrassment to the EIR and not in the spirit of the CEQA.

I grew up in West Hollywood before it was a city. First, Kings Road, then Alfred Street, where I celebrated my 7th and best birthday. I remember when CVS was a bowling alley! My current stay on Horn Avenue began in late 1989, and today I turn 69.

I wonder about an exotic 200-tall structure near an earthquake fault.

I hate to drive in our town already; our traffic is sure to get worse under this proposal.

I'm greatly saddened the last three family owned restaurants on the Sunset Strip will be lost—Mrs. Masachika Takahashi (Ten Masa Sushi – not directly connected to this project), and Mr. Kino (Ta-Ke Sushi) and Mr. Sandro Oliverio (Amarone Kitchen & Wine), whose warm, friendly restaurants make West Hollywood feel like a community, and not Las Vegas. No relocation assistance for these dear folks who've worked for decades to provide an intimate atmosphere where customers feel a genuine welcome and make West Hollywood proud? There is a great *social* environment loss by destroying family businesses. Apparently, there is no bullet point for that.

Sincerely,

Michael D. Vivian, Ph.D., LMFT
Professor Emeritus of Sociology
1230 Horn Avenue, No. 415
West Hollywood, CA 90069-2175

Encl.(2 pages) – *Park Labrea News / Beverly Press*, "Viper Room visuals draw public's ire" by Careron Kiszla (October 17, 2019, pp. 1 & 26)

ny, with
s in the
er 70s

• Bridge housing in Hollywood pg. 3
• Burglary suspects sought pg. 4

lume 29 No. 42 Serving the Beverly Hills, West Hollywood, Hancock Park and Wilshire Communities October 17, 2019

Viper Room visuals draw public's ire

■ Project's aesthetics can't be considered in environmental review

BY CAMERON KISZLA

Opponents of a plan to build a 15-story tower on the site of the Viper Room nightclub railed against the project in an Oct. 10 environmental impact report scoping meeting at the West Hollywood Library. One of their biggest complaints, however, will have to wait to be addressed.

The meeting was intended to elicit feedback from the community about what they'd like to see studied as part of the EIR, and multiple people in the crowd of a few dozen people complained that the aesthetics of the project, which was designed by Pritzker Prize-winning architect Thom Mayne's firm Morphosis, was already excluded.

"Why is air pollution more important than eye pollution?" asked attendee Richard Rothenberg.

Silver Creek Commercial Development's project, which is expected to be approximately 200 feet tall at 8850 Sunset Blvd., features a pair of structures that join at the top and the bottom: one plant-covered glass condominium building and a crescent-shaped structure wrapped in white that the developer's website calls "a unique hotel designed in a way never seen before in architecture."

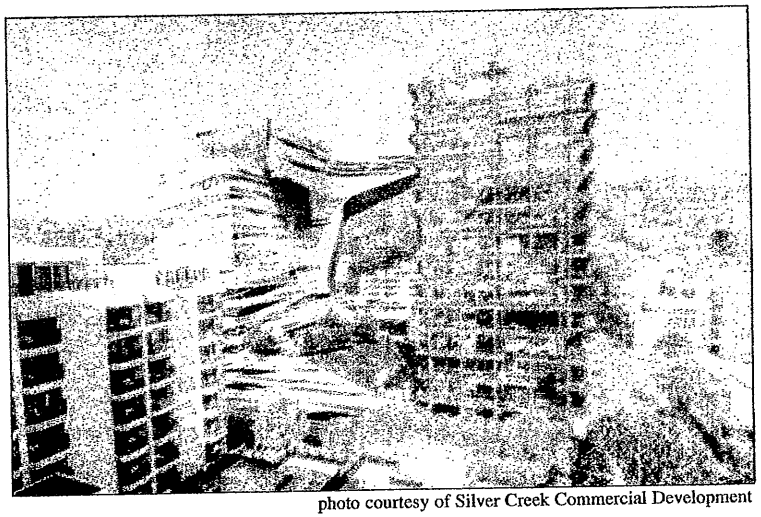


photo courtesy of Silver Creek Commercial Development

The 8850 Sunset Blvd. project's architecture has drawn strong responses from West Hollywood residents.

