Addendum to the Final Environmental Impact Report for the Robertson Lane Hotel Project
SCH No. 2014121026

Prepared for:

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APPENDICES

E Mitigation Monitoring and Reporting Program for the Modified Project

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACM	asbestos-containing material
AQMP	Air Quality Management Plan
CEQA	California Environmental Quality Act
City	City of West Hollywood
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO_2E	carbon dioxide equivalent
dBA	A-weighted decibel
EIR	environmental impact report
FAR	floor-area-ratio
GHG	greenhouse gas
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HALS	Historic American Landscapes Survey
HVAC	heating, ventilation, and air conditioning
IS	Initial Study
KOA	KOA Corporation
LBP	lead-based paint
L_{dn}	day–night average noise level
L_{eq}	equivalent noise level
LGBT	lesbian, gay, bisexual, transgender
LGBTQ	lesbian, gay, bisexual, transgender, queer (or questioning)
LOS	level of service
mph	miles per hour
MT	metric ton
NAHC	Native American Heritage Commission
OPR	Office of Planning and Research
PM_{10}	coarse particulate matter
$PM_{2.5}$	fine particulate matter
PRIMP	Paleontological Resources Impact Mitigation Program
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SF	square feet
USC	University of Southern California
VMT	vehicle miles traveled
VOC	volatile organic compound

1 INTRODUCTION

The City of West Hollywood's City Council certified an Environmental Impact Report (EIR) for the Robertson Lane Hotel Project (approved project) in June 2018 (State Clearinghouse No. 2014121026). The EIR was prepared pursuant to the California Environmental Quality Act (CEQA) and contains a disclosure and analysis of potential environmental effects associated with implementation of the approved project. Pursuant to City Council Resolution No. 18-5070, the City also adopted a Mitigation Monitoring and Reporting Program and confirmed that following the implementation of mitigation, the approved project would result in less than significant environmental impacts in all analyzed issue areas. The approved project involves redevelopment of an existing commercial property within the City of West Hollywood (City) with a multi-use hotel building. The approved project is described in the EIR as the "Reduced Project Alternative," in which some of the uses would be reduced in size relative to the originally proposed project, and the massing of the proposed structures would be set back farther from an on-site historical resource (the Factory building). The anticipated environmental impacts of the approved project were similar to those of the originally proposed project analyzed in detail in the EIR. Impacts were slightly reduced due to the overall reduction in size of the project, but not to the degree that the overall impact determinations would change. As such, impact determinations for the approved project were the same as those identified for the originally proposed project analyzed in detail in the EIR. Based on the analysis contained in the EIR and other considerations, the City Council approved the approved project following its certification of the EIR. For the purposes of this addendum, the Reduced Project Alternative is referred to as the "approved project," whereas the project analyzed in detail in the EIR is referred to as the "originally proposed project."

Since certification of the EIR and approval of the approved project in June 2018, the project applicant has decided to seek the approval of several minor modifications to the approved project. The approved project, as modified, will be referred to as the "modified project" in this addendum. The modified project would involve certain modifications to the demolition and construction activities as compared to the approved project, though it would result in less overall excavation and associated truck trips and haul disposal. Overall, the density and mix of uses proposed would be substantially the same as the approved project. The modified project would not change the mixed-use nature of the approved project or its overall density or relationship to neighboring structures as shown in Tables 5-1 and 5-2.

The purpose of this addendum is to analyze the proposed modifications to the approved project and to determine whether implementation of the modified project would result in any new significant environmental impacts not identified in the previously certified EIR, or whether any previously identified significant effects would be substantially more severe under the modified project. This addendum also evaluates whether mitigation measures or alternatives previously

found infeasible would become feasible due to changes that have occurred since certification of the EIR. The previously certified EIR is hereby incorporated by reference.

2 CEQA REQUIREMENTS

The California Code of Regulations, Title 14, Section 15000 et seq. (CEQA Guidelines) discuss a lead agency's responsibilities in handling new information when changes to a project occur after an EIR is certified. Section 15164(a) of the CEQA Guidelines states that:

> *"The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."*

Section 15162 of the CEQA Guidelines provides that preparation of a subsequent EIR is required only under the following circumstances:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

> (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
>
> (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As further discussed below, although minor changes have been proposed to the approved project since certification of the EIR in June 2018, these changes would not result in new significant impacts, substantial increases in previously identified significant impacts, or the requirement for new mitigation measures or alternatives to be studied. Therefore, an addendum, rather than a subsequent or supplemental EIR, is appropriate. In addition, and in accordance with CEQA Guidelines Section 15164(e), the addendum should include a brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162, and the explanation must be supported by substantial evidence. The addendum need not be circulated for public review, but may simply be attached to the Final EIR.

Since certification of the EIR in June 2018, the state adopted updates to the CEQA Guidelines to add efficiency and clarity to aspects of the guidelines and to incorporate recent case law and legislation that had not yet been reflected in the text of the guidelines. The recently adopted updates also include revisions to Appendix G of the CEQA Guidelines, which consists of environmental checklist questions that are used by many lead agencies as the framework for environmental documents prepared pursuant to CEQA.

The revised CEQA Guidelines were adopted on December 28, 2018, approximately 6 months after the certification of the Final EIR, approximately 21 months after the Draft EIR was released for public review, and 4 years after the Notice of Preparation of an EIR was issued. As such, the environmental checklist questions used in the EIR for the approved project were based on the version of the CEQA Guidelines and Appendix G that was in place when both the NOP and the Draft EIR were released for public review in 2014 and in 2017, respectively. Section 15007(c) of the CEQA Guidelines states that “If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved.” Because this EIR was released for public review prior to adoption of the Guideline amendments, the analysis for the modified project does not need to be updated to conform with the revised Guidelines. Furthermore, the EIR was also finalized and certified prior to adoption of the Guidelines amendments. As such, changes pertaining to the CEQA Guidelines

updates do not need to be addressed in this addendum. Additionally, the legislation and court decisions that are reflected in the updates were already in effect at the time the Draft EIR was circulated for public review in the period of March to May 2017. As such, the EIR for the approved project is in compliance with the content requirements of the 2018 CEQA Guidelines revisions. For these reasons, no revisions are required in the CEQA analysis of the project as a result of the CEQA Guidelines updates. The recent adoption of these updates does not constitute substantial changes with respect to the circumstances under which the project will be undertaken, nor does it constitute new information of substantial importance that would change the impact conclusions in the certified EIR.

Nevertheless, since this addendum is prepared after the CEQA amendments went into effect and in the interest of providing the public and decision makers as much information on the environmental consequences as possible, this document includes discussions for informational purposes only of whether the proposed project changes included under the modified project will generate wildfire or energy impacts in accordance with the revisions to the CEQA Guidelines and Appendix G that are now in effect in 2019. These discussions are provided in Section 7.7 and Section 7.14, respectively.

3 PROJECT LOCATION AND SETTING

The project site for the modified project is the same as that of the approved project and the originally proposed project (i.e., no changes in the project site or site boundaries have occurred subsequent to certification of the EIR). As stated in the EIR, the project site is located in the City of West Hollywood along North Robertson Boulevard and North La Peer Drive. The site is 1.94 acres in size and consists of the following addresses: 645, 647, 653, 655, 661, 665, and 681 North Robertson Boulevard and 648, 650, 652, and 654 North La Peer Drive. The project site has approximately 400 feet of street frontage along Robertson Boulevard (along the east side of the site) and approximately 200 feet of street frontage along La Peer Drive (along the west side of the site). The site is bound by commercial properties to the north and south. The project site is currently developed with three commercial buildings, three surface parking lots, and several concrete courtyards and patios interspersed among the buildings. West Hollywood Park is across the street from the project site, on the east side of Robertson Boulevard.

Prior to the City's approval of the approved project, the project site was within the CN2 (Commercial, Neighborhood 2) and CC2 (Commercial, Community 2) zoning districts. The project site now has general plan and zoning designations corresponding to the Robertson Lane Specific Plan, which was adopted with the City's approvals for the approved project.

4 DESCRIPTION OF APPROVED PROJECT

The approved project entailed demolition of several existing on-site structures, retention of a portion of the on-site historical resource (the Factory building), and construction a multi-use hotel building approximately 258,042–square feet (sf) in size. Details and characteristics of the approved project are shown in Table 4-1.

Table 4-1
Approved Project Characteristics

	Description of Use	Size (in square feet (sf))
Existing Structures to be Demolished	Retail outbuilding	226
	Commercial building (The Factory)	removal of 12,000 square feet
	Commercial building (addition to the Factory)	6,764
Existing Structures to Remain	Commercial building (located along the southernmost site boundary at 645 Robertson Boulevard)	5,576
	Commercial building (wholesale design showroom building at 653-659 Robertson Boulevard)	10,325
	Commercial building (The Factory)	retention of 14,400 sf
Proposed Site Uses	Hotel Rooms	107,694
	Hotel Retail	6,596
	Non-Hotel Retail	16,671
	Hotel Restaurants	6,222
	Non-Hotel Restaurants	12,508
	Hotel Outdoor Dining	5,636
	Non-Hotel outdoor dining	5,357
	Hotel meeting spaces	10,428
	Nightclub	2,462
	Gym	1,052
	Spa	0
	Back-of-House Areas	28,379
	Lobby and Circulation	71,492
	Design Showroom	10,325
	Total Floor Area*	258,042
Hotel Rooms	241 rooms	
Parking	No less than 750 parking spaces would be provided in a 6-level subterranean garage, which would be shared among the site uses. All parking spaces would be located below the project site.	
Building Height	2 stories to 9 stories (aboveground)	

* Numbers do not total, as underground and outdoor uses are not included in the total floor area.

The design, size, and land uses of the approved project were similar to the originally proposed project that was studied in detail in the EIR. The total floor area for the originally proposed project was 262,315 square feet, which is slightly larger than the total floor area for the approved project. The approved project also had slight reductions in retail and restaurant space relative to the originally proposed project.

5 DESCRIPTION OF MODIFIED PROJECT

The primary change in the project design involves demolition of two additional on-site structures. The additional structures planned for demolition are two single-story, commercial structures located at 645 Robertson Boulevard and at 653-659 Robertson Boulevard. They are 5,576 square feet and 10,325 square feet in size, respectively. The smaller structure (645 Robertson Boulevard) is currently used for retail purposes and the larger structure (653-659 Robertson Boulevard) is a design showroom. (For the purposes of this analysis, these structures will be referred to as "645 Robertson" and "653 Robertson.") As shown in Table 4-1, these structures currently exist on the project site, within the Robertson Lane Specific Plan area, and were going to be retained and incorporated into the design of the approved project. Under the modified project, these structures would be removed.

Removal of 645 Robertson and 653 Robertson allows for a number of minor modifications in project design resulting in a more efficient use of space on the project site. The following design changes would be part of the modified project:

- **Increased Factory Building Restoration & Retention.** Demolition of 645 & 653 Robertson expands the developable area on the project site, allowing for retention and restoration of eleven of the twelve existing modules comprising the historic Factory building. (Both of these structures were evaluated in Appendix D of the EIR, and neither 645 Robertson or 653 Robertson have been identified as historical resources.)
- **Fewer Subterranean Levels & Reduced Excavation.** Demolition of 645 & 653 Robertson allows for the development of larger floorplates in the subterranean parking garage, which in turn allows for fewer subterranean floors to be constructed to achieve the required number of parking spaces in the City's approvals for the approved project. As such, the parking garage would be reduced from 6 subterranean levels to 3 subterranean levels, while retaining the same number of parking spaces (750 spaces). Eliminating 3 levels of the parking garage reduces the anticipated excavation from approximately 180,000 cubic yards to approximately 154,000 cubic yards and improves circulation within the parking garage. Additionally, more non-parking uses would be incorporated into the first level of the parking structure, allowing for additional project uses to be positioned on subterranean levels, including the hotel gym and additional back-of-house areas, thereby increasing the overall efficiency in use of space on the site.

- **Site Access Improvements.** Demolition of 645 & 653 Robertson allows for the approved project's driveway along the project's Robertson Boulevard frontage to be moved so that it no longer penetrates the rehabilitated Factory building's base. Specifically, by providing increased development area on the Robertson Boulevard frontage, the previously approved driveway can be moved and divided into two dedicated driveways that do not encroach on the Factory building – one driveway dedicated for ingress to the parking garage to the south of the Factory building and the other dedicated for egress to the north of the Factory building. These modifications are expected to represent an overall improvement in vehicular circulation and entirely avoid penetrating the Factory building's base. Separating the inbound and outbound driveways on Robertson Boulevard also would eliminate conflicting traffic movements on site, thereby reducing the potential for vehicles to queue onto the parking ramps. Similar to the approved project, the modified project would maintain one inbound and one outbound driveway on La Peer Drive. However, the inbound driveway is proposed to move to the north end of La Peer Drive and would include three dedicated ingress lanes, compared to the approved project, which had one ingress lane turning into three lanes on the interior of the project site.

- **Modifications within the Multi-Use Hotel Building.** The project changes described above would enable modifications within the building and proposed uses to accommodate an improved guestroom layout, a small reduction in the total number of guestrooms, and minor adjustments to other uses. Overall, the modified project would remain consistent with the approved project's development parameters, including building height and floor-area-ratio (FAR). Tables 5-1 and 5-2 show side-by-side comparison of the key components and design elements of the approved project versus the modified project with the uses and design of each level more fully described below. Appendix A shows the site plans for the modified project.

Table 5-1
Comparison of Approved Project and Modified Project (Summary of Key Features)

Project Detail	Approved Project	Modified Project
Proposed land use	Hotel with ancillary commercial uses	Hotel with ancillary commercial uses
Hotel rooms	241 rooms	237 rooms
Total floor-area-ratio of the building	3.05	3.04
Height	Maximum of 9 stories above grade	Maximum of 9 stories above grade
Parking spaces	750 spaces	750 spaces
Parking Garage	6 levels below grade	3 levels below grade
Ingress/egress	One driveway along Robertson Boulevard (approximately 30 feet wide); three driveways along La Peer Drive (one egress at approximately	Two driveways along Robertson Boulevard (approximately 23 feet wide and 20 feet wide); two driveways along La Peer Drive

Table 5-1
Comparison of Approved Project and Modified Project (Summary of Key Features)

Project Detail	Approved Project	Modified Project
	15 feet wide and one each ingress/egress at approximately 15 feet and 5 inches wide)	(approximately 24 feet wide and 36 feet wide)
Demolition	Removal of two on-site commercial buildings	Removal of four on-site commercial buildings
Factory building rehabilitation	14,400 sf (approximately 55%) of the Factory building retained	20,800 sf (approximately 79%) of the Factory building retained
	Vehicular driveway along Robertson Boulevard penetrates the Factory building's base	Vehicular driveways along Robertson Boulevard do not penetrate the Factory building's base)
	Relocated Factory building situated adjacent to the existing design showroom at 653 Robertson Boulevard, partially obstructing views of the Factory building from the south	42-foot setback between the relocated Factory building and the neighboring building to the south, providing increased views of the Factory building from the south

Table 5-2
Comparison of Approved Project and Modified Project (Square Footage Detail)

	Project Component	Approved Project (sf)	Modified Project (sf)	Comparison (modified + or – compared to approved)
Proposed Demolition	Demolition of existing on-site commercial structures	18,990	28,491	+ 9,727 sf building demolition
Area of Proposed Site Uses in Square Feet (sf)	Hotel Rooms	107,694	108,727	+ 1,033 sf (but -4 rooms)
	Hotel Retail	6,596	7,980	+ 811 sf of retail
	Non-Hotel Retail	16,671	16,098	
	Hotel Restaurants	6,222	7,157	- 5,085 sf restaurant & outdoor dining
	Non-Hotel Restaurants	12,508	4,856	
	Hotel Outdoor Dining	5,636	6,179	
	Non-Hotel outdoor dining	5,357	6,446	
	Hotel meeting spaces	10,428	10,019	- 409 sf meeting space
	Nightclub	2,462	2,462	no change
	Gym	1,052	5,039	+ 3,987 sf gym
	Spa	0	0	no change
	Back-of-House Areas	28,379	25,528	- 2,851 sf back-of-house
	Lobby and Circulation	71,492	39,203	- 32,289 sf lobby & circulation
	Design Showroom	10,325	21,758	+ 11,433 sf design showroom
	Total floor area included in floor-area-ratio (FAR) calculation*	258,042	257,121	- 921 sf of FAR building area
	Total building area*	577,180	474,510	- 102,670 sf of total building area

* Numbers do not total, as underground and outdoor uses are not included in the total floor area used to calculate FAR, and only the building area totals are inclusive of the parking areas.

Design Details for Modified Project

The uses for each level of the modified project are listed as follows:

- **Parking Levels P3 & P2.** The P3 level would be the lowest level of the parking garage. It would be accessed by valet only from the La Peer Drive (west) driveway and would include mechanized vehicle lifts. The P2 level of the garage would be used for valet parking, truck loading/unloading, and back of house support activities. The west side of the P2 level would be accessed from the La Peer Drive driveway and would be used for valet parking only. The east side of the garage would be accessed from Robertson Boulevard and also would contain loading spaces.

- **Level P1 (Parking and Uses accessible from Street Level).** The P1 level would house hotel program, parking, and back of house spaces. The hotel's 10,000 sf meeting/banquet space would be accessed from grade on Robertson Boulevard and via elevator from Robertson Lane, a pedestrian paseo that would extend across the project site. This east side of P1 would also include a nightclub that would serve the hotel.

- **Level 1 (Street Level).** The first aboveground floor would consist of restaurants, cafés, retail spaces, the hotel lobby, wholesale design showroom space, hotel back-of-house uses, outdoor dining space, and Robertson Lane (the pedestrian paseo). The reassembled Factory building would front Robertson Boulevard and the Robertson Lane pedestrian paseo. Vehicular and truck/loading ingress and egress points would be located at the northern and southern ends of the site along Robertson Boulevard.

- All retail uses would front Robertson Lane or Robertson Boulevard. The street level uses fronting La Peer Drive would consist of the La Peer Drive pedestrian entrance to Robertson Lane, the hotel entrance and lobby, a one-way entrance down into the subterranean parking garage with queueing capacity at the northwestern corner of the building and a one-way exit up from the parking garage at the southwestern corner of the building along the La Peer Drive frontage.

- **Level 2.** The second aboveground floor would consist of public restaurant with outdoor dining, wholesale design showroom space, hotel amenity terraces and indoor spaces, lobbies, and hotel back-of-house uses. The reassembled and rehabilitated Factory building would front Robertson Boulevard and include public retail space at this level. A public restaurant featuring outdoor dining as part of the northern hotel building would front Robertson Lane.

- **Level 3.** The third aboveground floor would include a guestroom floor consisting of 27 hotel rooms and suites. The Level 3 hotel rooms would be located in two connected building sections, one fronting La Peer Drive and the other overlooking Robertson Boulevard. To the south of Robertson Lane, Level 3 would consist of hotel restaurant and outdoor dining, hotel amenity and terrace spaces, and back of house areas.

- **Levels 4-7.** The fourth through seventh aboveground floors would each consist of 42 hotel rooms and suites with connecting circulation spaces. All four levels would be substantially the same. These levels would create two connected building elements.

- **Level 8.** The eighth floor of the hotel building would also consist of 42 hotel rooms and suites with connecting circulation spaces, very similar to Levels 4-7, in a slightly modified configuration.

- **Level 9.** The ninth aboveground (partial rooftop) level would contain hotel restaurant space with associated outdoor dining terraces on the uppermost level of the building component overlooking Robertson Boulevard and West Hollywood Park, with a pool, pool deck, and hotel restaurant on the rooftop of the building component fronting La Peer Drive. Those two areas would be connected by circulation and back-of-house spaces.

Additionally, a number of refinements have been made to architectural elements under the modified project. (These refinements are typical of the final design phases of development projects.) Architectural elements that would be incorporated into the modified project would include panelized hotel window assemblies; arched windows at the La Peer hotel lobby; and limestone cladding for the building, with colored architectural precast concrete and warm, dark metals integrated throughout. Additionally, the La Peer hotel lobby has been brought to the street front, removing the porte cochere and allowing all passenger and vehicle drop-off to occur off street. These design refinements would not affect or change the environmental impact analysis or conclusions for the approved project.

6 SUMMARY OF ENVIRONMENTAL EFFECTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION FOR THE APPROVED PROJECT

The certified EIR identified that the project (both the originally proposed project and the approved project) would result in no impact or in less than significant impacts for the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry Resources

- Biological Resources
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Energy Consumption

Impacts related to air quality, cultural resources, geology and soils, noise, and transportation and traffic were determined to be potentially significant absent mitigation. The following mitigation measures were provided for the approved project to reduce these impacts to a less than significant level. (Note that MM-TRAF-1 has already been implemented since certification of the EIR and some minor revisions to MM-CUL-8 and MM-NOI-3 are recommended in this addendum to reflect changes associated with the modified project. The recommended revised versions of MM-CUL-8 and MM-NOI-3 are described in detail in Section 7.4 and Section 7.10 of this addendum, respectively. Therefore, the unmodified versions of MM-CUL-8 and MM-NOI-3 as presented in the certified EIR are provided in the list immediately below.)

- **MM-AQ-1:** The following dust control measures shall be implemented by the contractor/builder to reduce fugitive dust coarse and fine particulate matter (PM_{10} and $PM_{2.5}$) emissions generated during earthmoving construction activities:

  a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

  b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour (mph).

  c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

  d. Speeds on unpaved roads shall be reduced to less than 15 mph.

e. All grading and excavation operations shall be halted when wind speeds exceed 25 mph.

f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday.

g. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.

h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by the South Coast Air Quality Management District (SCAQMD)).

i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.

- **MM-AQ-2:** During project demolition and construction, off-road equipment with engines rated at 150 horsepower or greater, shall meet, at a minimum, the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Section 2423(b)(1). Based on the anticipated equipment for these phases, this measure would be applicable to, but not limited to, excavators, graders, rubber-tired dozers, and cranes.
- **MM-CUL-1: Documentation.** Prior to project commencement of any building disassembly, relocation, and partial restoration activities associated with the Factory building, Historic American Building Survey (HABS) Level 2 documentation of the building shall be performed and submitted to the following archives/ organizations: Library of Congress, HABS/HAER/HALS Collection; West Hollywood Preservation Alliance; West Hollywood Heritage Project; Los Angeles Conservancy; National Trust for Historic Preservation; ONE Archives at the University of Southern California (USC); County of Los Angeles Library, West Hollywood Library; and other entities/repositories to be identified by the City of West Hollywood. HABS documentation shall be incorporated into the interpretive and commemorative strategies for the Factory building under MM-CUL-5, 6 and 7, as appropriate.
- **MM-CUL-2: Documentation.** Upon completion of the Factory building rehabilitation and restoration activities in accordance with the Secretary of the Interior's Standards for Rehabilitation, the applicant shall submit a complete application for designation of the Factory building under W.H.M.C. Section 19.58.070 for listing as a West Hollywood Cultural Resource.

- **MM-CUL-3: Salvage.** Modular components of the Factory building that are in good condition and are not used as part of the project – in particular, embossed steel sidewall panels and steel windows – shall be stored at a location nearby for future use as needed. The applicant shall consult with a qualified architectural conservator on the appropriate storage of retained modular components.

  The components to be salvaged but not reused shall be "attic stock" for any future repairs, restoration, etc. The components shall be inventoried and catalogued, shall be marked or tagged with individual numbers, and the inventory shall include original location and photographs of existing conditions. The components shall be stored at an indoor location and protected from weather and damage.

- **MM-CUL-4: Sensitive Treatment/Conservation.** Prior to commencement of construction activities, the applicant shall develop Treatment Specifications for the cleaning, repair, and installation of modular components of the Factory building during and after construction. Prepared by a preservation architect meeting the Secretary of the Interior's Standards in Architecture and/or Historic Architecture, these specifications will ensure the appropriate conservation of materials to be retained as part of the project, including cataloguing of component parts and site preparation during dismantling and reassembly, as well as future cleaning and treatment of the building's materials as part of regular building maintenance.

- **MM-CUL-5: Interpretation/Commemoration (Mitchell Camera Corporation).** The applicant shall provide on-site interpretation/commemoration of the Mitchell Camera Corporation use of the building, such as public art, historic photographs, display of Mitchell cameras, amongst others. A team of qualified professionals assembled by the applicant shall prepare a preliminary interpretation/commemoration plan, and in connection with the preparation of that plan, shall explore opportunities for programmatic partnerships with affinity organizations dedicated to the preservation and promotion of the Hollywood film industry. The preliminary plan shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered by the applicant in the development of the final interpretation/commemoration plan. The final interpretation/commemoration plan shall be presented to the City of West Hollywood Historic Preservation Commission for comment prior to installation, and completed to the satisfaction of the Community Development Director prior to issuance of a Certificate of Occupancy for the hotel.

