
Addendum to the Final Initial Study/
Negative Declaration

Sunset Strip Off-Site Signage Policy

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ADA	Americans with Disabilities Act
approved project (or policy)	Sunset Boulevard Off-Site Signage Policy
AQMP	air quality management plan
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of West Hollywood
CNEL	Community Noise Equivalent Level
dB	decibel(s)
dBA	A-weighted decibel(s)
EIR	environmental impact report
FAR	Floor Area Ratio
IS	Initial Study
kWh	kilowatt-hour(s)
Leq	equivalent noise level
LOS	level of service
ND	Negative Declaration
NOI	Notice of Intent to Adopt a Negative Declaration
PF	Public Facilities
PPV	peak particle velocity
project area	Sunset Specific Plan area
RCNM	Roadway Construction Noise Model
SAAP	Sunset Arts and Advertising Program
SB	Senate Bill
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SSP	Sunset Specific Plan
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled

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Executive Summary

The City of West Hollywood (City) has been working to implement the Sunset Boulevard Off-Site Signage Policy since the City adopted the policy in 2019. Implementing the policy entails review, consideration, and approval of various billboard projects on Sunset Boulevard, followed by construction and operation of such projects. In the six years following policy approval, the number and scope of billboard projects has increased.

In 2019, the City analyzed the environmental impacts of the policy and an originally contemplated billboard development scenario as part of an Initial Study/Negative Declaration (IS/ND). The IS/ND did not reveal any significant environmental impacts. Now that the number and scope of billboard projects have expanded, the City has initiated an environmental review process to study the expanded billboard development scenario. This document, which is an addendum to the previously adopted IS/ND, analyzes the expanded billboard development scenario, with the goal of determining whether the expanded billboard development scenario would result in new significant impacts or significant impacts of increased severity. This document also addresses minor proposed changes to the adopted policy.

The analysis herein includes a detailed, updated assessment of light/glare, air quality, greenhouse gas emissions, energy, cultural and tribal cultural resources, and noise. The results of this analysis are summarized in this document, with supporting technical details in the appendices. This document also includes analysis under all other topical areas as required by the California Environmental Quality Act. Additionally, this document includes two technical studies prepared in response to public concerns and/or City staff requests: an analysis of lighting effects on wildlife and an analysis of traffic safety. While these analyses were not required to support impact determinations under the California Environmental Quality Act, they are included herein to support and inform the City's decision making with regards to the expanded billboard development scenario.

As demonstrated throughout the environmental analysis in this document (see Chapter 8), the expanded billboard development scenario and proposed policy changes were not found to result in new significant environmental impacts or substantial increases in the severity of significant impacts previously identified and disclosed in the IS/ND. These findings indicate that the requirements for preparing a subsequent or recirculated IS/ND, as specified in the California Environmental Quality Act, have not been met.

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1 Introduction

The City of West Hollywood’s City Council adopted a Negative Declaration (ND) for the Sunset Strip Off-Site Signage Policy (referred to as the “approved project” or the “policy”) in 2019.¹ The ND was prepared pursuant to the California Environmental Quality Act (CEQA) and is supported by an Initial Study that contains a disclosure and analysis of potential environmental effects associated with implementation of the approved project. Together, the Initial Study and the ND adopted in 2019 will be referred to as the “2019 IS/ND” or “IS/ND” in this addendum. Based on the analysis contained in the IS/ND and other considerations, the City Council approved the Sunset Strip Off-Site Signage Policy following adoption of the ND.

The 2019 IS/ND presents an environmental analysis for a signage development scenario, in order to analyze the environmental effects of policy implementation. The scenario is based on a number of factors, including the types of signage development, the number of signs, and the geographic intensity of signage development that are allowed under the Sunset Strip Off-Site Signage Policy, along with reasonable assumptions for the nature and pace of signage development on the Sunset Strip. Subsequent to adoption of the ND and approval of the Sunset Strip Off-Site Signage Policy in 2019, the City began policy implementation, which has consisted of a series of Design Excellence Screening processes to select applications for billboard projects that are then allowed to proceed through the entitlement process. The City has conducted three rounds of Design Excellence Screening, referred to as Round 1, Round 1.5, and Round 2. After selection of the Round 1 billboard projects, the City prepared an addendum to analyze the differences between the signage development scenario assumed in the IS/ND and the actual scenario that would result from development of the Round 1 billboard projects. This addendum will be referred to herein as the 2021 Addendum. The 2021 Addendum concluded that the Round 1 billboard projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the adopted IS/ND.²

Subsequent to completion of the 2021 Addendum, the City began processing applications for the Round 1.5 billboard projects and began initiating the Design Excellence Screening process for Round 2. The purpose of this addendum, in part, is to update the signage development scenario to include Round 1.5 and Round 2 billboard projects, as well as to wholistically address the signage development scenario that would result from development of all billboard projects associated with Rounds 1, 1.5, and 2 (“modified signage development scenario”).

Additionally, in conjunction with the expansion of the signage development scenario, the City is proposing amendments to the policy that was adopted in 2019. These amendments are focused on clarifying and strengthening the policy’s light and glare requirements for billboards based on the proposed expansion of the signage development scenario (referred to as “proposed policy amendments”). As such, this addendum also analyzes the proposed policy amendments. The modified signage development scenario, together with the proposed policy amendments, will be referred to as the “modified project” for the purpose of this addendum.

¹ The terms “Sunset Strip Off-Site Signage Policy” and “Sunset Boulevard Off-Site Signage Policy” are used interchangeably throughout this document.

² Both the IS/ND and the 2021 Addendum note that billboard projects integrated into larger projects (e.g., new development, building remodels) would undergo further CEQA review on a project-by-project basis, since the effects of the larger projects were unknown at the time of the IS/ND and 2021 Addendum.

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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 that was not included in a project's IS/ND. Section 15162 of the CEQA Guidelines provides:

- (a) When an environmental impact report (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 ND 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 ND 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 ND was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or ND;
 - (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.

An addendum to an adopted ND may be prepared if minor technical changes or additions are necessary or none of the conditions listed above calling for the preparation of a subsequent ND have occurred. In accordance with CEQA Guidelines Section 15164(e), the addendum should include a brief explanation of the decision not to prepare a subsequent ND 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 adopted ND. As further discussed below, although minor changes are being proposed to the adopted policy, these changes would not result in new significant impacts, substantial increases in previously identified significant impacts, or the requirement for mitigation measures. Therefore, an addendum, rather than a subsequent ND, is appropriate.

CEQA Guideline Revisions

While the ND was adopted in 2019, the IS/ND and associated Notice of Intent to Adopt a Negative Declaration (NOI) was circulated for public review in 2017. In December 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 recent updates to Appendix G can be summarized as follows: narrowing the scope of aesthetic impacts; moving the topic of paleontology from the cultural resources section to the geology section; adding threshold questions to address the topic of energy; expanding wildfire issues; combining airport safety and noise into one threshold question; deleting the reference to private airstrips; incorporating vehicle miles traveled analysis into the transportation section; making the hydrology and utilities questions more concise and applicable to modern issues; clarifying that land use conflicts must relate to a physical impact on the environment; and adding “unplanned” to the population growth question, so that the question now focuses only on unplanned growth.

The revised CEQA Guidelines were adopted over a year after the NOI for the IS/ND was issued. As such, the environmental checklist questions used in the IS/ND for the approved project were based on the version of the CEQA Guidelines and Appendix G that was in place when the NOI and the IS/ND were released for public review in 2017. 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 the IS/ND was released for public review prior to adoption of the Guideline amendments, 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 IS/ND was circulated for public review in 2017, and all applicable legislation and court decisions that were in place in 2017 were considered in the IS/ND. As such, the IS/ND 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 adopted IS/ND.

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 of the project as possible, this document includes discussions, for informational purposes only, of the modified project’s potential effects in the environmental categories that were added to Appendix G of the CEQA Guidelines (i.e., energy, wildfire, and vehicle miles traveled). The other environmental topics with revised thresholds have already been addressed in the IS/ND: the topic of paleontology is addressed in Section 8.6, Geology and Soils, of the IS/ND; airport safety and airport noise are addressed in Section 8.8, Hazards and Hazardous Materials, and Section 8.13, Transportation and Traffic, respectively; hydrology is addressed in Section 8.9, Hydrology and Water Quality; utilities are addressed in Section 8.15, Utilities and Service Systems; land use is addressed in Section 8.10, Land Use and Planning; and population growth is addressed in Section 8.12, Population and Housing, Public Services, and Recreation. Edits to the thresholds in these categories would not change the impact conclusions for the project (in either its approved or modified forms).

3 Project Location and Setting

The Sunset Strip Off-Site Signage Policy applies to existing, entitled, and proposed billboards located within the Sunset Specific Plan (SSP) area (project area). The project area consists of the portion of Sunset Boulevard that extends through the City and the street-fronting parcels to the north and south of Sunset Boulevard. This area is also referred to as the Sunset Strip and is described in the SSP as the area extending along Sunset Boulevard approximately 1.6 miles between Sunset Hills Road on the west and just west of Havenhurst Drive on the east. The City of Beverly Hills is to the west and the City of Los Angeles is to the east and north of the project area. Under the modified signage development scenario that is analyzed in this addendum, no changes would occur to the project area boundaries.

Regional access to the project area is provided via U.S. Route 101 (the Hollywood Freeway), which is located approximately 3 miles east of the City's eastern boundary. Local access to the project area is provided via major north/south and east/west roads. Major east/west roads include Sunset Boulevard, which extends through the center of the project area; Santa Monica Boulevard, located approximately 0.30 mile south of the project area; and Fountain Avenue, located approximately 0.20 mile south of the project area. Major north/south streets that intersect the project area, listed from west to east, include Doheny Drive, San Vicente Boulevard, and La Cienega Boulevard. Crescent Heights Boulevard is another major north/south road that intersects Sunset Boulevard approximately 0.14 mile east of the eastern project area boundary.

Sunset Boulevard is a highly urbanized area within the City and is an internationally known corridor, historically recognized for its entertainment uses, restaurants, and nightlife. The street extends along the base of the Hollywood Hills and is characterized by rolling topography with frequent curves along the street. It contains a mix of low- and high-rise buildings, most of which front directly onto the street. Billboards and tall wall signs are also dominant elements of the visual environment and contribute to the iconic image of the Sunset Strip. The urbanized nature of Sunset Strip combined with the abundance of entertainment and tourist destinations leads to a high level of automobile and pedestrian activity.

The majority of properties fronting Sunset Boulevard are developed with commercial uses, although several properties are developed with multi-family residential units. The areas to the north and south of Sunset Boulevard are primarily developed with single- and multi-family residences, and the areas to the east and west are developed with a mixture of single- and multi-family residences and commercial uses.

The project area encompasses the same area as the SSP area. Accordingly, the majority of the project area is designated and zoned as SSP (Sunset Specific Plan) in the City of West Hollywood General Plan and Zoning Ordinance. The SSP was adopted by the City in 1996 to guide development along the portion of Sunset Boulevard that extends through the City (City of West Hollywood 2019a). Two parcels on the south side of Sunset Boulevard toward the eastern terminus of the project area are zoned PF (Public Facilities). These parcels are occupied by the William S. Hart Park and Off-Leash Dog Park.

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4 Project Background

As described in Chapter 1, Introduction, the City adopted the Sunset Boulevard Off-Site Signage Policy and an associated IS/ND in 2019. Subsequent implementation of the policy entailed several rounds of Design Excellence Screening for prospective billboard applicants. This chapter includes additional details regarding the Design Excellence Screening processes and CEQA review conducted in association with the Sunset Boulevard Off-Site Signage Policy to date.

Design Excellence Screening Processes – Rounds 1, 1.5, and 2

- **Round 1 of Design Excellence Screening.** In 2019, screening applications for billboard projects were submitted to the City by applicant teams, and the City assembled a Design Excellence Review Committee to evaluate the applications. The committee concluded its review of the applications in May 2020 and selected 22 billboard project applications³ that were then allowed to proceed through the entitlement process. These projects are collectively referred to as the “Round 1” billboard projects, because they were selected as part of the City’s first round of Design Excellence Screening. At the time of this writing, the Round 1 projects are in various states of completion, with some constructed and operational, others approved but not yet constructed, and others still under review with the City.
- **Round 1.5 of Design Excellence Screening.** In July 2020, the City Council voted in support of a recommendation to allow the reexamination and screening of project submittals on the east end of the Sunset Strip, at the City’s eastern gateway, and for sites that include legacy video screens. This process resulted in the selection of 8 additional billboard project applications⁴ that were allowed to proceed through the entitlement process. These projects are collectively referred to as the “Round 1.5” billboard projects.
- **Round 2 of Design Excellence Screening.** In 2021–2022, the City conducted another round of Design Excellence Screening. This process resulted in the selection of 10 additional billboard project applications that were allowed to proceed through the entitlement process. These projects are collectively referred to as the “Round 2” billboard projects.

All billboard projects were selected by the City based on their exemplification of the design standards and overall vision for the Sunset Strip set forth in the policy. Each selected project also requires individual discretionary review and approval from City decision makers.

The collection of projects that has emerged from the Design Excellence Screening process is consistent with the goals and objectives of the adopted policy but differs in some ways from the signage development scenario that was assumed in the IS/ND. The purpose of this addendum is to describe and analyze the changes to this signage development scenario, to ensure that the modified signage development scenario would not lead to new or different environmental impacts than those originally analyzed in the IS/ND.

³ Of the original 22 off-site signage applications that were selected as part of Round 1 of Design Excellence Screening, 4 applications have been withdrawn. As such, there are currently a total of 18 billboard projects that are part of Round 1.

⁴ Of the 8 off-site signage applications that were selected as part of Round 1.5 of Design Excellence Screening, 2 applications have been withdrawn. As such, there are currently a total of 6 billboard projects that are part of Round 1.5.

CEQA Review

After selection of the Round 1 billboard projects in 2020, the City prepared an addendum to the adopted IS/ND in 2021 to evaluate the differences between the signage development scenario assumed in the IS/ND and the actual scenario that would result from development of the Round 1 billboard projects, referred to as the 2021 Addendum. The 2021 Addendum concluded that the Round 1 billboard projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the adopted IS/ND.⁵ Since the time of the 2021 Addendum, several Round 1 projects have been approved, some of which have been constructed and are now operational.

The 2021 Addendum references additional concept awards for the eastside of the Sunset Strip, as well as the potential for an additional round of Design Excellence Screening. However, the details of the eastside concept awards (which came to be referred to as the “Round 1.5 billboard projects”) and future Design Excellence Screening were unknown at the time. As such, the analysis in the 2021 Addendum was focused on Round 1 billboard projects. Details regarding the additional signage projects that are now referred to as Round 1.5 and Round 2 billboard projects have become available since the time of the 2021 Addendum, and these projects are currently proceeding through the entitlement process with the City. As such, the purpose of this current addendum is to update the signage development scenario to include Round 1.5 and Round 2 billboard projects. Additionally, in order to avoid bifurcating the analysis of the billboard development scenario associated with the Sunset Boulevard Off-Site Signage Policy, this addendum considers Round 1 as part of the overall development envelope; however, projects associated with Rounds 1.5 and 2 are characterized in greater detail in this project description, since Round 1 has already been described in the 2021 Addendum.

⁵ Both the IS/ND and the 2021 Addendum note that billboard projects integrated into larger projects (e.g., new development, building remodels) would undergo further CEQA review on a project-by-project basis, since the effects of the larger projects were unknown at the time of the IS/ND and 2021 Addendum.

5 Definitions

The types of billboards and signs within the City are defined in Chapter 19.90, Definitions/Glossary, of the City's Zoning Ordinance. The SSP, as amended by the Sunset Boulevard Off-Site Signage Policy, also contains definitions and guidelines for off-site signs along Sunset Boulevard within the City.

Signage terms relevant to this document are defined below using information from the existing Zoning Ordinance, the adopted Sunset Boulevard Off-Site Signage Policy, and the City's current conventions for defining and describing different sign types.

Billboard. A billboard is defined in the adopted Sunset Boulevard Off-Site Signage Policy as “a large panel or display designed to carry outdoor off-site advertising content” (adopted policy, page 36).

Full motion billboard. This term is generally used to refer to a billboard that is comprised of a screen with capabilities of showing animation and/or cycling static images. In the adopted policy, the IS/ND, and the 2021 Addendum, this type of sign has been referred to as a “digital billboard.” The City has more recently been using the term “full motion billboard” to be more clearly descriptive of this billboard type.

Internally illuminated static billboard. This term is generally used to describe a particular billboard design involving backlit printed copy (similar to a light box). Similar to a traditional billboard, physical removal of the messaging surface is needed to change the advertising copy. Unlike a traditional billboard, uplights and downlights are not needed, since lighting is internal to the billboard face. In prior CEQA documentation associated with the project, this type of sign was generally referred to as a “static billboard” and was not necessarily distinguished from a traditional billboard.

Off-site sign. An off-site sign is a sign that identifies a use, facility, service, or product that is not located, sold, or manufactured on the same premises as the sign or which identifies a use, service, or product by a brand name which, although sold or manufactured on the premises, does not constitute the principal item for sale or manufactured on the premises (Zoning Ordinance Section 19.90.020). The term “off-site sign” is inclusive of billboards and tall wall signs.

On-site sign. A sign that advertises something that is sold or produced on the premises.

Sunset Boulevard Arts and Advertising Program. The Sunset Arts and Advertising Program (SAAP) is a City initiative to manage and enhance billboards along the Sunset Strip. This program includes the Design Excellence Screening process (described in Chapter 4, Project Background, above), review and regulation of billboard projects, and the Moving Image Media Art Program, which involves showcasing artwork on full motion billboards along Sunset Strip. New billboards and existing billboards that are modified pursuant to the policy are considered part of the SAAP.

Tall wall sign. A tall wall sign operates in a manner similar to a billboard; however, the advertisement is applied directly to the exterior wall of an existing structure, rather than being affixed to a freestanding pole like a traditional billboard. The Zoning Ordinance defines a tall wall sign as “An off-site sign with minimum area of 5,000 square feet, attached to an existing building wall visible from Sunset Boulevard” (Zoning Ordinance Section 19.90.020).

Traditional billboard. A traditional billboard is defined in the adopted policy as a billboard utilizing print technology to convey the advertising message and requiring physical installation, removal, and maintenance of the messaging

surface (such as, but not limited to stretched vinyl) on a recurring basis (adopted policy, page 37). This term is generally used to refer to billboards that are illuminated externally with uplights or downlights. In prior CEQA documentation associated with the SAAP, this type of sign was generally referred to as a “static billboard.”

Video screen. A video screen, formally referred to in the City’s Zoning Ordinance as a “Large Screen Video Sign” is defined as “A sign comprised of a large video screen displaying advertising content in animated or motion picture form” (Zoning Ordinance Section 19.90.020). Large Screen Video Signs were also defined in the section of the SSP governing signage (which was replaced by the adopted policy in 2019). Per the applicable section of the SSP, no more than four Large Screen Video Signs were permitted along the Sunset Strip.

6 Project Description

6.1 Proposed Changes to the Signage Development Scenario

6.1.1 Original Signage Development Scenario

The approved project consists of a policy document (the “Sunset Boulevard Off-Site Signage Policy”), which amended the City’s Zoning Ordinance and the SSP to revise regulations for digital billboards and new off-site signage along the 1.6-mile corridor of Sunset Boulevard known as the Sunset Strip. In summary, the regulations include the following:

1. Updated standards, requirements, and guidelines for integrating new billboards into new development and significant upgrade projects;
2. Opportunities for providing new sign faces on the Sunset Strip, including digital sign faces (i.e., full motion billboards). New sign faces must be integrated into new development or be a component of significant upgrade projects. Digital sign faces may also be developed as a conversion from a traditional billboard, if the billboard is on a site with a designated cultural resource (referred to as “digital conversions”); and
3. Updated regulations for modifications to existing static billboards (referred to as “modifications” or “standard modifications”).