Some attendees, however, were less kind.

"This belongs in Dubai," Rothenberg added. "I mean, it's freaky."

The bold architectural choices can't be considered as part of the EIR because, under the California Environmental Quality Act, the impact of aesthetics is excluded for projects in a transit priority area, such as this project.

The visuals can, however, be a factor in the project's overall approval, according to Jennifer Alkire, planning manager for current and historic preservation planning for the city.

Once the EIR is complete, the project's visual appeal, as well as many other factors, can be considered as the city's Planning

See **Project's** page **26**

Project's appearance can be considered by Planning Commission, City Council

From page 1

Commission and, ultimately, the City Council, decide if they will allow the construction of a five-star 115-room hotel and 41 housing units, 31 of which will be market-rate condominiums and 10 of which will be affordable housing. The complex, which is expected to be approximately 369,000 square feet, will replace approximately 21,000 square feet of building space, including the Viper Room nightclub that was once owned in part by Johnny Depp. It will also feature four levels of subterranean parking with 269 parking spaces.

Those in attendance were divided on the project's merits, though one attendee, West Hollywood resident Richard Lewis, said he supports the project that aims to go up only two doors down from his home. Lewis said he likes that the developers included affordable housing, which "this city desperately needs," but he also appreciated the building's architecture.

"They're going to build something. I'd prefer it to be architecturally interesting," Lewis said.

If the project receives all necessary approvals, construction is expected to begin in 2021 and be finished by 2024.

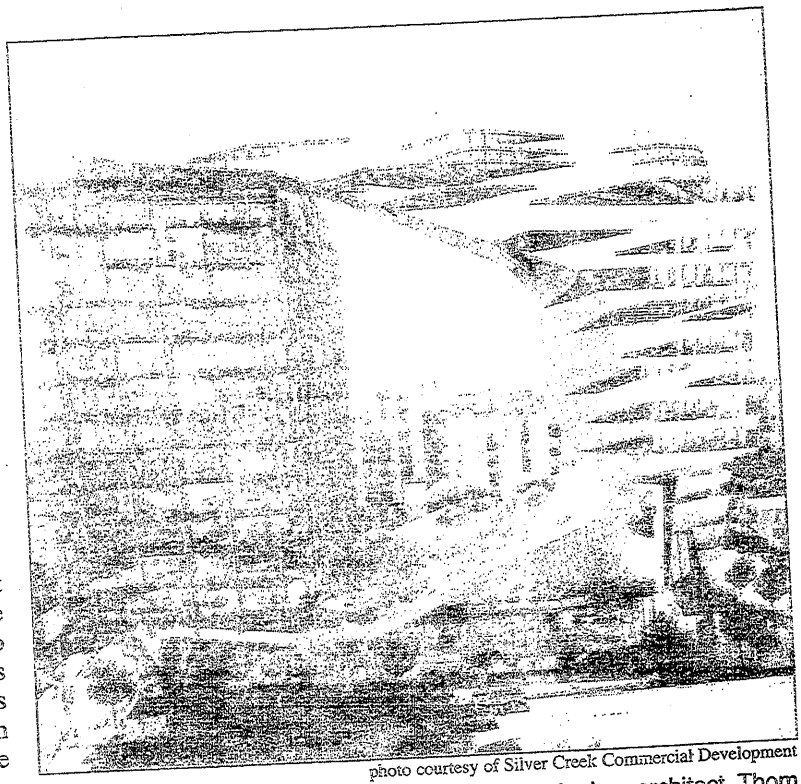


photo courtesy of Silver Creek Commercial Development

The project was designed by Pritzker Prize-winning architect Thom Mayne's firm Morphosis.

The city is accepting written comments through Oct. 25 related to what people would like to see studied as part of the EIR. Comments can be sent to Senior Planner Doug Vu at dvu@weho.org.