- **MM-CUL-6: Interpretation/Commemoration (Oral History Project: Studio One).** The applicant shall commission an oral history project in which patrons of Studio One and others are interviewed and given the opportunity to discuss the experience of visiting the nightclub and being part of the LGBTQ community in West Hollywood and Los

Angeles during the 1970s and '80s. One of the primary goals of the oral history project will be to encapsulate the diverse and varied experiences of being a LGBTQ person in West Hollywood during the 1974-1992 era, including the stories of discrimination and restrictive door policies enforced at Studio One, ensuring that all perspectives are represented. The oral history project will be conducted in accordance with the principles and best practices of oral history (developed by the Oral History Association) and managed by an individual (or individuals) qualified and experienced in the practice. All interviews for the oral history project shall be digitally recorded (audio and/or visual) and made available on site, so that visitors will be able to listen to (and possibly see) the interviews in a location related directly to the original Studio One use of the building, as well as online. These interviews shall also be donated to organizations/entities/repositories such as the West Hollywood Preservation Alliance, West Hollywood Heritage Project, Los Angeles Conservancy, One Archives at USC, Los Angeles County Public Library, West Hollywood Branch, and LGBTQ Coalition. The oral history project shall be developed in coordination with the City of West Hollywood and to the satisfaction of the Community Development Director.

- **MM-CUL-7: Interpretation/Commemoration (Studio One).** The applicant shall provide on-site interpretation/commemoration of the Studio One use of the building, such as historic photographs, permanent display of the oral history project (see MM-CUL-6) and/or public art. Such interpretation/commemoration may include multiple forms of media to provide a robust depiction of the music, dance, and special effects that were used at Studio One. All interpretation/commemoration will be located onsite, with the locus of commemoration installed inside of or immediately adjacent to the Factory building. A team of qualified professionals assembled by the applicant shall prepare a preliminary interpretation/commemoration plan, and in connection with the preparation of that plan shall explore opportunities for programmatic partnerships with affinity organizations dedicated to the preservation and promotion of LGBT history. The preliminary plan shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered by the applicant in the development of the final interpretation/commemoration plan. The final interpretation/ commemoration plan shall be presented to the City of West Hollywood Historic Preservation Commission for comment prior to installation and completed to the satisfaction of the Community Development Director prior to issuance of a Certificate of Occupancy for the hotel.
- **MM-CUL-8: Rehabilitation/Restoration.** The applicant shall rehabilitate the retained portion of the Factory building in accordance with the Secretary of the Interior's Standards for Rehabilitation (the Standards). The design of new components at the Factory building's base, including new storefronts and a vehicular entrance to the

subterranean parking area, shall also conform to the applicable Standards. All work will proceed under the direction of a historic preservation architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture.

- **MM-CUL-9: Rehabilitation/Restoration.** The applicant shall remove non-historic features and restore missing character-defining features on the historic east façade of the Factory building dating to the 1929-1946 period of significance in compliance with the Standards, including, at minimum:

  a. Removal of a non-original exterior staircase.

  b. Removal of non-original concrete masonry unit walls that currently sit in front the building, enclosing a non-historic courtyard space (and obscuring the façade).

  c. Replacement of non-historic windows with salvaged original steel windows.

  d. Conservation of exterior materials, including removal of paint from poured-in-place concrete foundation, steel sidewall panels, window frames, and glazing; and replacement of broken glazing as necessary.

- **MM-CUL-10: Rehabilitation/Restoration.** The applicant shall remove non-historic features and restore missing character-defining features on the historic west façade of the Factory building, dating to the 1974-1992 period of significance, including at minimum:

  a. Removal of non-historic steel entrance canopy and low concrete walls.

  b. Replacement of non-original entrance doors with replica doors dating to the period of significance.

  c. Conservation of exterior materials, including removal of paint from poured in place concrete foundation, steel sidewall panels, window frames, freight elevator doors, and glazing; and replacement of broken glazing as necessary.

- **MM-CUL-11: Construction Monitoring.** Prior to commencement of any construction activity associated with the Factory building, the applicant shall retain a qualified architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture to monitor all disassembly, construction and rehabilitation activities to ensure appropriate treatment of the building and character-defining features and materials during the construction project.

- **MM-CUL-12: Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find

and determine whether or not additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA; 14 CCR 15064.5(f); PRC, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

- **MM-CUL-13: Paleontological Resources.** Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. The qualified paleontologist shall be on site during all rough grading and other significant ground-disturbing activities in depths greater than 10 feet below ground surface. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP should be consistent with the guidelines of the Society of Vertebrate Paleontologists (2010) and should include but not be limited to the following:

  a. Attendance at the pre-construction conference by a qualified paleontologist or his/her representative.

  b. Monitoring of excavation activities by a qualified paleontological monitor in areas identified as likely to contain paleontological resources. The monitor shall be equipped to salvage fossils and/or matrix samples as they are unearthed in order to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment in the area of the find in the event paleontological resources are discovered.

  c. Because the underlying sediments may contain abundant fossil remains that can only be recovered by a screening and picking matrix, these sediments shall occasionally be spot screened through one-eighth to one-twentieth-inch mesh screens to determine whether microfossils exist. If microfossils are encountered, additional sediment samples (up to 6,000 pounds) shall be collected and processed.

  d. Preparation of recovered specimens to a point of identification and permanent preservation. This includes the washing and picking of mass samples to recover small invertebrate and vertebrate fossils and the removal of surplus sediment from around larger specimens to reduce the volume of storage for the repository and the storage cost for the developer.

  e. Identification and curation of specimens into a museum repository with permanent retrievable storage.

f. Preparation of a report of findings with an appended itemized inventory of specimens. When submitted to the City of West Hollywood, the report and inventory would signify completion of the program to mitigate impacts to paleontological resources.

- **MM-CUL-14: Inadvertent Discovery of Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Los Angeles County Coroner shall be notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant from the deceased Native American. The Most Likely Descendant shall complete his or her inspection within 24 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.
- **MM-GEO-1:** The proposed project shall be designed in accordance with the recommendations from the site-specific Geotechnical Investigation. In the event that changes are made in the recommendations set forth in the final geotechnical report, the project design shall be updated in accordance with those changes. Prior to the issuance of a building permit, the applicant shall submit the final design and construction plans for review and approval by the City Building Official or designee and the City Engineer or designee. The final design and construction plans shall show that the recommendations from the Geotechnical Investigation regarding foundation, site coefficient and seismic zonation, walls below grade, waterproofing and drainage, floor slab support, dewatering and groundwater control, excavation and slopes, and shoring have been incorporated into the final design.
- **MM-NOI-1:** Construction activities shall take place during the permitted time and day per Chapter 9.08.050 of the City of West Hollywood's (City's) Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 8 a.m. to 7 p.m. Monday through Friday (interior work only is permissible from 8 a.m. to 7 p.m. on Saturdays). This condition shall be listed on the project's final design to the satisfaction of the City Engineering Department.
- **MM-NOI-2:** The City of West Hollywood shall require the applicant to adhere to the following measures as a condition of approving the grading permit:

- The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City Engineering Department.
- Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and West Hollywood Park, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors, including recreational users of West Hollywood Park.
- During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors, including recreational users in West Hollywood Park.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.
- If equipment is being used that can cause hearing damage at adjacent noise receptor locations (distance attenuation shall be taken into account), portable noise barriers shall be installed that are demonstrated to be adequate to reduce noise levels at receptor locations below hearing damage thresholds. This may include erection of temporary berms or plywood barriers to create a break in the line-of-sight, or erection of a heavy fabric tent around the noise source.

MM-NOI-3(ALT-3)[1] Prior to certificate of occupancy, the amplified sound system shall be calibrated for the outdoor uses so as to not exceed the noise levels listed

[1] For MM-NOI-3, an alternate measure was provided for the Reduced Project Alternative (Alternative 3 in the EIR). The Reduced Project Alternative was ultimately approved by the City Council and is, therefore, the "approved project." Because MM-NOI-3 provides specifications for outdoor uses on certain levels of the multi-use hotel building, the minor design changes made in the Reduced Project Alternative resulted in shifts in the locations of some of the outdoor uses within the building. MM-NOI-3 was revised to accommodate those changes and to ensure that the measure remained effective.

below. The amplified sound system sound output shall be measured at the distances provided below on a plane parallel from the face of the speaker and verified and documented by a qualified acoustical engineer:

a) Level 1:
   i. 75 A-weighted decibels (dBA) equivalent noise level (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.
   ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.

b) Level 2:
   i. Hotel Restaurant Roof Garden, Public Restaurant Roof Garden, and Public Outdoor Space:
      - 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
      - 70 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.
   ii. Lobby Terrace:
      - 75 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
      - 59 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.

c) Level 9:
   i. 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
   ii. 65 dBA (L_{eq}) 35 feet, during nighttime hours from 10 p.m. to 8 a.m.

- **MM-NOI-4:** Prior to certificate of occupancy, noise measurements shall be conducted to be reviewed and approved by City staff, to demonstrate that the habitable areas (hotel rooms) have been designed to reduce interior noise to 45 dBA or lower (community noise equivalent level (CNEL) or day–night average noise level (L_{dn})).
- **MM-NOI-5:** Prior to approval of the plans and specifications for the project, City staff shall review and approve the proposed heating, ventilation, and air conditioning (HVAC), outdoor mechanical equipment, and kitchen mechanical equipment unit specifications to ensure that the on-site stationary equipment does not exceed 55 dBA at 50 feet, or otherwise exceed any established noise thresholds for stationary sources.

- **MM-TRAF-1**: Prior to issuance of a Certificate of Occupancy by the City of West Hollywood (City), the applicant shall be responsible for widening the northbound approach to the intersection of Robertson Boulevard and Santa Monica Boulevard. The northbound approach shall be widened to one shared left/through lane and one exclusive right-turn lane, which shall be accomplished by shifting the center line to the west and removing two on-street parking spaces on the west side of Robertson Boulevard. By widening the northbound approach from one to two lanes, this improvement would provide additional capacity to serve the added vehicular demand as a result of the project.

Following the implementation of the mitigation measures identified above and based on the analysis in the previously certified EIR, all approved project impacts would be less than significant.

7 ENVIRONMENTAL IMPACT ANALYSIS FOR THE MODIFIED PROJECT

Changes proposed to the approved project since its June 2018 approval by the City can be summarized as follows: demolishing two additional commercial buildings, retaining and rehabilitating a larger portion of the Factory building, reducing the depth of the subterranean parking garage, increasing the size of the floorplates in the subterranean parking garage, and making minor modifications to the multi-use hotel building, including minor reductions in the number of hotel rooms and FAR building area.

Construction

The construction scenario for the modified project would be similar to the construction scenarios for the approved project and the originally proposed project that are described and analyzed in the certified EIR. Minor changes in the construction scenario that would occur as a result of project modifications are characterized as follows:

- The construction period analyzed in the EIR extended from 2017 to 2019. However, construction is now anticipated to start in 2019 and is expected to be complete in 2022.
- Demolition of existing on-site buildings would increase from approximately 18,990 square feet to 28,491 square feet. This would increase the truck trips required for demolition, since more demolition debris would need to be hauled off site. It may also increase the number of workers required for demolition and/or the duration of demolition activities.
- Excavation and soil export would decrease from approximately 180,000 cubic yards to approximately 154,000 cubic yards. This would decrease the number of truck trips

required for excavation, since less soil would need to be hauled off site. It may also decrease the duration and number of workers required for excavation activities.

- Total building area would decrease by 102,670 sf, as shown in Table 5-2. This would decrease the intensity of the building construction phase, which may reduce the number of workers and vehicle trips required for this phase, as well as the duration of the building construction phase.

Aside from these changes, the construction scenario for the modified project would be generally the same as that of the approved project. As shown above, some construction activities and phases would increase in intensity while others would decrease, and based on the detailed design development of the modified project and coordination with the selected general contractor and construction team, the overall construction time could be decreased from approximately 36 months to 27 months. Although building demolition requirements would increase by approximately 10,000 sf, the 26,000 sf reduction in excavation requirements and 102,670 sf reduction in total building area would reduce the overall construction activities associated with the modified project as compared to the approved project. As such, the construction assumptions shown in the EIR remain applicable and effective for the modified project. Furthermore, a 2-year delay in the construction start date would not have a material effect on the analysis. This is because estimated construction emissions typically decrease as start dates become delayed, since newer and more efficient construction equipment are assumed to replace older equipment. Conversely, ambient traffic in the project area may have increased due to general growth in the region and buildout of other development projects in the area. Construction traffic from the proposed project would be added to a street network with increased "Future-without-Project" traffic levels relative to those contemplated in the EIR. However, this increase in background traffic growth would occur with or without the project and was also addressed in the cumulative analysis in the EIR. The total number of construction-related vehicle trips would decrease under the project modifications, and construction traffic would remain temporary.

Accordingly, the modified project would not result in any new significant environmental impacts related to construction and would not result in a substantial increase in the severity of previously identified significant impacts related to construction beyond those described and analyzed in the certified EIR. Additionally, as further enumerated in the following sections, no substantial changes have occurred with respect to the circumstances under which the project is being undertaken and no new information has become available which would require major revisions in the EIR.

Operation

Once constructed, operational activities would be similar to those described and analyzed for the approved project. As described in Table 5-2, some of the proposed uses would be reduced under

the modified project (e.g., the number of hotel rooms and amount of restaurant space), whereas other aspects of the project would increase slightly (e.g., the size of the design showroom and retail space). Overall, the FAR of the modified project would be slightly reduced relative to that of the approved project. As such, the overall intensity of operational activities under the modified project would be similar to, and in many cases less than, that of the approved project. As outlined in the following sections, the change in degree of impacts would not be substantial enough to change the overall impact determinations for the approved project.

Accordingly, the modified project would not result in any new significant environmental impacts related to operations and would not result in a substantial increase in the severity of previously identified significant impacts related to operations beyond those described and analyzed in the certified EIR. Additionally, as further enumerated in the following sections, no substantial changes have occurred with respect to the circumstances under which the project is being undertaken and no new information has become available which would require major revisions in the EIR.

The potential environmental impacts associated with the modified project relative to those identified in the EIR for the approved project are discussed below. None of the impact determinations would change relative to the certified EIR, and the same mitigation measures identified for the approved project and listed in Section 6 of this addendum, with minor modifications to reflect adjustments in the modified project design, identified in Sections 7.4 and 7.10 of this addendum, would be required for the modified project. Following implementation of these mitigation measures, the modified project would continue to result in less than significant impacts in all analyzed issue areas. Therefore, and based on the analysis below, this addendum is the appropriate environmental document under CEQA, and no supplemental or subsequent EIR is required.

7.1 Issue Areas Determined Less than Significant in the Initial Study

Environmental Analysis

Five environmental issue areas examined in the Initial Study were dismissed from further analysis in the EIR because the analysis in the Initial Study showed that the project would have no impact or a less than significant impact for these issue areas (see Draft EIR, Appendix A). The approval of the approved project (which was an alternative to the originally proposed project) did not alter the impact conclusions for these issue areas. These issue areas are addressed below, in consideration of the proposed project modifications, to substantiate that no new significant impacts would occur in any of these categories under the modified project.

- **Agriculture and Forestry Resources.** The modified project would still occur within the same project site as described in the Initial Study and in the EIR. As originally determined in the Initial Study, no impacts would occur to agriculture and forestry resources because no such resources are present. No changes have occurred in circumstances or information relative to agriculture and forestry at the project site that would affect this conclusion.
- **Biological Resources.** The modified project would still occur within the same project site as described in the Initial Study and in the EIR. As originally determined in the Initial Study, impacts to biological resources would be less than significant, because no significant biological resources are expected to occur on the project site. The site is currently developed and lacks suitable habitat. No changes have occurred in circumstances or information relative to biological resources at the project site that would affect this conclusion. Therefore, impacts related to biological resources would remain less than significant.
- **Mineral Resources.** The modified project would still occur within the same project site as described in the Initial Study and in the EIR. As originally determined in the Initial Study, no impacts to mineral resource would occur because no such resources are present. No changes have occurred in circumstances or information relative to mineral resources at the project site that would affect this conclusion.
- **Population and Housing.** Consistent with the analysis presented in the Initial Study, the modified project would not involve the construction of new residential units in the City. As such, the modified project would not cause population growth through the development of residences. However, the Initial Study determined that the number of jobs available at the site would increase. The analysis in the Initial Study determined that this increase fell within anticipated employment growth in the City as projected by the Southern California Association of Governments (SCAG). The anticipated jobs that would be available at the site may change slightly under the modified project, due to minor changes in the overall square footage of the multi-use hotel building and adjustments in square footage of the different types of uses within the building. The modified project would be slightly smaller than both the originally proposed project and the approved project in terms of FAR building area and in terms of total building area. As such, the number of employees at the site may slightly decrease under the modified project, which would slightly decrease the project's potential to draw growth to the City. However, this decrease would not be substantial such that the impact determination would change. Therefore, impacts would remain less than significant.
- **Recreation.** The modified project would not induce substantial population growth resulting in increased use or deterioration of existing park facilities, as it would not

involve new housing and is not expected to draw substantial growth to the City, as explained above. As described in the Initial Study, the guests and visitors of the modified project could use nearby recreational facilities, including West Hollywood Park (which is across the street from the project site). The modified project would provide on-site recreational amenities for guests and visitors, which is expected to reduce reliance on off-site recreational facilities. As concluded in the Initial Study, the increases in employment and visitors at the project site would not significantly exacerbate current conditions, given the non-residential nature of the modified project and the provision of on-site recreational areas. For the same reasons, the modified project is not expected to result in the need for expanded recreational facilities or new recreational facilities. Therefore, impacts related to recreational facilities would remain less than significant.

For these reasons, the impact analysis and conclusions presented in the Initial Study for the issue areas listed above would not change due to the project modifications proposed under the modified project. No impacts related to agriculture and forestry resources or mineral resources would occur as a result of the modified project, and impacts in the categories of biological resources, population and housing, and recreation would remain less than significant. As such, the proposed modifications would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to agriculture and forestry resources, mineral resources, biological resources, population and housing, or recreation.

Changes in Circumstance/New Information

No new agricultural, forestry, biological, recreational, or mineral resource-related uses or resources have been introduced to the project site since publication of the Initial Study. No new regulations have been implemented in these categories that would alter the conclusions or the analysis presented in the Initial Study in the categories of agricultural and forestry resources, biological resources, mineral resources, population and housing, or recreation. However, two changes have occurred over this time period that pertain to the population/housing analysis and the recreation analysis:

Since the publication of the Initial Study, SCAG has released new employment growth projections. The number of jobs anticipated in the Initial Study remains well within these updated projections (SCAG 2016). The proposed modifications under the modified project would not substantially change the project's employment projections, as explained above. As such, SCAG's release of new employment growth projections does not change the impact conclusions presented in the Initial Study in the category of population and housing.

Since the publication of the Initial Study, the Phase II Park Master Plan Implementation Project has begun in West Hollywood Park. This project includes creation of park open space, development of a new aquatic facility, development of a new recreation and community center, a new children's playground and tot lot, park improvements, and demolition of the existing auditorium, swimming pool, tiny tot building, and restroom building. The commencement of this project represents an improvement to a nearby recreational resource and would not change the impact conclusions relative to the project's potential to affect recreational resources. The Phase II Park Master Plan Implementation Project may in fact reduce the potential for the proposed modified project to affect recreational resources, since it upgrades a nearby resource, expanding potential recreational opportunities and reducing the potential for deterioration in the future.

For the reasons described above, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to these issue areas that would change the impact conclusions for agricultural and forestry resources, biological resources, mineral resources, population and housing, or recreation. The remaining 13 environmental impact categories were carried forward for more detailed analysis in the Draft EIR and are discussed individually in Section 7.2 through Section 7.14 below.

7.2 Aesthetics

Environmental Analysis

As explained in the EIR and pursuant to California Public Resources Code (PRC) Section 21099(d)(1), the approved project is one of several types of projects whose aesthetic impacts are not considered significant impacts on the environment. As stated in PRC 21099(d)(1), a project's aesthetic impacts are not considered significant impacts on the environment if the project is a residential, mixed-use residential, or employment center project and is located on an infill site within a transit priority area. The EIR concluded that the approved project qualified as an employment center project located on an infill site within a transit priority area. The EIR also provided an analysis of potential aesthetic impacts for informational purposes, and impacts were determined to be less than significant without mitigation. The modified project would continue to be an employment center project on an infill site within a transit priority area consistent with the EIR's conclusions. Therefore, the modified project's aesthetic impacts are not considered significant impacts on the environment. Nevertheless, as in the EIR, this addendum includes an analysis of the aesthetic impacts of the modified project for informational purposes only.

As demonstrated in the subsections below, the appearance of the modified project would not differ substantially from that of the approved project. As such, the modified project would not

result in new significant impacts to aesthetics, nor would it result in substantial increases in the severity of impacts or the need for mitigation measures, for the reasons further described below.

Construction

Construction activities associated with the modified project would differ somewhat from the approved project as described in Section 5 of this addendum. However, visual impacts during the construction phase would not differ greatly from those described in the EIR, since construction activities would still occur within an enclosed construction site with limited public visibility. The number of trucks entering and exiting the site may decrease slightly due to the reduced excavation requirements and demolition activities would take slightly longer due to the additional buildings to be removed; however, on balance, the overall aesthetic effects of construction would be similar to those of the approved project. Impacts would, therefore, remain less than significant. As such, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of construction-related aesthetic impacts.

Operation

While the minor design changes as described in detail in Section 5 above do not alter the aesthetic quality or visual character of the overall project, the modified project design differs in two key ways from the approved project design: two commercial buildings in the southeasterly corner of the project site would be removed and additional modules of the Factory building would be retained in the same area. The Factory building is a structure that has cultural and historic importance to the surrounding community, and the certified EIR determined that the building is culturally significant under CEQA. With the two existing commercial structures in the southeasterly corner of the project site removed, additional components of the Factory building retained and rehabilitated, and a new 42-foot setback between the Factory building and the neighboring building to the south, the Factory building would be more visible along Robertson Boulevard, and the overall design of the project would appear more cohesive from nearby public vantage points. Removal of the two existing commercial buildings from the southeasterly portion of the project site and retention of additional portions of the Factory building would not negatively affect the visual character of the site relative to the approved project.

Retaining additional portions of the Factory building in lieu of 645 Robertson and 653 Robertson would increase the amount of windows and glass on the site, relative to the approved project. The structures at 645 Robertson and 653 Robertson are single-story structures with gray walls and standard storefront windows. In contrast, the retained and rehabilitated Factory building would be taller than the structures proposed for removal (approximately 48 feet in height, as

measured from Robertson Lane), with long rows of windows extending along the facades. Windows can be a source of light and glare; as such, expanding the retained portion of the Factory building could increase light and glare from the project. However, the additional windows associated with the expanded Factory building would be minor in the context of the multi-use hotel building as a whole. Under both the approved project and the modified project, a majority of the proposed building (portions of which extend 9 stories above grade) would be comprised of glass windows. As such, retention of an additional 6,400 square feet of Factory building would not result in a substantial change in the light/glare that is produced from the project site, and impacts would remain less than significant for the same reasons that are described in the EIR.

The overall building heights of the modified project would be consistent with those of the approved project. Although the additional components of the retained Factory building would be located on the 645 and 653 Robertson properties, which would increase building heights as compared to existing conditions on those properties, the modified project would remain within the height envelope permitted by the Robertson Lane Specific Plan, and the Factory building height would remain below the maximum building height that would be developed on the interior of the site. As such, the overall visibility, visual prominence, and shade/shadow would not change as a result of the project modifications. For these reasons, impacts in the category of aesthetics would remain less than significant. The modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect in the category of operation-related aesthetics impacts.

Changes in Circumstance/New Information

Since the certification of the EIR, no substantial changes in the aesthetic or visual environment in the project area have occurred. Similarly, no topographical changes or other landform alterations have occurred that would fundamentally change the approach or conclusions of the aesthetics analysis in the EIR. Additionally, there are no changes in regulations or design standards have been implemented since EIR certification that would alter the conclusions or the analysis in the category of aesthetics. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to aesthetics that would change the impact conclusions in the EIR.

7.3 Air Quality

Environmental Analysis

As described in the certified EIR, the approved project would result in less than significant impacts to air quality, after mitigation. The air quality mitigation measures shown in Section 6 of

this addendum are required to reduce identified impacts to a level below significance during construction. Operational impacts were determined to be less than significant, with no mitigation required. The modified project would not result in substantial changes in the construction scenario for the approved project or in its operational activities. As such, the modified project would not result in new significant impacts to air quality, substantial increases in the severity of previously identified significant impacts, or the need for new mitigation measures, for the reasons further described below.