For the purposes of CEQA, the IS/ND analyzes a reasonably foreseeable development scenario formulated based on the design criteria in the policy, in conjunction with the historical number of off-site signs that have been approved since adoption of the SSP. The development scenario, as analyzed in the IS/ND, is summarized below. (Refer to Chapter 2 of the IS/ND for further details of this development scenario.)

- Standard modifications for up to 71 existing billboard faces
- 4,000 square feet of static (i.e., traditional) to digital (i.e., full motion) conversions on historic resources (e.g., 4 sign faces of 1,000 square feet each, or 5 sign faces of 800 square feet each, etc.)
- 18 new billboard faces associated with new development or significant upgrades (17 of which could be digital, also known as “full motion”)⁶

The IS/ND analyzed 71 standard modification projects and 4,000 square feet of digital conversions at the project level and determined that construction and operation of any such projects would not have significant environmental impacts and would not require further analysis under CEQA. New billboard projects were analyzed to the extent feasible in the IS/ND. However, because any new billboard was expected to be incorporated into a larger development project (either a new building or an upgrade of an existing building), complete analysis of such projects could not be presented in the IS/ND. The nature, scope, scale, and location of new development or building upgrades was highly speculative and thus was determined to require separate, project-specific CEQA review, to be conducted when such projects are brought before the City. As such, it was assumed in the IS/ND that any new billboard face would be analyzed as part of the CEQA review for larger developments or building upgrade projects.

⁶ The 2021 Addendum analyzed the update of this scenario to the 22 billboard applications that were ultimately selected during Round 1 of Design Excellence Screening.

However, for the purposes of addressing the potential effects of policy implementation, new billboards were described generally in the IS/ND as part of the signage development scenario and were analyzed to the extent practicable.

In addition to standard modifications, digital conversions, and new billboards, the policy also allows for signage projects to be proposed under the “alternative proposals” provision of the SSP, which provides for projects that meet the intent of the SSP vision but are not explicitly provided for in the SSP, or which do not meet one or more standards in the SSP. This is a long-standing provision in the SSP, was retained in the SSP update, and is included in the Sunset Boulevard Off-Site Signage Policy. Due to the highly flexible and creative nature of this alternative proposals provision, it would have been too speculative to describe or analyze alternative signage projects in the IS/ND.

In summary, the following signage development scenario was described in the IS/ND: 71 standard modification projects; 4,000 square feet of digital conversions; and 18 new billboard faces as part of new development or significant upgrade projects. This scenario was an estimate at the time, since the actual signage proposals that would come before the City were unknown. As further described in Section 6.1.2, Modified Signage Development Scenario, of this addendum, the signage development scenario that ultimately arose after policy approval does not precisely match the scenario analyzed in the IS/ND. The signage development scenario that is currently being set forth will be referred to generally as the “modified signage development scenario” and is described further in Section 6.1.2, below.

6.1.2 Modified Signage Development Scenario

Overview

As described in Chapter 4, the signage development scenario that has ultimately emerged from the City’s three rounds of Design Excellence Screening differs in some ways from the scenario that was analyzed in the IS/ND. Namely, the modified signage development scenario involves more billboard faces than originally anticipated. Specifically, the modified signage development scenario includes a total of 56 new billboard faces, which is an increase relative to the new billboard faces assumed in the IS/ND. The modified signage development scenario also involves the development of billboards in the absence of new development or significant upgrade projects, which was not contemplated in the IS/ND.

Billboard Project Details

The modified signage development scenario consists of the projects selected during Design Excellence Screening to proceed through the entitlement process. While each of these billboard projects still requires separate project-by-project discretionary review and approval by City decision makers, the purpose of this addendum is to update the overall scenario that is described in the IS/ND to reflect the real-life scenario that has emerged during policy implementation and to analyze this scenario pursuant to CEQA. As described in Chapter 4, the process of Design Screening Excellence occurred over the course of three rounds (referred to as Round 1, Round 1.5, and Round 2), and a new batch of billboard projects was selected during each round. The billboard projects selected as part of each round are summarized below.

- **Summary of Round 1 Billboard Projects.** Round 1 currently consists of 18 billboard projects, comprised of 5 projects involving the conversion of existing traditional billboards to full motion billboards on historic

resources (totaling 5,435 square feet), 5 billboard projects integrated into new development or significant upgrades (totaling approximately 8 full motion billboard faces and 4 internally illuminated static billboard faces), and 8 billboard projects involving new billboards on properties not undergoing new development (totaling approximately 5 full motion billboard faces and 7 internally illuminated static or traditional billboard faces). As described in Chapter 4, the Round 1 billboard projects have already been analyzed pursuant to CEQA in the adopted IS/ND and the subsequent 2021 Addendum. Several minor changes to the Round 1 scenario have occurred since 2021, including the withdrawal of several billboard project applications and design changes to several projects. Nevertheless, in balance, the overall billboard development scenario remains largely consistent with what was described and analyzed in the 2021 Addendum. Of the Round 1 projects analyzed in the 2021 Addendum, 10 projects have been constructed since the time of the 2021 Addendum, and 2 projects have been approved but not yet constructed. This leaves 6 projects under Round 1 that are still pending approval.

- **Summary of Round 1.5 Billboard Projects.** Round 1.5 consists of 6 billboard projects, totaling 12 new billboard faces (11 full motion billboard faces and 1 internally illuminated static billboard face). Four of the proposed projects would also involve the removal of existing traditional billboards and video screens, with a total of 6 existing traditional billboard faces and 4 existing video screens proposed for removal under Round 1.5. See Table 6.1-1 for additional details regarding Round 1.5 billboard projects.
- **Summary of Round 2 Billboard Projects.** Round 2 consists of 10 billboard projects, totaling 20 new billboard faces (14 full motion billboard faces and 6 internally illuminated static billboard faces). Four of the proposed projects would also involve the removal of existing traditional billboards or tall wall, with a total of 7 traditional billboard faces and 1 tall wall proposed for removal under Round 2. See Table 6.1-1 for additional details regarding Round 2 billboard projects.

Given the above, the modified signage development scenario for Rounds 1, 1.5, and 2 can be characterized in summation as follows:

- 5 projects involving traditional billboard to full motion conversions on historic resources (totaling 5,435 square feet)
- 38 full motion billboard faces (as part of new development, significant upgrade projects, or as a standalone new billboard)
- 18 internally illuminated static or traditional billboard faces (as part of new development, significant upgrade projects, or as a standalone new billboard)
- Removal of 23 existing sign faces from the Sunset Strip (4 video screen signs, 13 traditional billboard sign faces, 5 on-site sign faces, and 1 tall wall sign)⁷

As mentioned above, the original project in the adopted IS/ND analyzed the addition of 18 new billboard faces. The modified project consists of 56 new billboard faces (38 full motion and 18 internally illuminated). Additionally, the modified project includes the removal of 23 existing sign faces. Given the 18 billboard faces which have been analyzed and approved under CEQA in the original IS/ND and the removal of 23 existing sign faces, the modified project would include an additional 15 new billboard faces which have not yet been analyzed.

⁷ This total does not reflect multiple small sign faces planned for removal from The Roxy (9009 Sunset), which will be reallocated into 1 sign face as part of an already approved billboard development at that property.

In addition to the billboard projects selected as part of the Design Excellence Screening process, the standard modifications to existing billboards described in the adopted IS/ND have been occurring on an ongoing basis. As described in the adopted IS/ND, certain changes to existing billboards are permitted by the adopted policy in the absence of discretionary review and approval. However, the real-life pace and number of standard modification projects has been far less than what was contemplated and analyzed in the IS/ND. Several standard modification projects have been processed to date, and at the time of this writing, the City is currently processing applications for modifications to existing billboards at 8782 Sunset Boulevard, 9145 Sunset Boulevard, 8818 Sunset Boulevard, and 8789 Sunset Boulevard. As such, the assumption in the IS/ND of 71 standard modifications has not been met and is not close to being met.

Development of Round 1.5 and Round 2 Billboard Projects

As described above in Chapter 4, billboard projects associated with Round 1 have been reviewed under CEQA as part of the adopted IS/ND and subsequent 2021 Addendum. While these projects are still being considered wholistically as part of the modified signage development scenario, the subsections below provide additional project details for Round 1.5 and Round 2 billboard projects only. Table 6.1-1 lists and describes the projects that are included in Rounds 1.5 and 2.

Table 6.1-1. Round 1.5 and Round 2 Billboard Projects

Project Address and Name	Billboards	Site Improvements, Façade Improvements, Public Realm Enhancements	Environmental Analysis
Round 1.5			
8222 Sunset The Chrysalis	New full motion billboard with 2 sign faces (1,000 sq ft and 500 sq ft)	- Pedestrian plaza with landscaping (includes removal of an existing newsstand) - Solar panels to be incorporated into the back faces of the billboard	2025 Addendum (this document)
8300 Sunset The Standard Hotel	- New full motion billboard with 1 sign face (1,000 sq ft) - Removal of a traditional billboard with 2 sign faces	Public realm enhancements	2025 Addendum (this document)
8371 Sunset Saddle Ranch	- New internally illuminated static billboard with 1 sign face (1,000 sq ft) - Removal of a traditional billboard with 2 sign faces	- Pedestrian plaza - Landscaping improvements - Site circulation improvements within the parking lot	2025 Addendum (this document)
8440 Sunset Mondrian	New full motion billboard with 2 sign faces (1,000 sq ft each)	- Pedestrian-oriented educational displays fronting the sidewalk - Pavement enhancements along sidewalk in front of the site	2025 Addendum (this document)
9039 Sunset The Stand	- New full motion billboard with 2 sign faces (960 sq ft each) - New internally illuminated static billboard with 1 sign face (743 sq ft) - Removal of 2 existing video screens - Removal of a traditional billboard with 2 sign faces	- Remodel of the building façade facing Sunset Boulevard - Educational content fronting the sidewalk - Pavement enhancements along sidewalk in front of the site	2025 Addendum (this document)
8410 Sunset The Sunset Eclipse*	- New full motion billboards with 3 sign faces (Top Sphere: 750 sq ft, Bottom Sphere: 743 sq ft, Vertical: 463 sq ft) - Removal of 2 existing video screens	Full redevelopment of the site	Project-specific CEQA document

Table 6.1-1. Round 1.5 and Round 2 Billboard Projects

Project Address and Name	Billboards	Site Improvements, Façade Improvements, Public Realm Enhancements	Environmental Analysis
Round 2			
8250 Sunset Between Dog and Wolf	New full motion billboard with 1 sign face (1,000 sq ft)	Remodel of the building façade	2025 Addendum (this document)
8481-95 Sunset Sunset3*	- New full motion billboard with 1 sign face (1,584 sq ft) - New internally illuminated static billboards with 4 sign faces (2 faces of 1,250 sq ft each and 2 faces of 2,090 sq ft each) - Removal of 2 existing traditional billboards (1 sign face each)	Full redevelopment of the site	Project-specific CEQA document
8801 Sunset Tower Theater	New full motion billboard with 1 sign face (1,500 sq ft)	- Pedestrian plaza - Landscaping improvements, including a micro park in rear of property	2025 Addendum (this document)
8850 Sunset The Viper Room*	- New full motion billboard with 1 sign face (1,000 sq ft) - New internally illuminated static billboard with 1 sign face (1,000 sq ft) - Removal of 2 traditional billboards (totaling 3 sign faces)	Full redevelopment of the site	Project-specific CEQA document
8873 Sunset The Cape	New full motion billboard with 2 sign faces ¹ (1,000 sq ft and 500 sq ft)	Remodel of the building façade	2025 Addendum (this document)
8906 Sunset Blossom	- New full motion billboard with 2 sign faces (1,000 sq ft each) - Removal of 1 traditional billboard (totaling 2 sign faces)	- Landscaping and sidewalk improvements - Art installations - New electric vehicle charging stations - Installation of solar panels on rooftop of existing gas station	2025 Addendum (this document)
8919 Sunset The Fog and Clearing*	- New full motion billboard with 1 sign face (1,000 sq ft) - New internally illuminated static billboard with 1 sign face (500 sq ft)	Full redevelopment of the site	Project-specific CEQA document

Table 6.1-1. Round 1.5 and Round 2 Billboard Projects

Project Address and Name	Billboards	Site Improvements, Façade Improvements, Public Realm Enhancements	Environmental Analysis
9121 Sunset Sunset Cinema	New full motion billboard with 2 sign faces (1,000 sq ft each)	Historic designation of building	2025 Addendum (this document)
9176 Sunset Sunset Jewel*	New full motion billboards with 2 sign faces (2,307 sq ft and 500 sq ft)	Full redevelopment of the site	Project-specific CEQA document
9255-9229 Sunset Wonderwall	- New full motion billboard with 1 sign face (3,438 sq ft) - Removal of existing tall wall	- Pedestrian plaza with educational content - Site improvements along property frontages, including landscaping and seating - Rooftop garden (for aesthetic purposes only; would not be accessible or usable by the public or building tenants)	2025 Addendum (this document)

Notes: sq ft = square feet.

* Billboard project would be integrated into a new development project.

¹ The details of the billboard project at 8873 Sunset are currently pending. One sign face may be proposed as an internally illuminated static billboard instead of a full motion billboard. However, this document assumes that both sign faces would be full motion billboards, since full motion billboards are generally considered more intensive.

Public Realm, Project Area, and Façade Improvements

As shown in Table 6.1-1, a total of 5 projects are associated with new development projects, meaning that the proposed billboards would be integrated into the architecture of a new building. The remaining 11 projects would not involve new development but are nevertheless required by the City to include site or building refurbishment. These activities are briefly characterized in Table 6.1-1 and would generally involve new landscaping, pedestrian plazas along Sunset Boulevard, and/or new building façades facing Sunset Boulevard. Some of the pedestrian plazas would include educational displays. Several projects would incorporate unique sidewalk pavers in front of the property. Pedestrian plazas must be ADA accessible, and security lighting would be provided per requirements in the City's Municipal Code.

Construction and Operational Scenarios

Construction

Construction for Round 1.5 and Round 2 projects are anticipated to commence in June 2026 and would conclude in December 2028.⁸ Construction activities for each project would generally involve site preparation and demolition (if needed), new billboard construction, and building and/or landscaping improvements. Section 8.3, Air Quality, below, provides a more detailed representative construction scenario.

The process of new billboard construction generally entails drilling a pole foundation, followed by placement of a billboard column into the footing. Next, the sign face (which is generally fabricated off site) is affixed to the billboard column. New foundations are typically 35 feet to 45 feet in depth and 5 feet in diameter, as described in the adopted IS/ND. Based on the City's subsequent project-specific experiences during implementation of Round 1 projects (some of which have already been constructed at the time of this writing), actual excavation depths can be as low as approximately 20 feet or as deep as approximately 75 feet.

Development schedules and construction scenarios for billboard projects that are integrated into new development are unknown and speculative and will be dependent on the design process, review schedules, and entitlements for the larger development projects.

Operations

Maintenance. The adopted IS/ND explains that maintenance activities for billboard projects are limited. Full motion billboards required periodic maintenance of the electrical components. Traditional and/or internally illuminated static billboards require advertising copy changes and occasional light bulb replacements. Copy changes are generally assumed to occur once per month and generally require one truck and work crew to perform. As described in Table 6.1-1, some projects would include new or additional landscaping. For certain properties (particularly those that do not currently contain landscaping), the introduction of landscaping could result in additional maintenance activities. In balance, this document assumes that each billboard project is anticipated to involve approximately two maintenance events per month, with each maintenance event involving one crew visiting the site to perform maintenance on landscaping, pedestrian plazas, and/or billboards.

⁸ Note: this schedule does not include construction of new development projects that include billboards. The construction schedules of the new development projects are expected to extend beyond December 2028.

Electricity Use. Implementation of the modified signage development scenario would result in an increase in electricity use along the Sunset Strip. The estimated electricity use of the modified signage development scenario is presented in Section 8.15, Utilities and Service Systems.

Lighting and Signage Programming. Programming of the signs would primarily consist of off-site advertising. However, in accordance with the Sunset Boulevard Off-Site Signage Policy, public art or civic announcements must be displayed periodically, in a manner consistent with the policy. All light-emitting technology incorporated into the billboard projects, including the billboards themselves and any new outdoor lighting, would be subject to the lighting regulations in the Sunset Boulevard Off-Site Signage Policy.

Methodology for Analysis

As described above, the modified signage development scenario encompasses billboard projects proposed as part of Round 1, Round 1.5, and Round 2. It is noted, however, that billboard projects incorporated into new development projects are subject to individual review and analysis under CEQA. The environmental impacts associated with construction and operation of the new development projects, together with their billboard components, has been (or will be) addressed and quantified as required in CEQA documents for the new development projects. As such, the construction and operation of new development projects that include billboards are not considered as part of the analysis in this addendum. Nevertheless, the information in this addendum regarding billboard development may be incorporated by reference into future CEQA documents for the new development projects, as applicable, and information about these larger projects has been included herein, where practicable.

Additionally, some of the Round 1 projects are already constructed or will soon be constructed, as noted above. Development of the Round 1 projects has already been analyzed in prior CEQA documents. However, Round 1 projects are considered in this addendum to the degree that they would overlap with, or otherwise create an additive effect with, Round 1.5 and 2 billboard projects. Examples include operational electrical demand, greenhouse gas emissions, and potential overlap of construction activities for Round 1 projects that are yet to be built.

6.2 Proposed Policy Amendments

6.2.1 Description of the Adopted Policy

The approved project consists of a policy document (the “Sunset Boulevard Off-Site Signage Policy”), which amended the City’s Zoning Ordinance and the SSP to revise regulations for digital billboards and off-site signage (including tall walls, static and traditional billboards, and temporary advertising installations) along the 1.6-mile corridor of Sunset Boulevard known as the Sunset Strip. In summary, the regulations include the following:

1. Updated standards, requirements, and guidelines for integrating new billboards into new development and significant upgrade projects;
2. Opportunities for providing digital sign faces on the Sunset Strip, either integrated into new development or significant building upgrade projects, or as a conversion from a traditional billboard, if the billboard is on a site with a designated cultural resource; and

3. Updated regulations for modifications to existing static billboards (referred to as “modifications” or “standard modifications”).
4. Updated regulations for tall walls, including allowances for modifications to existing tall walls and installation of new tall walls.

For the purposes of CEQA, the IS/ND analyzed a reasonably foreseeable development scenario formulated based on the design criteria in the policy, in conjunction with the historical number of off-site signs that have been approved since adoption of the SSP.

6.2.2 Description of the Proposed Policy Amendments

The City is proposing changes to the adopted Sunset Boulevard Off-Site Signage Policy. Changes to the policy are summarized below. The summary below focuses on proposed changes that could potentially affect the original analysis or conclusions within the ND.

The “Lighting and Operational Standards,” “Architectural Lighting,” and “Definitions” sections of the adopted policy would be amended to broaden and clarify the applicability of the various light/glare requirements from the adopted policy and to add new requirements. Some of the proposed revisions incorporate recommendations from the *Sunset Boulevard Arts & Advertising Program Sign Lighting Study* (Appendix A).