From:	Antoinette O"Grady
To:	Doug Vu
Cc:	Jennifer Alkire
Subject:	8850 Sunset Blvd. NOP Environmental Impact Report
Date:	Friday, October 25, 2019 3:01:39 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

As I was unable to attend the recent environmental scoping meeting, I want to add my comments in strong opposition to this proposed development on environmental grounds.

I understand that there is still a rigorous process before the application moves to the decision making phase, but, as a long time West Hollywood resident on Larrabee, I want to record my own concern that the scale and scope of the project as proposed will do nothing to enhance our neighborhood. Rather, it will inevitably detract from and damage our environment by concentrating yet more vehicles on our already jammed streets, whilst significantly adding to air and noise pollution.

I have read the initial study. The number of potential significant impacts is unsurprising. In exchange, the project offers nothing to our community to compensate for its permanent environmental burden. The inducement of ten income - restricted units is paltry and insufficient compared to the impact alone of placing a parking garage with 269 spaces in a wholly inappropriate area. And what of the additional burden of the ride-share vehicles that may flock to the site's businesses? However many parking spaces the developers wish to include, it is inevitable, given the poor public transport infrastructure in the city, that a significant added air and noise pollution impact, and further congestion, would arise. I urge some consideration of rideshare vehicles in considering the development's environmental impact.

I have a number of other concerns that I will save until further in the application process. For now, I'll conclude by saying that if a developer wants to build in our city, there needs to be a more equitable exchange for the negative impact that this project would occasion. As the proposal stands, this development will take away local businesses that residents have supported for years, whilst damaging our environment, and irrevocably changing the livability of our neighborhood. That's not good enough for this city and its people.

Sincerely,

Antoinette O'Grady

From: Aliki Papadeas
To: Doug Vu
Subject: 8850 Sunset
Date: Wednesday, October 9, 2019 6:47:47 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am a resident of West Hollywood, I live at 1211 Horn Avenue and I would like to know why the developer has proposed adding an “emergency helipad” to their plans.

Why is there any need for helicopters to be landing and talking off 1000 feet from my residence? Why is an emergency helipad required? I strongly oppose this helipad. I oppose this project as it is rendered, because the height and scale of this project are totally out of proportion to the surrounding neighborhood.

We dont need more hotel rooms and/or emergency helipads in this neighborhood!

Sincerely,
Aliki Papadeas, 30 year WeHo resident
1211 Horn Avenue #304
West Hollywood CA 90069,

From: Cathy Waldman
To: Doug Vu
Subject: Proposed Project at 8850 Sunset Blvd.
Date: Wednesday, October 23, 2019 8:58:24 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Mr. Vu,

I am a 22 year resident of Larrabee St. and would like to go on record that I am opposed to the project as presented at 8850 Sunset Blvd. The size and density of this project is too big for the space and neighborhood. Something 50% smaller would be more reasonable and appropriate for this narrow and curvy street. Sunset Strip is over saturated with hotels, the residents of this city don't want anymore hotels.

Developers and the decision makers at the City continue to overlook that West Hollywood residents desperately want to keep our small town feel. We are trying to protect what's left of the charm and history that made us want to live here. These large buildings that are being erected on Sunset have a negative effect on those living in the surrounding area, WEHO Heights and the streets North of Sunset. With each new construction the quality of life in our neighborhood deteriorate as the cost of living, traffic, noise, climate and air quality gets worse and our safety is compromised. Many streets above Sunset have no outlet and residents rely solely on Sunset Blvd. to come and go from their homes, since there is no way out to the North. Does that ever get any consideration?

8850 Sunset Blvd. deserves an exciting use of the space that would honor and grow the history of this legendary area that is mainly known for its exciting nightlife and home of the entertainment industry. As a second generation Los Angeles native, it saddens me to watch the continued destruction of the things that made Los Angeles special, it's so very greedy and short sighted. This site should be a destination for everyone; tourists and more importantly the people that make this neighborhood their home. The city should be protecting the legacy of the Sunset Strip and pushing for something to be built that would appropriately honor this iconic street.