Construction

The modified project would have a similar construction scenario to the approved project, with the exception of the construction start date. As shown in the EIR, project construction was anticipated to start in 2017. However, construction is now anticipated to start in late-2019 and is expected to be completed in 2022. This change does not affect the conclusions of the construction air quality analysis. In fact, the minor change in construction start date may slightly reduce impacts relative to those of the approved project (although not to the extent that the impact determinations would change). Earlier construction start dates typically represent a worst-case scenario for air quality impacts. As start dates move into the future, estimated emissions decrease, as newer and more efficient construction equipment are expected to replace older equipment over time. The construction schedule analyzed in the EIR (with a start date in 2017) thus represents a more conservative analysis relative to the construction schedule for the modified project (with a start date in 2019). Additionally, the proposed modifications involve minor changes to the overall construction scenario, and many of the changes would equate to decreases in construction intensity for some phases. The modified project would involve the following changes in construction activities as compared to the approved project: increased demolition; decreased excavation; decreased soil export; and decreased building construction area. While the area of demolition would increase (by about 10,000 sf), all other activities would decrease in intensity. In particular, the total building area of the modified project would be reduced by more than 100,000 sf compared to the approved project. However, the decreased construction intensity would not reduce air quality impacts such that the impact determinations would change. This is because air quality impacts are based on the worst-case daily construction emissions. While the overall intensity of construction would decrease, the number of vehicle trips and the level of activity on the most intense day of construction are not expected to change relative to the approved project. As with the approved project, MM-AQ-1 and MM-AQ-2 would still be required and would continue to reduce construction emissions to less than significant levels. For these reasons, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of construction air quality.

Operation

The modified project would result in minor changes in the sizes of different uses within the multi-use hotel building, which could slightly alter the number of visitors and vehicle trips associated with each use, thereby altering the operational air emissions. See Table 5-2 for details on the increased and decreased square footages of each use. As shown in Table 5-2, some uses would increase while others would decrease. On balance, overall vehicle trips and site activities associated with the modified project are expected to be similar to those of the approved project. The operational air emissions calculations presented in the EIR are based on the designs for the originally proposed project, which had a slightly greater land use intensity when compared to both the approved project and the modified project, and therefore provide a conservative assessment for the modified project. Operational impacts were determined to be less than significant under the originally proposed project. Since the intensity of use would be slightly reduced under the modified project when compared to both the originally proposed project and the approved project, operational impacts would remain less than significant.

The maximum daily operational emissions from the project, as calculated in the EIR, also take into account emissions from energy sources such as electricity and natural gas combustion, as well as other sources such as gasoline-powered landscaping maintenance equipment and architectural coatings for the maintenance of buildings. Under the modified project, these activities would not substantially change relative to the approved project. The building size would decrease slightly, and the amount of landscaping would increase, but not to the extent that maintenance requirements or activities would substantially change. As such, the conclusion presented in the EIR that operational impacts would be less than significant continues to apply to the modified project. For these reasons, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of operational air quality.

Air Quality Management Plan Consistency

Air quality analysis includes an evaluation of a project's consistency with the applicable air quality management plan (AQMP). The analysis in the EIR determined that the originally proposed project and the approved project would result in less than significant impacts relative to conflicts with the applicable AQMP. The criteria for consistency with the AQMP are as follows:

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Regarding the first criterion, the air quality modeling conducted for the originally proposed project demonstrated that it would generate minimal air pollutant emissions and would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of standards. As described above, the modified project would result in minor changes to project-generated criteria air pollutants and would not alter this conclusion. In fact, emissions may slightly decrease under the modified project due to the adjustments to the project design outlined in Table 5-2.

Regarding the second criterion, projects are considered consistent with the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP. As analyzed in the certified EIR, the project site was changed from CN2 and CC2 zoning and general plan designations to Robertson Lane Specific Plan. The Robertson Lane Specific Plan allows for greater height and greater floor area on the project site and allows for the development of hotel uses, which are prohibited within the CN2 zoning district. The approved project would not result in direct population growth, since it does not include the development of additional housing. However, the approved project would increase the number of people temporarily staying at the project site due to the hotel use and would require additional employees relative to existing conditions. Under the modified project, the number of hotel guests would slightly decrease, since the number of hotel rooms would decrease from 241 rooms (approved project) to 237 rooms (modified project). As explained in Section 7.1 of this addendum, the number of jobs at the site is expected to be similar to those contemplated under both the originally proposed project and the approved project and could be slightly reduced. As such, the modified project would not change the conclusions in the EIR relative to AQMP consistency, and impacts would remain less than significant. No other changes to the air quality analysis originally presented in the EIR would occur as a result of the project modifications. For the reasons described above, no new significant impacts would result from the modified project, and no previously identified significant impacts would be increased in severity in the category of air quality management plan consistency.

Changes in Circumstance/New Information

There are no changes with respect to circumstances under which the project will be undertaken that would change the air quality emissions impact conclusions in the EIR. Because the air quality issue area is constantly evolving, new information has become available since the EIR was prepared. Specifically, the impact analysis in the EIR discussed project consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP) for the South Coast Air Basin. However, the currently adopted AQMP is the 2016 AQMP. While the new AQMP contains certain changes in approaches to achieving regional air quality goals, the new AQMP does not affect the criteria by which a project is determined to be inconsistent or consistent with the AQMP. Therefore, the AQMP consistency analysis from the EIR is still relevant and applicable,

and the impact conclusions in the EIR would not change. There are no substantial changes with respect to circumstances under which the project will be undertaken and no new information of substantial importance that has become available would change the impact conclusions in the EIR.

7.4 Cultural Resources

Environmental Analysis

As explained in the certified EIR, the approved project would result in less than significant impacts to cultural resources, following the implementation of mitigation. The mitigation measures shown in Section 6 of this addendum are required to reduce identified impacts to a level below significance. The modified project does not represent substantial changes in the treatment of cultural resources relative to the approved project and would result in improvements in the treatment of cultural resources on the site. As such, the modified project would not result in new significant impacts to cultural resources, nor would it result in substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures, for the reasons described below. Additional information and substantiation for these conclusions is provided in Appendix B, which consists of a supplement to the Historical Resources Technical Report that was prepared for the approved project.

Historical Resources

Impacts to historical resources under the modified project would be similar to those identified for the approved project. As discussed in the EIR, the project site contains a historical resource (the Factory building), and potentially significant effects to this resource were identified that could be mitigated to a less than significant level though the implementation of identified mitigation measures. The modified project would reduce impacts to this resource when compared to the impacts of the approved project. As shown in Table 5-1, the modified project retains and rehabilitates four additional modules of the Factory building. Specifically, the approved project would have resulted in retention of 55% of the Factory building, while the modified project would result in retention of 79% of the building. Additionally, the project modifications involve eliminating a driveway that would have penetrated the Factory building's base. The modified project would result in increased visibility of the Factory building, due to the addition of a 42-foot setback between the Factory building and the neighboring building to the south. Nevertheless, the modified project would still involve disassembling the Factory building, relocating the retained portion on site, removing a portion of the building from the site, installing storefront assemblies along its eastern façade, increasing the height of the southern portion of the building and the south-facing façade, and development of a mixed-use hotel building adjacent to the Factory building. While impacts would be reduced as compared to the approved project, the

changes to this historical resource are still considered potentially significant impacts. As such, the same mitigation measures that were set forth for the approved project would be required for the modified project (MM-CUL-1 through MM-CUL-11). Because the southerly driveway along Robertson Boulevard would no longer penetrate the Factory building's base, requirements for the design of this penetration can be removed from MM-CUL-8. The revised version of MM-CUL-8 is shown below and supersedes the version shown in Section 6 of this addendum. MM-CUL-8 has also been updated accordingly in the project's mitigation monitoring and reporting program (see Appendix E). While impacts would be reduced under the modified project, they would remain less than significant with mitigation incorporated.

- **MM-CUL-8: Rehabilitation/Restoration.** The applicant shall rehabilitate the retained portion of the Factory building in accordance with the Secretary of the Interior's Standards for Rehabilitation (the Standards). The design of new components at the Factory building's base, including new storefronts, ~~and a vehicular entrance to the subterranean parking area,~~ shall also conform to the applicable Standards. All work will proceed under the direction of a historic preservation architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture.

The project modifications would involve demolition of two additional structures on the project site: a commercial structure located at 645 Robertson Boulevard and a wholesale design showroom located at 653-659 Robertson Boulevard. These properties were evaluated for significance in the EIR, and the evaluation concluded that the structures are not considered historical resources under CEQA. As such, demolition of these structures would not result in new significant effects. For the reasons described above, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of historical resources.

Archaeological and Paleontological Resources; Human Remains

Impacts to archeological resources, paleontological resources, and human remains would be similar to those of the approved project. While the depth of excavation would decrease, the total surface area of the site to be excavated would increase. As such, the potential to uncover buried cultural resources would still be present under the modified project. As with the approved project, impacts could be potentially significant in the event that unknown resources or remains were uncovered during excavation. The same mitigation measures provided for the approved project would reduce these impacts to below a level of significance (MM-CUL-12, MM-CUL-13, and MM-CUL-14). With implementation of these measures, impacts to archeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated under the modified project. As such, the project modifications would not result in

new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of archaeological resources, paleontological resources, or human remains.

Changes in Circumstance/New Information

No changes to the site have occurred that would alter the conclusions or the analysis for the approved project in the category of cultural resources. No new regulations or design standards have been implemented since EIR certification that would alter the conclusions or the analysis for the approved project in the category of cultural resources. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken and no new information of substantial importance that has become available relative to this issue area that would change the impact conclusions in the EIR.

7.5 Geology and Soils

Environmental Analysis

As explained in the EIR, the approved project would result in less than significant impacts in the category of geology and soils, after mitigation. The geology and soils mitigation measure shown in Section 6 of this addendum is required to reduce identified impacts to a level below significance. The project modifications do not represent a change in the location of the project or substantial changes in the design of the project. As such, the modified project would not result in new significant impacts to geology and soils and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures, for the reasons described below.

The project site would not change under the modified project; as such, the same geologic conditions that were analyzed and discussed for the approved project would apply to the modified project. The modified project would involve a greater lateral extent of excavation but a reduced depth of excavation on site, as the subterranean parking level was reduced from a narrower garage with six stories below grade (approved project) to a larger garage floorplate with only three stories below grade (modified project). The parking garage would have extended 60 feet below grade under the approved project and is now planned to extend approximately 50 feet below grade under the modified project. As described in the EIR, the project site is underlain by liquefiable soils to a depth of 37.5 feet. As with the approved project, the modified project would involve excavation below the liquefiable soils, effectively removing them from the site. As with the approved project, the potential hazards related to liquefiable soils would be reduced through excavation and removal of these soils. Additionally, the design recommendations from the finalized site-specific Geotechnical Investigation would continue to address potential soil-related hazards at the project site for the modified area of excavation under the modified project.

Compliance with the recommendations from the Geotechnical Investigation is required per MM-GEO-1. Upon incorporation of this mitigation measure, impacts of the modified project in the category of geology and soils would continue to be less than significant. As such, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category geology and soils.

Changes in Circumstance/New Information

No changes to geologic features have occurred, and new regulations or design standards have been implemented that would alter the conclusions or the analysis for the approved project in the category of geology and soils. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to these issue areas that would change the impact conclusions in the EIR.

7.6 Greenhouse Gas Emissions

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts to greenhouse gas emissions. No project-specific mitigation measures were required; however, the approved project would be required to implement mitigation measure 3.15-1 from the City's Final Program EIR for the City's General Plan and Climate Action Plan. The modified project does not involve substantial changes in either the construction activities or the operational activities compared to the approved project. As such, the modified project would not result in new significant impacts to greenhouse gas emissions, nor would it result in substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures, for the reasons described below.

Construction

As described in Section 7.3 of this addendum, the modified project would have a similar construction scenario to the approved project, with the exception of the construction start date. As shown in the EIR, project construction was anticipated to start in 2017. However, construction is now anticipated to start in late-2019 and is expected to be completed in 2022. This change does not affect the conclusions of the construction greenhouse gas emissions analysis. Earlier construction start dates typically represent a worst-case scenario for emissions. As start dates move into the future, estimated emissions would likely decrease, as newer and more efficient construction equipment are expected to replace older equipment over time. The minor change in construction start date associated with the modified project is not anticipated to substantially change the construction emissions as calculated in the EIR. The modified project

would also involve the following changes in construction activities: increased demolition (from approximately 18,990 sf to 28,491 sf); decreased excavation and decreased soil export (from approximately 180,000 cubic yards to approximately 154,000 cubic yards); and decreased building construction area (from approximately 577,180 sf to 474,510 sf). As such, while the area of demolition would increase (by about 10,000 sf), all other activities would decrease in intensity, including excavation and hauling activities that typically generate greater greenhouse gas emissions, and based on the detailed design development of the modified project and coordination with the selected general contractor and construction team, the overall construction time could be decreased from approximately 36 months to 27 months. As such, overall construction greenhouse gas emissions would likely be reduced compared to the approved project. Compliance with mitigation measure 3.15-1 from the City's Final Program EIR for the City's General Plan and Climate Action Plan would still be required. The measure requires project applicants to implement all feasible measures for reducing greenhouse gas emissions associated with construction that are recommended by the City and/or the SCAQMD. As explained in the certified EIR, construction greenhouse gas emissions are amortized over 30 years and then added to operational emissions to determine whether a significant impact would occur. Minor decreases in excavation and minor increases in demolition, amortized over 30 years, would not substantially alter total project-generated greenhouse gas emissions such that impacts would substantially change. For reference, the total amortized construction-related GHG emissions for the project was estimated at 72 metric tons carbon dioxide equivalent (MT CO_2E), compared to 3,526 MT CO_2E for operational emissions (Draft EIR, Section 3.5). As such, minor adjustments in construction activity would not change the impact conclusions or the analysis presented in the EIR. Impacts would therefore remain less than significant. As such, the modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category of construction greenhouse gas emissions.

Operation

The approved project's operational greenhouse gas emissions were calculated in the certified EIR using the anticipated landscape maintenance activities, energy usage, vehicle trips, solid waste generation, water supply requirements, and wastewater treatment requirements. The modified project would not substantially alter any of these activities. The overall building size would slightly decrease, and the amount of landscaping would increase, but not to the extent that maintenance requirements or activities would substantially change. The number of vehicle trips would decrease, as shown in Appendix D. Therefore, greenhouse gas emissions impacts associated with modified project operations would not increase as compared to the approved project, and impacts of the modified project would be similar to or less than those of the approved project. The sustainability measures characterized for the project in the Draft EIR would still be implemented for the modified project. Impacts related to greenhouse gas emissions for the modified project

would accordingly remain less than significant. As such, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to operational greenhouse gas emissions.

Changes in Circumstance/New Information

No substantial changes to cumulative GHG emissions have occurred since the certified EIR was certified. While research and regulations for GHG emissions are constantly evolving, there have been no substantial changes with respect to circumstances under which the project will be undertaken and there is no new information of substantial importance that has become available relative to this issue area that would change the GHG emissions impact conclusions in the EIR.

7.7 Hazards and Hazardous Materials

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts in the category of hazards and hazardous materials. The modified project does not involve a change in project location or a change in the materials that would be required for construction or operations. As such, the modified project would not result in new significant impacts related to hazards and hazardous materials and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures, for the reasons described below.

Construction

The analysis in the certified EIR described and analyzed hazardous materials that may be used during construction of the approved project and potential hazards that may exist on the project site. The project modifications would not substantially alter the types of hazardous materials or the quantity of hazardous materials that would be used during construction, nor would it change the analysis of hazards on the project site since the modified project would not involve a change in project location. The construction scenario would be similar, and the same types of materials would be used during construction. The primary difference in construction related to hazards is that the modified project involves demolition of two additional structures. The EIR identifies the potential for asbestos-containing material (ACM) and lead-based paint (LBP) to be present in the existing on-site structures. Demolition of two additional buildings would increase the possibility of encountering ACM and LBP during demolition activities and may also increase the amount that would need to be removed and safely disposed. However, as described in the EIR, a preconstruction survey would be required to determine the presence of ACM and LBP. All ACM and LBP would be removed prior to the start of demolition and renovation activities in accordance with California Department of Toxic Substances Control requirements for LBP and the SCAQMD

requirements for ACM (Rule 1403). Per state law, the applicant must obtain proof of satisfaction of state and regional requirements prior to the start of demolition and renovation activities. Upon adherence to existing requirements and regulations, the demolition of two additional structures that could contain ACM and/or LBP would not substantially increase impacts related to hazards and hazardous materials. Impacts would remain less than significant for the same reasons described in the EIR. As such, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to construction-related hazards and hazardous materials.

Operation

The operational analysis presented for hazards and hazardous materials in the EIR would still apply to the modified project. While the square footages of some of the uses within the multi-use hotel building would be slightly different under the modified project, the types of uses would remain the same as compared to the approved project (hotel, retail, restaurant, club, design showroom, pedestrian paseo). Slight changes in the square footages of some of these uses would not alter the types of potentially hazardous materials that are required for operation. And, because the changes in square footages are minor, the volume of materials required for operation would not substantially change. As with the approved project, operation of the modified project would involve very little transport, storage, use, or disposal of hazardous materials associated with janitorial, maintenance, and repair activities (i.e., commercial cleaners, lubricants, or paints), and household cleaning supplies. Use of these materials would be limited, and transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Impacts would, therefore, remain less than significant. As such, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to operational hazards and hazardous materials.

Emergency Response & Evacuation Plans

Regarding effects to implementation of an emergency response plan or an emergency evacuation plan, the modified project would not alter the analysis presented in the EIR. As with the approved project, construction would have some potential to affect emergency access due to temporary, intermittent increases in truck traffic in the vicinity. The same precautions for maintaining emergency response and implementing required emergency procedures that are described in the EIR would apply to the modified project. As with the approved project, impacts would be less than significant. For these reasons, the modified would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to implementation of emergency response and evacuation plans.

Changes in Circumstance/New Information

No changes to the general land use and character of the project area have occurred since the EIR was certified. As such, it is unlikely that hazardous materials with the potential to adversely affect the project have been released in the area or on the site in the past year. Additionally, databases of hazardous materials sites were consulted to ensure that no new hazardous materials sites or releases have been listed on the project site or in the immediate vicinity (DTSC 2019, SWRCB 2019). This investigation confirmed that no new listings with the potential to affect the project have occurred.

Since certification of the EIR, updates to the CEQA Guidelines have gone into effect. One of the revisions to Appendix G of the CEQA Guidelines involves a more extensive wildfire analysis for projects located in or near state responsibility areas for firefighting or lands classified as very high fire hazard severity zones (14 CCR 15000 et seq., as amended December 28, 2018). Wildfire hazards were addressed in the EIR; however, additional information regarding wildfire hazards are provided in this paragraph based on the updates to the CEQA Guidelines. The project site is not located in a state responsibility area or in a state-designated fire hazard severity zone. The nearest state responsibility area is located approximately 10 miles to the west (in the Santa Monica Mountains), and the nearest very high fire hazard severity zone is located approximately 0.6 miles north of the project site, in the Hollywood Hills (CAL FIRE 2019). As described in the EIR, the project site is not located within a City-designated wildland fire hazard area. The project site is located over 0.5 mile from the southern boundary of the City-designated "moderate" wildland fire hazard area (located at the base of the Hollywood Hills). As such, the project site is not expected to be susceptible to wildfires and is not located within or near a wildfire hazard area or a state responsibility area. Development of the modified project would not, therefore, expose people to significant risks related to wildfire hazards, nor would it exacerbate wildfire risks in the area. The updates to the CEQA Guidelines also involve addressing effects related to emergency response and evacuation plans within or near a very high fire hazard severity zone or state responsibility area. Effects to emergency response and evacuation plans were addressed in the EIR and determined to be less than significant. The modified project would not affect this conclusion, as the modified project would not involve any additional design elements or activities having the potential to affect emergency response or evacuation. While there are new guidelines for the evaluation of development projects and wildfire risk, the proposed project would not result in significant effects under the new guidelines, as demonstrated herein.

Aside from the CEQA Guidelines updates discussed in the paragraph above, no new regulations or design standards have been implemented that would alter the conclusions of the hazards and hazardous materials analysis. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of

substantial importance that has become available relative to hazards and hazardous materials in the project area that would change the impact conclusions in the EIR.

7.8 Hydrology and Water Quality

Environmental Analysis

As explained in the certified EIR, the approved project would result in less than significant impacts to hydrology and water quality. No mitigation measures were required. The modified project does not involve changes in the location of the project, the construction scenario for the project, or the design of the project such that the existing or proposed hydrologic conditions of the site would be substantially altered. As such, the modified project would not result in new significant impacts to hydrology and water quality and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures, for the reasons described below.

Construction

The construction scenario of the modified project would be similar to that of the approved project, and the same construction best management practices described in the EIR would continue to apply to the modified project and would minimize the potential for adverse effects to water quality during construction. The key change in the construction scenario between the approved project and the modified project is the reduced depth of the parking garage and the expanded floor area of each parking garage floorplate. As described in the EIR, groundwater has been encountered at depths between 22 feet and 32.5 feet below the existing site grade in exploratory borings, and the historically highest groundwater level was established at about 10 feet below the existing site grade (Draft EIR, Section 3.7). The approved project required construction dewatering, since excavation was going to extend below the depth where groundwater was expected to be encountered. Even though the depth of parking garage would be reduced under the modified project (reduced from 60 feet below grade under the approved project to approximately 50 feet below grade), the modified project would still involve excavations below the anticipated groundwater depth. As such, groundwater would likely still be encountered and construction dewatering would still be involved under the modified project. The rate and/or duration of groundwater pumping may slightly decrease under the modified project, but not to the degree that the overall impact determinations would change. As with the approved project, the amount of groundwater that is pumped and discharged would be negligible relative to the volume of water in the groundwater basin, and extraction would not substantially deplete groundwater supplies or significantly affect groundwater levels. For these reasons, construction impacts would remain less than significant. As such, the modified project would not result in

new significant environmental effects or a substantial increase in the severity of a previously significant effect in the category of construction effects to hydrology and water quality.

Operation

Design and operation of the modified project would be subject to the same or similar drainage standards that were identified for the approved project, such as the Los Angeles County Department of Public Works Low Impact Development Standards, Municipal National Pollutant Discharge Elimination System Permit requirements, and Section 15.95.095 of the City's Municipal Code. Compliance with these regulations would continue to minimize stormwater runoff volumes and pollutants to the extent practicable. As with the approved project, it is anticipated that stormwater quality would be improved and runoff volumes would be reduced compared to existing conditions since the site is currently developed and paved without a stormwater capture system. Additionally, the modified project includes expansion of landscaped area on the project site. This could further reduce runoff volumes and improve the quality of stormwater runoff relative to both existing conditions and the approved project. As with the approved project, the modified project would not include any uses that might discharge unusual pollutants, such as industrial or manufacturing uses. The building foundation would be designed to prevent groundwater from intruding into the structure, ensuring that a permanent dewatering program would not be required during long-term project operation. Further, as described in the EIR, permanent post-construction stormwater management measures for stormwater capture would be implemented pursuant to the Los Angeles County Department of Public Works Low Impact Development Standards Manual, including above-grade planter boxes, which would filter water before discharging to the street. As such, impacts involving operational stormwater runoff and discharges would remain less than significant. The project modifications include adjustments in the square footages of some of the proposed uses. However, the types of uses would remain the same, and any associated changes to water use would be minimal. The estimated water use described in the EIR would not change such that new effects to water use or groundwater use would occur. Any potential effects may slightly decrease under the modified project due to the reduced building FAR and number of hotel rooms that would in turn reduce potential water demand. Impacts would therefore remain less than significant. As such, the modified project would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect in the category of operational effects to hydrology and water quality.

Project Location

The project site would not change under the modified project; as such, the same hydrologic conditions that were analyzed and discussed for the approved project would apply to the modified project. As with the approved project, the modified project is not located within a 100-year flood hazard area, and impacts related to other flooding hazards (seiche, mudflow, levee or

dam failure, etc.) would remain less than significant. As such, the modified project would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect related to hydrology and water quality.

Changes in Circumstance/New Information

The project site and project area remain urbanized and mostly paved, which no natural drainages. No new regulations or design standards have been implemented that would alter the conclusions or the analysis for the approved project in the category of hydrology and water quality. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to these issue areas that would change the impact conclusions in the EIR.

7.9 Land Use and Planning

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts in the category of land use and planning. The modified project would be of a similar size, design, and land use intensity as the approved project. As compared to the approved project, the modified project involves a reduced parking garage depth; expanded parking garage floorplates; expanded retention of the Factory building; and slight changes in the number of hotel rooms, square footages of the different uses within the multi-use hotel building, and vehicle access to the site. These changes would not increase the modified project's potential to physically divide an established community; as such, impacts would be the same as those of the approved project and would, therefore, remain less than significant.

The modified project would not substantially change the land use policy consistency analysis presented in the EIR. The minor reduction in the number of hotel rooms and in the FAR of the building may slightly reduce the extent to which the modified project would implement City goals and policies pertaining to business development and expansion of hotel and hospitality uses (see General Plan Land Use Policy 1.21). However, the expanded retention of the Factory building would slightly increase the extent to which the modified project would implement City goals involving architecture and design (see General Plan Land Use Goal 5). The overall building design, mix of land uses, and amenities associated with the project would not change.