The applicability of luminance (i.e., brightness) limits would be clarified, such that these limits would apply to all off-site advertising signs, outdoor lighting (including architectural lighting), temporary displays, and creative or promotional installations. (Under the adopted policy, luminance limits are generally applied to what are currently referred to in the adopted policy as “digital billboards.”) Additional specifications for brightness limits would also be provided for any billboard with sign area in excess of 1,000 square feet, such that brightness would be reduced commensurate with increased sign area. A new requirement would be incorporated specifying that billboards abutting residentially zoned properties must be oriented toward Sunset Boulevard and away from the residentially zoned property line(s). Regulations for the speed of animated content included in the adopted policy have been revised to further clarify. Monitoring and reporting requirements for light levels, which are currently only applicable to what are currently referred to as digital billboards, would apply to all new or modified off-site advertising signs requiring a development agreement. The amended policy would clarify that testing and reporting of light levels must be completed by the City’s independent lighting consultant. Conversely, under the adopted policy, the required monitoring and reporting can be conducted by the billboard applicant, operator, or their representative. The revisions also specify that a lighting monitoring test demonstrating compliance with the policy’s lighting standards must be completed prior to the issuance of a Certificate of Occupancy for the off-site advertising sign(s). In contrast, the adopted policy specifies that a lighting monitoring report needs to be submitted “upon installation” of the sign. The revised specifications for the timing of the initial lighting test would ensure that new or modified off-site advertising sign(s) are not initially operating above the allowable light levels. Consistent with the adopted policy, lighting monitoring would still need to be conducted at three-year intervals during operations under the amended policy. The amended policy, however, also includes a stipulation allowing the City to request a lighting monitoring test at any point to confirm ongoing compliance with applicable standards.

7 Summary of Environmental Effects Identified in the Adopted IS/ND

The adopted IS/ND identified that the approved project would result in no impact or in less-than-significant impacts for all environmental topic areas under CEQA, as listed below.

- Aesthetics
- Agriculture, Forestry, and Mineral Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions, including energy consumption
- Hazards and Hazardous Materials, including Wildfire
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing, Public Services, and Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

The adopted policy includes a variety of environmentally protective measures that are described in the adopted IS/ND. Some of the environmental significance conclusions in the IS/ND rely on the environmental protections set forth in the policy, particularly the significance conclusions in the categories of aesthetics, biological resources, cultural and tribal cultural resources, greenhouse gas emissions, and noise. In addition to the protections required pursuant to the policy, a variety of regulations are in place at the local, state, and federal level that would address potential effects of construction and operation associated with off-site signage projects. These include laws for structural, seismic, and geologic safety and stability; regulations for handling hazardous materials that may be used for or encountered during construction or maintenance; local ordinances for construction traffic control; and local ordinances governing noise created by construction and operational activities. Through compliance with the adopted policy and other applicable regulations for environmental protection, the analysis in the IS/ND determined that significant, unavoidable impacts would not occur.

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8 Environmental Impact Analysis for the Proposed Changes

8.1 Aesthetics

8.1.1 Environmental Analysis

As described in the adopted IS/ND, the aesthetic impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the proposed modifications to the signage development scenario and the proposed policy amendments would not alter this conclusion. New significant impacts to aesthetics would not result, and substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures would not result, for the reasons further described below.

As described in the IS/ND, the Sunset Strip Off-Site Signage Policy includes provisions that prevent new or modified billboards from obstructing public views (thereby reducing effects to scenic vistas) and regulations pertaining to design excellence (thereby reducing effects to visual character/quality). These same provisions remain in place and would continue to reduce the effects of the project to below a level of significance, under either the original or the modified signage development scenarios.

The IS/ND analyzes a signage development scenario that included a development envelope of 18 new billboard faces along the Sunset Strip, 17 of which were anticipated to be digital (i.e., full motion). Under the modified signage development scenario, 38 additional billboard faces would be developed at full buildout. However, the modified signage development scenario also includes the removal of 23 existing sign faces, thus resulting in a net increase of 15 billboard faces relative to the original signage development scenario. The proposed policy amendments would strengthen and clarify the lighting regulations from the adopted policy, as further discussed under the subheading “Light/Glare,” below. The proposed policy amendments would ensure that even with an expanded billboard development scenario, the light/glare impacts of the SAAP would remain less than significant.

Scenic Vistas and State Scenic Highways

Public views of the Los Angeles Basin and the Hollywood Hills are available from Sunset Boulevard and are generally considered scenic. Views of these scenic vistas are typically available from corridors formed by north-south streets that intersect with Sunset Boulevard. Views from public vantage points to the north of Sunset Boulevard looking south toward the Los Angeles Basin are typically partially or entirely obstructed by intervening topography, structures, vegetation/landscaping, and other elements of the surrounding urban landscape. Similarly, views from public vantage points south of Sunset Boulevard looking north towards the Hollywood Hills are typically partially or entirely obstructed for the same reasons. The new billboards are proposed on properties that are already developed with structures. As such, the new billboards would not introduce new visual features where there currently are none, thereby reducing potential new effects to scenic vistas that are available from Sunset Boulevard. Furthermore, the adopted Sunset Strip Off-Site Signage Policy contains several design provisions that would reduce the effects of the proposed new billboards on scenic vistas. For example, the policy promotes the integration of new billboards into the architecture and design of the existing buildings on which they are located. Furthermore, billboards along the

Sunset Strip are positioned so that they are visible to east–west travelers along Sunset Boulevard, as opposed to observers looking north toward the Hollywood Hills or south toward the Los Angeles Basin. As with existing billboards, the new billboards would also be generally oriented for east–west viewing, thereby reducing north–south obstructions. Applicants for the new billboards are also required to submit sightline studies demonstrating that visual obstructions from public vantage points would not occur.⁹ Due to the existing visual conditions along the Sunset Strip, the general orientation and massing of billboards, and policy requirements that prevent substantial visual obstructions, the modified signage development scenario is not expected to result in significant effects to scenic vistas.

The nearest highway listed on the California State Scenic Highway Map is the Interstate 110 which is considered a federal byway and is located approximately 7 miles southeast of the project area. The next nearest highway is Highway 1 which has eligible state scenic highway status and is located approximately 7.5 miles southwest of the project area (Caltrans 2018). Due to the distance of the closest state scenic highways, the modified signage development scenario is not expected to result in significant effects to state scenic highways.

Visual Character/Quality

As described in the IS/ND, the Sunset Strip Off-Site Signage Policy includes a number of standards that would prevent new billboards from causing visual blight or new obstructions. It is the intent of the policy to improve and protect the visual character and quality of the Sunset Strip, and new billboards developed in compliance with the policy are not expected to substantially degrade the visual character or quality of the project area, as stated in the IS/ND. The Sunset Strip is characterized by an abundance of signs, pedestrian and automobile traffic, entertainment venues, and other visual elements contributing to a vibrant and visually rich urban scape. While the modified signage development scenario would expand the number of sign faces relative to what was analyzed in the IS/ND, the additional sign faces have would not substantially degrade the existing visual character or quality of the project area. Rather, such signs would contribute to achieving the City’s established vision for the Sunset Strip, which includes a signage environment that is innovative and noteworthy and that would propel the Sunset Strip into the forefront of unique, creative outdoor media, consistent with its history of renowned signage. The proposed new sign faces have undergone a rigorous selection process facilitated by the City. During this process, experts in the fields of architecture, media, arts, advertising, and historic resources preservation reviewed billboard applications and selected the billboard projects that are part of Rounds 1, 1.5, and 2. These billboard projects were chosen based on design excellence and exemplification of the City’s vision for the Sunset Strip. As such, the proposed new sign faces have already undergone review by experts in relevant fields for their design and appearance in the context of the Sunset Strip. While new sign faces would alter the appearance of the Sunset Strip, these changes would support planning and design goals for the project area and would be consistent with the vibrant, urban character of the project area. For these reasons, the modified signage development scenario would not substantially degrade the existing visual character/quality of the project area.

Shade/Shadow

Additional shading and shadow could result from the proposed new billboards. However, as explained in the IS/ND, billboard structures are small in massing relative to most other structures along the Sunset Strip. Shadows cast by the new billboards would be small and would be generally subsumed within shadows created by nearby buildings

⁹ The City does not have policies for protection of private views; as such, this analysis addresses views from public vantage points. Furthermore, effects on private views are not considered impacts on the environment generally under CEQA.

and structures. While some new billboards could extend above existing buildings, the shadows cast by billboard structures are generally long and narrow and rarely cover the entirety of a structure or a property. Additionally, many of the buildings in the project area are commercial in nature with limited outdoor space and shade sensitive uses. Furthermore, the policy encourages new billboards to be integrated within buildings and architecture. As such, many of the proposed new billboards are not designed such that substantial new shadows would be cast. For these reasons, the modified signage development scenario is not anticipated to create substantial shade/shadow in the project area, such that shade-sensitive uses would be adversely affected.

Light/Glare

The City recently conducted an updated lighting study for off-site signage on the Sunset Strip (the *Sunset Boulevard Arts & Advertising Program Sign Lighting Study* [Appendix A], hereafter referred to as the “Lighting Study”). A lighting study was also completed in support of the adopted policy and IS/ND (FKA 2017); however, policy implementation has evolved since 2019 and the City determined that an updated study was necessary. The City has been actively implementing the adopted policy for approximately 5 years, and during this time, signage technologies have progressed, the design, scope, and configuration of signage proposals received by the City has evolved, and additional rounds of Design Excellence Screening have been conducted, as discussed in Chapter 4 and in Section 6.1.2 of this addendum. The Lighting Study presents a quantitative analysis of approved and proposed billboards along a particular section of the Sunset Strip (“study area”) that is representative of a worst-case scenario for light/glare effects, considering these updated conditions. The study area was selected based on the proposed density of signs and their proximities to residentially zoned properties. The Lighting Study analyzes approved and proposed billboards within this selected study area, assuming that each billboard uses the maximum allowable brightness levels from the adopted policy, regardless of billboard size. With these assumptions, the analysis demonstrates an exceedance of light trespass requirements as listed in the adopted policy at several residentially zoned properties in the vicinity of the study area. The Lighting Study sets forth recommendations for additional lighting requirements that would address these exceedances. The recommendations consist of sign face orientation requirements for billboard projects abutting residentially zoned properties and luminance (brightness) limitations that are more stringent for billboards that exceed 1,000 square feet in sign area. These recommendations have been incorporated into the proposed policy amendments and would be applied in the review and approval of all future billboard projects, including those currently under review. With the amended policy applied to the expanded billboard development scenario, billboards on the Sunset Strip would not create light trespass that exceeds the adopted policy’s threshold of 1.4 footcandles at residentially zoned property lines, even at locations with high concentrations of signs in proximity to residentially zoned properties (Appendix A). As such, with incorporation of the recommendations from the Lighting Study, compliance with the policy would continue to effectuate less-than-significant impacts in the category of light/glare.

It is noted that the threshold of 1.4 footcandles at residentially zoned property lines was established as part of the adopted policy and would remain a requirement in the amended policy. This threshold is supported by evidence including the adopted IS/ND and the original lighting study conducted for the adopted policy (City of West Hollywood 2019b; FKA 2017). The threshold is applied to residentially zoned properties on the border of the SSP. Properties within the SSP zoning district are not subject to this threshold. The Sunset Strip is well known as an area of higher intensity nighttime uses, where increased lighting, noise, traffic, etc. are expected elements of the environment. As described in the SSP, the Sunset Strip is a “major traffic thoroughfare for the Los Angeles region” (City of West Hollywood 2019a). The SSP further identifies residential uses within its boundaries as secondary uses, with commercial spaces being predominant. Residential uses on commercial properties within the SSP are also described as providing a buffer between the commercial areas of Sunset Strip and adjacent residential

neighborhoods. The SSP acknowledges the plan's potential to result in significant impacts to adjacent residential land uses, but such impacts are not identified for the residential land uses within the SSP itself (City of West Hollywood 2019a). Similarly, residential uses within the SSP are not reviewed for light trespass under the adopted policy or the proposed amended policy. While hotel uses can also be considered light-sensitive receptors in some cases, such uses have transient residential occupancies, and in this instance, guests along the Sunset Strip are presumed to expect higher intensity nighttime uses including elevated levels of light and other effects such as noise. For these reasons, the City has determined, as part of developing the adopted policy, that residences and hotels zoned SSP are not subject to the policy's light trespass standard. The applicability of this standard would not change under the policy amendments. It is noted that residences and hotels within the SSP zoning district still benefit from the overall brightness limitations and visual comfort controls in the policy, which would be broadened and strengthened under the amended policy.

In addition to incorporating recommendations of the Lighting Study, the proposed policy amendments also include changes to the light monitoring requirements. These changes would increase the stringency and widen the applicability of such requirements. Specifically, the proposed revisions would strengthen this aspect of the policy by ensuring that lighting from off-site signage projects is thoroughly and accurately monitored and adjusted as needed for policy compliance.

Changes to the policy's Lighting and Operational Standards would not alter the conclusions presented in the adopted IS/ND. The Lighting Study demonstrates that compliance with its recommendations (which have been incorporated into the amended policy) would effectuate less-than-significant impacts to light/glare, even at the worst-case-scenario signage development location along the Sunset Strip. While light trespass is reviewed specifically at residentially zoned property lines adjacent to the SSP, compliance with the amended policy would also limit overall light and glare along the Sunset Strip. For these reasons, no new significant impacts would result, and no previously identified significant impacts would increase in severity.

Daytime Glare

The above-described policy requirements would limit the light and glare effects of illuminated billboards and associated architectural lighting. However, some billboard projects may contain other sources of light and glare. Specifically, the billboard project at 8222 Sunset Boulevard would include installation of solar panels, and the billboard project at 8906 Sunset Boulevard would include replacement and upgrade of existing solar panels. At 8222 Sunset, solar panels would be installed on the south-facing side of the billboard structure. At 8906 Sunset, existing solar panels on the rooftop of an existing gas station canopy would be replaced and updated equipment. The proposed solar panels have the potential to create daytime glare; however, they would not be expected to cause significant glare because solar panels are designed to absorb as much sunlight as possible and therefore have minimal reflectivity. Any glare elements would be further reduced by intervening elements in the immediate viewshed of the highly urbanized project area. Additionally, some billboard projects have been designed with metallic support structures. For example, the billboard at 8801 Sunset would be supported with micro-perforated stainless steel panels. Certain metallic building materials can result in daytime glare. However, any such metallic support structures would have anti-reflective coatings to minimize daytime glare. Other potentially reflective materials would be limited to minor decorative accents, which would not have large surface areas and would generally be shielded by other architectural elements. For these reasons, no new significant sources of daytime glare would be introduced by the modified signage development scenario.

8.1.2 Changes in Circumstances/New Information

Since adoption of the policy and the IS/ND in 2019, changes have occurred to the visual environment of the project area. Specifically, at the time of this writing, 13 signage projects proposed under the policy have been approved, 10 of which are fully constructed and operational. As such, the number and types of off-site signs along the Sunset Strip have changed since 2019. However, these changes are consistent with the expected outcomes of policy implementation, as described and analyzed in the adopted IS/ND. As mentioned in Chapter 4, the City has conducted three rounds of Design Excellence Screening for signage projects. Buildout of Rounds 1, 1.5, and 2 would alter the visual environment of the Sunset Strip. However, this change is consistent with policy direction and design decisions from the City's decision-making bodies. The adopted policy, together with the proposed policy amendments that strengthen light/glare requirements, would continue to ensure that signage projects do not result in significant environmental impacts in the category of aesthetics. For these reasons, 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 that would change the impact conclusions in the IS/ND.

8.2 Agriculture, Forestry, and Mineral Resources

8.2.1 Environmental Analysis

The analysis in the adopted IS/ND for the approved project determined that the project would result in no impact in the categories of agriculture and forestry resources and mineral resources (see Sections 3.2 and 3.11 in the IS/ND). The modified signage development scenario and proposed policy amendments would not result in new significant impacts or a substantial increase in severity of previously identified significant impacts related to agriculture, forestry, and mineral resources, for the reasons described below.

As discussed in the adopted IS/ND, there are no existing agriculture or timberland land uses on or near the project area. In addition, the project area is zoned Sunset Specific Plan, which does not allow for agriculture or timberland uses (City of West Hollywood 2019a, 2011). Furthermore, the City does not contain any agricultural land, agriculturally zoned land, or land under a Williamson Act contract (CDOC 2022a, 2022b). As such, the analysis in the IS/ND concluded that the approved project would result in no impacts to agriculture and forestry resources. Under the modified signage development scenario, the project area would remain the same; as such, the same conclusions presented in the adopted IS/ND would continue to apply to the modified signage development scenario. As such, the modified signage development scenario would not result in new significant impacts, nor would it result in a substantial increase in the severity of previously identified significant impacts related to agriculture and forestry resources.

As analyzed in the adopted IS/ND, the approved project would not result in impacts to mineral resources, as no known mineral resources are located within the City, nor is the project area used for mineral resource extraction. Under the modified signage development scenario, the project area would remain the same; as such, the same conclusions presented in the adopted IS/ND would continue to apply to the modified signage development scenario. Therefore, the modified signage development scenario would not result in new significant impacts, nor would it result in a substantial increase in the severity of previously identified significant impacts related to mineral resources.

8.2.2 Changes in Circumstances/New Information

A comparison of Google Earth aerial images from 2019 (when the IS/ND was adopted) and 2025 confirms that no new agricultural, forestry, or mineral resource-related uses or resources have been introduced to the project area. No new regulations have been implemented that would alter the conclusions or the analysis of the originally approved project in the categories of agricultural and forestry resources or mineral resources. Therefore, there are no substantial changes with respect to circumstances under which the modified signage development scenario and proposed policy amendments will be undertaken, and there is no new information of substantial importance that has become available relative to these environmental issue areas that would change the impact conclusions in the IS/ND.

8.3 Air Quality

8.3.1 Environmental Analysis

As described in the adopted IS/ND, the air quality impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the proposed modifications to the signage development scenario and the proposed policy amendments would not alter this conclusion. New significant impacts to air quality would not result, and substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to air quality and thus would not alter the potential effects of off-site signage projects on air quality relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario. This analysis is supported by information in Appendix B of this addendum.

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 IS/ND determined that the approved project would result in less than significant impacts relative to conflicts with the applicable AQMP from the South Coast Air Quality Management District. The criteria for consistency with the applicable AQMP from the South Coast Air Quality Management District 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 approved project demonstrated that it would generate minimal criteria 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 demonstrated by the detailed analysis presented in Appendix B for the modified project, the modified project also would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to

new air quality violations, or delay attainment of standards specified in the AQMP. The modified project would not conflict with the first criterion for consistency with the applicable AQMP.

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 IS/ND, the approved project was not associated with population growth in the region. Similarly, signage development under the modified project is considered consistent with the existing land use designation for the project area and would not generate an increase in growth. As such, the modified project would not conflict with the second criterion for consistency with the applicable AQMP.

It is noted that the new development projects with billboard components could potentially be associated with growth in residential and/or commercial development. As also stated in the adopted IS/ND, such projects are not expected to exceed applicable growth forecasts. Nevertheless, their potential to conflict with the AQMP has been (or will be) analyzed as required in project-specific, standalone CEQA documents.

Based on these considerations, impacts related to the modified project's potential to conflict with or obstruct implementation of the applicable AQMP 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 consistency with an applicable air quality plan.

Criteria Air Pollutant Emissions

As determined in the adopted IS/ND, construction activities associated with the approved project would fall below the South Coast Air Quality Management District's significance thresholds for criteria air pollutants. In Appendix B, the modified project's construction emissions are quantified and compared to the significance thresholds, as well as to the emissions originally disclosed in the IS/ND. As demonstrated in Appendix B, the construction emissions estimated for the modified project would also fall below the South Coast Air Quality Management District thresholds. It is noted, however, that construction emissions for the modified project as shown in Appendix B are higher than those shown in the adopted IS/ND. The analysis in Appendix B conservatively reflects the modeling of a worst-case construction scenario, with the potential for 3 billboard projects to be undergoing construction at the same time (while the results from the IS/ND reflect emissions from a single billboard construction effort). Additionally, billboards associated with Rounds 1.5 and 2 are generally more intensive than those contemplated in the IS/ND analysis. As such, construction emissions would be greater under the modified project when compared to the approved project but would remain below the level of significance for the modified project.