Sincerely,

Cathy Waldman
1219 Larrabee St. #2
West Hollywood, CA 90069

From: DIANNA
To: Doug Vu
Subject: Re: 8850-8878 Sunset Boulevard proposed building
Date: Tuesday, October 8, 2019 4:32:35 PM

Hi Doug,
Thank you for your reply.
The information about the helipad makes sense. I just hope it won't be used for anything other than emergency evacuations.

I'm also concerned with the additional traffic in the area due to this building. The traffic on Sunset, Larrabee, Palm and Holloway is already unbearable. People already get impatient coming up Palm to turn left onto Holloway/Sunset - so they pass on the left instead of waiting their turn, which blocks cars trying to come down Palm

The side street/alley, Nellas, is continually used as a parking lot to huge machines (cherry picker, I believe) which narrows that end of the street to one lane. There is bound to be a head on collision one day from people going south on Palm and turning onto Nellas. You can't see around this machine, and yet, it is there more often than not.

I don't understand the need for yet another hotel nor the need for more over-priced condos.

I have been a resident of West Hollywood since 1980 and it seems we've gone from a city that supports its residents to a city that focuses on high priced, membership only, exclusive clubs - such as Soho House, the San Vicente Bungalows, the Arts Club to name a few.

I wish I could attend the meeting this week, but will be out of town.

Thank you for listening. I don't often get the chance to speak with a senior city planner. I greatly appreciate your input.

Best regards,
Dianna Redman

Sent from my iPhone

> On Oct 8, 2019, at 2:36 PM, Doug Vu <dvu@weho.org> wrote:
>
> Hi Dianna,
>
> John forwarded your email to me and asked that I respond. The helipdad is a Fire Department requirement for high-rise buildings that will ONLY be used for emergency life safety events, and will not be used for any other purpose. However, I will add your email below to the public record.
>
> Let me know if you have any questions,

Regards,
Doug

Douglas Vu, ASLA
Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
(323) 848-6318


From: John Keho
Sent: Saturday, October 5, 2019 6:32 PM
To: John Heilman
Cc: diannaredman@aol.com
Subject: Re: 8850-8878 Sunset Boulevard proposed building

Hi Dianna, I'll have the planner on the project reach out to you Monday.

John Keho

Sent from my iPhone

On Oct 5, 2019, at 3:22 PM, John Heilman <JHeilman@weho.org> wrote:

> Hi Dianna. Nice to hear from you. I'm copying our staff. I believe the fire department requires new high rise buildings to be designed with helipads which are only used in the event of an emergency. I will let our Community Development Director give you more information. Hope you are well. John
>
> Sent from my iPhone
>
> On Oct 5, 2019, at 5:54 PM, "diannaredman@aol.com" <diannaredman@aol.com> wrote:
>
> > **CAUTION - EXTERNAL SENDER.** Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.
> >
> > Hi John,
> >
> > I hope this finds you well and happy.
> >
> > I won't be able to attend the "Draft Environmental Impact Report Scoping Meeting" on October 10th for the 8850-8878 Sunset Blvd

proposed building as I will be out of town.

Please note my biggest concern as a neighbor to this proposed building .(I live at Palm and Sunset) I do not want a building with a helipad in the neighborhood. The noise would be unbearable and unfair to local residents.

Surely there is a noise regulation against such things.

Already we have multiple businesses in the area that are membership only and that clearly do not serve
local long term residents such as myself. I fear the helipad would only attract more of the same at the expense of the renters and home owners in this area.

The building I can deal with -- although I can't imagine how traffic can be any worse on Sunset. It is already out of control.

Please NO HELIPAD!

I know Deah would agree. 