As described in Section 3 of this addendum, the City's approval of the approved project included adoption of the Robertson Lane Specific Plan. The provisions of this specific plan have been codified as Section 19.16.040 of the West Hollywood Municipal Code and now apply to the project site. The project modifications would be consistent with the Robertson Lane Specific

Plan and, therefore, would be consistent with the zoning and general plan designations for the project site.

As such, impacts involving the modified project's consistency with applicable land use plans and policies would remain less that significant. Because the modified project does not involve a change in location, the modified project would not be located within a habitat conservation plan or natural community conservation plan area, and no impacts would occur due to conflicts with those plans.

For these reasons, land use and planning impacts would remain less than significant. As such, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to land use and planning.

Changes in Circumstance/New Information

No changes in land uses in the project area have occurred that would change the land use analysis and conclusions originally presented in the EIR. No new regulations, plans, or policies have been adopted or updated that would affect the land use analysis or conclusions originally presented in the EIR. The same general plan that was analyzed and addressed in the EIR remains in effect, as does the Streetscape Master Plan. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to land use and planning in the area that would change the impact conclusions in the EIR.

7.10 Noise

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts relative to noise, after implementation of mitigation. The noise mitigation measures shown in Section 6 of this addendum are required to continue to be applied to the modified project to reduce identified impacts to a level below significance. Below, changes in the construction and operational scenarios for the modified project are identified, followed by an explanation of why these changes would not result in a new significant impact, would not increase the severity of a previously identified significant impact, and would not result in the need for new mitigation measures. Additional information and substantiation for these conclusions is provided in Appendix C, which consists of a supplement to the noise technical report that was prepared for the approved project.

Short-Term Construction Noise

The modified project would have a similar construction scenario to the approved project, but would involve the following changes in construction activities: increased demolition; decreased excavation; decreased soil export; and decreased building construction area. The increase in demolition would have the potential to increase construction noise, due to increased site activity as well as increased truck trips to haul away debris from the demolished buildings. Conversely, decreased excavation and soil export would reduce site activity and truck trips. Although the duration and extent of some activities may change, the overall construction noise levels from the modified project would be the same as that expected from the approved project. The construction noise analysis involves analyzing worst-case construction noise. The demolition of additional buildings on the project site would not occur simultaneously with the demolition of other buildings on the project site, and therefore worst-case construction noise would not increase. As such, additional demolition in one portion of the project site would not have the potential to substantially increase effects to noise- or vibration-sensitive receptors. For these reasons, construction-related noise and vibration effects from the modified project would be the same as those identified and analyzed in the EIR. Impacts would, therefore, remain less than significant with incorporation of mitigation measures MM-NOI-1 and MM-NOI-2, which would address and minimize construction-generated noise. For these reasons, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of previously identified significant effects in the category of construction-related noise impacts.

Long-Term Operational Noise

As described in the EIR, operational noise would be produced from operation of the multi-use hotel building and from off-site traffic noise. The EIR demonstrated that outdoor noise produced from the project's outdoor areas (pool, outdoor dining, etc.) would fall below significance thresholds at off-site noise-sensitive receptors during both the daytime and the nighttime. Mitigation measure MM-NOI-3 was required to ensure that operation of amplified sound systems in the outdoor areas would not lead to significant impacts. With mitigation, impacts were identified as less than significant. Under the modified project, several changes have occurred to the size, location, and orientation of the outdoor uses due to the minor modifications to the building design that would be implemented under the modified project. As such, a revised noise analysis has been conducted to analyze the operational noise effects of the modified project's outdoor areas. The revised noise analysis is included in this addendum as Appendix C. The analysis includes a detailed list of the proposed changes to the outdoor areas and is based on the maximum number of people that could gather in each outdoor area. The same noise management practices described in the EIR would apply to the modified project, including installation of solid parapet walls that would shield outdoor spaces on the upper levels of the building from off-site noise-sensitive receptors and orientation of speakers away from the

off-site noise-sensitive receptors. As demonstrated in Appendix C, the estimated noise levels at all off-site sensitive receptors would continue to fall below the significance thresholds during both the daytime and the nighttime. As such, the modified project would not substantially change the noise impacts associated with outdoor areas such that a new significant impact would occur or a previously identified significant impact would increase in severity. Nevertheless, as with the approved project, MM-NOI-3 would still be required to verify that the noise levels generated by the amplified sound systems would remain below the significance thresholds. To accommodate the modified project design and the adjustments to outdoor areas, MM-NOI-3 would be revised as shown below consistent with the analysis in Appendix C. The revised version of MM-NOI-3 supersedes the version shown in Section 6 of this addendum and has also been updated accordingly in the project's mitigation monitoring and reporting program (see Appendix E). Upon incorporation of MM-NOI-3, impacts would remain less than significant.

- **MM-NOI-3:** Prior to certificate of occupancy, the amplified sound system shall be calibrated for the outdoor uses so as to not exceed the noise levels listed below. The amplified sound system sound output shall be measured at the distances provided below on a plane parallel from the face of the speaker and verified and documented by a qualified acoustical engineer:

    a) Level 1:
        i. 75 A-weighted decibels (dBA) equivalent noise level (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.
        ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.
    b) Level 2 - Public Outdoor Dining:
        i. 84 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
        ii. 66 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.
    c) Level 2 – West Hotel Terrace and Center Hotel Terrace:
        i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.
        ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.
    d) Level 3 – Hotel Amenities and Outdoor Dining:
        i. 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
        ii. 68 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.
    e) Level 3 – Center Terrace:
        i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.
        ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.

f) Level 9 – Hotel Outdoor Dining, Hotel Terrace, Restaurant and Pool/Deck:
   i. 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.
   ii. 65 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.
g) Level 9 – Center Terrace:
   i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.
   ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.

As with the approved project, operational noise within hotel rooms would potentially exceed applicable standards as a result of nearby traffic noise and on-site hotel, nightclub, and retail activities, resulting in a potentially significant impact. The modified project would not have the potential to substantially increase interior noise levels in the hotel rooms. As with the approved project, implementation of MM-NOI-4 would ensure compliance the applicable standards for interior noise levels. Upon implementation of MM-NOI-4, impacts would remain less than significant with mitigation incorporated. Operational noise would also be produced by on-site stationary equipment (e.g., air handlers, exhaust fans, and pool equipment). As with the approved project, the modified project would have on-site stationary equipment, with the potential to affect nearby sensitive receptors. As with the approved project, implementation of MM-NOI-5 would reduce the potential for such effects to below a level of significance.

Other types of operational noise sources discussed in the EIR are noise from the proposed subterranean parking garage and off-site traffic noise. As with the approved project, the parking garage for the modified project would be located underground and would therefore be shielded from noise-sensitive uses. Impacts would remain less than significant for the same reasons described in the EIR. Off-site traffic noise from the modified project would be slightly reduced relative to the approved project, since the modified project would generate fewer trips than the approved project. Impacts would therefore remain less than significant.

For the reasons described above, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of previously identified significant effects in the category of operational or permanent noise impacts.

Changes in Circumstance/New Information

Since the EIR was certified, construction of the La Peer Hotel was completed across the street and to the southwest of the proposed project. Because the La Peer Hotel provides guest lodging, it could be considered a noise- and vibration-sensitive land use. The La Peer Hotel is located approximately 150 feet southwest of the project site. The closest noise- and vibration-sensitive receptor analyzed in the EIR is West Hollywood Park, located approximately 60 feet east of the project site. As such, effects at the La Peer Hotel would be similar to or less than those identified

for West Hollywood Park. Upon implementation of mitigation measures MM-NOI-1 through MM-NOI-5, impacts would continue to be less than significant with mitigation incorporated. No changes in land uses in the project area have occurred that would change the noise analysis and conclusions originally presented in the EIR. Furthermore, no new regulations have been adopted or updated that would affect the noise analysis or conclusions originally presented in the EIR. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to noise that would change the impact conclusions in the EIR.

7.11 Public Services

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts related to public services. Because the types of uses and the proposed land use intensities under the modified project would be similar to those of the approved project, impacts to fire protection, police protection, schools, and library services would be generally the same as those identified for the approved project. While some uses within the multi-use hotel building would increase and others would decrease under the modified project, these minor adjustments would not affect fire, police, park, school, library, or City administrative services. For example, increased retail and design showroom floor area and decreased restaurant floor area would not have a material effect on the project's overall demand for public services. While the overall land use intensity of the project would slightly decrease as a result of the modifications proposed under the modified project, it would not decrease the extent that the analysis or the impact determinations presented for the approved project would change. As such, impacts would remain less than significant.

As with the approved project, the modified project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, and impacts would remain less than significant. Therefore the modified project would not result in new significant environmental effects or in a substantial increase in the severity of previously identified significant effects related to public services.

Changes in Circumstance/New Information

No changes have occurred (such as closure of a nearby public facility serving the project site) that would change the public services analysis and conclusions originally presented in the certified EIR. Furthermore, no new regulations have been adopted or updated that would affect the public services analysis or conclusions originally presented in the EIR. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to public services that would change the impact conclusions in the EIR.

7.12 Transportation and Traffic

Environmental Analysis

As described in the EIR, the approved project would have a less than significant impact related to transportation and traffic, following the implementation of mitigation. The traffic and transportation mitigation measure shown in Section 6 of this addendum was required to reduce identified potentially significant impacts to a less than significant level. As noted in Section 6, this mitigation measure has been implemented since certification of the EIR. Below, the modified project is discussed relative to the analysis of the originally proposed project, as presented in the EIR. Substantiation is provided for why the project changes would not result in a new significant impact, would not increase the severity of a previously identified significant impact, and would not result in the need for new mitigation measures. Additional information and substantiation for these conclusions is provided in Appendix D, which consists of a supplement to the traffic study that was prepared for the approved project.

Conflicts with Policies Established for the Effectiveness of the Circulation System

Construction

The total number of construction traffic trips may increase under the modified project during demolition of the existing on-site uses, since two additional buildings would be demolished. However, the total number of construction trips would decrease during excavation, since less soil export would be required. Overall, the number of construction-related vehicle trips are expected to be similar to that of the approved project during site preparation activities. The peak period of construction is identified in the EIR as the building construction phase, which would occur after demolition and excavation. Because this phase of construction was associated with the maximum number of vehicular trips that would be expected to occur throughout construction, it was the phase of construction that was selected for analysis in the traffic and transportation section of the EIR. The project modifications could slightly reduce the number of construction-related trips required during the building construction phase due to the overall decrease in building size. However, trips would not be reduced such that the impact determinations would change. Construction impacts would therefore remain less than significant under the modified project consistent with the analysis in the certified EIR. Therefore, the modified project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts related to construction transportation and traffic.

Operation

In support of the analysis in the EIR, KOA Corporation (KOA) prepared a Traffic Impact Study for the originally proposed project, which evaluated that project's potential to affect intersection

operations in the project area and to conflict with the thresholds of significance established by the City of West Hollywood and the nearby cities of Beverly Hills and Los Angeles, which own and operate several intersections in the project area. A Traffic Study Addendum has been prepared to determine whether any new significant impacts would result from the modified project (see Appendix D). As stated in Appendix D, the modified project would generate substantially fewer vehicle trips as compared to the originally proposed project during the 24-hour daily period, the midday peak hour, and the evening (PM) peak hour. This reduction is primarily attributable to the reduced amount of restaurant space that would be developed under the modified project. The modified project would result in a slight increase in vehicle trips (i.e., two trips) during the weekday morning (AM) peak hour. While the modified project would result in a nominal increase in AM peak hour trips as compared to the originally proposed project, this increase would not cause the modified project to result in any new significant impacts related to traffic and transportation. As demonstrated in Appendix D, under the modified project, impacts would continue to remain less than significant with mitigation incorporated (MM-TRAF-1). (As noted, the identified mitigation has already been implemented.) For these reasons, the modified project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts related to operational transportation and traffic.

Conflicts with the Applicable Congestion Management Program

As described in the EIR, performance standards for circulation are also established by the County of Los Angeles in its Congestion Management Program (CMP). The CMP requires analysis of a project's potential to affect designated monitoring locations on the CMP highway system. Monitoring locations are established at freeway segments and intersections. As determined in the EIR, impacts to the CMP system were determined to be less than significant for the originally proposed project. As described above, the modified project would result in fewer trips than the originally proposed project that was analyzed in the EIR. Trips would not be reduced such that the impact determination would change. Impacts would therefore remain less than significant under the modified project, no new significant impacts would result, and no previously identified significant impacts would increase in severity.

Design Features

As with the approved project, the modified project would not introduce new intersections or incompatible uses to the project area. However, the EIR discussed potential traffic hazards associated with vehicle delay and queuing at the proposed ingress/egress for the subterranean parking garage, increased pedestrian activity in the area, and the temporary, intermittent creation of a pedestrian-only zone on Robertson Boulevard between the project site and West Hollywood Park. Impacts were determined to be less than significant. As compared to the analysis in the EIR, the modified project would not substantially change pedestrian activity, nor would it change

the intermittent creation of a pedestrian-only zone. As such, the impact analysis presented for those topics in the EIR would remain the same for the modified project, and impacts would be less than significant.

As described in Section 5 of this addendum, the modified project includes changes to the ingress/egress for the subterranean parking garage. These changes are further described and analyzed in Appendix D. As with the approved project, ingress and egress would be provided via driveways on La Peer Drive and Robertson Boulevard. However, in contrast to the approved project, the ingress/egress along Robertson Boulevard would be divided into two separate driveways. The ingress driveway would be located at the southerly end of the project site (south of the relocated Factory building), while the egress driveway would be located toward the northerly end of the project site (north of the pedestrian lane). While adjustments have been proposed to the ingress/egress, the overall concept of having vehicular entrances and exits on both La Peer Drive and Robertson Boulevard remains the same. Based on the analysis of the proposed changes to the ingress/egress presented in Appendix D, overall traffic flow would be improved into and out of the site and it was determined that no new impacts or increases in severity of impacts would occur relative to vehicle queuing and vehicle circulation near the project site's driveways. As such, impacts would remain less than significant, consistent with the analysis in the certified EIR. For these reasons, the modified project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts related to operational vehicle queuing or circulation.

Conflicts with Policies Regarding Alternative Transportation

The modified project's proposed demolition of two additional structures, increased retention of the Factory building, minor changes in the square footages of the land uses within the multi-use hotel building, and adjustments in the plans for ingress/egress would not affect transit, bicycle, or pedestrian facilities, nor would it hinder the City from implementing policies to encourage development of alternative transportation facilities and to encourage increased use of such facilities. Impacts would remain less than significant, no new significant impacts would result, and no previously identified significant impacts would increase in severity.

Changes in Circumstance/New Information

Since the certification of the EIR in 2018, the requirements of MM-TRAF-1 have been implemented (see Appendix D for details). This would ensure that, once the modified project is constructed, no significant impacts would result at the intersection of Robertson Boulevard and Santa Monica Boulevard, which was improved by implementation of MM-TRAF-1. Implementation of this mitigation measure occurred in accordance with the mitigation monitoring and reporting program that was adopted by the City Council in June 2018.

Implementation of the mitigation measure does not affect the environmental analysis for the modified project, aside from the fact that no further action needs to be taken in the future by the applicant or the City relative to mitigation measure MM-TRAF-1. A desktop review of transportation facilities in the area confirmed that, aside from implementation of MM-TRAF-1, no changes have occurred in the nearby transportation facilities since certification of the EIR that would change or otherwise affect the analysis and conclusions originally presented in the EIR.

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. On December 28, 2018, after certification of the EIR, updates to the CEQA Guidelines required under SB 743 went into effect. Under the new transportation guidelines, LOS, or automobile delay, will no longer be considered an environmental impact under CEQA. Rather, vehicle miles traveled (VMT) will be used to assess the significance of transportation impacts. OPR's regulatory text indicates that a public agency may immediately commence implementation of the new transportation impact guidelines, and that the guidelines must be implemented statewide by July 1, 2020. The traffic and transportation analysis in the certified EIR relies on LOS to characterize impacts, since use of VMT was not yet mandatory, and the EIR was circulated for review well before the updated CEQA Guidelines were approved. Use of VMT is still not mandatory under CEQA, and the City has not elected to be governed immediately by the revised traffic and transportation analysis methodology. Accordingly, the City's methodology for analyzing transportation and traffic impacts in effect when the EIR was prepared and at the time of this addendum is based on LOS, and this methodology must be applied to the modified project. As demonstrated above under the LOS methodology that is in effect, the modified project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts related to operational transportation and traffic.

No other new regulations, plans, or policies have been adopted or updated that would affect the analysis or conclusions related to traffic or transportation facilities that were originally presented in the EIR. For these reasons, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to transportation and traffic that would change the impact conclusions in the EIR.

7.13 Utilities and Service Systems

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts in the category of utilities and service systems. No mitigation measures were required. The land use mix within the multi-use hotel building would slightly change under the modified project; however these changes are not expected to substantially increase the water demand, stormwater runoff, or solid waste generation of the project. As such, the modified project would not result in new significant impacts to utilities and service systems, nor would it result in substantial increases in the severity of impacts or the need for mitigation measures, for the reasons described below.

Some uses within the multi-use hotel building would increase under the modified project, while others would decrease. The uses that would decrease include restaurant space and number of hotel rooms. While other uses would increase in size (such as retail and design showroom), these uses would have a lower water use per square foot than the uses that would decrease. For example, a typical restaurant uses approximately 300,000 gallons per 1,000 square feet of area per year. A typical retail shop uses approximately 74,000 gallons per 1,000 square feet of area per year (CAPCOA 2016). As such, the adjustments in use of space within the multi-use hotel building are not expected to substantially increase water demand or wastewater generation and in fact would be expected to reduce water demand and wastewater generation.

Conversely, typical retail uses generate slightly greater amounts of solid waste than typical restaurant uses. A typical restaurant generates approximately 0.91 tons of solid waste per 1,000 square feet of area per year. A typical retail shop generates approximately 1.05 tons of solid waste per 1,000 square feet of area per year (CAPCOA 2016). As such, the solid waste generation of the modified project could slightly increase relative to approved project conditions. However, the change would be minor to negligible in the context of the project as a whole and particularly in the context of regional solid waste generation and landfill capacity. On balance, the adjustments in square footages under the modified project are not expected to substantially change the project's water demand, wastewater generation, or solid waste generation such that a new significant impact would occur. As described in the EIR, the incremental increases in water demand, wastewater generation, and solid waste generation from the project would be negligible in a regional context and would not exceed the capacity of existing facilities. Because the approved project fell well below the threshold of significance for these impacts, the nominal changes that would be associated with the project modifications would not change the impact conclusions.

Stormwater discharge would not substantially change based on the modified project. The modified project would have increased areas of landscaping, which could slightly reduce stormwater runoff and improve the quality of runoff. However, these changes would not affect the determinations in the EIR, and impacts would remain less than significant.

For these reasons, impacts to utilities and service systems would remain less than significant under the modified project. As such, the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect in the category of utilities and service systems.

Changes in Circumstance/New Information

No changes have occurred to the City's utilities and service systems since certification of the EIR that would change or otherwise affect the analysis and conclusions originally presented in the EIR. Furthermore, no new regulations, plans, or policies have been adopted or updated that would affect the analysis or conclusions related to utilities and service systems that was originally presented in the EIR. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to utilities and service systems that would change the impact conclusions in the EIR.

7.14 Energy Consumption

Environmental Analysis

As described in the EIR, the approved project would result in less than significant impacts from energy consumption. Because the types of uses and land use intensities would be similar to those of the approved project, energy consumption during construction and operation of the modified project is expected to be similar to that of the approved project. Operational energy use could slightly decrease due to the minor reduction in restaurant space and hotel rooms under the modified project. Conversely, energy use from retail and design showroom uses could slightly increase. On balance, energy use is expected to be similar to that of the approved project. During construction, vehicle trips and equipment use may increase during demolition, in order to remove the two additional buildings that would be demolished under the modified project. However, vehicle trips and equipment use would decrease during excavation, due to decreased soil export and depth of excavation. Additionally, the overall building size would decrease under the modified project, which would reduce the intensity of the building construction phase. On balance, construction energy use is expected to be similar to or slightly less than that of the approved project. Energy consumption effects identified for the approved project were less than significant and would remain less than significant under the modified project, since energy use would be similar and may slightly decrease. Furthermore, due to the new construction start date

and the associated opening year, construction equipment and building design would be more efficient for the modified project than the approved project, since requirements for energy efficiency in buildings, vehicles, and equipment continuously increase. For these reasons, impacts in the category of energy consumption would remain less than significant, consistent with the conclusions in the certified EIR, and the modified project would not result in new significant environmental effects or in a substantial increase in the severity of a previously significant effect in the category of energy consumption.

Changes in Circumstance/New Information

As described above, requirements for energy efficiency and greenhouse gas reductions are continuously becoming more stringent. Since the EIR was certified in 2018, Senate Bill 100 was passed, which increases energy efficiency standards established in previous state legislation. Senate Bill 100 requires increased percentages of electricity to come from renewable sources, relative to previous laws that were passed. As such, the project's anticipated consumption of nonrenewable energy would decrease over time, as Senate Bill 100 is implemented statewide and overall nonrenewable energy consumption decreases. At the local level, since the EIR was certified, the City began subscribing to the Clean Power Alliance, a service that allows electricity customers to purchase renewable power. This would allow the project operator to purchase electricity specifically from renewable sources, which would decrease the project's consumption of nonrenewable energy. These changes at the local and state level would therefore further reduce the modified project's potential energy consumption impacts.

Since certification of the EIR, updates to the CEQA Guidelines have gone into effect. One of the updates involves the introduction of recommended thresholds for impacts associated with energy consumption. At the time of EIR certification, the CEQA Guidelines provided no specific thresholds for energy impacts. Nevertheless, the EIR included a section that evaluated the project's energy impact (Section 3.13 of the Draft EIR). The thresholds used in this section were as follows: (a) would the project result in wasteful, inefficient, or unnecessary consumption of energy; (b) would the project conflict with existing energy standards and regulations; and (c) would the project place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. The thresholds currently presented in the revised CEQA Guidelines are similar to the thresholds used in the EIR and are as follows: (a) would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; and (b) would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As shown by comparing the thresholds addressed in the EIR to those that are presented in the current (2019) version of the CEQA Guidelines, the same general topics are covered (i.e.,

wasteful, inefficient, or unnecessary consumption of energy and conflicts with applicable energy policies). The analysis in the energy section of the EIR addresses the project's consistency with the California Building Energy Efficiency Standards and the California Green Building Standards Code. Additionally, a consistency analysis with the City of West Hollywood Climate Action Plan, the California Air Resources Board Scoping Plan, and statewide greenhouse gas reduction goals for 2030 and 2050 is provided in Section 3.5 (Greenhouse Gas Emissions) in the Draft EIR, and impacts were determined to be less than significant. While the topic of energy efficiency policies and greenhouse gas reduction policies is continuously evolving, the changes involved under the modified project would not affect the conclusions in the EIR, as the modified project would not involve any additional design elements or activities having the potential to increase conflicts with energy efficiency plans, policies, or regulations. While there are new guidelines for the evaluation of energy impacts, these impacts have already been evaluated in the EIR and were determined to be less than significant, as demonstrated herein.

Therefore, no changes have occurred with respect to circumstances under which the project will be undertaken, and there is no other new information of substantial importance that has become available relative to energy that would change the impact conclusions in the EIR.

7.15 Mitigation Measures and Alternatives

The certified EIR provides a discussion of alternatives to the project and mitigation measures that would reduce potentially significant impacts to below a level of significance. Some of the alternatives presented in the EIR were found not to be feasible. As stated in CEQA Guidelines Section 15162(a), a subsequent EIR is required if mitigation measures or alternatives previously found not to be feasible in the EIR would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This trigger for a subsequent EIR (or a supplemental EIR per CEQA Guidelines Section 15163) has not been met for a number of reasons. First, neither the approved project nor the modified project would result in significant effects. All potentially significant effects would be reduced to a less than significant level through implementation of mitigation measures. Additionally, the approved project itself is an alternative to the originally proposed project that was analyzed in the EIR and was identified as the environmentally superior alternative (excluding the no project alternative). As described above, the modifications proposed under the modified project may result in even further reductions to some of the impacts associated with the approved project.

While several alternatives were rejected as infeasible in the EIR, none of the alternatives would have reduced a significant effect of either the originally proposed project or the approved project (which was an alternative to the originally approved project). No changes have occurred related to the modified project, the environment, or the regulatory setting that would change the determinations for those alternatives.

For these reasons, no subsequent EIR is required and this addendum is the appropriate environmental review document consistent with CEQA Guidelines section 15164.

8 REFERENCES

14 CCR 15000–15387 and Appendices A–N. Guidelines for Implementation of the California Environmental Quality Act, as amended through December 28, 2018.