As explained in the adopted IS/ND, operational activities associated with the approved project were assumed to be minimal and periodic in nature, resulting in less than significant impacts. Operational emissions were addressed qualitatively in the adopted IS/ND, based on the limited nature of anticipated operational activities. In Appendix B, the operational activities of the modified project are quantified, in order to ensure that even with the additional billboard projects proposed under the modified project, operational emissions would be below a level of significance. The quantitative analysis in Appendix B demonstrates minimal to negligible operational emissions from the modified project. As such, operational impacts would remain less than significant for the modified project.

Overall, no new significant impacts have been identified for criteria air pollutant emissions, and no previously identified significant impacts would substantially increase in severity.

Sensitive Receptors/Localized Impacts

As determined in the adopted IS/ND, impacts related to sensitive receptors and localized impacts were determined to be less than significant. This analysis was conducted by comparing construction emissions from a single billboard construction effort to the applicable localized significance thresholds. As discussed under “Criteria Air Pollutant Emissions” above, the construction emissions analysis for the modified project assumes the potential for 3 overlapping billboard construction projects, as well as more intensive construction scenarios. The localized air quality analysis in Appendix B reflects the overlapping construction efforts and more intensive construction scenarios assumed for the modified project (as described above under “Criteria Air Pollutant Emissions”). Even with this increase in assumed intensity, the localized emissions from the modified project were still found to fall below a level of significance. Other air quality topics pertaining to localized air quality impacts and nearby sensitive receptors (such as carbon monoxide hotspots, toxic air contaminants, and health effects of criteria air pollutants), are discussed in Appendix B for the modified project. Impacts were determined to be less than significant. As such, no new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

Odors and Other Emissions

As with the approved project, the modified project would not introduce a new source of substantial odors or other emissions to the project area. While some odors may occur during construction (e.g., as a result of construction equipment or asphalt pavement application), such odors would disperse rapidly from project sites and would not affect substantial numbers of people. Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. As described in the adopted IS/ND and in Appendix B, the approved and modified projects would not entail the development of any such odor-generating land uses. For these reasons, impacts would remain less than significant for the modified project. The modified project would not lead to new impacts, and no previously identified significant impacts would substantially increase in severity.

8.3.2 Changes in Circumstances/New Information

The air quality analysis presented in Appendix B and summarized above takes into account new information and changes in circumstances that could have affected the analysis, such as updates to the California Emissions Estimator Model, updates in energy efficiency standards, adoption of an updated AQMP, and updates to the Appendix G thresholds in the CEQA Guidelines. As further substantiated in Appendix B of this addendum, there are no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to air quality that has changed the impact conclusions in the IS/ND.

8.4 Biological Resources

8.4.1 Environmental Analysis

As described in the adopted IS/ND, no impacts would occur in the category of biological resources, with the exception of potential impacts to nesting birds. As described in the IS/ND, billboard projects have the potential to disturb ornamental vegetation that could provide potential nesting sites for birds that are protected under Sections

3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act (1918). However, for any billboard-related construction activity occurring during the nesting season (February 1–August 31) that would involve vegetation trimming or removal, the Sunset Boulevard Off-Site Signage Policy requires that a qualified biologist survey the immediate area for the presence of an active bird nest and that any active nests are not disturbed or otherwise adversely affected during construction. Upon compliance with this provision, the analysis in the IS/ND determined that the construction activities associated with billboard projects would not have an adverse effect on protected nesting birds. As demonstrated in the analysis below, the modified project would not alter this conclusion. New significant impacts to biological resources would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons described below.

The proposed policy amendments do not pertain to biological resources and thus would not alter the potential effects of off-site signage projects on biological resources relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

The proposed modifications in the signage development scenario would not change the determinations in the IS/ND relative to biological resources. As described in the IS/ND, biological resources are not generally present along the Sunset Strip. As such, neither the original signage development scenario nor the modified signage development scenario would have the potential to adversely affect biological resources, with the exception of the potential nesting bird impacts that are identified in the IS/ND. As with the signage development scenario analyzed in the IS/ND, signs developed as part of the modified signage development scenario would also have the potential to affect nesting birds. However, all signs would continue to be subject to the regulations established in the Sunset Strip Off-Site Signage Policy. Under the Sunset Strip Off-Site Signage Policy, construction activities that involve vegetation trimming or removal and occur between February 1 and August 31 require that a qualified biologist must survey the immediate area for the presence of an active bird nest. If an active bird nest is located within the disturbance area, avoidance measures shall be developed by the biologist to ensure compliance with the Migratory Bird Treaty Act. The Migratory Bird Treaty Act specifically states that it is unlawful by any means or manner to pursue, hunt, take, capture (or) kill any migratory bird, any part, nest, or egg of any such bird. Upon compliance with the established provisions in the policy for the protection of nesting birds, which also ensure compliance with the Migratory Bird Treaty Act, construction activities associated with billboards developed under the modified signage development scenario would not have an adverse effect on protected nesting birds.

Due to the highly developed nature of the Sunset Strip and the types of operational activities that billboards entail (i.e., periodic truck trips and advertising copy changes), operations would not adversely affect nesting birds that may be present on the Sunset Strip. The modified signage development scenario would lead to a marginal increase in operational maintenance activities relative to the signage development scenario that was analyzed in the IS/ND, as explained in Section 6.1.2 above. However, in the context of the urbanized, heavily trafficked environment of the Sunset Strip, a marginal increase in periodic truck trips and maintenance activities would not pose an adverse effect to nesting birds. It is also noted that many of the billboard projects within Rounds 1.5 and 2 include new landscaping or landscaping improvements, which may serve or add or improve potential nesting opportunities in the project area during project operation.

For the reasons described above, potential nesting bird impacts would remain less than significant. As such, the modified signage development scenario and proposed policy amendments 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 biological resources.

8.4.2 Changes in Circumstances/New Information

The project area remains urbanized and continues to lack wetland vegetation, natural drainages, or sensitive natural communities. While some changes in ornamental vegetation may have occurred due to ongoing development and/or property improvements along the Sunset Strip, ornamental vegetation is not considered a sensitive biological resource. As described above, the Sunset Strip Off-Site Signage Policy includes protections for birds that may utilize ornamental vegetation along the Sunset Strip for nesting sites.

As mentioned in Section 6.1.2 above, 38 additional billboard faces would be developed under the modified signage development scenario at full buildout. However, the modified signage development scenario includes the removal of 23 existing sign faces, leaving a net increase of 15 billboard faces relative to the original signage development scenario. To address public concerns related to potential effects of billboard-related lighting on wildlife in the vicinity of the Sunset Strip, an Analysis of Lighting Effects on Wildlife Memorandum was prepared for the modified signage development scenario (Appendix E2). While implementation of the modified signage development scenario would incrementally increase ambient nighttime lighting along the Sunset Strip and in the immediate vicinity, wildlife in the area already exists within an artificially illuminated environment, with existing lighting measurements north of Sunset Boulevard already exceeding full-moon lighting conditions. When lighting associated with proposed off-site signage reaches the nearest potential habitat area, it would be substantially diminished due to distance, generally to an average level that would fall at or below that of a bright full moon. Additionally, substantial glare effects have not been identified at locations to the north of the Sunset Strip. The environment in the area has already been substantially altered by existing artificial nighttime lighting sources, such as streetlamps, building and security lighting on residences and businesses, vehicle headlights, sky glow from the Los Angeles basin, etc. Wildlife in the vicinity of the Sunset Strip is thus already adapted to these conditions, which have likely resulted in both positive and negative effects to wildlife behavior and biodiversity in the area. The proposed addition of new lighting sources to this area in the form of off-site signage would not substantially change these conditions, particularly given the diminishment of illuminance by the time billboard-related lighting reaches the nearest naturalized area. While artificial nighttime lighting sources have various effects to wildlife, given the existing conditions in the area of the Sunset Strip and the calculated light trespass levels, substantial effects attributable to the modified signage development scenario would not be expected (Appendix E2).

As such, there are no substantial changes with respect to the circumstances under which the modified signage development scenario and proposed policy amendments will be undertaken, and there is no new information of substantial importance that has become available relative to biological resources that would change the impact conclusions in the adopted IS/ND.

8.5 Cultural Resources

8.5.1 Environmental Analysis

As described in the adopted IS/ND, cultural resource impacts of the Sunset Strip Off-Site Signage Policy, analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the modified project would not alter this conclusion. New significant impacts to cultural resources would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons described below.

The proposed policy amendments do not pertain to cultural resources and thus would not alter the potential effects of off-site signage projects on cultural resources relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

Archaeological Resources and Human Remains

Several billboard projects proposed under Rounds 1.5 and 2 have the potential to result in ground disturbance, similar to many of the billboard projects proposed under Round 1. New billboards requiring a standalone pole structure and foundation typically require excavations that are approximately 20–45 feet deep, although some may extend as deep as 75 feet, depending on the billboard design and site soil conditions. Landscaping and paving improvements associated with some billboard projects would involve ground disturbance as well (although ground-disturbing activities would be relatively shallow compared to billboard pole excavations). Adverse effects to archaeological resources can occur if significant resources are uncovered during ground disturbance and subsequently destroyed, otherwise harmed, and/or not properly preserved in accordance with applicable laws.

The IS/ND states that no prehistoric or historic archaeological resources were identified in the project area based on a records search at the South Central Coastal Information Center (SCCIC). However, given the time that has passed since the records search referenced in the IS/ND, a new records search was conducted for the project area for the purposes of this document (see Appendix C1 for details). The findings of this updated records search continue to show that there are no recorded archaeological resources in the project area. Additionally, a search of the Native American Heritage Commission's Sacred Lands File was conducted in March 2025, and the search was completed with negative results. As such, no new archaeological resources have been identified in the project area since the time of the adopted IS/ND. Nevertheless, as explained in the adopted IS/ND, the potential exists for uncovering a previously unknown archaeological resource during ground-disturbing activities (particularly those required for excavating new pole foundations). As explained in the adopted IS/ND, the policy includes requirements established for the protection of archaeological resources. Specifically, any modification to existing signage involving ground disturbance must be reviewed by a qualified archaeologist prior to any ground disturbance taking place. The archaeologist must provide an assessment of archaeological sensitivity and the potential to impact subsurface deposits and may provide recommendations for archaeological monitoring, additional study, or testing, if warranted. Additionally, in the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities, all construction work occurring within 100 feet of the find must immediately stop until a qualified archaeologist can evaluate the significance of the find. The City has been applying these requirements as conditions of approval to each new billboard project and would continue to do so under the modified project. As such, in the unlikely event that archaeological resources or human remains are encountered during excavation activities, such resources would be identified and protected to the extent required by law. Impacts would remain less than significant, for the same reasons as identified in the IS/ND. As such, the modified signage development scenario and proposed policy amendments 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 archaeological resources.

Historic Built Environment Resources

As stated in the IS/ND, the Sunset Strip contains numerous historic built environment resources. Billboard projects have the potential to indirectly impact historical resources by obscuring significant character-defining features of the building or historic views of the Sunset Strip. Provisions were built into the Sunset Boulevard Off-Site Signage Policy to prevent significant impacts to historical resources. As set forth in the policy and as described in the adopted IS/ND, off-site signage projects located on or directly adjacent to historical resources would be required to conform

with the Secretary of the Interior’s Standards for Rehabilitation. Such projects are also required to be issued a Certificate of Appropriateness by the Historic Preservation Commission.

As with the original signage development scenario, some of the billboards developed under the modified signage development scenario may occur on or adjacent to a historic resource. At the time of the IS/ND, the specific locations of future billboard projects were unknown. However, billboard projects have since been selected as part of Rounds 1, 1.5, and 2, and projects that are located on or adjacent to a historic resource can be identified. Projects within Round 1 that are located on or adjacent to a historic resource are discussed and listed in the 2021 Addendum. Table 8.5-1 shows the list of Round 1.5 and Round 2 projects and identifies which projects are located on or adjacent to a historic resource.

Table 8.5-1. Historic Built Environment Resources

Project Address and Name	Historic Status of On-Site Buildings	Historic Status of Adjacent (Next-Door) Buildings
8222 Sunset The Chrysalis	On-site building found ineligible (6Z) and is proposed for demolition ¹	8218 Sunset (eligible for NR, CR, and local register) ²
8300 Sunset The Standard Hotel	On-site building eligible for NR and local register, listed on CR	8341 De Longpre Ave ("William S. Hart House;" locally designated)
8371 Sunset Saddle Ranch	On-site building found ineligible (6Z)	Adjacent buildings not designated or eligible for historic designation (6Z)
8440 Sunset ("Mondrian")	On-site building found ineligible (6Z)	Adjacent buildings not designated or eligible for historic designation (6Z)
9039 Sunset ("The Stand")	On-site building not historic age	Adjacent building not designated or eligible for historic designation (6Z)
8410 Sunset ("The Sunset Eclipse")*	On-site building not historic age	Adjacent buildings not designated or eligible for historic designation (6Z)
8250 Sunset ("Between Dog and Wolf")	On-site building found ineligible (6Z) ¹	Adjacent building not designated or eligible for historic designation (6Z)
8481-95 Sunset ("Sunset3")*	On-site building found ineligible (6Z)	Adjacent building is not historic age
8801 Sunset ("Tower Theater")	On-site building not eligible for historic designation but may warrant special consideration in local planning (6L)	1127 Horn Avenue (locally designated)
8850 Sunset ("The Viper Room")*	On-site buildings approved for demolition in 2024; no on-site buildings identified as historic resources	Adjacent building is not historic age
8873 Sunset ("The Cape")	On-site building not historic age	Adjacent building not eligible for historic designation (6Z)
8906 Sunset ("Blossom")	On-site building found ineligible (6Z)	Adjacent buildings not designated or not listed as eligible for historic designation
8919 Sunset ("The Fog and Clearing")*	On-site building found ineligible (6Z)	Adjacent buildings not designated or eligible for historic designation (6Z)
9121 Sunset ("Sunset Cinema")	On-site building eligible for local designation	Adjacent buildings not designated or eligible for historic designation (6Z)

Table 8.5-1. Historic Built Environment Resources

Project Address and Name	Historic Status of On-Site Buildings	Historic Status of Adjacent (Next-Door) Buildings
9176 Sunset ("Sunset Jewel")*	On-site building not eligible for historic designation (6Z)	Adjacent buildings not designated or eligible for historic designation (6Z)
9255-9229 Sunset ("Wonderwall")	On-site buildings not eligible for historic designation (6Z) ¹	Adjacent buildings not designated or not listed as eligible for historic designation

Sources: City of Beverly Hills 2010, 2025; City of West Hollywood 1987, 2008, 2016, 2021, 2025; City of Los Angeles 2025.

Notes:

BOLD text = Project would be subject to the Sunset Boulevard Off-Site Signage Policy's protections for historic resources based on its location on or adjacent to a designated or eligible historic resource. (Such protections include demonstrating conformance with the Secretary of the Interior's Standards for Rehabilitation and approval of a Certificate of Appropriateness from the City's Historic Preservation Commission.)

Status Code 6Z = Found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation

Status Code 6L = Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.

NR = National Register of Historic Places

CR = California Register of Historical Resources

Historic age = Structures that were generally built over 45 years ago

* Project is part of a new development project, and demolition of on-site buildings is anticipated. Such projects are subject to individual review under CEQA, which may require additional study in the category of cultural resources.

¹ Project includes alterations to a potentially historic-age structure that has previously been determined ineligible for historic designation (6Z). The 6Z status codes for these properties have been reconfirmed with updated property evaluations in Appendix C2.

² The project at 8222 Sunset is located adjacent to a historic resource within the City of Los Angeles (8218 Sunset), which could be subject to indirect impacts as a result of the adjacent billboard development. Given that 8218 Sunset is outside of the SSP boundaries, this property is not subject to the historic resources protections in the adopted policy. Nevertheless, indirect impacts are still required to be examined pursuant to CEQA. An indirect effects analysis for the billboard project at 8222 Sunset is thus included in Appendix C2 of this document. The analysis in Appendix C2 demonstrates that indirect impacts to nearby historical resources as a result of the proposed billboard development at 8222 Sunset would be less than significant.

As demonstrated in Table 8.5-1, there are three projects within Rounds 1.5 and 2 that would be subject to the historic resources protections specified in the Sunset Boulevard Off-Site Signage Policy. As described in the adopted IS/ND, compliance with these provisions would ensure that billboards would not obscure the important character-defining features of historical resources, including any significant historic street views. The billboard project designs would be reviewed for compatibility in scale, size, and proportion to historical resources, so as not to adversely impact the integrity of the resource or its setting. The requirement to submit a Certificate of Appropriateness for review by the City's Historic Preservation Commission would ensure that billboard projects located on or adjacent to properties with designated cultural resources would be designed and constructed in conformance with the Secretary of the Interior's Standards for Rehabilitation.

As described in the notes for Table 8.5-1, there are three billboard projects proposed as part of Rounds 1.5 and 2 that required further study to verify that no significant impacts to historical resources would occur. These projects involve demolishing a structure previously thought to be historic age (8222 Sunset), affixing a full motion billboard with support structure to the façade of a historic-age structure (9229 Sunset), and removal of signage and façade improvements on a historic-age structure (8250 Sunset). The buildings at 8222 Sunset, 9229 Sunset, and 8250 Sunset are evaluated in detail in Appendix C2. All structures on these three properties were confirmed as ineligible for historic designation; as such, demolition and/or alterations to these structures would not constitute a significant impact to a historical resource under CEQA. The project at 8222 Sunset is also located adjacent to a historic resource within the City of Los Angeles (8218 Sunset), which could be subject to indirect impacts as a result of the

adjacent billboard development. Given that 8218 Sunset is outside of the SSP boundaries, this property is not subject to the historic resources protections in the adopted policy. Nevertheless, indirect impacts are still required to be examined pursuant to CEQA. An indirect effects analysis for the billboard project at 8222 Sunset is thus included in Appendix C2 of this document. The analysis in Appendix C2 demonstrates that indirect impacts to nearby historical resources as a result of the proposed billboard development at 8222 Sunset would be less than significant.

For the reasons described above, potential historic built environment impacts would remain less than significant. As such, the modified signage development scenario and proposed policy amendments 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 historic resources.

Paleontological Resources

The adopted IS/ND identifies that geological units underlying the project area may support paleontological resources. As such, the IS/ND concludes that billboard projects may have the potential to encounter paleontological resources during ground disturbing activities.

Given the expansion of proposed billboard development under Rounds 1.5 and 2 and the time that has passed since writing of the IS/ND, Dudek conducted additional research on paleontological resources in the project area (Appendix C3). The institutional records search and desktop geological and paleontological review conducted for the project area did not reveal any previous paleontological discoveries within the project area. (See Appendix C3 for details). In addition, the project area is not anticipated to be underlain by unique geologic features. However, the project area is underlain by Pleistocene older slightly elevated and dissected alluvium, which has high paleontological sensitivity, and by early Holocene sediments which also have high paleontological sensitivity based on numerous scientifically significant fossil discoveries from these geological units in the region. This means that the soils underlying the project area may support paleontological resources and that paleontological finds could occur during certain ground-disturbing activities. Based on depths reported for previous fossil localities and geological literature results, fossil bearing units (middle Holocene to Pleistocene) could reasonably be expected to be encountered at a depth of 12 to 15 feet below ground surface.

Given that excavation for billboards generally ranges from 22 feet to 45 feet in depth, ground-disturbing activities associated with billboard construction have the potential to encounter and potentially destroy a unique paleontological resource or site. This is consistent with the conclusion reached in the IS/ND. As explained in the IS/ND, the Sunset Boulevard Off-Site Signage Policy includes a requirement to ensure that any ground disturbance associated with changes in billboard pole location would not result in destruction of a paleontological resource. This requirement is shown below in italics and is applied by the City to all billboard projects involving ground disturbance.