Thank you for listening,

Dianna Redman
1011 Palm Ave #107
West Hollywood, CA. 90069-4069
310-291-3730

From: Susan
To: Jennifer Alkire
Cc: Doug Vu
Subject: Re: resident comments on 8850 Sunset Project Initial Study
Date: Monday, October 21, 2019 11:51:18 AM

Thanks so much Jennifer. Appreciate this email. I also appreciate you and Doug explaining to me how this process works. And thanks for the work you perform for our city

Best,
Susan Milrod

Sent from my iPhone

> On Oct 21, 2019, at 11:15 AM, Jennifer Alkire <jalkire@weho.org> wrote:
>
> Hi Susan,
>
> Thanks for reaching out. I can confirm that I received your email and attachment, and that it will be included in the record.
>
> If you have any other questions in the next week, feel free to contact me directly.
>
> Thanks,
> Jennifer
>
> Jennifer Alkire, AICP
> Planning Manager, CHPP
> City of West Hollywood
> (323) 848-6487
>
> ---
>
> **From:** Susan Milrod [mailto:susanmilrod@gmail.com]
> **Sent:** Sunday, October 20, 2019 7:01 PM
> **To:** Jennifer Alkire
> **Subject:** Fwd: resident comments on 8850 Sunset Project Initial Study
>
> **CAUTION - EXTERNAL SENDER.** Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.
>
> Jennifer — I sent this to Doug and got a message that he was away and it should go to you.
>
> Please let me know that it's safety arrived, etc.

Thanks so much, Susan Milrod

Begin forwarded message:

From: Susan Milrod <susanmilrod@gmail.com>
Subject: resident comments on 8850 Sunset Project Initial Study
Date: October 20, 2019 at 6:51:18 PM PDT
To: Doug Vu <dvu@weho.org>

Doug - I've attached my comments regarding this study. Please let me know if you need me to reformat them, etc. I know my name, address etc. fall on a separate page — but I wasn't sure if whoever receives this study from you should know my identity (including whether it goes to the builders).

Would appreciate a quick email letting me that this document is now in your wonderful hands. That way, won't get OCD about physically bringing a copy to City Hall to give you.

Thanks for everything and best your way,

Susan Milrod
310-867-5031

From: Amit Cohen
To: Doug Vu
Subject: Viper room plan
Date: Friday, October 11, 2019 8:24:12 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

I am all in! It looks fantastic and would be a great asset to the sunset strip.

My vote is yes

Sent from my iPhone

Steve Taffolla

From: GODEK, GWENN <gwenn.godek@lausd.net>
Sent: Friday, September 27, 2019 10:52 AM
To: Michele Webb
Cc: Wong, Christy
Subject: RE: Information Request for a Development Project - 8850 Sunset Boulevard Project in West Hollywood

Got it, Michele. Will get you a response as soon as possible. FYI, I'm going to be copying Christy on these emails going forward, so that I'm not your only contact here.

Please note that West Hollywood Elementary School, a sensitive receptor, is located less than 300 feet from the project site. Given this school's proximity to the proposed site, we would typically submit the following comments on your Neg Dec/MND/EIR (whatever the case may be) when it is published. However, I'd like to start taking the opportunity to send you our standard comments now for your consideration and possible inclusion in your environmental document as warranted.

Let me know if you have any questions or concerns. Providing the information below at this stage in the process is a new strategy we are trying out, so I welcome your feedback.

Air Quality

The proposed Project will share local roadways with the students and staff of West Hollywood ES, which is located a short distance south of the proposed project site. This should be considered a sensitive receptor to air pollution impacts. Construction activities for the proposed project could result in short term impacts on ambient air quality in the area resulting from equipment emissions and fugitive dust. To ensure that effective mitigation is applied to reduce construction air pollutant impacts on the schools, we ask that the following language be included as a mitigation measure for air quality impacts:

- If the proposed mitigation measures do not reduce air quality impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related air emissions at the affected schools. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

Noise and Vibration

Noise created by construction activities may affect West Hollywood ES. These construction activities include grading, earth moving, hauling, and use of heavy equipment. The California Environmental Quality Act requires that such impacts be quantified and eliminated or reduced to a level of insignificance.

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level. To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise impacts:

- If the proposed mitigation measures do not reduce noise impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related noise at the affected schools. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for LAUSD transported students.

- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.

- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.

- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.