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APPENDICES

APPENDIX A

Modified Project Site Plans

APPENDIX B

Supplemental Historical Resources Technical Report

APPENDIX C

Supplemental Noise Analysis

APPENDIX D

Supplemental Traffic Analysis

APPENDIX E

Mitigation Monitoring and Reporting Program for the Modified Project

For Addendum
Attachment A
Please See
Staff Report
Exhibit F

Architectural Resources Group

March 5, 2019

Project Modifications Supplement to the Robertson Lane Historical Resources Technical Report

The purpose of this Project Modifications Supplement to the original Robertson Lane Historical Resources Technical Report and subsequent Supplement that described the project alternative ultimately approved by the City Council (collectively, "Historic Report") is to provide an analysis about the proposed project modifications to the approved Robertson Lane Project (the Approved Project) as they relate to the Factory Building, located at 661-665 S. Robertson Boulevard/652 N. La Peer Drive. The Factory Building is listed in the California Register of Historical Resources and eligible under multiple City of West Hollywood Cultural Resource Criteria, and is therefore a historical resource for the purposes of CEQA.

Approved Robertson Lane Project Description

The project alternative approved by the City Council in 2018 included the development of a new multiuse hotel of approximately 258,042 square feet that would vary from three to nine stories in height (approximately 27 feet to 123 feet, inclusive of rooftop structures). Construction of this Approved Project would involve demolition of one of the three existing commercial buildings on the project site and three existing surface parking lots containing a total of 197 parking spaces. 655-657 N. Robertson Blvd. includes a 226 square foot single-height structure that sits at the northeast corner of the lot, detached from the main building on that parcel, and would be demolished. The existing one-story commercial buildings located at 645-653 N. Robertson Boulevard (a wholesale design showroom) would remain in place.

Additionally, the Approved Project would involve (1) disassembling the 26,400 square foot building located at 661-665 N. Robertson Boulevard/652 N. La Peer Drive (the Factory Building) and (2) demolition of the Factory Building's 6,764 square foot former office building, which has been significantly altered, and (3) the reassembly of an approximately 140' long, two-story portion of the main 26,400 square foot Factory Building, which is currently approximately 240' in length, in a different location on the project site. Specifically, the portion of the Factory Building that would be reassembled would be repositioned from its current location spanning east-west between Robertson Boulevard and La Peer Drive, to a new location on the site with a modified building orientation. The building would be situated on a north-south axis along Robertson Boulevard at the eastern edge of the project site. The current Robertson Blvd. façade would face north onto an open-air paseo. This north-facing façade would be restored to its historic Mitchell Camera Corporation factory appearance, including the replacement of non-historic windows with salvaged original windows, conservation and reuse of original embossed steel cladding, and removal of non-historic elements such as an exterior staircase and second story entrance. The length of the building

along Robertson Boulevard would incorporate new storefront entrances for commercial tenants but would otherwise be restored to its historic factory appearance. The current La Peer Drive façade would face south under the approved reconfiguration of the building. The south-facing façade would be restored to its historic Studio One discotheque appearance. Since this façade included the primary entrance to Studio One, it may include restoration of period-specific signage and freight elevator. Also, as part of the Approved Project, prefabricated building units (such as steel window frames and embossed steel panels) that are in good condition but not utilized in the reassembly and rehabilitation of the preserved and restored section of the building are to be retained and stored for future use.

Modified Robertson Lane Project Description

The focus of this narrative of the currently proposed modifications to the Approved Project ("Modified Project") is the treatment of the Factory Building in the Modified Project. Under the Modified Project, the two one-story commercial buildings located at 645 and 653-659 N. Robertson Boulevard would now be demolished, which provides additional area on the project site that could accommodate the retention of additional components of the Factory Building.

In its existing condition, the two-story Factory Building is 240 feet long and 40 feet wide at its main volume. The northern wing is 40 feet wide and 50 feet long. The building has a basement at the eastern end of the main volume, which is roughly 40 feet wide by 80 feet long. Based on these calculations, the Factory Building is 26,400 square feet in total size (see the table below).

The Factory Building was constructed on a 20-foot modular grid, and its main volume consists of twelve 20-foot modules, which create the 240-foot building length. The Modified Project includes the removal of only one of the twelve modules, leaving roughly 92% of the building's length. The northern wing, which includes 4,000 square feet of floor area, would also be removed. Therefore, under the Modified Project, approximately 20,800 square feet (79%) of the total Factory Building will be retained, compared to the 55% in the Approved Project.

	Factory Building: Existing Dimensions	Factory Building: Dimensions After Approved Project	Factory Building: Dimensions After Modified Project
Basement	3,200 sq ft	3,200 sq ft	3,200 sq ft
L1	11,600 sq ft	5,600 sq ft	8,800 sq ft
L2	11,600 sq ft	5,600 sq ft	8,800 sq ft
TOTAL	26,400 sq ft	14,400 sq ft	20,800 sq ft

As in the Approved Project, under the Modified Project the Factory Building will still be situated at a north-south axis along Robertson Boulevard, with its former east elevation facing north and its former west elevation facing south. The building will sit on a new base,

containing storefront assemblies fronting onto Robertson Boulevard. At the west elevation, the base will abut a pre-function space for the ballroom to the west. The vehicular driveway opening, which was included in the Approved Project, has been removed from the Factory Building base under the Modified Project and relocated to the southern end of the project site.

Modified Project Impacts

The Modified Project will have similar less than significant impacts to the Factory Building as compared to the Approved Project, however, it is by far a superior project in its treatment of the Factory Building for the following reasons:

- It retains and rehabilitates an additional four 20-foot modules of the Factory Building, amounting to 6,400 square feet of original Factory Building that will be preserved and rehabilitated, leaving roughly 92% of the building's existing length and nearly 80% of the building as a whole rather than 55%, as in the Approved Project.
- It removes the vehicular driveway that was proposed as penetrating the Factory Building's base at its east elevation, providing vehicular access off Robertson Blvd.
- It provides an approximately 42-foot buffer between the Factory Building's south elevation and the neighboring building to the south, which will create more space for viewing and approaching the south elevation of the Factory Building from Robertson Boulevard.

With these changes, the Modified Project will still have similar impacts on the Factory Building as compared to the Approved Project:

1. Removal of small portions of the Factory Building, leaving a section that measures 220 feet by 40 feet. The north wing of the building, currently 50 feet by 40 feet in size, would be disassembled and its component parts reused as part of the reconstructed Factory Building. The office building, which has been substantially altered in such a way that it no longer retains its appearance from the period of significance, would be removed.
2. Relocation of the retained section of the building on site. It would be resituated at a 90-degree angle so that its length runs on a north-south axis along N. Robertson Boulevard and the former east-facing façade would front north onto an open-air paseo; its former west-facing façade will front south.
3. Installation of new storefront assemblies along the east façade, at the base of the building.
4. Increase in height of the southern portion of the building and south facing façade (formerly facing La Peer Drive), due to a higher foundation necessary to address the natural southward slope of the Project site.

5. Development of a multiuse hotel/commercial project to the west of the Factory Building that would vary from three to nine stories in height (approximately 27 feet to 123 feet, inclusive of rooftop). The new hotel development will be set back from the Factory Building's west façade at a distance of approximately 15 to 24 feet, and the nearest volume to the west will be approximately 51' feet tall. Generally, under the Modified Project the height of the hotel building components nearest to the Factory Building have been reduced compared to the Approved Project, and these building components will not be visible to pedestrians on Robertson Boulevard.

In summary, from a historic resources perspective, there are no new or increased adverse effects on the Factory Building resulting from the Modified Project as compared to the Approved Project. Rather, as described above, impacts under the Modified Project are less than those under the Approved Project, which the certified EIR mitigated to a less than significant level.

Mitigating Impacts of the Modified Project

As discussed in the Historic Report, while most of the Factory Building's character-defining features would have been retained as part of the Approved Project, the loss or diminishment of several character-defining features would still be significant in the absence of mitigation. To address that impact, the Historic Report recommended and the City imposed through certification of the EIR a mitigation program that will, when fully implemented, reduce the Approved Project's cultural resources impact to a less-than-significant level.

The mitigation program included 11 Mitigation Measures that fall into the following categories: Rehabilitation/Restoration, Salvage, Sensitive Treatment/Conservation, Construction Monitoring, Documentation, and Interpretation/Commemoration.

The Mitigation Measures for the Approved Project are as follows:[1]

Rehabilitation/Restoration

1. Rehabilitate the retained portion of the Factory Building in accordance with the *Secretary of the Interior's Standards for Rehabilitation* (the *Standards*).
2. Remove non-historic features and restore missing character-defining features on the historic east façade (which under the Project will become the north façade) of the building dating to the 1929-1946 period of significance in compliance with the *Standards*, including:

[1] The Mitigation Measures are listed in a different order and with a different numbering system in the Cultural Resources Section of the EIR than in the Historic Report, but otherwise they are exactly the same.

a. Removal of a non-original exterior staircase.

b. Removal of non-original concrete masonry unit walls that currently sit in front the building, enclosing a non-historic courtyard space (and obscuring the façade).

c. Replacement of non-historic windows with salvaged original steel windows.

d. Conservation of exterior materials, including removal of paint from poured-in-place concrete foundation, steel sidewall panels, window frames, and glazing; and replacement of broken glazing as necessary.

3. Remove non-historic features and restore missing character-defining features on the historic west façade (which under the Project will become the south façade) of the building, dating to the 1974-1992 period of significance, including:

a. Removal of non-historic steel entrance canopy and low concrete walls.

b. Replacement of non-original entrance doors with replica doors dating to the period of significance.

c. Conservation of exterior materials, including removal of paint from poured in place concrete foundation, steel sidewall panels, window frames, freight elevator doors, and glazing; and replacement of broken glazing as necessary.

Sensitive Treatment/Conservation

4. Develop Treatment Specifications for the cleaning, repair, and installation of modular components of the building's construction.

Construction Monitoring

5. Construction monitoring by an architect meeting the *Secretary of the Interior's Professional Qualification Standards* in Architecture and/or Historic Architecture to ensure appropriate treatment of the building and character-defining features and materials during the construction project.

Documentation

6. Historic American Building Survey (HABS) Level 2 documentation of the building

7. Nominate the Factory Building for listing as a West Hollywood Cultural Resource upon project completion

Interpretation/Commemoration

8. Provide on-site interpretation/commemoration of the Mitchell Camera Corporation use of the building, such as public art, historic photographs, display of Mitchell cameras, amongst others.

9. Commission an oral history project in which patrons of Studio One and others are interviewed and given the opportunity to discuss the experience of visiting the nightclub and being part of the LGBTQ community in West Hollywood and Los Angeles during the 1970s and '80s.
10. Provide on-site interpretation/commemoration of the Studio One use of the building, such as historic photographs, permanent display of the oral history project (Item 10) and/or public art.

Because the Modified Project involves the reassembly of more of the Factory Building's modular components onsite as part of the development than the Approved Project, the following Mitigation Measure will be implemented on a reduced scale as compared to how it would have been implemented under the Approved Project:

Salvage

1. Retain modular components of the building that are not used as part of the Project – in particular, embossed steel sidewall panels and steel windows – that are in good condition and store at a location nearby for future use as needed.

More specifically, under the Modified Project, many more of the Factory Building's modular components (embossed steel sidewall panels and steel windows) will be necessary for its reassembly onsite. Thus, substantially fewer building components would be stored as compared to the Approved Project. Nevertheless, in the event that there are unused building components that are in good condition and are not reused as part of the Modified Project, they will be salvaged and stored as attic stock for future use, as needed.

The rest of the Mitigation Measures will still be implemented as part of the Modified Project.

Therefore, with the implementation of these Mitigation Measures and consistent with the conclusions in the Historic Report and the certified EIR, the Modified Project would not materially impair the significance of the Factory Building such that it would no longer be eligible for listing in the California Register or for designation as a City of West Hollywood Cultural Resource. The Factory Building would still remain eligible for listing/designation at the state and local levels, and as a result, no substantial adverse change to the Factory Building's significance would occur, and no significant impact would result under CEQA.

A E S
Acoustical Engineering Services

Robertson Lane Hotel Project
Revised Noise Analysis for Modified Project

This Revised Noise Analysis provides an update to the Noise Impact Study prepared for the Robertson Lane Hotel Project dated June 2016 for the Draft EIR Project and the Supplemental Noise Analysis dated September 27, 2017 for the Enhanced Preservation Alternative. The Enhanced Preservation Alternative was approved by the City of West Hollywood on June 2018 (Approved Project). This analysis was conducted to determine whether potential modifications to the proposed project (Modified Project) could result in any new significant impacts or substantially increase the severity of previously identified impacts as compared to those analyzed in the Environmental Impact Report (EIR) for the Approved Project. The offsite sensitive receptors analyzed in this Revised Noise Analysis are the same as those identified in the Noise Impact Study and Supplemental Noise Analysis, and are shown in the attached Exhibit 1.

The Modified Project, as shown in the attached Exhibit 2, generally includes the following changes to the outdoor areas from the Approved Project:

- One of the outdoor dining areas on the east side of Level 1 has been removed.
- The outdoor dining terrace on the east side of Level 2 has increased in size, from 1,219 square feet to 5,862 square feet.
- A hotel terrace of 1,042 square feet was added to the west side of Level 2.
- Terraces (totaling 4,357 square feet) have been added to the Wholesale Design Showroom on Level 2.
- The restaurant and roof garden that was on Level 2 has been moved and reconfigured to Level 3.
- The pool and pool deck on the west side of Level 9 remains with a slightly revised layout.
- The outdoor dining terrace on the east side of Level 9 has increased in size, from 1,896 square feet to 2,653 square feet.

The changes to the outdoor areas proposed as part of the Modified Project would result in modifications to the size, location, and orientation of outdoor areas and an associated increase in the maximum number of people that could gather in the outdoor areas. The maximum number of people gathering in outdoor areas under the Modified Project would be approximately 2,151 as compared to approximately 1,928 and 1,220 under the Draft EIR Project and Approved Project, respectively. Consistent with the analysis of the Draft EIR Project and Approved Project, and to present a conservative analysis, the noise levels for the Revised Noise Analysis were calculated based on simultaneous maximum occupancy of all of the outdoor areas (i.e., maximum of 2,151 people). For all outdoor areas except the Wholesale Design Showroom terraces, the analysis also assumed simultaneous use of amplified sound (i.e., audio speaker systems). Amplified sound is not proposed for the Wholesale Design Showroom terraces. The reference noise levels utilized in the analysis of the outdoor areas are the same as those for the Noise Impact Study and

Supplemental Noise Analysis, which assumed a reference noise level of 65 dBA and 62 dBA (L_{eq} at 3.3 feet distance) for a male and female, respectively, speaking in a raised voice. In addition, it is assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time.

Similar to the Approved Project, the Modified Project would implement Project Design Features to ensure that noise impacts from the outdoor areas would be less than significant. The following Project Design Features would be implemented for the Modified Project:

1) The amplified sound system shall be calibrated for the outdoor uses so as to not exceed the following levels. The amplified sound system sound output is to be measured at the distance provided below on a plane parallel from the face of the speaker:
    a. Level 1:
        i. Daytime Hours (8:00 a.m. to 10:00 p.m.)
            1. Outdoor Dining: 75 dBA (L_{eq}) at 15 feet
        ii. Nighttime Hours (10:00 p.m. to 8:00 a.m.)
            1. Outdoor Dining: 60 dBA (L_{eq}) at 15 feet
    b. Level 2:
        i. Daytime Hours (8:00 a.m. to 10:00 p.m.)
            1. Public Outdoor Dining: 84 dBA (L_{eq}) at 35 feet
            2. West Hotel Terrace and Center Hotel Terrace: 75 dBA (L_{eq}) at 15 feet
        ii. Nighttime Hours (10:00 p.m. to 8:00 a.m.)
            1. Public Outdoor Dining: 66 dBA (L_{eq}) at 35 feet
            2. West Hotel Terrace and Center Hotel Terrace: 60 dBA (L_{eq}) at 15 feet
    c. Level 3:
        i. Daytime Hours (8:00 a.m. to 10:00 p.m.)
            1. Hotel Amenities and Outdoor Dining: 85 dBA (L_{eq}) at 35 feet
            2. Center Terrace: 75 dBA (L_{eq}) at 15 feet
        ii. Nighttime Hours (10:00 p.m. to 8:00 a.m.)
            1. Hotel Amenities and Outdoor Dining: 68 dBA (L_{eq}) at 35 feet
            2. Center Terrace: 60 dBA (L_{eq}) at 15 feet
    d. Level 9:
        i. Daytime Hours (8:00 a.m. to 10:00 p.m.)
            1. Hotel Outdoor Dining, Hotel Terrace, Restaurant and Pool/Deck: 85 dBA (L_{eq}) at 35 feet
            2. Center Terrace: 75 dBA (L_{eq}) at 15 feet
        ii. Nighttime Hours (10:00 p.m. to 8:00 a.m.)
            1. Hotel Outdoor Dining, Hotel Terrace, Restaurant and Pool/Deck: 65 dBA (L_{eq}) at 35 feet

2. Center Terrace: 60 dBA (L_{eq}) at 15 feet

2) Orient the Level 2 and Level 9 outdoor speaker system, such that, the sound projection from the speakers would aim toward the audience/guest area and away from the off-site noise sensitive receptors.
3) Provide an 8-ft high solid parapet wall (e.g., translucent glass) for the Outdoor Dining area in the northeast corner on Level 2.
4) Provide a 6-ft high solid parapet wall (e.g., translucent glass) at the Hotel Amenities and Outdoor Dining areas on Level 3.
5) Provide an 8-ft high solid parapet wall (e.g., translucent glass) at the Hotel Outdoor Dining, Hotel Terrace, and Restaurant and Pool/Deck on Level 9.
6) Provide a 6-ft high solid parapet wall (e.g., translucent glass) at the Center Terrace on Level 9.

Accordingly, the Approved Project's MM-NOI 3 would be changed as follows:

MM-NOI-3 Prior to certificate of occupancy, the amplified sound system shall be calibrated for the outdoor uses so as to not exceed the noise levels listed below. The amplified sound system sound output shall be measured at the distances provided below on a plane parallel from the face of the speaker and verified and documented by a qualified acoustical engineer:

a) Level 1:

i. 75 A-weighted decibels (dBA) equivalent noise level (Leq) at 15 feet, during daytime hours from 8 a.m. to 10 p.m.

ii. 60 dBA (Leq) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.

b) Level 2 – ~~**Restaurant Roof Gardens and**~~ Public Outdoor **Dining**~~**Space**~~:

i. 8**4**~~**5**~~ dBA (Leq) at 35 feet during daytime hours from 8 a.m. to 10 p.m.

ii. **66**~~**70**~~ dBA (Leq) at 35 feet during nighttime hours from 10 p.m. to 8 a.m.

c) Level 2 – ~~**Lobby**~~ **West Hotel** Terrace **and Center Hotel Terrace**:

i. 75 dBA (Leq) at ~~3~~**1**5 feet during daytime hours from 8 a.m. to 10 p.m.

ii. **60**~~**59**~~ dBA (Leq) at ~~3~~**1**5 feet during nighttime hours from 10 p.m. to 8 a.m.

d) Level 3 – Hotel Amenities and Outdoor Dining:

i. 85 dBA (Leq) at 35 feet during daytime hours from 8 a.m. to 10 p.m.

ii. 68 dBA (Leq) at 35 feet during nighttime hours from 10 p.m. to 8 a.m.

e) Level 3 – Center Terrace:

i. 75 dBA (Leq) at 15 feet during daytime hours from 8 a.m. to 10 p.m.

ii. 60 dBA (Leq) at 15 feet during nighttime hours from 10 p.m. to 8 a.m.

f~~e~~) Level 9 **– Hotel Outdoor Dining, Hotel Terrace, Restaurant and Pool/Deck**:

i. 85 dBA (Leq) at 35 feet, during daytime hours from 8 a.m. to 10 p.m.

ii. 65 dBA (Leq) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m.

g) Level 9 – Center Terrace:

i. 75 dBA (Leq) at 15 feet during daytime hours from 8 a.m. to 10 p.m.

ii. 60 dBA (Leq) at 15 feet during nighttime hours from 10 p.m. to 8 a.m.

Table 1 (below) presents the anticipated number of people at each of the outdoor areas and the proposed amplified sound levels, used for the noise analysis.

Table 1. Outdoor Use Assumptions

Hotel Level	Description	Square Footage[a]	Estimated Total Number of People[a]	Amplified Sound System Levels, dBA (L_{eq}) for Background Music, Banquet and Party	
				Daytime Hours (8 a.m. to 10 p.m.)	Nighttime Hours (10 p.m. to 8 a.m.)
Level 1	Outdoor dining at the east side, facing Robertson Blvd.	584	29	75	60
Level 2	West Hotel Terrace	1,042	70	75	60
	Center Hotel Terrace	750	50	75	60
	Public Outdoor Dining	5,862	293	84	66
	Wholesale Design Showroom Terrace (southeast)	346	24	n/a	n/a
	Wholesale Design Showroom Terrace (southwest)	433	29	n/a	n/a
	Wholesale Design Showroom Terraces (east)	1,910	128	n/a	n/a
	Wholesale Design Showroom Terraces (north/northwest)	1,668	112	n/a	n/a
Level 3	Hotel Amenities	3,690	246	85	68
	Outdoor Dining	3,525	176	85	68
	Center Terrace	1,468	98	75	60
Level 9	Hotel Outdoor Dining	2,653	133	85	65
	Pool Deck	7,046	352	85	65
	Pool Area	1,293	26	n/a	n/a
	Hotel Terrace	3,462	231	85	65

Hotel Level	Description	Square Footage[a]	Estimated Total Number of People[a]	Amplified Sound System Levels, dBA (L_{eq}) for Background Music, Banquet and Party	
				Daytime Hours (8 a.m. to 10 p.m.)	Nighttime Hours (10 p.m. to 8 a.m.)
	Hotel Restaurant	520	35	85	65
	Center Terrace	1,782	119	75	60

[a] *Source: HKS, 2019*

Table 2 (below) presents the estimated noise levels at the off-site noise sensitive receptors from people gathering and amplified sound system at the Modified Project's outdoor use areas during the daytime. Table 2 also compares these noise levels to those of the Draft EIR Project and Approved Project. As indicated in Table 2, the estimated noise levels at all off-site noise-sensitive receptors would be below the daytime significance threshold and would be similar to the estimated noise levels associated with the Draft EIR Project and Approved Project.

Table 2. Outdoor Uses Noise Levels – Daytime Hours (8 a.m. to 10 p.m.)

Location	Modified Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq})			Draft EIR Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq}) People + Amplified Sound	Approved Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq}) People + Amplified Sound	Existing Daytime Ambient, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
	People	Amplified Sound	People + Amplified Sound					
R1	48.2	62.7	62.9	62.2	61.4	58.3	63.3	No
R2	33.3	51.6	51.7	47.8	45.9	53.6	58.6	No
R3	37.9	54.1	54.2	55.9	51.2	54.4	59.4	No
R4	39.8	53.5	53.7	56.6	49.8	61.1	64.1	No
R5	35.5	54.0	54.1	54.4	46.9	62.3	65.3	No

[a] *Significance threshold is equal to ambient plus 5 dBA where the existing ambient is less than 60 dBA and plus 3 dBA where the existing ambient is equal to or greater than 60 dBA.*

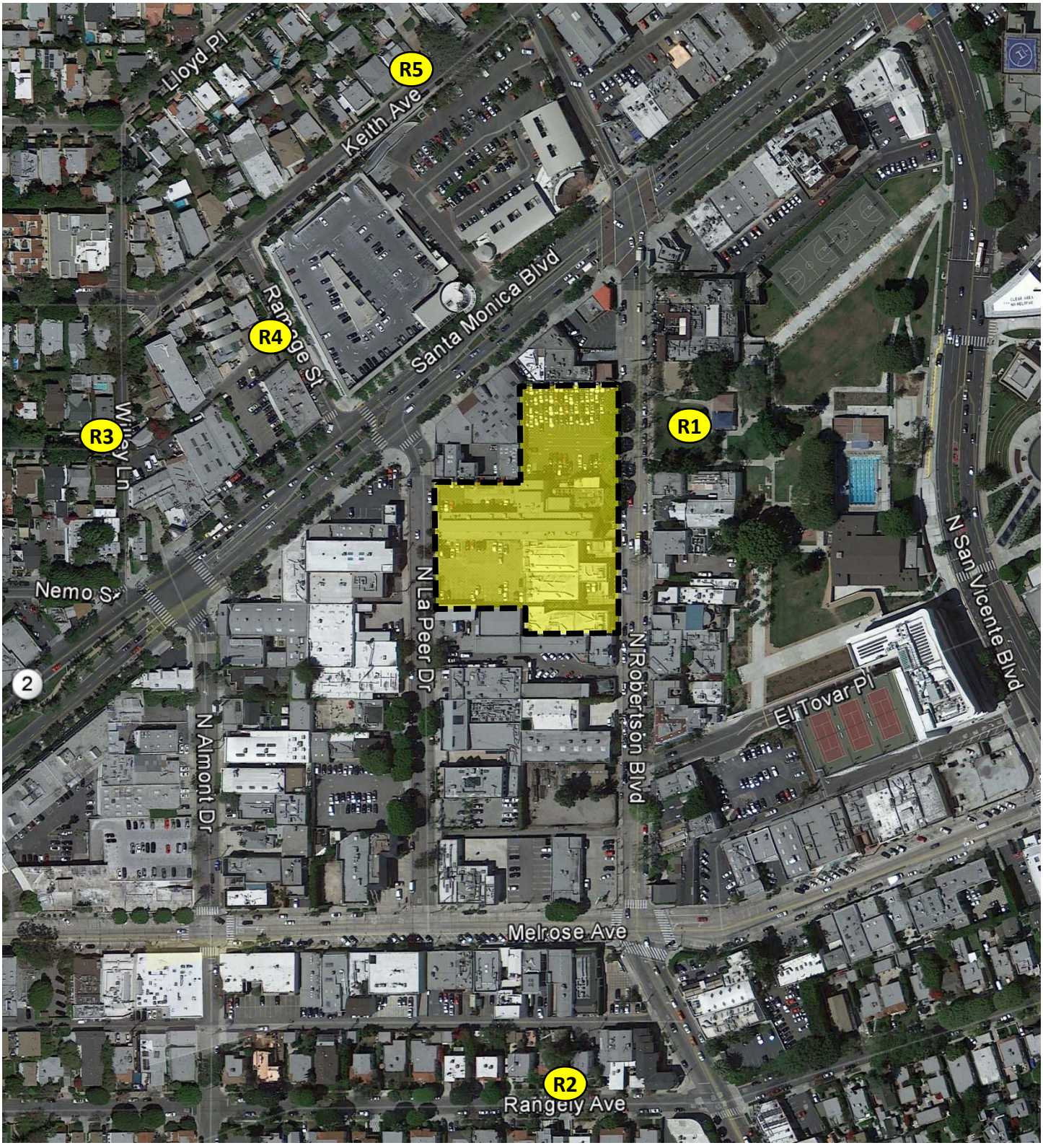
Table 3 (on page 6) presents the estimated noise levels at the off-site noise sensitive receptors from people gathering and the amplified sound at the Modified Project's outdoor use areas during the nighttime. Table 3 also compares these noise levels to those of the Draft EIR Project and Approved Project. As indicated in Table 3, the estimated noise levels at all off-site noise-sensitive receptors would be below the nighttime significance threshold and would be similar to the estimated noise levels associated with the Draft EIR Project and the Approved Project.