If paleontological resources are encountered during excavation, all work within 100 feet of the find must stop and the City of West Hollywood Planning & Development Services Department shall be immediately notified. A qualified paleontologist shall be retained to evaluate the finds and recommend appropriate handling and recovery methods. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the qualified paleontologist.

Given the limited sediment removal amounts from undisturbed geological units with high paleontological resource sensitivity, which are estimated to be less than 250 cubic yards for the modified project, the existing policy requirement is considered to be adequate. Required compliance with the existing paleontological resources

requirement would ensure that impacts would remain less than significant. As such, the modified signage development scenario and proposed policy amendments 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 paleontological resources.

8.5.2 Changes in Circumstances/New Information

No changes to the project area have occurred that would alter the conclusions or the analysis in the category of cultural resources. No new regulations or design standards have been implemented since IS/ND adoption that would alter the conclusions or the analysis 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 IS/ND.

8.6 Geology and Soils

8.6.1 Environmental Analysis

As described in the adopted IS/ND, the geology and soils impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts in the category of geology and soils would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below. The proposed policy amendments do not pertain to geology and soils and thus would not alter the potential effects of off-site signage projects on geology and soils relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

While 37 additional billboard faces would be developed under the modified signage development scenario, an increase in the number of potential billboard faces along the Sunset Strip would not alter effects in the category of geology and soils. As described in the IS/ND, a number of geological hazards are present along the Sunset Strip, and new billboards would introduce new structures that could be subject to such hazards. However, as identified in the IS/ND, installation of new billboards would be required to be conducted in accordance with existing federal, state, and City laws and guidelines concerning seismic and structural safety, thereby ensuring maximum feasible stability. Upon compliance with seismic safety regulations, impacts from new billboards were identified as being less than significant. This same conclusion would continue to apply under the modified signage development scenario. The analysis presented in the IS/ND would not change based on the addition of 37 potential sign faces. Furthermore, billboards do not have the potential to increase the probability or exacerbate the potential for a geologic or soils-related hazard to occur.

Regarding soil erosion and loss of topsoil, the increase in the proposed billboard development envelope could increase the amount of soil erosion that would occur as a result of billboard construction, since more billboard-related construction activities would occur. However, as identified in the IS/ND, pole installations for billboards would not result in large areas of exposed soils, and the limited areas of exposed soils would be covered with the new pole or with pavement and landscaping within a few days of initial ground disturbance. Furthermore,

the City's Municipal Code has numerous requirements in place that minimize and prevent soil erosion. These requirements include implementation of structural controls such as berms and plastic sheeting to minimize the escape of sediment; situating excavated soils in a manner that minimizes the amount of sediment that runs off site; and covering of any soil piles during the rainy season (Municipal Code Section 15.56.090). Projects may also be required to submit a Standard Urban Storm Water Mitigation Plan (Municipal Code Section 15.56.095). Therefore, substantial soil erosion or loss of topsoil would not result. The additional construction activities associated with the modified signage development scenario would represent a minor to negligible increase in potential soil exposure, and impacts would remain less than significant for the same reasons as identified in the IS/ND.

In conclusion, impacts in the category of geology and soils resources would remain less than significant for the modified signage development scenario, as described above. As such, the modified signage development scenario and proposed policy amendments 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 geology and soils.

8.6.2 Changes in Circumstances/New Information

No changes to geologic features have occurred since adoption of the IS/ND. However, several changes to regulatory geological maps have occurred at the state and local level. While these changes do not alter the significance conclusions in the adopted IS/ND, they are summarized below for informational purposes.

In 2018, the California Geological Survey issued revisions to the Earthquake Fault Zones shown on the Earthquake Zones of Required Investigation for the Beverly Hills Quadrangle. (The project area is located partially within the Beverly Hills Quadrangle. This map was not available at the time that the IS/ND was drafted and circulated for public review.) The revised map shows a new Alquist-Priolo Earthquake Fault Zone along the western portion of the Sunset Strip, in association with the Hollywood Fault (California Geological Survey 2018). However, the IS/ND identifies that the approved project would be implemented in an area where a known earthquake fault could potentially rupture. As such, while more properties along the Sunset Strip are now within an Alquist-Priolo Earthquake Fault Zone, this would not change the environmental impacts identified in the IS/ND.

In 2020, the City adopted an updated Local Fault Precaution Zones map. This map shows local fault precaution zones along and within proximity to the Hollywood Fault. Different regulations and requirements are applied to properties within the different zones. Most properties along the Sunset Strip were located within the "Fault Precaution Zone 1" in the prior map that was in place at the time of the IS/ND, and most properties remain within this zone on the updated map (City of West Hollywood 2019c). As identified in the IS/ND, several portions of the project area are located within the City of West Hollywood Fault Precaution Zone. This statement has not changed as a result of the updated Local Fault Precaution Zones map. As such, the updates to this map have not affected or changed the environmental impacts identified in the IS/ND.

Aside from the updated geological maps described above, no other new regulations or design standards have been implemented that would alter the conclusions or the analysis in the category of geology and soils. As such, there are no substantial changes with respect to circumstances under which the modified signage development scenario and proposed policy amendments will be undertaken, and there is no new information of substantial importance that has become available relative to geology and soils that would change the impact conclusions in the IS/ND.

8.7 Greenhouse Gas Emissions

8.7.1 Environmental Analysis

As described in the adopted IS/ND, the greenhouse gas (GHG) impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the proposed modifications to the signage development scenario and the proposed policy amendments would not alter this conclusion. New significant impacts related to GHG emissions would not result, and substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to GHG emissions and thus would not alter the potential effects of off-site signage projects on GHGs relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario. This analysis is supported by information in Appendix B of this addendum.

The addition of billboards under the modified signage development scenario is anticipated to lead to more GHG emissions when compared to the original signage development scenario. However, as demonstrated in Appendix B, the quantified GHG emissions from the modified signage development scenario would remain below the threshold used in the adopted IS/ND. The analysis in Appendix B also discusses project consistency with applicable GHG reduction plans, policies, and regulations and presents an analysis of the modified project's consistency with the City's Climate Action and Adaption Plan, the Southern California Association of Governments' 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, and state legislation, including Senate Bill 32 and the 2022 Scoping Plan for Achieving Carbon Neutrality. The modified project's consistency with these plans, policies, and regulations is demonstrated in detail in Appendix B. As with the approved project, the modified project would not represent conflicts with applicable plans, policies, or regulations.

It is noted that the GHG impacts associated with construction and operation of new development projects that include billboards have been (or will be) separately addressed as required in CEQA documents for those new development projects. However, many new developments in the City include sustainability features that often effectuate consistency with GHG reductions plans and policies; as such, significant impact are not anticipated.

For the reasons described above, impacts would remain less than significant. No new significant impacts would occur compared to the approved project, and no previously identified significant impacts would substantially increase in severity.

8.7.2 Changes in Circumstance/New Information

The GHG analysis presented in Appendix B takes into account new information and changes in circumstances that could have affected the analysis, such as an updated version of the California Emissions Estimator Model, updates in GHG-related regulations, adoption of the City's Climate Action and Adaption Plan, and updates in energy efficiency standards. Additionally, since adoption of the IS/ND, 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. Appendix B addresses the topic of energy consumption, and no significant impacts are identified.

As further substantiated in Appendix B of this addendum, there are no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to GHG emissions that has changed the impact conclusions in the IS/ND.

8.8 Hazards and Hazardous Materials

8.8.1 Environmental Analysis

As described in the adopted IS/ND, the hazards and hazardous materials impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts to hazards and hazardous materials would not result, and substantial increases in the severity of impacts or the need for new mitigation would not result, for the reasons further described below.

The proposed policy amendments do not pertain to hazardous materials and thus would not alter the potential effects of off-site signage projects on hazardous materials relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

Hazardous Materials

The IS/ND describes the types of materials that are anticipated to be used, transported, and disposed during the construction and operation of billboard projects implemented under the Sunset Strip Off-Site Signage Policy. The analysis in the IS/ND determines that use of these anticipated materials in accordance with established federal, state, and local regulations would not pose a significant hazard to the public or to the environment. The materials that are expected to be used for billboard construction and operation are not considered acutely hazardous and are used routinely throughout urban environments for construction projects and small-scale structural improvements. The modified signage development scenario would not result in changes to the types of materials that are expected to be used for billboard projects. Upon compliance with existing regulations, construction and operation of billboards under either the original or modified signage development scenarios would not result in significant impacts involving the use of hazardous materials. Impacts would remain less than significant for the same reasons presented in the IS/ND. As such, the modified signage development scenario would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to the use of hazardous materials.

Hazardous Materials Sites

As stated in the IS/ND, there are few properties within or adjacent to the project area that are identified on regulatory databases of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, as reported in the IS/ND, several properties within the project area are listed on the Regional Water Quality Control Board's GeoTracker site and the California Environmental Protection Agency's Enviro Mapper site (SWRCB 2025a; CalEPA 2025). The majority of listed sites are leaking underground storage tanks, associated with automotive uses. All the listed sites have reached a "case closed" status, indicating the leak, spill, cleanup, and/or investigation has been addressed (SWRCB 2025a). In the unlikely event that construction workers were to encounter contaminated soils during ground disturbance associated with billboard construction, the suspect soils would be tested, removed,

and disposed of in accordance with applicable local, state, and federal regulations for proper treatment of contaminated soils. Compliance with such regulations would further minimize the likelihood of the release of hazardous materials into the environment during billboard construction projects. Impacts would remain less than significant, for the same reasons identified in the IS/ND. As such, the modified signage development scenario and proposed policy amendments would not result in new significant environmental effects or in a substantial increase in the severity of a previous identified significant effect relative to hazardous materials sites.

Proximity to Airports, Schools, and Wildland Fire Hazard Areas

The modified signage development scenario would occur in the same setting and location as the original signage development scenario (i.e., the Sunset Strip). As such, the findings and analysis in the IS/ND regarding proximity to airports, schools, and wildland fire hazard areas would not change as a result of the modified signage development scenario. For the same reasons identified in the IS/ND, impacts involving proximity to schools would be less than significant, and no impacts would occur involving proximity of the project area to airports. Wildland fire hazard areas have changed since the adoption of the IS/ND and are discussed further in Section 8.8.2, Changes in Circumstances/New Information. As such, the modified signage development scenario would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to proximity of the project area to airports, schools, and wildland fire hazard areas.

Emergency Response and Evacuation Plans

The IS/ND evaluated the potential for policy implementation to impair or interfere with an adopted emergency response plan or emergency evacuation plan and determined that no impacts would occur. Under the modified signage development scenario, this determination would not change. The number of vehicle trips involved with billboard construction and operation is minor to negligible; as such, the modified signage development scenario would not increase the potential for policy implementation to generate traffic to the degree that emergency response or evacuations would be impeded. Traffic associated with billboard projects would remain minor to negligible under the modified scenario. Construction of some billboards may require temporary sidewalk and/or lane closures. However, these closures would not impede emergency access routes or implementation of evacuation plans, as they would be site-specific and temporary, would be limited to a small portion of the sidewalk and/or roadway, and would include detour signage as necessary.

As such, the modified signage development scenario would not result in new significant environmental effect or in a substantial increase in the severity of a previously identified significant effect related to emergency response and evacuation plans.

8.8.2 Changes in Circumstances/New Information

Databases of hazardous materials sites were consulted to ensure that no new hazardous materials sites or releases have been listed in the project area or in the immediate vicinity subsequent to the adoption of the IS/ND. This investigation confirmed that no new listings with the potential to adversely affect the project have occurred (DTSC 2025; SWRCB 2025a). Additionally, the site that was previously an open case in the project area (8873 Sunset Boulevard), during the time the IS/ND was written, has been closed as of December 2021 (SWRCB 2025b).

Since the adoption of the IS/ND, 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 (VHFHSZs) (14 CCR 15000 et seq., as amended December 28, 2018). Wildfire hazards were addressed in the IS/ND; however, additional information regarding wildfire hazards is provided in this paragraph based on the updates to the CEQA Guidelines. Additionally, the California Department of Forestry and Fire Protection (CAL FIRE) updated the statewide Fire Hazard Severity Zone maps in 2025. The project area is not located in a state responsibility area. The nearest state responsibility area is located approximately 10 miles west (in the Santa Monica Mountains) (CAL FIRE 2025). However, based on the recently updated Fire Hazard Severity Zone maps, a majority of the project area is located in a VHFHSZ. The area directly north of the project area is developed with residential uses. While some vegetation is present between the residences, Sunset Strip does not directly abut wildland areas. Rather, the project area and its surroundings are highly urbanized and surrounded on all sides by development. The modified signage development scenario would not change existing conditions such that additional people or habitable structures would be exposed to significant risk of loss, injury, or death caused by a wildland fire in the Hollywood Hills. The modified project does not involve new buildings or new building occupants, which could increase the number of people exposed to wildland fire hazards in the area. While the modified signage development scenario would include billboard projects which involve the operation of LED bulbs in the project area, when used for their intended purposes and when operated and installed in accordance with standard procedures, LED bulbs do not pose an increased risk of fire relative to other lighting sources. Additionally, billboard construction and operation would occur in accordance with existing federal, state, and City laws and guidelines concerning fire safety. In the event of a wildfire emergency in the project area, the Los Angeles County Fire Department would provide fire protection services. 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 VHFHSZ or state responsibility area. Effects to emergency response and evacuation plans were addressed in the IS/ND, and no impacts were identified. The modified signage development scenario and proposed policy amendments would not affect this conclusion, for the reasons described above under the subheading for “Emergency Response and Evacuation Plans.” As such, while there are new guidelines for the evaluation of development projects and wildfire risk, the modified signage development scenario and proposed policy amendments would not result in significant effects under the new guidelines, as demonstrated herein.

Aside from the CEQA Guidelines and the CAL FIRE 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 IS/ND.

8.9 Hydrology and Water Quality

8.9.1 Environmental Analysis

As described in the adopted IS/ND, the hydrology and water quality impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts to hydrology and water quality would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not

result, for the reasons further described below. The proposed policy amendments do not pertain to hydrology and water quality and thus would not alter the potential effects of off-site signage projects on hydrology and water quality relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

The analysis in the IS/ND determined that the hydrology and water quality impacts of the original signage development scenario and policy implementation would be below a level of significance primarily due to the minor nature of construction activities, ground-disturbing activities, and development footprints that are associated with billboards. Furthermore, the Sunset Strip is highly urbanized under existing conditions and does not contain streams, rivers, or other water resources having the potential to be altered by billboard development. Under the modified signage development scenario and proposed policy amendments, these same conclusions would continue to apply. The billboard projects not involved with larger development projects would generally involve limited ground disturbance, and any areas of disturbance would be covered upon construction completion, thereby precluding long-term erosion or sedimentation effects. The modified signage development scenario would not result in the exposure of large areas of exposed soils that could be transported off site during storm events. Requirements of the City's Municipal Code include implementation of structural controls such as berms and plastic sheeting to minimize the escape of sediment and other pollutants, situating excavated soils in a manner that minimizes the amount of sediment that runs off site, and covering any soil piles during the rainy season (Municipal Code Section 15.56.090). Construction equipment at billboard sites could result in spilled or leaked petroleum products; however, the City's Municipal Code also requires implementation of best management practices, which "shall be used in areas exposed to storm water for the removal and lawful disposal of all fuels, chemicals, fuel and chemical wastes, animal wastes, garbage, batteries, or other materials which have potential adverse impacts on water quality" (Section 15.56.070). Additionally, the City's Municipal Code prohibits discharges into the storm drain system of any fuel, chemical wastes, or other materials that have potential adverse impacts on water quality (Municipal Code Section 15.56.060). Therefore, standard site management practices and typical equipment maintenance would generally preclude leaks and spills of a magnitude that would adversely affect water quality. During operations, proper operation and maintenance of billboards would ensure that such structures do not contribute pollutants to stormwater runoff. While some billboard projects include new or refurbished landscaping, such landscaping would be required to adhere to City requirements for drought-resistant landscaping, thereby reducing water use. Any such water use would be negligible in the context of City-wide water demands. Furthermore, some billboard projects do not have a landscaping component and would therefore involve little to no water use during operation. For these reasons, impacts in the category of hydrology and water quality would not change as a result of the modified signage development scenario and proposed policy amendments. Impacts would remain less than significant for generally the same reasons identified in the IS/ND. As such, the modified signage development scenario and proposed policy amendments would not result in new significant environmental effects or in a substantial increase in the severity of a previously identified significant effect relative to hydrology and water quality.

8.9.2 Changes in Circumstances/New Information

The project area and vicinity remain urbanized and mostly paved, with no natural drainages. As such, there are no substantial changes with respect to circumstances under which the modified signage development scenario and proposed policy amendments will be undertaken, and there is no new information of substantial importance that has become available relative to hydrology and water quality that would change the impact conclusions in the IS/ND.

8.10 Land Use and Planning

8.10.1 Environmental Analysis

As described in the adopted IS/ND, no land use and planning impacts would occur as a result of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts in the category of land use and planning would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below.

Physical Division of a Community

The proposed policy amendments do not pertain to physical division of a community and thus would not alter the potential effects of off-site signage projects on physical division of a community relative to the conclusions in the adopted IS/ND. Neither the modified nor the original signage development scenarios would involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood, which would have the potential to physically divide a community. As described in the IS/ND, billboard projects do not have the potential to physically divide a community. No impacts would occur, for the same reasons as identified in the IS/ND. As such, the modified signage development scenario and proposed policy amendments would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to physical divisions within an established community.

Land Use Plan/Policy Consistency

The modified signage development scenario and proposed policy amendments would not substantially change the land use policy consistency analysis presented in the IS/ND. The IS/ND sets forth a policy consistency analysis between the Sunset Strip Off-Site Signage Policy and the City's goals and policies for Sunset Boulevard, as set forth in the General Plan, the SSP, and the Zoning Ordinance. The analysis demonstrates that the Sunset Boulevard Off-Site Signage Policy is consistent with the other goals and policies that the City has established for Sunset Boulevard. Under the modified project, the "Lighting and Operational Standards," "Architectural Lighting," and "Definitions" sections of the adopted policy would be amended to broaden and clarify the applicability of the various light/glare requirements from the adopted policy and to add new requirements. Some of the proposed revisions incorporate recommendations from the *Sunset Boulevard Arts & Advertising Program Sign Lighting Study* (Appendix A). The policy amendments include regulations and clarification regarding topics such as sign brightness, billboard orientation, and speed of animated content. The proposed policy amendments would remain consistent with the City's goals and policies for Sunset Boulevard that have been previously analyzed in the IS/ND. The modified signage development scenario is representative of the billboard projects that were ultimately selected by the City as part of a design excellence screening process and have been selected for their ability to achieve the City's goals and vision for the Sunset Strip. As such, the amended Sunset Boulevard Off-Site Signage Policy and the modified signage development scenario that has emerged from the design excellence screening process remain consistent with the City's land use plans and policies. No impacts would occur, for generally the same reasons as identified in the IS/ND. As such, the modified signage development scenario would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to consistency with land use plan and policies.

8.10.2 Changes in Circumstances/New Information

Since the adoption of the IS/ND, development has continued to proceed on the Sunset Strip, in accordance with the goals and policies of the City's General Plan and the SSP. While some new uses have been proposed or constructed since the adoption of the IS/ND, this has not changed the City's overall goals and vision relative to signage development on the Sunset Strip. As such, continued land use changes and development in the project area would not affect the consistency of the Sunset Strip Off-Site Signage Policy with City land use goals and policies. The same General Plan that was analyzed and addressed in the IS/ND remains in effect, as does the SSP. 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 IS/ND.