- Haul routes are not to pass by ***any*** school, except when school is ***not*** in session.

- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

Thanks! Have a nice weekend!

Regards,
Gwenn Godek
CEQA Advisor | CP
LAUSD | OEHS
(d) 213.241.4707
(c) 310.936.4303
http://achieve.lausd.net/ceqa

From: Michele Webb <mwebb@dudek.com>
Sent: Friday, September 27, 2019 8:12 AM
To: GODEK, GWENN <gwenn.godek@lausd.net>
Subject: Information Request for a Development Project - 8850 Sunset Boulevard Project in West Hollywood

Dear Ms. Godek,

Please find attached a request for information from LAUSD regarding a proposed development project in the City of West Hollywood (the 8850 Sunset Boulevard Project).

Feel free to call or email me with any questions on this request.

Many thanks in advance for your assistance.

Best regards,

Michele Webb

Michele Webb
DUDEK
38 North Marengo Avenue / Pasadena, CA 91101
626.204.9823

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov

Governor's Office of Planning & Research

OCT 02 2019

STATE CLEARINGHOUSE

September 24, 2019

Doug Vu
West Hollywood, City of
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: SCH# 2019090447, 8850 Sunset Boulevard Project, Los Angeles County

Dear Mr. Vu:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   - **a.** A brief description of the project.
   - **b.** The lead agency contact information.
   - **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   - **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   - **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   - **a.** Alternatives to the project**.**
   - **b.** Recommended mitigation measures**.**
   - **c.** Significant effects**.** (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   - **a.** Type of environmental review necessary.
   - **b.** Significance of the tribal cultural resources.
   - **c.** Significance of the project's impacts on tribal cultural resources.
   - **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   - **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
   - **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

SANITATION DISTRICTS OF LOS ANGELES COUNTY

Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

November 22, 2019

Ref. DOC 5309606

Mr. Doug Vu, ASLA
Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. Vu:

NOP Response for the 8850 Sunset Boulevard Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on September 19, 2019. The proposed project is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer lines, which are not maintained by the Districts, for conveyance to either or both the Districts' Sherman Trunk Sewer, located in Huntley Drive at Santa Monica Boulevard or the Sherman Relief Trunk Sewer, located in Palm Avenue north of Santa Monica Boulevard. The Districts' 12-inch diameter Sherman Trunk Sewer has a capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 0.8 mgd when last measured in 2013. The Districts' 18-inch diameter Sherman Relief Trunk Sewer has a capacity of 4.1 mgd and conveyed a peak flow of 1.6 mgd when last measured in 2013.

2. Wastewater generated by the proposed project will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works.

3. The expected increase in average wastewater flow from the project site, described in the notice as a 275,078 square-foot mixed use development, is 33,423 gallons per day, after the structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Services, select Will Serve Program under Wastewater Program and Permits, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will

Printed on Recycled Paper

be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Services, select Rates & Fees under Wastewater (Sewage). In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:dc

cc: A. Schmidt
A. Howard

8850 Sunset Boulevard Project
Comments on scope & content of the Environmental Impact Report

(please hand in to City staff at the scoping meeting or mail back by October 25, 2019)

Name: Dina Wassif

Agency/Organization: resident

Address: 959 Palm Ave

City, State, Zip Code: CA 90069

E-mail (optional): djnassif@yahoo.com

Comments: This a monstrosity that ruins the neighborhood. This design is an eyesore that will bring a horrible view, traffic to wells.

8850 Sunset Boulevard Project
Comments on scope & content of the Environmental Impact Report

(please hand in to City staff at the scoping meeting or mail back by October 25, 2019)

Name: Nick Schaffer

Agency/Organization:

Address: West Hollywood

City, State, Zip Code:

E-mail (optional):

Comments:

Hotel Noise Parking
Traffic
Rooftop function Noise
function specific traffic

Cottages on Larrabee parking [5 cottages on site 8 units - six spaces]

No Hotel there at all

Entrance/exit on Larrabee
Signage @ London ineffective

Free employee parking
Plenty of parking