Table 3. Outdoor Uses Noise Levels – Nighttime Hours (10 p.m. to 8 a.m.)

Location	Modified Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq})			Draft EIR Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq})	Approved Project Estimated Noise Levels from Outdoor Areas, dBA (L_{eq})	Nighttime Ambient Noise Levels, dBA (L_{90})	Nighttime Significance Threshold,[a] dBA (L_{90})	Significant Impact?
	People	Amplified Sound	People + Amplified Sound	People + Amplified Sound	People + Amplified Sound			
R1	49.2	44.4	50.4	50.4	50.3	55.6	50.6	No
R2	33.3	33.4	36.4	32.7	32.7	41.8	36.8	No
R3	37.9	35.5	39.9	39.2	38.9	46.1	41.1	No
R4	39.8	34.7	41.0	40.3	39.1	51.7	46.7	No
R5	35.5	35.1	38.3	39.2	36.9	48.8	43.8	No

[a] *Nighttime hours significance threshold is equal to nighttime ambient L_{90} minus 5 dBA.*

As analyzed above, the estimated noise levels from the outdoor uses for the Modified Project would be below the City significance threshold, which was used to analyze noise impacts in the EIR. In addition, the Modified Project's noise levels from the outdoor uses would be similar to the estimated noise levels for the Approved Project's outdoor uses. Therefore, as compared to the Approved Project, the Modified Project would not involve new significant environmental effects or substantially increase the severity of previously identified significant effects related to noise levels for outdoor uses. Impacts would remain less than significant with the implementation of the Project Design Features identified above.



Project Site

R# Noise Receptor Location

SCALE: NOT TO SCALE

Exhibit 1 - Noise Receptor Location

AES
Acoustical Engineering Services

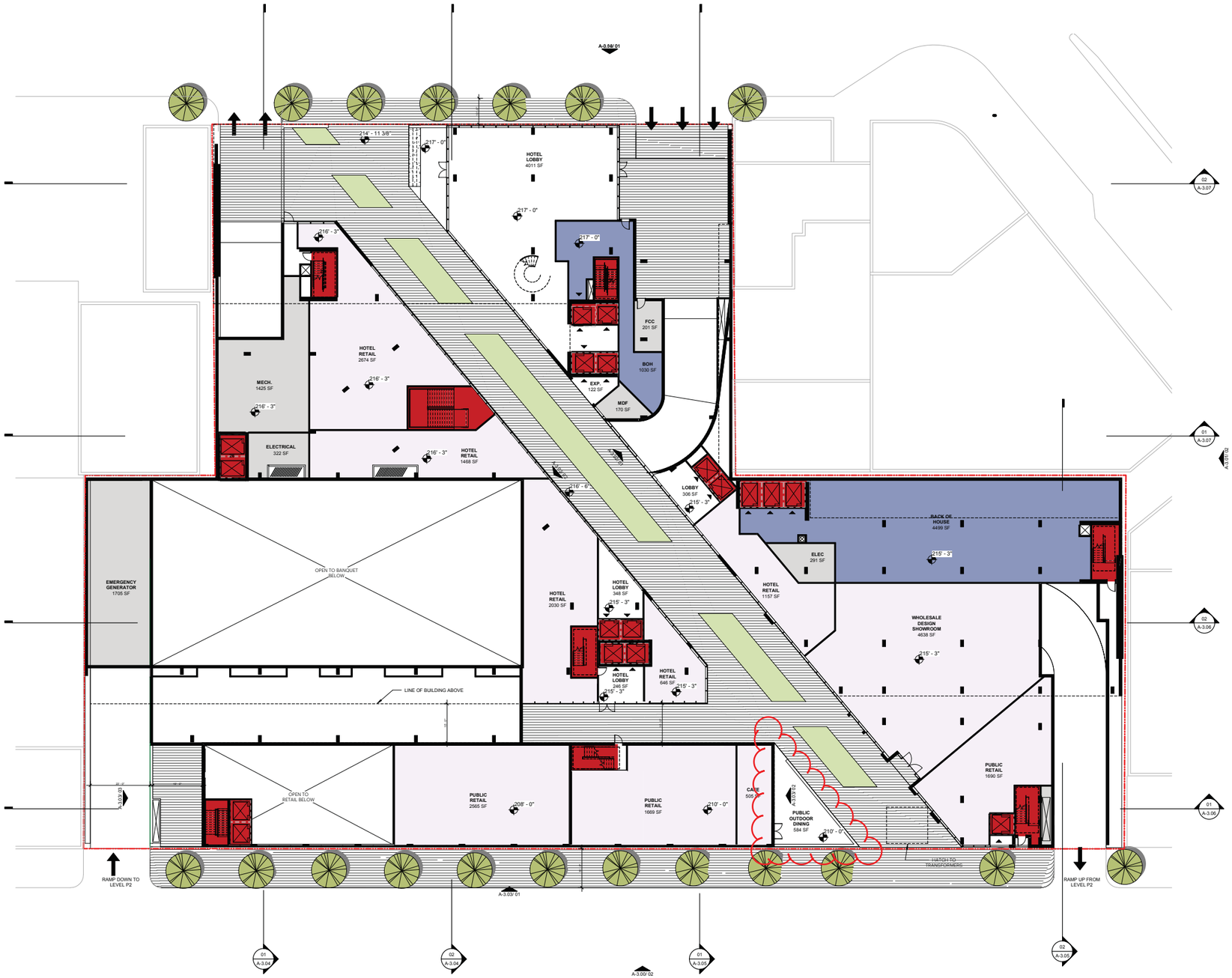


Exhibit 2 - Floor Plans
Showing Outdoor Areas

HKS

ARCHITECT
HKS ARCHITECTS, INC.
10880 WILSHIRE BLVD.
SUITE 1850
LOS ANGELES, CA 90024

HISTORIC ARCHITECT
ARCHITECTURAL RESOURCES GROUP
360 E. 2ND STREET, SUITE 225
LOS ANGELES, CA 90012

INTERIOR DESIGNER
MARTIN BRUDNIZKI DESIGN STUDIO
227 WEST 29TH STREET, 13TH FLOOR
NEW YORK, NY 10001

STRUCTURAL ENGINEER
ENGLEKIRK STRUCTURAL ENGINEERS
888 S. FIGUEROA STREET, 18TH FLOOR
LOS ANGELES, CA 90017

MEP ENGINEERS
ME ENGINEERS
600 WILSHIRE BLVD, SUITE 1200
LOS ANGELES, CA 90017

CIVIL ENGINEER
KPFF
700 SOUTH FLOWER STREET, SUITE 2100
LOS ANGELES, CA 90017

LANDSCAPE ARCHITECT
SWA GROUP
811 W 7TH STREET, 8TH FLOOR
LOS ANGELES, CA 90017

ROBERSTON LANE

648 NORTH LA PEER DR.
WEST HOLLYWOOD, CALIFORNIA 90069

Faring.

OWNER / DEVELOPER
FARING.
659 N. ROBERTSON BLVD.
WEST HOLLYWOOD, CA 90069

KEY PLAN

REVISION
NO. DESCRIPTION DATE

HKS PROJECT NUMBER
22766.000

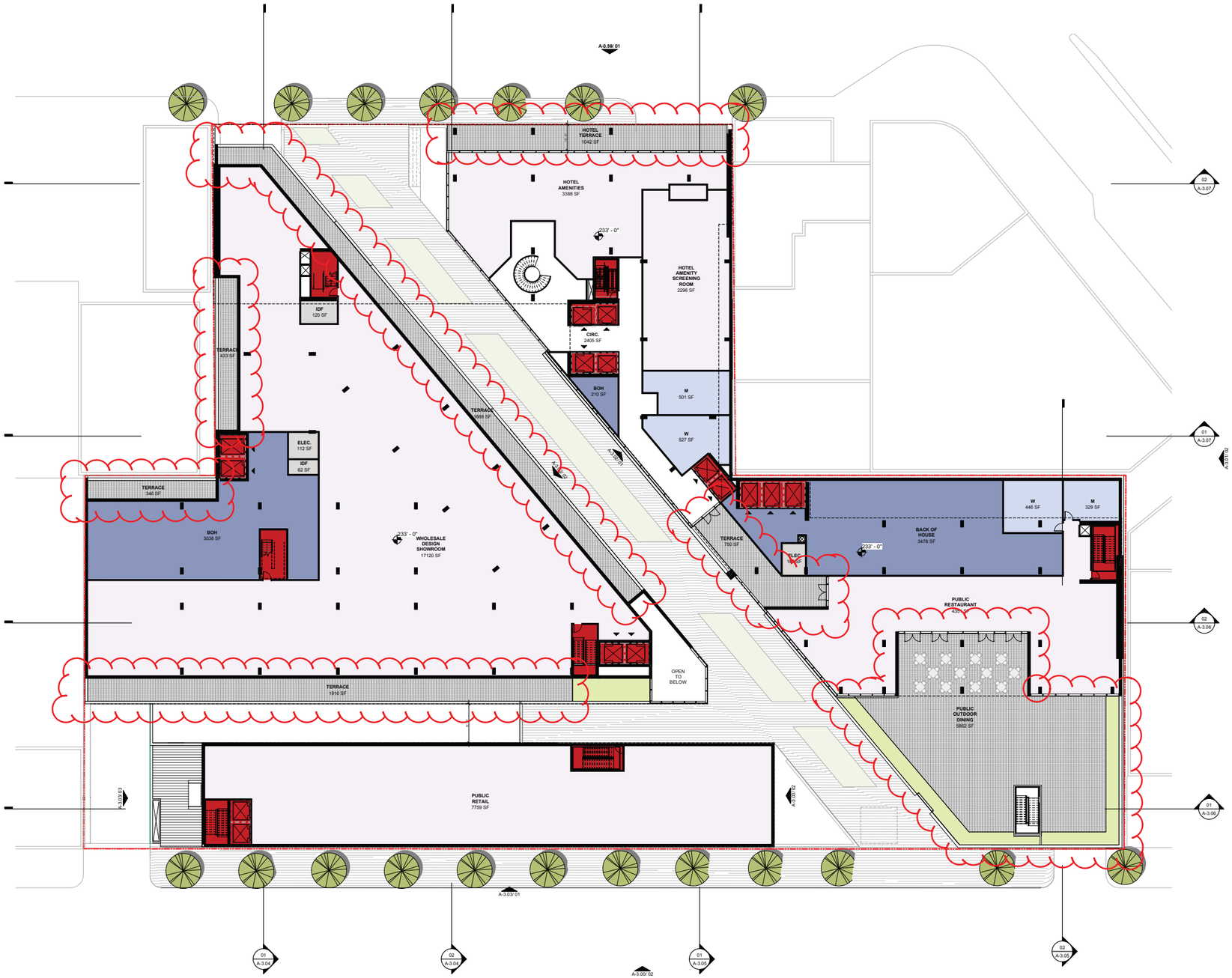
DATE
02/22/19

ISSUE
PLANNING REVIEW

SHEET TITLE
LEVEL 1 PLAN

SHEET NO.
A-2.06

PLOT DATE: 2/22/2019 12:32:19 PM TEMPLATE VERSION 2.6.3.20190421



1 LEVEL 2 OVERALL PLAN
1/16" = 1'-0"

PLOT DATE: 2/22/2019 12:32:31 PM TEMPLATE VERSION: 2.6.0.20142.1

HKS

ARCHITECT
HKS ARCHITECTS, INC.
10880 WILSHIRE BLVD.
SUITE 1850
LOS ANGELES, CA 90024

HISTORIC ARCHITECT
ARCHITECTURAL RESOURCES GROUP
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LOS ANGELES, CA 90012

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NEW YORK, NY 10001

STRUCTURAL ENGINEER
ENGLEKIRK STRUCTURAL ENGINEERS
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LOS ANGELES, CA 90017

MEP ENGINEERS
ME ENGINEERS
600 WILSHIRE BLVD, SUITE 1200
LOS ANGELES, CA 90017

CIVIL ENGINEER
KPFF
700 SOUTH FLOWER STREET, SUITE 2100
LOS ANGELES, CA 90017

LANDSCAPE ARCHITECT
SWA GROUP
811 W 7TH STREET, 8TH FLOOR
LOS ANGELES, CA 90017

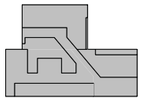
ROBERSTON LANE

648 NORTH LA PEER DR.
WEST HOLLYWOOD, CALIFORNIA 90069

Faring.

OWNER / DEVELOPER
FARING.
659 N. ROBERTSON BLVD.
WEST HOLLYWOOD, CA 90069

KEY PLAN

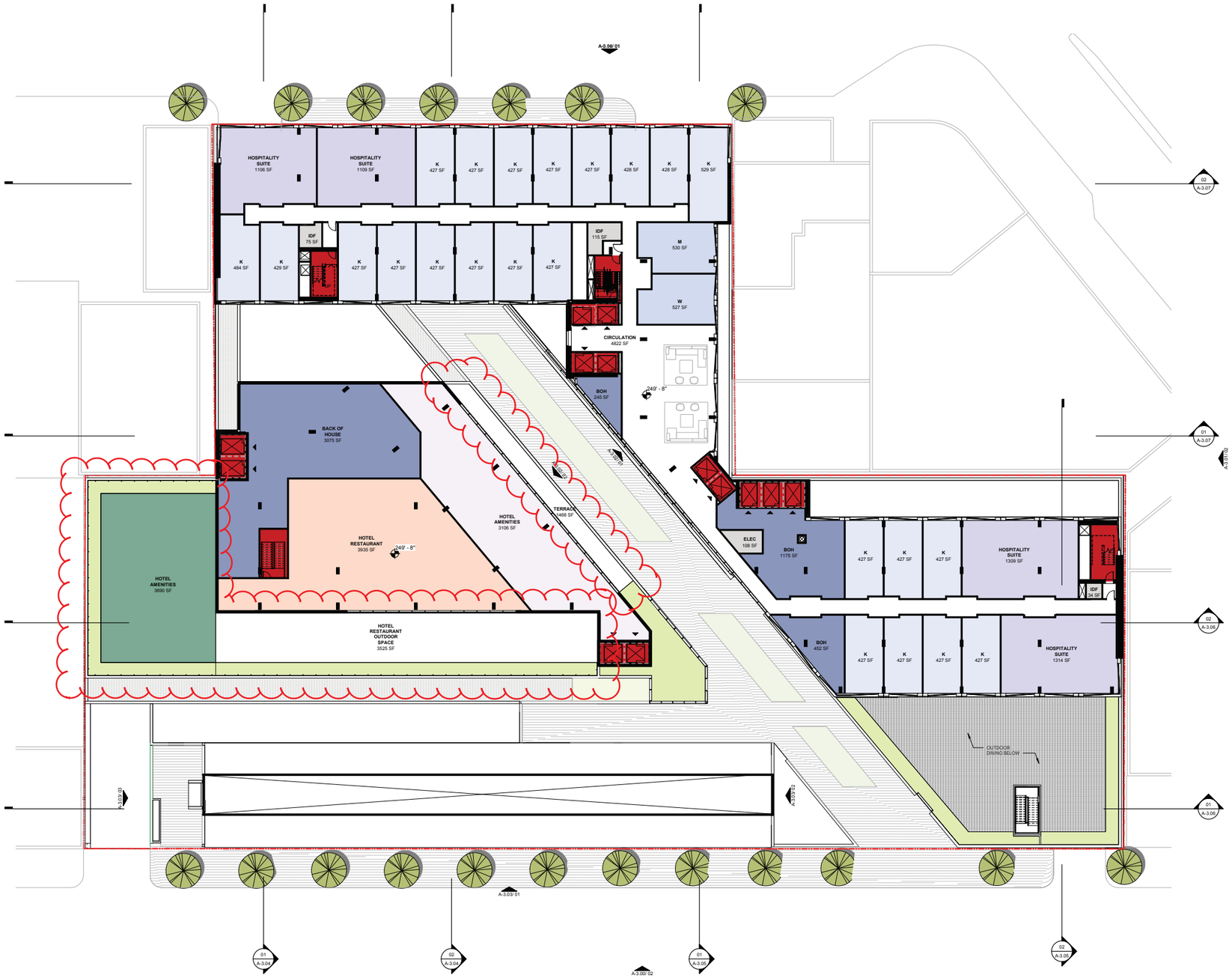


REVISION
NO. DESCRIPTION DATE

HKS PROJECT NUMBER
22766.000
DATE
02/22/19
ISSUE
PLANNING REVIEW

SHEET TITLE
LEVEL 2 PLAN

SHEET NO.
A-2.07



1 LEVEL 3 PLAN
1/16" = 1'-0"

GUESTROOM MATRIX				
Room Type	Bay Dimensions	Avg. Area	Keys	Mix
Kings	14'-6" x 30'-0"	435 sf	178	75%
Double Queens	14'-6" x 30'-0"	435 sf	40	17%
1.5 Bay Suites	18'-0" x 30'-0"	550 sf	15	6%
Hospitality Suites	37'-6" x 30'-0"	1125 sf	4	2%
TOTAL HOTEL KEYS			237	

HKS

ARCHITECT
HKS ARCHITECTS, INC.
10880 WILSHIRE BLVD.
SUITE 1850
LOS ANGELES, CA 90024

HISTORIC ARCHITECT
ARCHITECTURAL RESOURCES GROUP
360 E. 2ND STREET, SUITE 225
LOS ANGELES, CA 90012

INTERIOR DESIGNER
MARTIN BRUDNIZKI DESIGN STUDIO
227 WEST 29TH STREET, 13TH FLOOR
NEW YORK, NY 10001

STRUCTURAL ENGINEER
ENGLEKIRK STRUCTURAL ENGINEERS
888 S. FIGUEROA STREET, 18TH FLOOR
LOS ANGELES, CA 90017

MEP ENGINEERS
ME ENGINEERS
600 WILSHIRE BLVD, SUITE 1200
LOS ANGELES, CA 90017

CIVIL ENGINEER
KPFF
700 SOUTH FLOWER STREET, SUITE 2100
LOS ANGELES, CA 90017

LANDSCAPE ARCHITECT
SWA GROUP
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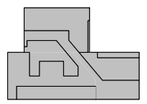


REVISION

NO.	DESCRIPTION	DATE

HKS PROJECT NUMBER
22766.000

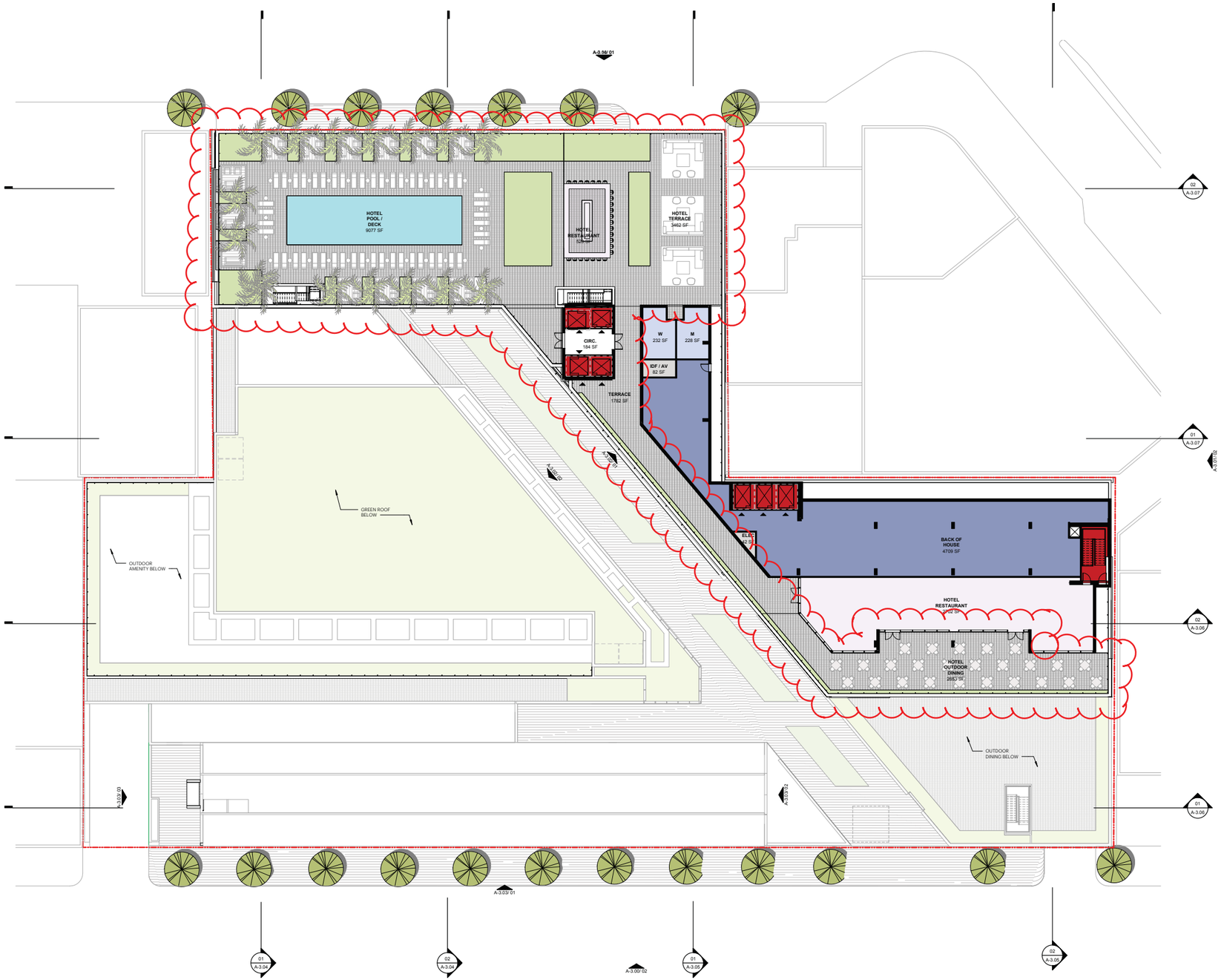
DATE
02/22/19

ISSUE
PLANNING REVIEW

SHEET TITLE
LEVEL 3 PLAN

SHEET NO.
A-2.09

PLOT DATE: 2/22/2019 12:32:35 PM TEMPLATE VERSION 2.6.3 20190421



1 LEVEL 9 PLAN
1/16" = 1'-0"

PLOT DATE:
2/22/2019 12:33:13 PM
TEMPLATE VERSION 2.6.0.20190421

HKS

ARCHITECT
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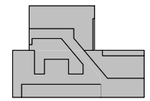

REVISION
NO. DESCRIPTION DATE

HKS PROJECT NUMBER
22766.000

DATE
02/22/19

ISSUE
PLANNING REVIEW

SHEET TITLE
LEVEL 9 PLAN

SHEET NO.
A-2.12

MEMORANDUM

To:	City of West Hollywood	Date:	March 6, 2019
From:	David S. Shender, P.E. Linscott, Law & Greenspan, Engineers	LLG Ref:	5-15-0223-1
Subject:	**Traffic Study Addendum** **Robertson Lane Project**		

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This traffic study addendum (the "Addendum") has been prepared for the proposed modification to the previously approved Robertson Lane project (the "Modified Project") located at 645-681 Robertson Boulevard and 648-654 La Peer Drive in the City of West Hollywood (the "Project Site"). On June 4, 2018, the West Hollywood City Council approved a proposed development on the Project Site (the "Approved Project"). The relative traffic impacts of the Approved Project were evaluated in a traffic study[1] prepared by KOA Corporation (the "KOA traffic study") which was incorporated into an Environmental Impact Report (EIR) certified by the West Hollywood City Council at its June 4, 2018 meeting. The purpose of this Addendum is to evaluate the relative changes in potential traffic impacts due to the Modified Project as compared to the Approved Project's traffic impacts as documented in the KOA traffic study and certified EIR.