8.11 Noise

8.11.1 Environmental Analysis

As described in the adopted IS/ND, the noise impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the proposed modifications to the signage development scenario and the proposed policy amendments would not alter this conclusion. New significant impacts to noise would not result, and substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to noise and vibration and thus would not alter the potential effects of off-site signage projects on noise relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential noise effects of the modified signage development scenario. It is noted that numerical noise and vibration analysis was not provided in the adopted IS/ND for the original signage development scenario. At the time of the IS/ND, the design and location of billboard projects were not known and were thus considered speculative. At the time of this addendum, specific locations and design parameters for billboard projects are known, such that numerical analysis can be performed. As such, in an effort provide decision makers with as much information as possible about the environmental consequences of the modified project, this section includes numerical noise and vibration analyses for the modified signage development scenario, with a focus on analysis of the Rounds 1.5 and 2 billboard projects, as the Round 1 projects have already been reviewed under CEQA for noise and vibration impacts.

Existing Noise Conditions

The City of West Hollywood is located in an urbanized and developed environment that is subject to numerous noise sources. The primary noise source in the City is currently vehicular traffic along major arterials including Sunset Boulevard. In addition, typical urban noise sources (e.g., hospitality businesses, entertainment venues, community events, construction activities, landscape equipment, and emergency vehicle sirens) also contribute to the overall noise environment.

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise and vibration sensitive.

The project area is predominantly developed with commercial uses. However, residential uses are located in several mixed-use developments along the Sunset Strip. Hotels are located throughout the project area, and the project area contains one park (William S. Hart Park and Off-Leash Dog Park).

According to the City of West Hollywood General Plan Noise Element, the potentially affected residences within or near the project area are within the 65- to 70-decibel (dB) traffic noise level contours generated by commuters traveling on major arterial roadways including Sunset Boulevard, San Vicente Boulevard, and La Cienega Boulevard. Since traffic noise is the dominant noise source in the area, the traffic noise level contours found in the Noise Element are assumed to represent the ambient noise levels experienced in the project area.

Local Noise Regulations

West Hollywood Municipal Code

The City of West Hollywood's Noise Control Ordinance prohibits construction from occurring between the hours of 7:00 p.m. and 8:00 a.m. on weekdays or at any time on Saturday (except, between the hours of 8:00 a.m. and 7:00 p.m., interior construction is permissible), or at any time on Sunday or on a holiday (Municipal Code Section 9.08.050). Construction activities that occur Monday through Saturday between the hours of 8:00 a.m. and 7:00 p.m. are allowed.

Section 9.08.050 (b) restricts engines, motors, or mechanical devices near residential districts. Sustained operation of un-enclosed motors, engines, or other noise-producing mechanical devices is prohibited between the hours of 10:00 p.m. and 8:00 a.m. When the noise-producing motor, engine, or mechanical device is enclosed, it shall not be plainly audible at a distance of 50 feet or more from the enclosure, or at a distance of 10 feet or more from any residence.

City of West Hollywood General Plan 2035

The following numerical construction noise threshold has been adapted from the City's General Plan EIR:

- A project-related temporary increase in ambient noise levels of 10 dB L_{eq} or greater (for any existing ambient noise condition) is considered significant.

Vibration Standards

Numerous public and private organizations and governing bodies have provided guidelines to assist in the analysis of ground-borne noise and vibration. To date, the City has not adopted a threshold for ground-borne vibration impacts. However, other environmental documents prepared by the City reference vibration guidelines from the California Department of Transportation (Caltrans). Information from Caltrans indicates that continuous or frequent intermittent vibrations with a peak particle velocity (PPV) of approximately 0.3 inches per second could cause damage to older residential structures. Given the presence of older residential structures (e.g., those built more than 50 years ago) in the vicinity of several proposed billboard projects, this threshold is considered appropriate for use in this document. Caltrans also establishes guidelines for human annoyance as caused by vibration. While

annoyance is not considered an impact to the environment, for informational purposes, it is noted that Caltrans establishes a guideline of 0.4 inches per second PPV as potentially causing severe annoyance (Caltrans 2020).

Short-Term Construction Noise

On-Site Construction Noise

As explained in the adopted IS/ND, short-term construction activities attributable to billboard projects installed pursuant to the Sunset Boulevard Off-Site Signage Policy would create intermittent elevated noise levels within and near the project area due to construction equipment, delivery of materials, construction worker trips, and construction personnel. At the time of the development of the adopted IS/ND, construction schedules, locations, and specific pieces of equipment were unknown. However, as explained above, the specific locations and design parameters for billboard projects are now known, such that numerical analysis can be performed. As such, in an effort provide decision makers with as much information as possible about the environmental consequences of the modified project, this section includes numerical construction noise analysis for the Rounds 1.5 and 2 billboard projects. The locations and construction intensities of the Rounds 1.5 and 2 billboard projects were evaluated to determine a worst-case scenario based on the proximity of anticipated construction activities to sensitive receptors. Billboard projects that would be integrated into new development projects were excluded from this evaluation, because construction of such billboards would be part of larger construction efforts (generally involving building demolition and building construction) that are subject to independent evaluation under CEQA. Among the Rounds 1.5 and 2 billboard projects that are not part of new development projects, the billboard project at 8906 Sunset Boulevard (“Blossom”) is considered the worst-case scenario for potential construction noise impacts, due to the proximity of billboard construction to an adjacent residential sensitive receptor. The discussion below summarizes the anticipated construction processes and provides estimated noise levels that could be experienced in this worst-case scenario situation.

Construction noise is a temporary phenomenon, with emission levels varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. Equipment that would be in use during construction of billboard projects is anticipated to include concrete saws, tractors, backhoes, loaders, generators, drill rigs, cranes, pavers, and rollers. The typical maximum noise levels at a distance of 50 feet from these various pieces of construction equipment are presented in Table 8.11-1. Note that the equipment noise levels presented in Table 8.11-1 are maximum noise levels. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 8.11-1. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L _{max} , dBA at 50 Feet)
Backhoe	78
Compressor (air)	78
Concrete Saw	90
Crane	81
Dozer	82
Excavator	81
Flat Bed Truck	74

Table 8.11-1. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max} , dBA at 50 Feet)
Front End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77
Roller	80
Scraper	84
Welder / Torch	73
All Other Equipment > 5 HP	85

Source: DOT 2006.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emissions from construction of the billboard project at 8906 Sunset Boulevard has been predicted at the adjacent residential sensitive receptor from the nearest position of the construction activity boundary for a given phase. The intent of the “nearest receptor” methodology is to help evaluate anticipated construction noise from all construction equipment or vehicle activity expected to be at the site boundary (i.e., as close as possible to the nearest sensitive receptor) for some period of time.

For this analysis, the nearest sensitive receptor was estimated to be as close as 20 feet from construction activities at 8906 Sunset Boulevard. At the construction phase activity boundary, this analysis assumes that one piece of equipment for each listed type per phase would be involved in the construction activity for an 8-hour period.

The Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest sensitive receptor. Although the RCNM was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects because the same types of construction equipment used for roadway projects are often used for other types of construction. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., a grader, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 8.11-1), and the distance from the noise-sensitive receiver. The predictive model also considers how many hours a given equipment piece may be on site and operating (or idling) within an established work shift. Topographical shielding and intervening build environment elements (e.g., retaining walls) were included in the predictive model. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix D, and produced the predicted results displayed in Table 8.11-2.

Table 8.11-2. Predicted Construction Noise Levels per Activity Phase

Construction Phase	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Activity (dBA)
Site Preparation/Excavation	74
New Billboard Installation	60

Table 8.11-2. Predicted Construction Noise Levels per Activity Phase

Construction Phase	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Activity (dBA)
Building and Landscaping Improvements	71

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels.

According to the City of West Hollywood General Plan Noise Element, the adjacent residential sensitive receptor is within the 70 dB traffic noise contour. Therefore, the applicable construction noise threshold at this residence would be 10 dB above ambient levels, which would equate to 80 dB. As shown in Table 8.11-2, construction noise levels at this receptor are estimated to range from approximately 60 dBA L_{eq} over 8 hours during the new billboard installation phase to approximately 74 dBA L_{eq} over 8 hours during the site preparation/excavation phase. As such, even considering the worst-case billboard location (in terms of construction proximity to residential sensitive receptors), construction noise impacts are below the level of significance. This impact determination is consistent with the conclusions of the qualitative analysis presented in the IS/ND.

It is noted, however, that several proposed billboard projects are located on hotel properties (8300 Sunset [The Standard Hotel] and 8440 Sunset [The Mondrian]). Hotels are often considered noise-sensitive receptors, even though they are also commercial uses. At 8300 Sunset, the proposed billboard would be situated adjacent to the western wall of the hotel structure, which lacks windows or balconies. At 8440 Sunset, the proposed billboard would be located in front of the hotel structure along Sunset Boulevard, where no balconies or other outdoor uses are situated. Both hotels are located within the 70 dB traffic noise contour (City of West Hollywood 2011), such that the applicable construction noise threshold would be 80 dB. The hotel structures are anticipated to provide approximately 25 dB to 30 dB of exterior-to-interior noise reduction. Even during use of the loudest pieces of construction equipment, as shown in Table 8.11-1, interior noise is anticipated to be reduced well below the threshold. Additionally, it is noted that the hotel property owners are also the billboard project proponents, such that the construction of a billboard would be an on-site improvement. Interior and exterior renovations to buildings such as hotels are commonplace and are often exempt from CEQA review. For these reasons, while construction noise could technically be louder on the exteriors of 8300 Sunset and 8440 Sunset, billboard construction at 8906 Sunset is considered worse for construction noise based on the proximity to an adjacent residence. Similarly, construction of the billboard at 8300 Sunset would occur adjacent to a park property, and parks are considered noise-sensitive receptors. However, the distance between anticipated billboard construction activities and usable park areas (e.g., pathways) is greater than the distance between 8906 Sunset and the adjacent residence.

As discussed previously, West Hollywood Municipal Code Section 9.08.050 limits daily construction noise that would create a noise disturbance between the hours of 8:00 a.m. and 7:00 p.m. All billboard projects would be subject to these requirements. The estimated noise levels at other sensitive receptors near the 8906 Sunset Boulevard site would be below the City's applicable noise standard of 75 dB to 80 dB (depending on whether structures are located in the 65 dB or 70 dB noise contour) as they are located farther away and/or would be shielded from construction noise from intervening buildings. Therefore, noise levels from construction activities would be less than significant.

Off-Site Construction Traffic Noise

The project would result in local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the project's air quality analysis, project-related traffic would include workers commuting to and from the project area as well as vendor and haul trucks bringing or removing materials. The most

intensive construction phase, assuming three concurrent projects (see Appendix B for detailed assumptions) would result in 54 one-way daily worker trips, 18 one-way daily vendor trips, and 36 one-way daily haul truck trips.

Based upon a review of the existing daily segment traffic volumes near the project area (West Hollywood General Plan Mobility Element), Sunset Boulevard carries approximately 51,462 vehicles per day (west of La Cienega Boulevard) (City of West Hollywood 2011). Comparing the maximum number of daily construction-related trips (i.e., 108 daily trips) to the traffic volumes listed in the City's Mobility Element (i.e., 51,462 vehicles), the additional vehicle trips would amount to a temporary increase of approximately 0.02% in traffic. Based upon the fundamentals of acoustics, a doubling of traffic (i.e., a 100% increase) would be needed to result in a 3 dB increase in noise levels, which is the level corresponding to an audible change to the typical human listener. Individual truck pass-bys would be clearly audible; nonetheless, the change in traffic noise levels on the hourly average basis would be negligible. An incremental increase of less than 1% of traffic volumes would not correspond to an audible or measurable increase in roadway noise and thus would be less than significant. Therefore, traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies. Impacts from project-related construction traffic noise would be less than significant.

Project Operational Noise

The Sunset Boulevard Off-Site Signage Policy prohibits off-site signs from including audio components and states that on-site sound shall be allowed only during special events. As described in the IS/ND, special events with audio components would be infrequent and would be subject to permits issued by the City Manager. Impacts from future potential special events were determined to be less than significant. The proposed policy amendments and modified signage development scenario would not alter the frequency of any such special events, and billboards would continue to be prohibited from having on-site audio components during daily operations. As such, most billboard projects do not include significant sources of on-site noise during daily operations. This would remain true for billboards that are part of Rounds 1.5 and 2, with two exceptions. The billboard project proposed for 8222 Sunset Boulevard would include a new transformer required to bring electrical power to the billboard. The property at 8222 Sunset Boulevard is unique among the billboard sites because the existing development on this property is limited to a small street-facing newsstand. As such, a transformer is required and would be installed behind the billboard structure (i.e., on the south side of the structure). Similarly, a transformer is required at 8250 Sunset Boulevard, based on the existing electrical system capability at that property, and would be installed adjacent to the proposed billboard, at the northeast corner of the property. Transformers are ongoing sources of operational noise; as such, additional analysis is provided below for the proposed transformers at 8222 Sunset Boulevard and at 8250 Sunset Boulevard.

According to information supplied for the project applicant for the billboard at 8222 Sunset, an enclosed transformer is proposed at the location, with an estimated sound level of approximately 47 dBA at 50 feet from the source. As noted previously, according to the City of West Hollywood General Plan Noise Element, the potentially affected area is dominated by traffic noise and is within the 65 to 70 dB CNEL (Community Noise Equivalent Level) traffic noise contour. Therefore, noise levels experienced in the immediate vicinity of 8222 Sunset Boulevard are already 18 to 23 dBA higher than noise that would be generated by the proposed transformer at a distance of 50 feet. At the nearest residential receiver, which is approximately 120 feet from the transformer location, the noise level from the transformer is predicted to be approximately 39 dBA, which is well below the 65 dBA CNEL traffic noise level experienced by most of the noise-sensitive receivers within the project area. Using standard logarithmic addition, the contribution of the transformer to the 65 dBA CNEL traffic noise level experienced by noise-sensitive

receivers in the area would be inaudible. As such, noise from the 8222 Sunset transformer would not be plainly audible at the nearest noise-sensitive receptors.

According to information supplied for the project applicant for the billboard at 8250 Sunset, an enclosed transformer is proposed at the location, with an estimated rating of 75 kilovolt amperes, which is equal to a sound level of approximately 47 dBA at 50 feet from the source. As noted previously, according to the City of West Hollywood General Plan Noise Element, the potentially affected area is dominated by traffic noise and is within the 65 to 70 dB CNEL (Community Noise Equivalent Level) traffic noise contour. Therefore, noise levels experienced in the immediate vicinity of 8250 Sunset Boulevard are already 18 to 23 dBA higher than noise that would be generated by the proposed transformer at a distance of 50 feet. At the nearest residential receiver, which is approximately 105 feet from the transformer location, the noise level from the transformer is predicted to be approximately 41 dBA, which is well below the 65 dBA CNEL traffic noise level experienced by most of the noise-sensitive receivers within the project area. Using standard logarithmic addition, the contribution of the transformer to the 65 dBA CNEL traffic noise level experienced by noise-sensitive receivers in the area would be inaudible. As such, noise from the 8250 Sunset transformer would not be plainly audible at the nearest noise-sensitive receptors.

As demonstrated above, even though a few billboard projects under the modified scenario would include operational noise-generating components (i.e., transformers), impacts would remain less than significant.

Construction Vibration

The main concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of ground-borne vibration occurring as part of the modified project would be additional construction activities occurring on the Sunset Strip.

The heavier pieces of construction equipment associated with this project, such as rollers, would register up to approximately 0.210 inches per second PPV at a distance of 25 feet (FTA 2018). As previously stated, for the purposes of this analysis, 0.3 inches per second PPV is used as the significance threshold for building damage, and severe annoyance may be caused at vibration levels of 0.4 inches/second PPV (Caltrans 2020).

Ground-borne vibration is typically attenuated over relatively short distances. As explained above under “On-Site Construction Noise,” the nearest residential sensitive receptor to construction activities would be a residential building south of the billboard project site at 8906 Sunset Boulevard. The residential building is approximately 20 feet away from the nearest location where construction equipment is assumed to be operating. Anticipated vibration levels would be approximately 0.293 inches per second PPV at the residential building, which is less than the threshold of 0.3 inches per second for damage to older residential structures, as well as the threshold for causing severe annoyance.

Therefore, impacts related to ground-borne vibration would be less than significant.

While the analysis above provides additional numerical analysis for the noise and vibration impacts of billboard projects, the impact conclusions remain the same as those reached in the IS/ND. The modified signage development scenario would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to noise and vibration.

8.11.2 Changes in Circumstances/New Information

Since the adoption of the IS/ND, development has continued to proceed on the Sunset Strip, in accordance with the goals and policies of the City's General Plan and the SSP. While some new noise-sensitive uses have been proposed or constructed since the adoption of the IS/ND (namely, new hotels), billboard projects that are implemented pursuant to the Sunset Boulevard Off-Site Signage Policy would not result in substantial, adverse increases in noise levels along the Sunset Strip, for the reasons described above and in the IS/ND. As such, the modified project would not result in new or different noise impacts as a result of new development on the Sunset Strip that has been developed or proposed since the time of the IS/ND. Additionally, the City has not adopted new noise regulations that would change the conclusions of the IS/ND.

8.12 Population and Housing, Public Services, and Recreation

8.12.1 Environmental Analysis

As described in the adopted IS/ND, no impacts would occur as a result of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, for the categories of population and housing, public services, or recreation. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts in the categories of population and housing, public services, and recreation would not result, and the substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to population and housing, public services, and recreation and thus would not alter the potential effects of off-site signage projects on these topical areas relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

As described in the IS/ND, billboard projects implemented pursuant to the Sunset Strip Off-Site Signage Policy do not have the potential to directly or indirectly create population growth. The need for new or expanded public services and recreational facilities is generally associated with population growth. As such, the Sunset Strip Off-Site Signage Policy and original signage development scenario were identified as having no impacts to population growth, public services, or recreation in the IS/ND. Expanding the billboard development scenario would not change these determinations. As with the original signage development scenario, the modified signage development scenario would not have impacts in these categories, for the same reasons identified in the IS/ND. The modified signage development scenario would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to population and housing, public services, or recreation.

8.12.2 Changes in Circumstances/New Information

No changes have occurred that would change the population and housing, public services, or recreation analysis and conclusions originally presented in the adopted IS/ND. No new regulations have been adopted or updated that would affect the analysis or conclusions originally presented in the IS/ND in the categories of population and

housing, public services, or recreation. As such, there are no substantial changes with respect to circumstances under which the project would be undertaken, and there is no new information of substantial importance that has become available relative to population and housing, public services, or recreation that would change the impact conclusions in the IS/ND.

8.13 Transportation and Traffic

8.13.1 Environmental Analysis

As described in the adopted IS/ND, the transportation and traffic impacts of the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant. As demonstrated in the analysis below, the modified signage development scenario and proposed policy amendments would not alter this conclusion. New significant impacts to transportation and traffic would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to traffic/transportation and thus would not alter the potential effects of off-site signage projects on traffic/transportation relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

Conflicts with Policies Established for the Effectiveness of the Circulation System/Conflicts with the Congestion Management Program

Under these thresholds, the analysis in the IS/ND primarily focuses on the amount of traffic expected to be generated during implementation of the Sunset Strip Off-Site Signage Policy. As such, the discussion below evaluates potential changes in traffic that could result from the modified signage development scenario, when compared to the original signage development scenario in the adopted IS/ND.