Approved Project

On June 4, 2018, the West Hollywood City Council approved the development of the Approved Project on the Project Site consisting of the following elements:

- A hotel with 241 guestrooms plus ancillary hotel restaurants, hotel retail, meeting rooms, etc.;
- 8,845 square feet of public restaurant floor area on the first floor;
- 13,770 square feet of public restaurant floor area on the rooftop level;
- 18,130 square feet of public retail floor area;
- 3,780 square feet of nightclub floor area; and
- 10,325 square feet of design showroom floor area.

[1] *Traffic Impact Study for Robertson Lane Hotel Project*, KOA Corporation, January 25, 2017

The Approved Project would provide 750 on-site parking spaces in a subterranean parking structure. Vehicular access to the on-site parking structure would be provided via one driveway on Robertson Boulevard (accommodating inbound and outbound traffic movements) and two driveways on La Peer Drive (one inbound driveway and one outbound driveway).

The trip generation forecast for the Approved Project is provided in Table 7 of the KOA traffic study (and is also attached to the memorandum for reference). The trip generation forecast provided in the KOA traffic study was prepared using trip rates listed in the 9th Edition of the *Trip Generation Manual*[2] published by the Institute of Transportation Engineers (ITE). The trip generation forecast estimated the potential new vehicle trips due to the proposed land uses and associated square footages/key count in the Approved Project, as well as reductions for vehicle trips associated with the existing uses on the Project Site. The trip generation forecast was prepared for the following weekday peak hours: morning (AM) commuter peak hour, midday (MD) peak hour, and afternoon (PM) commuter peak hour. In addition, a trip generation forecast is provided over a 24-hour (daily) weekday period. As shown on Table 7 of the KOA traffic study, the Approved Project is forecast to generate the following net new vehicle trips during a typical weekday:

- 2,390 net new daily trips;
- 128 net new AM peak hour trips;
- 202 net new MD peak hour trips; and
- 157 net new PM peak hour trips.

The KOA traffic study evaluated the potential traffic impacts of the Approved Project at 18 study intersections during the weekday AM, MD and PM peak hours. In addition, the KOA traffic study evaluated the potential traffic impacts of the Approved Project at five residential street segments during a typical weekday. The KOA traffic study concluded that prior to the consideration of mitigation measures, one study intersection had the potential to be significantly impacted by Approved Project traffic during the weekday MD and PM peak hours: Robertson Boulevard and Santa Monica Boulevard (identified at TRAF-1 in the certified EIR). The KOA traffic study concluded that the remaining 17 study intersections, as well as at the five residential street segments, would not be significantly impacted by Approved Project traffic during any of the analyzed time periods. In addition, the KOA traffic study concluded the Approved Project would not adversely affect the highway and transit network as defined in the Los Angeles County Congestion Management Program. Finally, the KOA traffic study concluded that vehicle circulation in the Project Site vicinity would not be significantly impacted as a result of the Approved Project's site access scheme.

[2] *Trip Generation Manual*, 9th Edition, Institute of Transportation Engineers, 2012.

The KOA traffic study identified a mitigation measure to reduce potential traffic and circulation impacts at the Robertson Boulevard/Santa Monica Boulevard intersection to a less than significant level. Identified as MM-TRAF-1 in the certified EIR, the mitigation measure consists of modifying the northbound Robertson Boulevard approach to the Santa Monica Boulevard intersection to provide one left-turn/through lane and one right-turn lane. With implementation of MM-TRAF-1, the Approved Project's potential traffic and circulation impacts would be less than significant as concluded in the KOA traffic study and certified EIR.

Modified Project

The applicant is now proposing the Modified Project, which will result in certain changes to the Approved Project's proposed land uses and vehicular site access scheme. Specifically, the Modified Project would consist of the following land use elements (along with comparisons to the Approved Project):

- A hotel with 237 guestrooms plus ancillary hotel restaurants, hotel retail, meeting rooms, etc. (decrease of 4 guestrooms);
- 10,213 square feet of public restaurant floor area[3] (decrease of 12,402 square feet);
- 1,089 square feet of café floor area (increase of 1,089 square feet);
- 16,098 square feet of public retail floor area (decrease of 2,032 square feet);
- 2,462 square feet of nightclub floor area (decrease of 1,318 square feet); and
- 21,758 square feet of design showroom floor area (increase of 11,433 square feet).

Like the Approved Project, the Modified Project would provide 750 on-site parking spaces in a subterranean parking structure. Vehicular access to the on-site parking structure would be provided via two driveways on Robertson Boulevard (one inbound driveway and one outbound driveway) and two driveways on La Peer Drive (one inbound driveway and one outbound driveway), which results in one additional driveway on Robertson Boulevard as compared to the Approved Project.

[3] Similar to the rooftop restaurant component of the Approved Project, the public restaurant component of the Modified Project would not be open for breakfast and lunch service.

The following sections provide an analysis and comparison of the relative traffic effects of Modified Project as compared to the Approved Project.

Trip Generation/Traffic Impacts at Study Intersections

A trip generation forecast was prepared for the Modified Project and is attached to this memorandum in ***Table 1***. The trip generation forecast provided in *Table 1* is consistent with the methodology used in the trip generation forecast for the Approved Project set forth in the KOA traffic study and certified EIR. Similar to Table 7 of the KOA traffic study, the trip generation forecast for the Modified Project was prepared for weekday AM, MD, and PM peak hours, as well as over a 24-hour daily period using trip rates provided in the *Trip Generation Manual*, 9th Edition, published by ITE.

As shown in *Table 1*, the Modified Project is forecast to generate the following net new vehicle trips during a typical weekday as compared to existing conditions:

- 1,168 net new daily trips;
- 130 net new AM peak hour trips;
- 163 net new MD peak hour trips; and
- 56 net new PM peak hour trips.

Table 1 also provides a comparison of the forecast trip generation for the Modified Project to the trip generation forecast provided in the KOA traffic study for the Approved Project. Based on this comparison, the Modified Project is calculated to generate:

- 1,222 fewer daily trips as compared to the Approved Project;
- 2 additional AM peak hour trips as compared to the Approved Project;
- 39 fewer MD peak hour trips as compared to the Approved Project; and
- 101 fewer PM peak hour trips as compared to the Approved Project.

As noted above, the Modified Project would generate substantially fewer vehicle trips as compared to the Approved Project during the 24-hour daily period, the MD peak hour, and the PM peak hour. The Modified Project would result in a slight increase in vehicle trips (i.e., two trips) during the weekday AM peak hour. While the Modified Project would result in a nominal increase in AM peak hour trips as compared to the Approved Project, this increase would not cause the Modified Project to result in any new impacts, or increase the impacts identified for the Approved Project in the KOA traffic study and certified EIR.

For example, as shown in Tables 15 and 17 of the KOA traffic study, the Approved Project was determined not to impact any of the study intersections during the weekday AM peak hour. Further, the KOA traffic study shows that the calculated incremental change in operations (measured in seconds of average motorist delay) during the AM peak hour at the study intersections with the addition of traffic from the Approved Project would be well below the City's threshold of significance for significant transportation impacts. For example, at the Robertson Boulevard/Santa Monica Boulevard intersection, Table 17 shows the calculated change in delay during the AM peak hour due to the Approved Project is 4.8 seconds[4] (the threshold of significance is an increase in delay of 8 or more seconds based on the forecast operations). The potential generation of two additional AM peak hour trips due to the Modified Project as compared to the Approved Project (i.e., an approximately 1.56% increase in the AM peak hour generation as compared to the Approved Project) would not cause the calculated delay at this intersection or any of the other study intersections to meet or exceed the City's thresholds of significance. Accordingly, the potential transportation impacts due to the nominal increase in trips during the AM peak hour resulting from the Modified Project's changes would be the same (or significantly less in the MD and PM peak hours) than those evaluated and reported in the KOA traffic study and certified EIR for the Approved Project.

Since the preparation of the KOA traffic study, ITE has published a 10th Edition of the *Trip Generation Manual*, which supersedes the 9th Edition used in the trip generation forecast provided in Table 7 of the KOA traffic study. Accordingly, the trip generation forecast for the Modified Project – including the calculating of trip generation for the existing uses on the Project Site, as well as the proposed land uses associated with the Modified Project – has been updated using the trip rates provided in the current 10th Edition of the ITE *Trip Generation Manual*.[5] As ITE has published the 10th Edition of the *Trip Generation Manual* to replace the 9th Edition, use of the trip rates provided in the 10th Edition can be considered the best practice for purposes of forecasting trip generation related to development projects.

[4] This calculated delay provided in the KOA traffic study is prior to consideration of the beneficial effects of MM-TRAF-1, which will reduce the delay at the Robertson Boulevard/Santa Monica Boulevard intersection during the AM peak hour.

[5] In the trip generation forecast for the Approved Project as provided in the KOA traffic study, the calculation of trips related to the existing and future retail uses on the Project Site was prepared using Specialty Retail trip rates as provided in the 9th Edition of the *Trip Generation Manual*. However, for the 10th Edition of the *Trip Generation Manual*, ITE has eliminated the Specialty Retail land use. Further, in the 10th Edition, ITE notes that the trip generation data used in developing the trip rates for the prior Specialty Retail land use have been incorporated into the trip generation data used in developing trip rates for the Shopping Center land use (ITE Land Use 820). Accordingly, the generation forecast prepared for the Modified Project as shown in *Table 2* utilizes the ITE Shopping Center trip rates for the existing and retail uses on the Project Site.

The updated trip generation forecast for the Modified Project is provided in ***Table 2***. As shown in *Table 2*, the Modified Project is forecast using the ITE 10th Edition trip rates to generate the following net new vehicle trips during a typical weekday as compared to existing conditions:

- 1,258 net new daily trips;
- 113 net new AM peak hour trips;
- 164 net new MD peak hour trips; and
- 71 net new PM peak hour trips.

Table 2 also provides a comparison of the forecast trip generation for the Modified Project to the trip generation forecast provided in the KOA traffic study for the Approved Project. Based on this comparison, the Modified Project is calculated to generate:

- 1,132 fewer daily trips as compared to the Approved Project;
- 15 fewer AM peak hour trips as compared to the Approved Project;
- 38 fewer MD peak hour trips as compared to the Approved Project; and
- 86 fewer PM peak hour trips as compared to the Approved Project.

When compared to the trip generation forecast provided in *Table 1*, the trip forecast provided in *Table 2* results in fewer net new trips for the Modified Project based on the ITE 10th Edition trip rates as compared to the 9th Edition trip rates. Accordingly, the findings provided here in regarding the traffic effects of the Modified Project would not be revised using the more current ITE 10th Edition trip rates. No new transportation impacts would result.

As previously noted, the KOA traffic study determined that in the absence of mitigation, the Robertson Boulevard/Santa Monica Boulevard intersection had the potential to be significantly impacted by Approved Project traffic. The certified EIR prepared for the Approved Project identified a mitigation measure (MM-TRAF-1) for the intersection. A recent field review has indicated that the mitigation measure – modifying the northbound Robertson Boulevard approach to the Santa Monica Boulevard intersection to provide one left-turn/through lane and one right-turn lane – has been implemented. Therefore, while the reduced trip generation associated with the Modified Project may avoid the need for mitigation at the Robertson Boulevard/Santa Monica Boulevard intersection – particularly based on the forecast of trip generation provided by the ITE 10th Edition manual – the mitigation has already been implemented.

Site Access/Internal Circulation

The Modified Project proposes 750 on-site vehicle parking spaces, consistent with the parking supply for the Approved Project. Also similar to the Approved Project, the Modified Project proposes that access to the on-site parking spaces will be available from both the Project Site's La Peer Drive and Robertson Boulevard driveways.

Figure 1 attached to this memorandum provides the proposed site plan for the Modified Project. As shown, the vehicular site access scheme for the Modified Project is evaluated and compared to the Approved Project in the following sections.

La Peer Drive

The Modified Project proposes one inbound driveway and one outbound driveway on La Peer Drive. As shown in *Figure 1*, the northerly driveway on La Peer Drive is proposed for inbound traffic movements and the southerly driveway is proposed for outbound traffic movements. The locations of the proposed driveways are similar to the La Peer Drive driveways proposed for the Approved Project, although the directionality of the driveways is reversed for the Modified Project.

Similar to the Approved Project, the La Peer Drive driveway in the Modified Project is intended to be primarily used by motorists related to the development's hotel component. Motorists related to the other public components of the Modified Project (i.e., retail, restaurant, nightclub, and design showroom) are intended to primarily use the Project Site's proposed Robertson Boulevard entry driveway.

As shown in *Figure 1*, the proposed on-site drop-off area on La Peer Drive can accommodate three queued vehicles, with the ability to queue additional vehicles as-needed in the adjacent through inbound lane. *Table 1* shows that the Modified Project's hotel component is forecast to generate 74 inbound trips during the weekday AM peak hour, 84 inbound trips during the weekday MD peak hour, and 72 inbound trips during the weekday PM peak hour, or approximately one to two vehicles arriving per minute during the peak hours of the day. Accordingly, the ability to accommodate three or more vehicles on-site would ensure that inbound vehicles would not queue onto La Peer Drive during the peak hours of the day.

Robertson Boulevard

The Modified Project proposes to provide one inbound driveway and one outbound driveway on Robertson Boulevard. As shown in *Figure 1*, the southerly driveway on Robertson Boulevard is proposed for inbound traffic movements and the northerly driveway is proposed for outbound traffic movements. The Approved Project proposed a single driveway on Robertson Boulevard for both inbound and outbound traffic movements. The Modified Project proposes separate inbound and outbound driveways on Robertson Boulevard to eliminate conflicting traffic movements on-site and thereby reduce the potential for vehicles to queue onto the parking ramps.

The outbound driveway on Robertson Boulevard is proposed to be located approximately 200 feet south of the limit line at the Santa Monica Boulevard intersection. Thus, northbound vehicle queues on Robertson Boulevard extending from Santa Monica Boulevard intersection would not be expected to conflict with left-turn and right-turn traffic movements from the Modified Project's outbound driveway. Accordingly, it is expected that both left-turn and right-turn traffic movements can be safely and efficiently accommodated at the Modified Project's Robertson Boulevard driveway. Therefore, consistent with the conclusions of the KOA traffic study and the certified EIR, vehicle circulation in the Project Site vicinity would not be significantly impacted as a result of the Modified Project's site access scheme.

cc: File

Table 1
MODIFIED PROJECT TRIP GENERATION [1]
ITE 9TH EDITION TRIP RATES

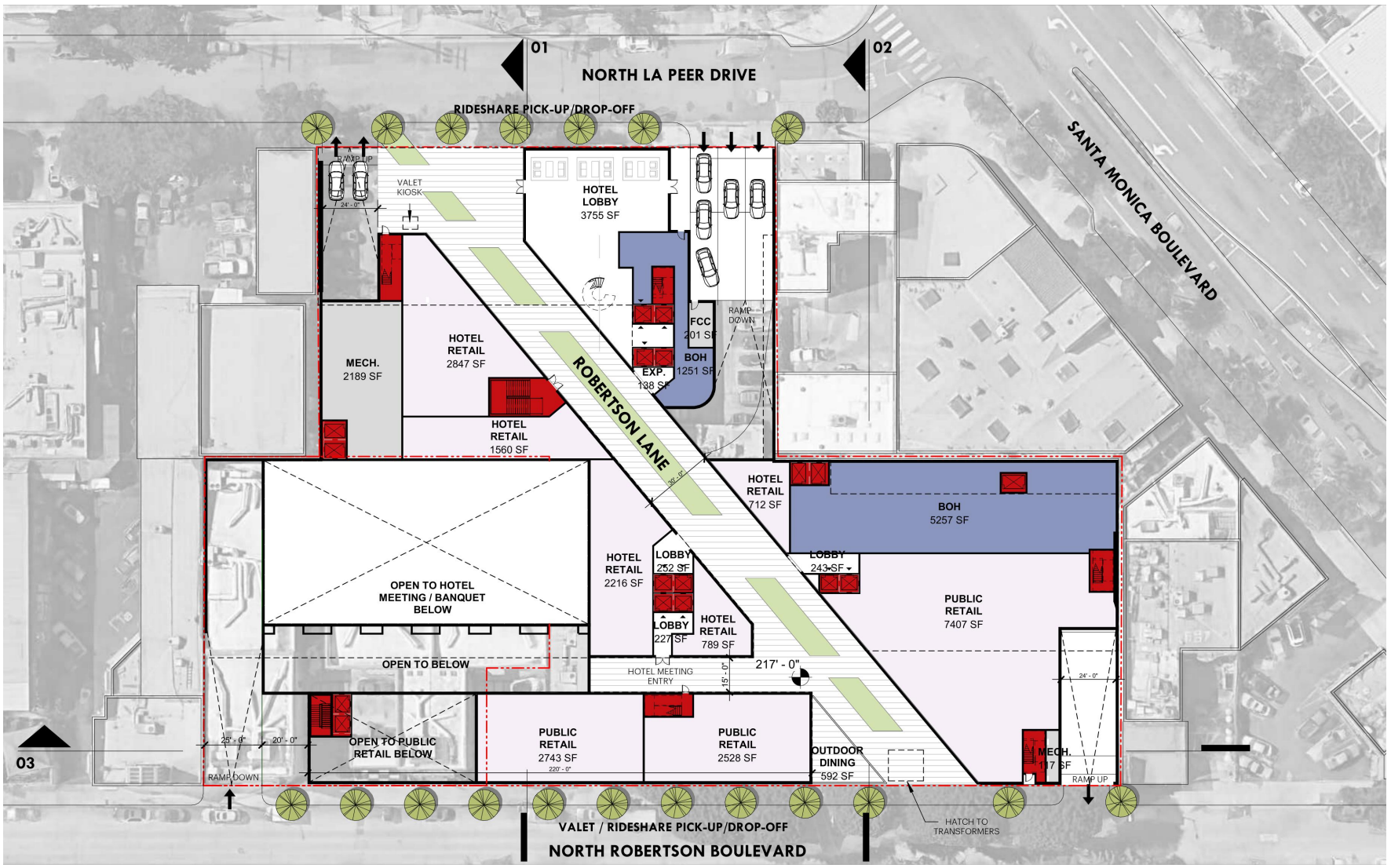
LAND USE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			MIDDAY PEAK HOUR VOLUMES [2], [3]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL	IN	OUT	TOTAL
Modified Project											
Quality Restaurant [4], [5], [6]	10,213 GSF	919	0	0	0	0	0	0	51	25	76
Cafe [7]	1,089 GSF	138	7	5	12	8	7	15	7	4	11
Retail [8], [9]	16,098 GLSF	713	13	8	21	45	36	81	19	25	44
Hotel [10]	237 Rooms	1,936	74	52	126	84	61	145	72	70	142
Nightclub [11]	2,462 GSF	335	-	-	-	-	-	-	18	10	28
Design Showroom [12]	21,758 GSF	110	3	1	4	6	6	12	5	5	10
PROPOSED PROJECT TRIPS		**4,151**	**97**	**66**	**163**	**143**	**110**	**253**	**172**	**139**	**311**
Existing Uses											
Quality Restaurant [5], [6]	(6,764) GSF	(608)	(4)	(1)	(5)	(31)	(7)	(38)	(34)	(17)	(51)
Retail [8], [9]	(5,802) GLSF	(257)	(5)	(3)	(8)	(16)	(13)	(29)	(7)	(9)	(16)
Gym [13]	(12,950) GSF	(426)	(9)	(9)	(18)	(9)	(9)	(18)	(26)	(20)	(46)
Nightclub [11]	(12,040) GSF	(1,640)	-	-	-	-	-	-	(90)	(47)	(137)
Design Showroom [12]	(10,325) GSF	(52)	(1)	(1)	(2)	(3)	(2)	(5)	(2)	(3)	(5)
EXISTING USES TRIPS		**(2,983)**	**(19)**	**(14)**	**(33)**	**(59)**	**(31)**	**(90)**	**(159)**	**(96)**	**(255)**
NET MODIFIED PROJECT TRIPS		**1,168**	**78**	**52**	**130**	**84**	**79**	**163**	**13**	**43**	**56**
APPROVED PROJECT TRIPS [14]		**5,373**	**96**	**65**	**161**	**179**	**113**	**292**	**239**	**172**	**411**
NET APPROVED TRIPS [14]		**2,390**	**77**	**51**	**128**	**120**	**82**	**202**	**80**	**77**	**157**
DIFFERENCE: NET MODIFIED - NET APPROVED TRIPS		**(1,222)**	**1**	**1**	**2**	**(36)**	**(3)**	**(39)**	**(67)**	**(34)**	**(101)**

[1] Source: ITE "Trip Generation," 9th Edition, 2012.
[2] Trips are one-way traffic movements, entering or leaving.
[3] Midday Peak rates from Peak Hour Generator.
[4] Restaurant open for dinner service only.
[5] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates.
- Daily Trip Rate: 89.95 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.81 trips/1,000 SF; 82% inbound/18% outbound
- Midday Peak Hour Trip Rate: 5.57 trips/1,000 SF; 82% inbound/18% outbound
- PM Peak Hour Trip Rate: 7.49 trips/1,000 SF; 67% inbound/33% outbound
[6] Quality Restaurant AM In/Out ratio from AM Peak Hour of Generator.
[7] ITE Land Use Code 932 (High-Turnover [Sit-Down] Restaurant) trip generation average rates.
- Daily Trip Rate: 127.15 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 10.81 trips/1,000 SF; 55% inbound/45% outbound
- Midday Peak Hour Trip Rate: 13.33 trips/1,000 SF; 53% inbound/47% outbound
- PM Peak Hour Trip Rate: 9.85 trips/1,000 SF; 60% inbound/40% outbound
[8] ITE Land Use Code 826 (Specialty Retail Center) trip generation average rates.
- Daily Trip Rate: 44.32 trips/1000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.33 trips/1000 SF of floor area; 60% inbound/40% outbound
- Midday Peak Hour Trip Rate: 5.02 trips/1000 SF of floor area; 56% inbound/44% outbound
- PM Peak Hour Trip Rate: 2.71 trips/1000 SF of floor area; 44% inbound/56% outbound
[9] AM Peak Hour retail rates from San Diego Traffic Generators (2002).
[10] ITE Land Use Code 310 (Hotel) trip generation average rates.
- Daily Trip Rate: 8.17 trips/room; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.53 trips/room; 59% inbound/41% outbound
- Midday Peak Hour Trip Rate: 0.61 trips/room; 58% inbound/42% outbound
- PM Peak Hour Trip Rate: 0.60 trips/room; 51% inbound/49% outbound
[11] ITE Land Use Code 925 (Drinking Place) trip generation average rates.
- Daily Trip Rate: Assume 136.2 trips/1,000 SF of floor area (based on proportion of PM peak hour trip rate to Daily trip rate, similar to ITE Land Use Code 931).
- AM Peak Hour Trip Rate: Nightclub assumed to generate negligible trips during weekday AM peak hour.
- Midday Peak Hour Trip Rate: Nightclub assumed to generate negligible trips during weekday MD peak hour.
- PM Peak Hour Trip Rate: 11.34 trips/1,000 SF of floor area; 66% inbound/34% outbound
[12] ITE Land Use Code 890 (Furniture Store) trip generation average rates.
- Daily Trip Rate: 5.06 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.17 trips/1,000 SF; 69% inbound/31% outbound
- Midday Peak Hour Trip Rate: 0.53 trips/1,000 SF; 50% inbound/50% outbound
- PM Peak Hour Trip Rate: 0.45 trips/1,000 SF; 48% inbound/52% outbound
[13] ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates.
- Daily Trip Rate: 32.93 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.41 trips/1,000 SF of floor area; 50% inbound/50% outbound
- Midday Peak Hour Trip Rate: 1.43 trips/1,000 SF of floor area; 47% inbound/53% outbound
- PM Peak Hour Trip Rate: 3.53 trips/1,000 SF of floor area; 57% inbound/43% outbound
[14] Vehicle trips for approved project based on "Traffic Impact Study for the Robertson Lane Hotel Project," KOA, January 25, 2017.