Construction. The IS/ND analysis estimates that each billboard construction project would result in approximately 10–16 roundtrip vehicle trips per day, which is considered a negligible increase in traffic. Construction of the billboard projects is anticipated to begin in June 2026 and would conclude in December 2028. Based on the number of billboard projects, typical timeframes for obtaining entitlements, and typical construction durations, it is assumed that a maximum of three billboard construction projects could be occurring on the Sunset Strip at a given time (including Round 1 billboard projects that have not been built yet). Three billboard construction projects on the Sunset Strip would result in approximately 30–48 daily vehicle trips. These additional construction activities would have a minimal to negligible effect on overall traffic on Sunset Boulevard. Some construction activities attributable to new billboard installation may involve temporary, localized sidewalk and lane closures at or adjacent to the site of a billboard. Sidewalk closures, especially along a roadway with high volumes on both vehicular and pedestrian traffic, would have the potential to result in safety hazards if pedestrians try to navigate around the closure by entering one of the traffic lanes. The potential sidewalk and lane closures would be temporary, site-specific, and limited to a small portion of the sidewalk or roadway. Additionally, an encroachment permit would be required for all billboard projects requiring sidewalk or lane closures. Appropriate detour signage would be provided in accordance with the safety requirements of the encroachment permit. Therefore, impacts would remain less than significant for the same reasons described in the IS/ND. As such, the modified signage development scenario would

not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to construction traffic.

Operation. As explained in the IS/ND, operational impacts to traffic would be minimal given the scale and periodic nature of the expected operational activities resulting from billboards. Full motion billboards require periodic maintenance of the electrical components. Traditional and/or internally illuminated static billboards require advertising copy changes and occasional light bulb replacements. Copy changes are generally assumed to occur once per month and generally require one truck and work crew to perform. Some billboard projects would include new or additional landscaping. For certain properties (particularly those that do not currently contain landscaping), the introduction of landscaping could result in additional maintenance activities. In balance, this analysis assumes that each billboard project is anticipated to involve approximately two maintenance events per month. As further discussed in Appendix B, the modified signage development scenario as a whole would result in approximately 104 monthly vehicle trips for maintenance purposes, which represents a minor increase in operational intensity that would be negligible in the context of the Sunset Strip. The occasional and brief addition of several truck trips to the project area that would occur under either the original or the modified signage development scenarios would not create a substantial increase in traffic. As with the original signage development scenario, the periodic nature of operational activities under the modified signage development scenario would result in minimal operational impacts that would affect transportation and traffic. For these reasons, impacts would remain less than significant. As such, the modified signage development scenario would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to operational traffic.

Summary. Due to the minor, intermittent, and temporary nature of construction and operational traffic associated with implementation of the proposed Sunset Strip Off-Site Signage Policy, exceedances of the City's standards for the effectiveness of its circulation system and conflicts with the applicable congestion management program would not result. As described above, the minor increase in activities associated with the modified project would not change these conclusions. Impacts would remain less than significant for generally the same reasons as described in the IS/ND.

Hazardous Design Features

The CEQA thresholds address whether a project would “substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).” The modified project would introduce new billboards to the Sunset Strip, including full motion animation billboards. The modified project would also include a variety of public realm enhancements. Given the long history of billboards on the Sunset Strip and the City's ongoing implementation of the SAAP, the additional billboards associated with the modified project would not be considered an incompatible use in the context of the project area. The public realm enhancements would not alter the geometric design of Sunset Boulevard. Any changes to driveways or parking lots would be designed and implemented in accordance with applicable national, state, and local standards and guidelines for safe circulation. As such, the modified project would not lead to increased impacts pursuant to CEQA thresholds for roadway hazards.

Additionally, all billboard projects would be subject to the Sunset Boulevard Off-Site Signage Policy, which includes provisions for the protection of driver attentiveness that apply to content displayed on full motion billboards. Required compliance with these provisions would reduce the potential for billboards to contribute to distracted driving. These provisions prohibit billboards from incorporating driver interaction features and from using colors or images that could be confused with traffic safety signage. Additionally, certain visual effects are prohibited,

including scrolling text and flashing images that rapidly change direction, oscillate, flash, or reverse in contrast. Animated content is also subject to certain regulations, which limit the speed of edits and changes in brightness, and which prohibit rapidly changing images without transitions. The policy also establishes a minimum refresh rate for cycling static images, to ensure that static images do not rapidly cycle. The new billboards proposed as part of the modified project would be required to comply with all of these requirements, which limit the aspects of advertising and art content that may be particularly distracting to drivers.

The topic of roadway hazards has thus been evaluated in detail in light of the modified project, and no significant, adverse impacts have been identified under CEQA. Impacts would remain less than significant, as set forth in the adopted IS/ND. The modified project would not, therefore, result in new significant impacts or a substantial increase in the severity of previously identified significant impacts related to substantial increases in hazards due to a design feature or an incompatible use.

Additional Traffic Study

As part of the approved project, the City commissioned studies prepared by traffic consulting firm Fehr and Peers to review the influence of billboards (particularly full motion billboards) on traffic conditions in the project area. While not required to support impact determinations under CEQA, City staff requested an updated analysis from Fehr and Peers, given the proposed expansion of billboard development. This analysis, which is presented in Appendix E1, includes an updated review of literature pertaining to billboard effects on driver attentiveness and traffic safety, as well as a review of collision data along the Sunset Strip as compared to collision data along similar roadway corridors with fewer billboards. As further discussed in Appendix E1, and consistent with the conclusions made in the prior studies conducted by Fehr and Peers, research has not found a statistically significant causal relationship between billboards and vehicle collisions. Similarly, the comparative collision analysis that was conducted did not reveal trends that suggest the presence of numerous billboards leads to a greater number of collisions compared with corridors in a similar urban environment with fewer billboards.

Despite the lack of a conclusive causal relationship between billboards and collisions, Fehr and Peers notes that billboards (particularly full motion billboards) are still considered contributors to driver distraction, along with numerous other factors, including cell phones, dynamic dashboards and speedometers, human activity, and other built environment elements along the roadside. Fehr and Peers found that external factors surrounding billboards may also contribute to the potential for driver distraction. Overall, Fehr and Peers found that there is a complex interplay of both internal factors for distraction (e.g., cell phones, dashboards) and external factors (e.g., billboards, digital advertisements on bus shelters, on-site signage, and traffic control tools). Fehr and Peers concluded that when there is a high density of billboards and additional distraction factors, roadway design practices can be implemented to help increase driver awareness and attentiveness in general.

Fehr and Peers conducted a field assessment of the Sunset Strip (including observations made during both daytime and nighttime) and developed suggestions for roadway improvements to increase driver awareness and attentiveness in general. Location-specific suggestions are provided, as well as corridor-wide suggestions. Suggestions include signal heads with yellow retro-reflective backplates, left turn restrictions at major driveways and skewed intersections, increased pedestrian phase walk times, curb extensions, and pedestrian refuge islands. It is noted that the City is already in the process of implementing yellow retro-reflective backplates on signal heads along Sunset Boulevard. The other suggested improvements would be incorporated into the City's Capital Improvement Program and implemented incrementally over time, throughout buildout of the modified signage development scenario. The improvements could be funded by billboard projects' required contributions to the City's general fund.

Implementation of the suggested improvements along Sunset Boulevard would not result in substantial physical impacts to the environment. A majority of the suggested improvements entail new or different traffic signing and striping, which would not require substantial construction or operational activities. Improvements involving pedestrian refuges and/or curb extensions would require minor construction work within roadways; however, such improvements would not differ substantially in intensity from routine maintenance activities, such as repaving or sidewalk repair. Such activities would occur within previously disturbed and developed areas and would not require extensive ground-disturbing activities or deep excavations. As such, these activities would not be expected to interfere with sensitive environmental resources, such as habitat, archaeological resources, or paleontological resources. While minor inconveniences may occur to drivers, cyclists, and pedestrians during implementation of the improvements, continued roadway safety would be ensured through City requirements for appropriate detour signage, construction workers with flags, etc. While some traffic patterns may change due to restriping, adjustments to signal phasing, and left-turn restrictions, such changes would not be considered potential impacts to the environment. (As explained in Section 8.13.2, intersection level of service, congestion, and vehicle delay are no longer considered impacts to the environment under CEQA.) Furthermore, while the improvements suggested by Fehr and Peers are currently conceptual in nature, the final design would be subject to review and approval by the City's Public Works Department and Engineering Division, and the improvements would be required to be designed and constructed in accordance with all national, state, and local guidelines and standards for safe roadway design. For these reasons, the suggested roadway improvements along Sunset Boulevard would not have the potential to lead to environmental impacts that would be considered significant.

As described above, the modified project would not be associated with a specific, adverse impact under CEQA pertaining to roadway safety impacts resulting from a design feature or incompatible use. As such, the suggested roadway improvements are not required for the purposes of mitigating or avoiding a significant environmental impact under CEQA. Nevertheless, they are discussed herein as improvements that would generally promote traffic safety along an already complex roadway corridor. Implementation of the suggested improvements would be anticipated to generate an improved traffic circulation environment.

Emergency Access

As stated in the IS/ND, billboard projects would not cause permanent obstructions to existing sidewalks, driveways, or roadways. Some billboard installations may require temporary sidewalk closures and/or lane closure during construction; however, appropriate emergency access and detour signage would be provided in accordance with encroachment permit requirements. As such, construction and operation of billboard projects implemented under the Sunset Boulevard Off-Site Signage Policy would not result in inadequate emergency access. This determination would not be altered under the modified signage development scenario. The addition of 15 sign faces over the course of policy implementation and along the 1.6-mile Sunset Strip would not increase or change the potential for policy implementation to affect emergency access. Impacts would remain less than significant, for the same reasons described in the IS/ND. As such, the modified signage development scenario would not result in new significant environmental effects or a substantial increase in the severity of a previously identified significant effect relative to emergency access.

Conflicts with Policies Regarding Alternative Transportation

As stated in the IS/ND, construction and operation of billboard projects would not substantially affect the use of bicycle, pedestrian, or transit routes and would not impede implementation of the goals, objectives, and policy actions related to these transportation modes. This determination would not be altered under the modified signage

development scenario. Project-related construction over the course of the multi-year policy implementation horizon and along the 1.6-mile Sunset Strip would not increase or change the potential for conflicts with alternative modes of transportation or with policies established for alternative modes of transportation. Pedestrian safety precautions would continue to take place during any necessary construction-related sidewalk closures, thereby minimizing effects to pedestrian traffic and safety. As described above, the modified project would not be associated with an appreciable increase in vehicle trips; as such, the project would not significantly contribute to conflicts with bicycle or bus traffic along Sunset Boulevard. For any billboard project located within the vicinity of a bus stop operated by the Los Angeles County Metropolitan Transportation Authority, coordination would occur prior to and during construction as needed, as stated in the IS/ND. For these reasons, the modified project would not lead to new or different impacts relative to conflicts with policies for alternative transportation modes. Impacts would remain less than significant, for the same reasons set forth in the IS/ND. 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 relative to alternative transportation.

8.13.2 Changes in Circumstances/New Information

Since the adoption of the IS/ND, updates to the CEQA Guidelines have gone into effect. One of the revisions incorporates the requirements of Senate Bill (SB) 743, which created a new process for analyzing transportation impacts under CEQA. Under the new transportation guidelines, level of service (LOS), or automobile delay, is no longer considered an environmental impact under CEQA. Rather, vehicle miles traveled (VMT) will be used to assess the significance of transportation impacts. On November 16, 2020, the City Council adopted updates to the local transportation guidelines pursuant to the requirements of SB 743. Most development projects in the City, which is considered a high-quality transit area, are considered to have less-than-significant VMT impacts, with the exception of projects that do not meet the screening criteria listed below. These criteria are listed below, followed by a description of whether each criterion would apply to the Sunset Boulevard Off-Site Signage Policy and associated billboard development.

1. **Project has a Floor Area Ratio (FAR) equal to or greater than 0.75.** Not applicable. The project consists of off-site signage and associated policies and, therefore, does not have an FAR. Any billboard projects part of new development that could include FAR will undergo project-specific CEQA review.
2. **Project does not have more than the required number of parking spaces, as specified by Chapter 10.07 of the West Hollywood Municipal Code.** Not applicable. The project consists of off-site signage and associated policies and, therefore, is not associated with a required number of parking spaces. Any billboard projects part of new development that could include parking will undergo project-specific CEQA review.
3. **Project is consistent with Connect SoCal, the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy.** The project consists of off-site signage and associated policies and, therefore, is not associated with substantial population or employment growth, development of or substantial changes to transportation infrastructure, significant GHG emissions, or other components that could be inconsistent with Connect SoCal. Any billboard projects part of new development that could include population or employment growth will undergo project-specific CEQA review.
4. **Project does not replace affordable residential units with fewer affordable residential units, moderate income residential units, or high-income residential units (i.e., must maintain the same number of existing affordable units or provide more).** The project consists of off-site signage and associated policies and, therefore, would not replace affordable residential units.
5. **Project does not have potential for significant regional draw (commercial uses that may require specialized workforce, i.e., movie production studios).** Construction trips for billboards would be temporary and

maintenance trips would be occasional and similar to activities that already occur for existing billboards along the Sunset Strip.

As demonstrated above, the Sunset Boulevard Off-Site Signage Policy meets the screening criteria and, therefore, is considered to have less-than-significant VMT impacts. Implementation of the Sunset Boulevard Off-Site Signage Policy, under either the original or modified signage development scenarios, would generate a relatively small number of temporary trips during billboard construction and nominal trips for billboard maintenance purposes. Billboard projects would not be associated with residents or regular employees and, therefore, would not generate significant VMT impacts. As such, the project would not generate substantial and permanent VMT, and VMT impacts would be less than significant.

In addition to incorporating the requirements of SB 743, the CEQA Guidelines updates also involved revisions to the transportation thresholds listed in Appendix G of the CEQA Guidelines. These revisions include simplification and consolidation of several of the previous threshold questions. Under the revised thresholds, Threshold A addresses conflicts with programs, plans, ordinances, or policies for the circulation system in general (including transit, roadway, bicycle, and pedestrian facilities). Several questions that were previously addressed under separate thresholds are now combined into Threshold A (alternative transportation policies and policies for the effectiveness and performance of the circulation system). Additionally, a new threshold has been added for the purpose of addressing VMT. The revised Threshold A (conflicts with programs, plans, ordinances, or policies addressing the circulation system in general) is addressed throughout the following subheadings above: “Conflicts with Policies Established for the Effectiveness of the Circulation System/Conflicts with the Congestion Management Program” and “Conflicts with Policies Regarding Alternative Transportation.” VMT is discussed in the paragraph above. As such, the revised Appendix G threshold questions in the category of transportation have been addressed herein.

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 IS/ND. 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 IS/ND.

8.14 Tribal Cultural Resources

8.14.1 Environmental Analysis

As described in the adopted IS/ND, impacts of the proposed Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, were determined to be less than significant in the category of tribal cultural resources (TCRs). As demonstrated in the analysis below, the modified project would not alter this conclusion. New significant impacts to TCRs would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to TCRs and thus would not alter the potential effects of off-site signage projects on TCRs relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

As described in the IS/ND, no specific, designated TCRs were identified in the project area as a result of records searches and Native American outreach. As described in Section 8.5 above, given the time that has passed since the records search referenced in the IS/ND, a new records search was conducted for the project area for the purposes of this document (see Appendix C1 for details). The findings of this updated records search continue to show that there are no recorded prehistoric resources in the project area.

The modified project is subject to Senate Bill (SB) 18 tribal notification requirements, since it includes amendments to the Sunset Boulevard Off-Site Signage Policy, which is a component of the Sunset Specific Plan. A request to obtain an SB 18 notification list was submitted to the California Native American Heritage Commission (NAHC) on March 24, 2025, along with a request for a Sacred Lands File (SLF) search of the project area. The NAHC responded on April 7, 2025. The SLF records search was reported as negative, indicating that the project area does not contain any reported Native American cultural resources. The NAHC also provided contact information for 15 Native American individuals to be notified under SB 18. Accordingly, the City sent notification letters to these 15 Native American individuals on April 25, 2025, via United States Postal Service (USPS) certified mail and email. The notification letters include a project description, a project location map, and instructions for how to contact the City with requests for consultation or any other questions regarding the project.

The City received a reply from three tribes. Responses from those tribes and subsequent communications are summarized below:

- Gabrieleno Band of Mission Indians - Kizh Nation: Responded via email on April 28, 2025, and on May 13, 2025, requesting consultation. The tribe subsequently provided information to the City about the project area and suggested mitigation measures. The City replied via email on August 11, 2025, with a copy of the below-described condition of approval pertaining to TCRs that is applied to billboard development on the Sunset Strip. The City stated that the information provided by the tribe does not provide sufficient evidence that a TCR exists within the project site. As such, the City determined that the below-listed condition is sufficiently responsive to concerns regarding TCRs. Continued implementation of this condition will ensure that the tribe has an opportunity to monitor ground-disturbing activities associated with billboard development.
- Gabrielino Tongva Indians of California Tribal Council: Responded via email on May 12, 2025, requesting to monitor ground-disturbing activities associated with the project. The City replied via email on August 11, 2025, with a copy of the below-described condition of approval that is applied to billboard development on the Sunset Strip. Continued implementation of this condition will ensure that the tribe has an opportunity to monitor ground-disturbing activities associated with billboard development.
- Santa Rosa Band of Cahuilla Indians: Responded via email on April 28, 2025, deferring any comments to the Soboba Band of Luiseno Indians Cultural Resource Department. The Soboba Band of Luiseno Indians did not submit any comments or consultation requests.

As described in Appendix C1, the City imposes the below-listed condition pertaining to TCRs during ground-disturbing activities for billboard projects. The language of this condition was developed as a result of tribal consultation for billboard development on the Sunset Strip occurring as part of Round 1. No known TCRs have been identified in the project area as a result of tribal outreach or consultation, and the City has not identified any new evidence that a TCR exists/existed in the project area. As such, no mitigation for TCRs is required under CEQA, which is consistent with determinations made in the adopted IS/ND. However, in a good faith effort to address tribal concerns, the City agreed to the below-listed condition and has been applying it to billboard project approvals during

Round 1 billboard development. This requirement will continue to apply for future billboard development on the Sunset Strip to ensure continued responsiveness to interested tribes.

Prior to commencement of ground disturbing activities for the Project, tribes who engaged in consultation regarding the project will be contacted and informed of the start date of ground disturbing activities. If a consulting tribe chooses to exercise the option to observe ground disturbing activities, access to the Project site will be provided upon 24-hour notification; full PPE (personal protective equipment) will be required for access to the Project site. If archaeological cultural resources (sites, features, or artifacts) are exposed during construction activities, 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 additional study is warranted. Depending upon the significance of the find under 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 a Construction Monitoring Treatment Plan (CMTP), additional testing, or data recovery may be warranted. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the archeologist. Additionally, if the encountered cultural resources are Native American in nature, the tribes who have requested consultation for the project will be contacted and consulted with regarding appropriate treatment. Consultation with tribes regarding the inadvertent discovery of a TCR (tribal cultural resource) will include soliciting the Tribe's concerns and preferred approach to the development of a CMTP; dispensation, storage and curation (repository or ground placement) of artifacts; whether Native American monitoring (part or fulltime) should be instituted, etc. If human remains are encountered, all procedures and protocols will be followed in accordance with state and local regulations with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Actions upon the discovery of human remains would at a minimum include temporarily halting all ground disturbing activities until the required evaluation of potential remains is complete, contacting the coroner and reporting the inadvertent discovery of human remains. If the coroner determines the human remains are Native American, the coroner will contact the Native American Heritage Commission who will determine the Most Likely Descendent (MLD) with whom further consultation regarding treatment of the human remains will be made.

The City has been applying this condition to each new billboard project and would continue to do so under the modified project. As such, in the unlikely event that TCRs are encountered during excavation activities, such resources would be identified and protected to the extent required by law. Impacts would remain less than significant. As such, the modified signage development scenario and proposed policy amendments 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 TCRs.

It is noted that new development projects with billboard components are subject to individual review and analysis under CEQA. As part of the project-specific CEQA review process, such projects are expected to be subject to Assembly Bill 52 requirements on a project-by-project basis pursuant to CEQA and may also be subject to SB 18, should a specific plan, specific plan amendment, or general plan amendment be involved. New development projects would generally be associated with more ground disturbance than standalone billboard projects, which could warrant additional considerations for the protection of TCRs. Because no TCRs have been identified in the

project area to date, no significant impacts are anticipated to result from future development along the Sunset Strip. Nevertheless, project-specific CEQA review and Assembly Bill 52 compliance would ensure that any potential impacts are identified and addressed in the event that a previously unknown TCR is identified on or near the site of a new development project.