Table 2
MODIFIED PROJECT TRIP GENERATION [1]
ITE 10TH EDITION TRIP RATES

LAND USE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			MIDDAY PEAK HOUR VOLUMES [2], [3]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL	IN	OUT	TOTAL
Modified Project											
Quality Restaurant [4], [5], [6]	10,213 GSF	856	0	0	0	0	0	0	54	26	80
Cafe [7]	1,089 GSF	122	6	5	11	9	6	15	7	4	11
Retail [8]	16,098 GLSF	608	9	6	15	34	34	68	29	32	61
Hotel [9]	237 Rooms	1,981	65	46	111	84	61	145	72	70	142
Nightclub [10]	2,462 GSF	301	-	-	-	-	-	-	18	10	28
Design Showroom [11]	21,758 GSF	137	4	2	6	8	7	15	5	6	11
PROPOSED PROJECT TRIPS		**4,005**	**84**	**59**	**143**	**135**	**108**	**243**	**185**	**148**	**333**
Existing Uses											
Quality Restaurant [5], [6]	(6,764) GSF	(567)	(4)	(1)	(5)	(24)	(6)	(30)	(36)	(17)	(53)
Retail [8]	(5,802) GLSF	(219)	(3)	(2)	(5)	(12)	(12)	(24)	(11)	(11)	(22)
Gym [12], [13]	(12,950) GSF	(426)	(9)	(8)	(17)	(8)	(10)	(18)	(26)	(19)	(45)
Nightclub [10]	(12,040) GSF	(1,470)	-	-	-	-	-	-	(90)	(47)	(137)
Design Showroom [11]	(10,325) GSF	(65)	(2)	(1)	(3)	(4)	(3)	(7)	(2)	(3)	(5)
EXISTING USES TRIPS		**(2,747)**	**(18)**	**(12)**	**(30)**	**(48)**	**(31)**	**(79)**	**(165)**	**(97)**	**(262)**
NET MODIFIED PROJECT TRIPS		**1,258**	**66**	**47**	**113**	**87**	**77**	**164**	**20**	**51**	**71**
APPROVED PROJECT TRIPS [14]		**5,373**	**96**	**65**	**161**	**179**	**113**	**292**	**239**	**172**	**411**
NET APPROVED TRIPS [14]		**2,390**	**77**	**51**	**128**	**120**	**82**	**202**	**80**	**77**	**157**
DIFFERENCE: NET MODIFIED - NET APPROVED TRIPS		**(1,132)**	**(11)**	**(4)**	**(15)**	**(33)**	**(5)**	**(38)**	**(60)**	**(26)**	**(86)**

[1] Source: ITE "Trip Generation Manual," 10th Edition, 2017.
[2] Trips are one-way traffic movements, entering or leaving.
[3] Midday Peak rates from Peak Hour Generator.
[4] Restaurant open for dinner service only.
[5] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates.
- Daily Trip Rate: 83.84 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.73 trips/1,000 SF; 80% inbound/20% outbound
- Midday Peak Hour Trip Rate: 4.47 trips/1,000 SF; 80% inbound/20% outbound
- PM Peak Hour Trip Rate: 7.80 trips/1,000 SF; 67% inbound/33% outbound
[6] Quality Restaurant AM In/Out ratio from AM Peak Hour of Generator.
[7] ITE Land Use Code 932 (High-Turnover [Sit-Down] Restaurant) trip generation average rates.
- Daily Trip Rate: 112.18 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 9.94 trips/1,000 SF; 55% inbound/45% outbound
- Midday Peak Hour Trip Rate: 14.04 trips/1,000 SF; 57% inbound/43% outbound
- PM Peak Hour Trip Rate: 9.77 trips/1,000 SF; 62% inbound/38% outbound
[8] ITE Land Use Code 820 (Shopping Center) trip generation average rates.
- Daily Trip Rate: 37.75 trips/1000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.94 trips/1000 SF of floor area; 62% inbound/38% outbound
- Midday Peak Hour Trip Rate: 4.21 trips/1000 SF of floor area; 50% inbound/50% outbound
- PM Peak Hour Trip Rate: 3.81 trips/1000 SF of floor area; 48% inbound/52% outbound
[9] ITE Land Use Code 310 (Hotel) trip generation average rates.
- Daily Trip Rate: 8.36 trips/room; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.47 trips/room; 59% inbound/41% outbound
- Midday Peak Hour Trip Rate: 0.61 trips/room; 58% inbound/42% outbound
- PM Peak Hour Trip Rate: 0.60 trips/room; 51% inbound/49% outbound
[10] ITE Land Use Code 925 (Drinking Place) trip generation average rates.
- Daily Trip Rate: Assume 122.1 trips/1,000 SF of floor area (based on proportion of PM peak hour trip rate to Daily trip rate, similar to ITE Land Use Code 931).
- AM Peak Hour Trip Rate: Nightclub assumed to generate negligible trips during weekday AM peak hour.
- Midday Peak Hour Trip Rate: Nightclub assumed to generate negligible trips during weekday MD peak hour.
- PM Peak Hour Trip Rate: 11.36 trips/1,000 SF of floor area; 66% inbound/34% outbound
[11] ITE Land Use Code 890 (Furniture Store) trip generation average rates.
- Daily Trip Rate: 6.30 trips/1,000 SF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.26 trips/1,000 SF; 71% inbound/29% outbound
- Midday Peak Hour Trip Rate: 0.70 trips/1,000 SF; 51% inbound/49% outbound
- PM Peak Hour Trip Rate: 0.52 trips/1,000 SF; 47% inbound/53% outbound
[12] ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates.
- Daily Trip Rate: No average trip rates available (see [13] below).
- AM Peak Hour Trip Rate: 1.31 trips/1,000 SF of floor area; 51% inbound/49% outbound
- Midday Peak Hour Trip Rate: 1.40 trips/1,000 SF of floor area; 46% inbound/54% outbound
- PM Peak Hour Trip Rate: 3.45 trips/1,000 SF of floor area; 57% inbound/43% outbound
[13] Source: ITE "Trip Generation", 9th Edition, 2012.
ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates.
- Daily Trip Rate: 32.93 trips/1,000 SF of floor area; 50% inbound/50% outbound
[14] Vehicle trips for approved project based on "Traffic Impact Study for the Robertson Lane Hotel Project," KOA, January 25, 2017.



NOT TO SCALE

MAP SOURCE: HKS ARCHITECTS

FIGURE 1
PROJECT SITE PLAN
GROUND FLOOR PLAN

ROBERTSON LANE HOTEL PROJECT

LINSCOTT, LAW & GREENSPAN, engineers

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MITIGATION MONITORING AND REPORTING PROGRAM FOR THE MODIFIED PROJECT

California Public Resources Code Section 21081.6 requires that, upon certification of an environmental impact report (EIR), "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation." Accordingly, the City of West Hollywood's City Council adopted a mitigation monitoring and reporting program (MMRP) for the Robertson Lane Hotel Project in June 2018, when the project was approved and the EIR was certified. Since June 2018, updates have been made to the design of the project, requiring minor changes in several mitigation measures. These changes have been made to ensure that potential impacts continue to be reduced below a level of significance. These changes do not meet any of the requirements for recirculation of an EIR set forth in Section 15162 of the California Environmental Quality Act (CEQA) Guidelines.

This chapter contains the MMRP that has been developed for the Robertson Lane Hotel Project, with the minor modifications referenced above. This MMRP has been developed in compliance with Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines. The mitigation measures in the table are coded by alphanumeric identification consistent with the EIR. The following items are identified for each mitigation measure:

- **Mitigation Monitoring.** This section of the MMRP lists the stage of the project during which the mitigation measure would be implemented and the stage during which proper implementation would be monitored and verified. It also lists the agency that is responsible for ensuring that the mitigation measure is implemented and that it is implemented properly.
- **Verification of Compliance.** This section of the MMRP provides a location for the implementing party and/or enforcing agency to make notes and to record their initials and the compliance date for each mitigation measure.

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
Air Quality						
MM-AQ-1 The following dust control measures shall be implemented by the contractor/builder to reduce fugitive dust coarse and fine particulate matter (PM_{10} and $PM_{2.5}$) emissions generated during earthmoving construction activities: a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease. b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour (mph). c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation. d. Speeds on unpaved roads shall be reduced to less than 15 mph. e. All grading and excavation operations shall be halted when wind speeds exceed 25 mph. f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday. g. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.	Construction (earthmoving activities)	Construction (earthmoving activities)	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by the South Coast Air Quality Management District (SCAQMD)). i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.						
MM-AQ-2 During project demolition and construction, off-road equipment with engines rated at 150 horsepower or greater, shall meet, at a minimum, the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Section 2423(b)(1). Based on the anticipated equipment for these phases, this measure would be applicable to, but not limited to, excavators, graders, rubber-tired dozers, and cranes.	Pre-construction; final plans and specifications	Final plans and specifications; construction	City of West Hollywood Community Development Department			
Cultural Resources						
MM-CUL-1 Documentation. Prior to project commencement of any building disassembly, relocation, and partial restoration activities associated with the Factory building, Historic American Building Survey (HABS) Level 2 documentation of the building shall be performed and submitted to the following archives/ organizations: Library of Congress, HABS/HAER/HALS Collection; West Hollywood Preservation Alliance; West Hollywood Heritage Project; Los Angeles Conservancy; National Trust for Historic Preservation; ONE Archives at the University of Southern California (USC); County of Los Angeles Library, West Hollywood Library; and other entities/repositories to be identified by the City of West Hollywood. HABS documentation shall be incorporated into the interpretive and	Prior to building disassembly	Prior to building disassembly	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
commemorative strategies for the Factory building under MM CUL-5, 6 and 7, as appropriate.						
MM-CUL-2 Documentation. Upon completion of the Factory building rehabilitation and restoration activities in accordance with the Secretary of the Interior's Standards for Rehabilitation, the applicant shall submit a complete application for designation of the Factory building under W.H.M.C. Section 19.58.070 for listing as a West Hollywood Cultural Resource.	Upon completion of Factory building rehabilitation	Upon completion of the application for designation of the Factory building	City of West Hollywood Community Development Department			
MM-CUL-3 Salvage. Modular components of the Factory building that are in good condition and are not used as part of the project – in particular, embossed steel sidewall panels and steel windows – shall be stored at a location nearby for future use as needed. The applicant shall consult with a qualified architectural conservator on the appropriate storage of retained modular components. The components to be salvaged but not reused shall be "attic stock" for any future repairs, restoration, etc. The components shall be inventoried and catalogued, shall be marked or tagged with individual numbers, and the inventory shall include original location and photographs of existing conditions. The components shall be stored at an indoor location and protected from weather and damage.	Demolition	During storage activities and one time after all storage activities are complete, for verification purposes	City of West Hollywood Community Development Department			
MM-CUL-4 Sensitive Treatment/Conservation. Prior to commencement of construction activities, the applicant shall develop Treatment Specifications for the cleaning, repair, and installation of modular components of the Factory building during and after construction. Prepared by a preservation architect meeting the Secretary of the Interior's Standards in Architecture and/or Historic Architecture, these specifications will ensure the appropriate conservation of materials to be retained as part of the project, including cataloguing of	Prior to construction activities	Prior to construction activities	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
component parts and site preparation during dismantling and reassembly, as well as future cleaning and treatment of the building's materials as part of regular building maintenance.						
MM-CUL-5 Interpretation/Commemoration (Mitchell Camera Corporation). The applicant shall provide on-site interpretation/ commemoration of the Mitchell Camera Corporation use of the building, such as public art, historic photographs, display of Mitchell cameras, amongst others. A team of qualified professionals assembled by the applicant shall prepare a preliminary interpretation/commemoration plan, and in connection with the preparation of that plan, shall explore opportunities for programmatic partnerships with affinity organizations dedicated to the preservation and promotion of the Hollywood film industry. The preliminary plan shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered by the applicant in the development of the final interpretation/commemoration plan. The final interpretation/commemoration plan shall be presented to the City of West Hollywood Historic Preservation Commission for comment prior to installation, and completed to the satisfaction of the Community Development Director prior to issuance of a Certificate of Occupancy for the hotel.	Prior to and during building operation	Final plans and specifications; pre-occupancy	City of West Hollywood Community Development Department			
MM-CUL-6 Interpretation/Commemoration (Oral History Project: Studio One). The applicant shall commission an oral history project in which patrons of Studio One and others are interviewed and given the opportunity to discuss the experience of visiting the nightclub and being part of the LGBTQ community in West Hollywood and Los Angeles during the 1970s and '80s. One of the primary goals of the oral history project will be to encapsulate the diverse and varied experiences of being a	Prior to building operation	Prior to building operation	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
LGBTQ person in West Hollywood during the 1974-1992 era, including the stories of discrimination and restrictive door policies enforced at Studio One, ensuring that all perspectives are represented. The oral history project will be conducted in accordance with the principles and best practices of oral history (developed by the Oral History Association) and managed by an individual (or individuals) qualified and experienced in the practice. All interviews for the oral history project shall be digitally recorded (audio and/or visual) and made available on site, so that visitors will be able to listen to (and possibly see) the interviews in a location related directly to the original Studio One use of the building, as well as online. These interviews shall also be donated to organizations/entities/repositories such as the West Hollywood Preservation Alliance, West Hollywood Heritage Project, Los Angeles Conservancy, One Archives at USC, Los Angeles County Public Library, West Hollywood Branch, and LGBTQ Coalition. The oral history project shall be developed in coordination with the City of West Hollywood and to the satisfaction of the Community Development Director.						
MM-CUL-7 Interpretation/Commemoration (Studio One). The applicant shall provide on-site interpretation/ commemoration of the Studio One use of the building, such as historic photographs, permanent display of the oral history project (see MM-CUL-6) and/or public art. Such interpretation/commemoration may include multiple forms of media to provide a robust depiction of the music, dance, and special effects that were used at Studio One. All interpretation/commemoration will be located onsite, with the locus of commemoration installed inside of or immediately adjacent to the Factory building. A team of qualified professionals assembled by the applicant shall prepare a preliminary interpretation/commemoration plan, and in connection with the preparation of that plan shall explore	Prior to and during building operation	Final plans and specifications; pre-occupancy	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
opportunities for programmatic partnerships with affinity organizations dedicated to the preservation and promotion of LGBT history. The preliminary plan shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered by the applicant in the development of the final interpretation/commemoration plan. The final interpretation/ commemoration plan shall be presented to the City of West Hollywood Historic Preservation Commission for comment prior to installation and completed to the satisfaction of the Community Development Director prior to issuance of a Certificate of Occupancy for the hotel.						
MM-CUL-8 Rehabilitation/Restoration. The applicant shall rehabilitate the retained portion of the Factory building in accordance with the Secretary of the Interior's Standards for Rehabilitation (the Standards). The design of new components at the Factory building's base, including new storefronts, shall also conform to the applicable Standards. All work will proceed under the direction of a historic preservation architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture.	Project design and construction	Final plans and specifications; construction	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
MM-CUL-9 Rehabilitation/Restoration. The applicant shall remove non-historic features and restore missing character-defining features on the historic east façade of the Factory building dating to the 1929-1946 period of significance in compliance with the Standards, including, at minimum: a. Removal of a non-original exterior staircase. b. Removal of non-original concrete masonry unit walls that currently sit in front the building, enclosing a non-historic courtyard space (and obscuring the façade). c. Replacement of non-historic windows with salvaged original steel windows. d. Conservation of exterior materials, including removal of paint from poured-in-place concrete foundation, steel sidewall panels, window frames, and glazing; and replacement of broken glazing as necessary.	Construction	Final plans and specifications; construction; and pre-occupancy	City of West Hollywood Community Development Department			
MM-CUL-10 Rehabilitation/Restoration. The applicant shall remove non-historic features and restore missing character-defining features on the historic west façade of the Factory building, dating to the 1974-1992 period of significance, including at minimum: a. Removal of non-historic steel entrance canopy and low concrete walls. b. Replacement of non-original entrance doors with replica doors dating to the period of significance. c. Conservation of exterior materials, including removal of paint from poured in place concrete foundation, steel sidewall panels, window frames, freight elevator doors, and glazing; and replacement of broken glazing as necessary	Construction	Final plans and specifications; construction; and pre-occupancy	City of West Hollywood Community Development Department			
MM-CUL-11 Construction Monitoring. Prior to	Prior to and	Construction	City of West			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
commencement of any construction activity associated with the Factory building, the applicant shall retain a qualified architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture to monitor all disassembly, construction and rehabilitation activities to ensure appropriate treatment of the building and character-defining features and materials during the construction project.	during construction		Hollywood Community Development Department			
MM-CUL-12 Inadvertent Discovery of Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA; 14 CCR 15064.5(f); PRC, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.	Construction	Construction	City of West Hollywood Community Development Department			
MM-CUL-13 Paleontological Resources. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. The qualified paleontologist shall be on site during all rough grading and other significant ground-disturbing activities in depths greater than 10 feet below ground surface. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project.	Prior to construction (grading) and during rough grading and other significant ground-disturbing activities in	Rough grading and other significant ground-disturbing activities in depths greater than 10 feet below ground surface	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
The PRIMP should be consistent with the guidelines of the Society of Vertebrate Paleontologists (2010) and should include but not be limited to the following: a. Attendance at the pre-construction conference by a qualified paleontologist or his/her representative. b. Monitoring of excavation activities by a qualified paleontological monitor in areas identified as likely to contain paleontological resources. The monitor shall be equipped to salvage fossils and/or matrix samples as they are unearthed in order to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment in the area of the find in the event paleontological resources are discovered. c. Because the underlying sediments may contain abundant fossil remains that can only be recovered by a screening and picking matrix, these sediments shall occasionally be spot screened through one-eighth to one-twentieth-inch mesh screens to determine whether microfossils exist. If microfossils are encountered, additional sediment samples (up to 6,000 pounds) shall be collected and processed. d. Preparation of recovered specimens to a point of identification and permanent preservation. This includes the washing and picking of mass samples to recover small invertebrate and vertebrate fossils and the removal of surplus sediment from around larger specimens to reduce the volume of storage for the repository and the storage cost for the developer. e. Identification and curation of specimens into a museum repository with permanent retrievable storage.	depths greater than 10 feet below ground surface					

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
f. Preparation of a report of findings with an appended itemized inventory of specimens. When submitted to the City of West Hollywood, the report and inventory would signify completion of the program to mitigate impacts to paleontological resources.						
MM-CUL-14 Inadvertent Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Los Angeles County Coroner shall be notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant from the deceased Native American. The Most Likely Descendant shall complete his or her inspection within 24 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.	Construction	Construction	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
Geology and Soils						
MM-GEO-1 The proposed project shall be designed in accordance with the recommendations from the site-specific Geotechnical Investigation. In the event that changes are made in the recommendations set forth in the final geotechnical report, the project design shall be updated in accordance with those changes. Prior to the issuance of a building permit, the applicant shall submit the final design and construction plans for review and approval by the City Building Official or designee and the City Engineer or designee. The final design and construction plans shall show that the recommendations from the Geotechnical Investigation regarding foundation, site coefficient and seismic zonation, walls below grade, waterproofing and drainage, floor slab support, dewatering and groundwater control, excavation and slopes, and shoring have been incorporated into the final design.	Project planning and permitting	Final plans and specifications	City of West Hollywood Community Development Department and Building & Safety Department			
Greenhouse Gas Emissions						
MM-3.15-1 (from the Final Program EIR for the City's General Plan and CAP). To further reduce construction-generated GHG emissions, the project applicant(s) of all project phases shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction. The City's recommended measures for reducing construction-related GHG emissions at the time of writing this EIR are listed below. The list will be updated as new technologies or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following: • Improve fuel efficiency of construction equipment: o Reduce unnecessary idling (modify work practices, install auxiliary power for drive comfort);	Prior to and during construction	Construction	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
o *Perform equipment maintenance (inspections, detect failures early, correction);* o Train equipment operators in proper use of equipment; o Use the proper size of equipment for the job; and o *Use equipment with new technologies (repowered engines, electric drive trains).* • Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power. • Use a CARB-approved low-carbon fuel, such as biodiesel, or renewable diesel for construction equipment. • *Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes.* • Reduce electricity use in the construction office by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones. • Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75% by weight). • Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials). • Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option. • Produce concrete on-site if determined to be less emissive than transporting ready mix.						

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
• Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from CARB's Heavy-Duty Vehicle Greenhouse Gas Measure and EPA. • Develop a plan to efficiently use water for adequate dust control. This may consist of the use of nonpotable water from a local source.						
Noise						
MM-NOI-1 Construction activities shall take place during the permitted time and day per Chapter 9.08.050 of the City of West Hollywood's (City's) Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 8 a.m. to 7 p.m. Monday through Friday (interior work only is permissible from 8 a.m. to 7 p.m. on Saturdays). This condition shall be listed on the project's final design to the satisfaction of the City Engineering Department.	Construction	Construction	City of West Hollywood Community Development Department			
MM-NOI-2 The City of West Hollywood shall require the applicant to adhere to the following measures as a condition of approving the grading permit: • The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment. • All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City Engineering Department.	Construction	Final plans and specifications; construction	City of West Hollywood Community Development Department			

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
• Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and West Hollywood Park, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible. • During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors, including recreational users of West Hollywood Park. • During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors, including recreational users in West Hollywood Park. • Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party. • If equipment is being used that can cause hearing damage at adjacent noise receptor locations (distance attenuation shall be taken into account), portable noise barriers shall be installed that are demonstrated to be adequate to reduce noise levels at receptor locations below hearing damage thresholds. This may include erection of temporary berms or plywood barriers to create a break in the line-of-sight, or						

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
erection of a heavy fabric tent around the noise source.						
MM-NOI-3 Prior to certificate of occupancy, the amplified sound system shall be calibrated for the outdoor uses so as to not exceed the noise levels listed below. The amplified sound system sound output shall be measured at the distances provided below on a plane parallel from the face of the speaker and verified and documented by a qualified acoustical engineer: a) Level 1: i. 75 A-weighted decibels (dBA) equivalent noise level (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m. b) Level 2 - Public Outdoor Dining: i. 84 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 66 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m. c) Level 2 – West Hotel Terrace and Center Hotel Terrace: i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m. d) Level 3 – Hotel Amenities and Outdoor Dining: i. 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 68 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m. e) Level 3 – Center Terrace: i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8	During calibration of outdoor amplified sound system	Prior to certificate of occupancy	City of West Hollywood Community Development Department			

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Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
a.m. to 10 p.m. ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m. f) Level 9 – Hotel Outdoor Dining, Hotel Terrace, Restaurant and Pool/Deck: i. 85 dBA (L_{eq}) at 35 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 65 dBA (L_{eq}) at 35 feet, during nighttime hours from 10 p.m. to 8 a.m. g) Level 9 – Center Terrace: i. 75 dBA (L_{eq}) at 15 feet, during daytime hours from 8 a.m. to 10 p.m. ii. 60 dBA (L_{eq}) at 15 feet, during nighttime hours from 10 p.m. to 8 a.m.						
MM-NOI-4 Prior to certificate of occupancy, noise measurements shall be conducted to be reviewed and approved by City staff, to demonstrate that the habitable areas (hotel rooms) have been designed to reduce interior noise to 45 dBA or lower (community noise equivalent level (CNEL) or day–night average noise level (L_{dn})).	Post construction	Prior to certificate of occupancy	City of West Hollywood Community Development Department			
MM-NOI-5 Prior to approval of the plans and specifications for the project, City staff shall review and approve the proposed heating, ventilation, and air conditioning (HVAC), outdoor mechanical equipment, and kitchen mechanical equipment unit specifications to ensure that the on-site stationary equipment does not exceed 55 dBA at 50 feet, or otherwise exceed any established noise thresholds for stationary sources.	Project planning and permitting	Final plans and specifications	City of West Hollywood Community Development Department			
Transportation and Traffic						
MM-TRAF-1 Prior to issuance of a Certificate of Occupancy by the City of West Hollywood (City), the applicant shall be responsible for widening the northbound approach to the intersection of Robertson Boulevard and Santa Monica	Prior to issuance of a certificate of occupancy	Prior to issuance of a certificate of occupancy	City of West Hollywood Community Development			completed

Mitigation Monitoring and Reporting Program for the Modified Project

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	*Monitoring Phase*	*Enforcing Agency*	*Initial*	*Date*	*Comments*
Boulevard. The northbound approach shall be widened to one shared left/through lane and one exclusive right-turn lane, which shall be accomplished by shifting the center line to the west and removing two on-street parking spaces on the west side of Robertson Boulevard. By widening the northbound approach from one to two lanes, this improvement would provide additional capacity to serve the added vehicular demand as a result of the project.			Department			

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