8.14.2 Changes in Circumstances/New Information

As described above, subsequent to adoption of the IS/ND, the City began imposing a condition on billboard development projects pertaining to TCRs. This condition is being applied in a good-faith effort to be responsive to interested tribes but has not been imposed based on any new evidence that a TCR exists/existed within the project area. As such, the more recent imposition of this condition pertaining to TCRs does not constitute new information of substantial importance, as defined in CEQA Guidelines Section 15162(a)(3), as it does not show that the project would have new significant effects or significant effects that are substantially more severe. Rather, impacts to TCRs would remain less than significant, for generally the same reasons as those identified in the adopted IS/ND.

No other changes to the project area or to applicable regulations have occurred that would alter the conclusions or the analysis in the category of TCRs. 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 TCRs that would change the impact conclusions in the IS/ND.

8.15 Utilities and Service Systems

8.15.1 Environmental Analysis

As described in the adopted IS/ND, the Sunset Strip Off-Site Signage Policy, as analyzed based on the original signage development scenario, was determined to have no impacts in the category of utilities and service systems, with the exception of solid waste generation, which was determined to be less than significant. As demonstrated in the analysis below, the modified project would not alter these conclusions. New significant impacts to utilities and service systems would not result, and substantial increases in the severity of impacts or the need for new mitigation measures would not result, for the reasons further described below.

The proposed policy amendments do not pertain to utilities and service systems and thus would not alter the potential effects of off-site signage projects on utilities and service systems relative to the conclusions in the adopted IS/ND. As such, the analysis below is focused on the potential effects of the modified signage development scenario.

Wastewater and Stormwater. As described in the IS/ND, billboard projects constructed and operated under the Sunset Boulevard Off-Site Signage Policy would not generate or discharge wastewater and would not increase stormwater runoff. As such, no impacts would occur in the categories of wastewater treatment requirements, wastewater generation, or capacity of wastewater or stormwater facilities. Similarly, billboard projects as part of the modified signage development scenario would also not generate or discharge wastewater and would not increase stormwater runoff. As such, the impact determinations in the IS/ND would remain the same for the modified project, and no impacts would occur, for the same reasons as stated in the IS/ND.

Water. The IS/ND states that billboard projects constructed and operated under the Sunset Boulevard Off-Site Signage Policy would not require the use of potable water. However, some of the billboard projects selected through Design Excellence Screening are associated with landscaping and would thus require potable water. Any landscaping would be required to adhere to City requirements for drought-resistant landscaping, thereby reducing water use. Any such water use would be negligible in the context of City-wide water use and would not require expansions in water infrastructure. While minor increases in water use may occur in association with the modified project, no new impacts or substantial increases in severity of impacts would result.

Solid Waste. The IS/ND states that construction activities associated with billboard projects would generate minor amounts of solid waste. For projects involving new pole foundations, minor amounts of soil would be exported from the billboard sites. However, as stated in the IS/ND, construction projects would incorporate source-reduction techniques and recycling measures to divert waste away from area landfills in accordance with City and state requirements. Construction for billboards would be required to comply with City standards of recycling 80% of all construction materials that need to be disposed of. Any non-recyclable construction waste generated would be disposed of at a landfill approved to accept such materials. Operations would generate minor amounts of soil waste, associated with expended LED bulbs or panels and used advertising copy. As stated in the IS/ND, this solid waste generation is not considered substantial. The modified signage development scenario would result in a marginal increase in solid waste production, due to the overall addition of 15 signs to the project area. However, the solid waste associated with 15 additional signs would be minor to negligible, and impacts would remain less than significant for the same reasons as described in the IS/ND.

For the reasons described above, the modified project would not result in new significant impacts or a substantial increase in the severity of impacts in the category of utilities and service systems.

8.15.2 Changes in Circumstances/New Information

Since adoption of the IS/ND, updates to the CEQA Guidelines have gone into effect. One of the revisions to Appendix G of the CEQA Guidelines involves changes to the threshold questions in the category of utilities and service systems. The revised Appendix G threshold questions now address whether new, expanded, or relocated electrical, natural gas, or telecommunications infrastructure may be necessary as a result of a project, the construction or relocation of which could cause significant environmental effects. Information regarding these additional topics are provided in the paragraphs below based on the updates to the CEQA Guidelines.

Electrical Infrastructure. The project area is highly urbanized and is served by existing electrical infrastructure, owned and operated by Southern California Edison (SCE). The anticipated electrical demand of the modified signage development scenario is described in Appendix B and is estimated as 8,840,000 kilowatt-hours (kWh) per year, after implementation of the anticipated new billboard projects. This amount of energy use is negligible in the context of regional demand. In 2022, approximately 86 billion kWh of electricity were used in SCE's service area. The anticipated total annual billboard energy use would be approximately 0.01% of this regional demand. As such, the increase in electricity demand in the project area resulting from the modified signage development scenario would be negligible relative to the electricity use in SCE's service area and is not, therefore, expected to require new or expanded electrical infrastructure. While site-specific electrical hookups and on-site improvements may be required at the sites of billboards (particularly for new billboards), this activity is included in the overall construction scenario for billboard projects that is analyzed in the IS/ND and in this addendum. Additionally, each billboard is required to undergo plan check with the City's Building and Safety Division, during which the sufficiency of electrical service and the ability of

service providers to serve the project are verified. Furthermore, electrical improvements would be limited to the site of each billboard and the adjacent street frontage and would not be associated with off-site improvements beyond the envelope of potential disturbance that is analyzed in the IS/ND and in this addendum. Therefore, no additional impacts outside of those analyzed and disclosed in the IS/ND and in this addendum would occur as a result of construction or expansion of electrical infrastructure. Impacts would therefore be less than significant. For billboards that are part of new developments, the electrical demand of such projects (including any billboards) would be analyzed during the project-specific CEQA review process required for each new development project.

Natural Gas Infrastructure. Billboard projects are not expected to increase demands for natural gas in the project area. Natural gas would not be required for billboard operations and would not generally be used for construction. As such, no impacts would occur.

Telecommunication Systems. Full motion billboards display illuminated sign content using a computer that receives images remotely via the internet. As such, new full motion billboards would require internet connections. Sunset Boulevard is situated within an urbanized area that is already served by several telecommunication services. While localized connections and upgrades may be required at or near the sites of full motion billboards, it is not anticipated that any off-site improvements or installation of telecommunication facilities would be necessary to accommodate full motion billboards. As with electrical infrastructure, any necessary improvements would likely be limited to the site of each billboard and the adjacent street frontage, and such activities are included within the overall billboard construction scenarios that are described and analyzed within the IS/ND and this addendum. Therefore, no additional impacts outside of those analyzed and disclosed in the IS/ND and in this addendum would occur as a result of construction or expansion of telecommunications infrastructure. Impacts would therefore be less than significant. For billboards that are part of larger projects, telecommunication demands of such projects (including any full motion billboards) would be analyzed during the project-specific CEQA review process that would be required for each new development project or building upgrade project.

As demonstrated in the paragraphs above, billboards constructed pursuant to the Sunset Boulevard Off-Site Signage Policy, under either the original or modified signage development scenarios, would not create new demands for electricity, natural gas, or telecommunications infrastructure such that new, expanded, or relocated facilities would be required. Any necessary improvements would be localized at the site of each billboard and the adjacent street frontage, and the activities required are included within the construction scenarios that are analyzed in the IS/ND and in this addendum. While there are new guidelines for the evaluation of utilities impacts, implementation of the Sunset Boulevard Off-Site Signage Policy (under either the original or modified signage development scenarios) would not result in significant effects under the new guidelines, as demonstrated herein.

Aside from the CEQA Guidelines updates discussed in the paragraphs above, no new regulations or design standards have been implemented that would alter the conclusions of the utilities and service systems 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 utilities and service systems in the project area that would change the impact conclusions in the IS/ND.

8.16 Mandatory Findings of Significance

Impacts to Biological and Cultural Resources

As discussed in Section 8.4, Biological Resources, the project area is located in a developed and urbanized area, and does not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. Additionally, the project area does not function as a corridor for the movement of native or migratory wildlife. All activities associated with the modified signage development scenario would be conducted in the highly urbanized environment of the modified project. However, the project area contains trees and other vegetation that have the potential to support nesting birds that are protected under the California Fish and Game Code and under the Migratory Bird Treaty Act. In the event that any such nesting birds are present during construction activities for billboard projects, the birds would be protected in accordance with the provisions of the adopted policy. Specifically, the adopted policy requires a nesting bird survey to be completed if construction occurs during the nesting bird season and would entail vegetation trimming or removal. Any impacts to biological resources that would occur as a result of the modified project would therefore be less than significant.

As discussed in Section 8.5, Cultural Resources, there are no known archaeological resources in the project area. Some billboard projects would involve minor amounts of ground disturbance along the Sunset Strip. As described in Section 8.5, no prehistoric or historic archaeological resources have been identified in the project area. Nevertheless, the potential exists for uncovering a previously unknown archaeological resource during ground-disturbing activities. As explained in Section 8.5, the policy includes requirements established for the protection of archaeological resources. In the unlikely event that archaeological resources or human remains are encountered during excavation activities, such resources would be identified and protected to the extent required by law. As also demonstrated in Section 8.5, the modified project is not anticipated to result in significant impacts to historic built environment resources. Impacts to cultural resources would be less than significant.

Impacts to Long-Term Environmental Goals

The modified project would not result in the achievement of short-term environmental goals to the disadvantage of long-term environmental goals. As demonstrated in Section 8.7 of this addendum, the modified project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, as described in Section 8.12 of this addendum, the modified project would not result in unplanned, substantial population growth. The project, in both its approved and modified forms, would be subject to a variety of sustainability measures at the state and local level, which ensure that billboard projects are constructed and operated to use resources efficiently, to the maximum extent practicable. For these reasons, the modified project would not lead to the achievement of short-term environmental goals to the disadvantage of long-term environmental goals.

Cumulative Impacts

Buildout of the SAAP would result in the addition of 56 new billboard faces along the Sunset Strip (several of which have already been constructed). This buildout has been analyzed for its environmental impacts throughout this addendum, and the effects of the totality of the approved and proposed billboard development are considered holistically herein. Specifically, the Lighting Study (Appendix A) considers a worst-case scenario for light/glare effects, which assumes that all billboards proposed under Rounds 1, 1.5, and 2 are constructed. The air quality, GHG, and energy analysis (Appendix B) considers the potential for multiple billboard projects to be undergoing construction at the same time and also considers the totality of the operational scenario in terms of GHG emissions and energy demands. The transportation analysis discusses operational vehicle trips, assuming full buildout of the

SAAP. Additionally, while not required under CEQA, the analysis conducted by Fehr and Peers (Appendix E1) considers the wholistic buildout of the SAAP relative to driver distraction. As demonstrated throughout this addendum, no significant environmental impacts have been identified as a result of program buildout.

As discussed throughout this addendum, several billboard projects would be integrated into a new development project. At the time of the adopted IS/ND, the locations, land use types, and scale of such projects were unknown. At this juncture, applications for such new development projects have been received by the City, and billboard awards have been granted to certain new development proposals. As such, it is now known that there are a total of 8 billboard projects associated with new development in Rounds 1, 1.5, and 2. These new development projects involve demolition of existing structures, construction of new buildings, and operation of various land uses, including residential and commercial uses. Of the 8 new development projects with billboards, 2 projects have approved CEQA documents (8850 Sunset and 8497 Sunset), 2 projects have in-progress CEQA documents (8240 Sunset and 9176 Sunset), and the remaining 4 projects are still in the design process and do not have published CEQA documents.¹⁰ Information about these new development projects, particularly their billboard components, has been included in this document to the extent practicable. Specifically, billboards that are part of new development have been analyzed in the Lighting Study (Appendix A) and in the analysis conducted by Fehr and Peers (Appendix E1). Impacts associated with the entirety of these new development projects, including their associated billboards, is or will be evaluated in the respective CEQA documents for these projects. Information in this addendum may be incorporated by reference at that time.

In addition to the 8 new development projects that include billboards, there are other development projects that are recently approved, proposed, and/or reasonably foreseeable in the vicinity of the Sunset Strip, including residential development projects in the neighborhoods to the north and south of the Sunset Strip.

While it is possible that construction of one or more of the proposed billboard projects could overlap with construction of a new development project, the construction and operational requirements for billboards are not anticipated to combine with future new development projects in the area to produce a cumulatively significant effect, due to the minimal activities required to install and maintain a billboard. Regarding potential aesthetic and land use effects, the proposed Sunset Boulevard Off-Site Signage Policy includes regulations that foster best urban design practices and that prevent potentially significant light trespass, glare, and obstruction of significant public views as identified in the SSP. As such, billboard development under the modified project is not anticipated to combine with new development projects to produce cumulatively considerable effects.

As discussed above, the modified project itself would result in cumulative billboard development along the Sunset Strip. This scenario is considered for its environmental impacts throughout this addendum. Additionally, development of the modified project may also overlap with the construction and operation of various new development projects in the project area, including those new development projects that are associated with billboards. As also discussed above, billboard development is not anticipated to combine with land development projects to produce cumulatively considerable environmental effects, based on the environmentally protective aspects of the Sunset Boulevard Off-Site Signage Policy and the relatively minimal construction and operational activities involved with billboard projects. For these reasons, cumulatively considerable effects are not anticipated to occur as a result of the modified project.

¹⁰ The CEQA statuses of new development projects with billboard components are current as of the time of this writing (August 2025).

Substantial Adverse Effects to Human Beings

As enumerated in the IS/ND, effects to human beings resulting from the approved project could be associated with aesthetics or transportation and traffic. However, as determined in the IS/ND, impacts in these categories would be less than significant. As described below, such impacts would remain less than significant under the modified project.

As discussed in Section 8.1, Aesthetics, the modified project would result in additional lighting and glare within the project area. However, any lighting and glare produced by billboard projects would be minimized by the regulations set forth in the Sunset Boulevard Off-Site Signage Policy. Additionally, the proposed policy amendments would strengthen and clarify the existing light and glare regulations to address the expanded billboard development scenario under Rounds 1.5 and 2. Light and glare impacts would be considered less than significant.

As discussed in Section 8.13, Transportation and Traffic, construction activities at billboard sites have the potential to result in temporary, localized sidewalk closures. Although this could potentially result in a pedestrian safety issue, appropriate emergency access and detour signage would be provided at each location in accordance with City requirements, ensuring the pedestrians would be able to safely maneuver around the closure. Effects to human beings would, therefore, be less than significant.

As described in Section 8.13, provisions have been included in the proposed Sunset Boulevard Off-Site Signage Policy to control and limit aspects of digital imagery that could contribute to driver distraction. For example, compliance with the sign brightness limits that are specified in the Sunset Boulevard Off-Site Signage Policy would ensure that full motion billboards have brightness levels that are well below the California Vehicle Code requirements. Many billboard projects also include pedestrian improvements, which would help foster increased pedestrian safety along the Sunset Strip. Due to these measures, the modified project would not create a substantial, adverse effect to human beings related to roadway hazards.

All billboard projects developed under the Sunset Boulevard Off-Site Signage Policy would be subject to varying levels of review and approval by the City. The City would be able to prohibit the implementation of any billboard projects that are inconsistent with the safety provisions contained in the Sunset Boulevard Off-Site Signage Policy and or that may otherwise adversely affect human beings. Impacts to human beings resulting from the modified project would be less than significant.

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Appendix A

Sunset Boulevard Arts & Advertising Program Sign Lighting Study



**SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM
SIGN LIGHTING STUDY
West Hollywood, California**

REVISED LIGHTING STUDY

Prepared for City of West Hollywood

May 5, 2025

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I. Executive Summary

This Revised Lighting Study (Study) is prepared by Francis Krahe & Associate Inc. for the City of West Hollywood to provide a review of the Sunset Boulevard Arts & Advertising program which includes illuminated Billboards and Tall Walls along Sunset Boulevard. This Study includes a detailed evaluation of the existing lighting conditions and future off-site advertising illumination within a portion of Sunset Boulevard where the off-site advertising is in close proximity to residential properties. The Draft Lighting Study issued on September 30, 2024 is updated in this Study to clarify recommendations previously stipulated, including Modification of Recommendations 1 and 2 presented on pages 20 through 23 below. This Study serves as the basis for the conclusions and recommendations to the City of West Hollywood presented below.

There are many Illuminated off-site advertising signs along Sunset Boulevard today with a planned increased number of signs either in the submittal process or anticipated in the future. This Study evaluates the existing lighting conditions and the effect of the proposed future signs. This Study also evaluates the effectiveness of the City of West Hollywood's Sunset Boulevard Off-Site Signage Policy with respect to light trespass and glare, and suggests clarifications to the Policy to improve the outcomes of future lighted signs.

The City of West Hollywood Planning Department identifies new proposed off-site advertising Signs within the Sunset Boulevard Arts & Advertising program along Sunset Boulevard as Round 1.0, Round 1.5, and Round 2.0 (attached Appendix A). The following Signs are included in this Study:

- Round 1.0 Signs approved under existing Policy and some of which are not yet constructed, which includes 19 Sign locations along Sunset Boulevard. The constructed Sign locations are evaluated as a part of the Existing Conditions in this Study. The Study area includes calculations for the Signs not yet constructed.
- Round 1.5 Signs includes 6 Sign locations along Sunset Boulevard. These are new signs included in the calculations below.
- Round 2.0 Signs includes 10 Sign locations along Sunset Boulevard in the City of West Hollywood. These are new signs included in the calculations below.

The Study includes detailed calculations and analysis for a portion of Sunset Boulevard containing 10 of these proposed Signs, and more generalized conclusions for the remainder of the proposed Signs along Sunset Boulevard. The extent of Sign locations along Sunset Boulevard varies in density and proximity to residential properties. This Study evaluates a portion of Sunset Boulevard with the highest density of Signs and with the greatest proximity to the residential properties to provide the most conservative evaluation of the Signs' potential for light trespass illuminance and glare, and the effectiveness of the current Policy.

This Study evaluates the light from off-site advertising which may be visible at the property line of adjacent residential zoned properties. In this Study, off-site advertising is hereinafter referred to as Signs, which includes Billboards and Back lit Signs, or any other materials that may be deployed to illuminate Sign faces at night, to display color, graphics, or text.

All exterior architectural lighting in the state of California is regulated by California Energy Code (CEC) section 140.7 and CalGreen section 5.106.8. All lighting that does not classify as a sign as defined in CEC section 130.3 is considered architectural lighting which must comply with the light trespass requirements of CalGreen. This includes architectural lighting, temporary event lighting, or any other materials that may be deployed to be illuminated at night to display color, graphics, or text images. Signs complying with the requirements of CEC section 130.3 are exempt from the CalGreen light trespass requirements and are evaluated in this Study relative to the Policy.

This Study also explains the how light is measured, which regulations control artificial lighting, and what type of artificial light exists along Sunset Boulevard and surrounding neighborhoods. This information is used to identify the change in the lighting conditions that would be produced by the Signs along Sunset Boulevard and at surrounding residential zoned properties.

This Study evaluates the Signs with respect to the City of West Hollywood Sunset Boulevard Off-Site Signage Policy (Policy). The Signs listed above are analyzed to confirm compliance with the Policy, and the Study identifies issues where the lighting resulting from the implementation of the proposed Round 1.0, 1.5, and 2.0 Signs would exceed the limits established by the Policy or create substantial change to the existing ambient lighting. This Study also includes recommendations for clarifications to the Policy to reduce the possibility of adverse lighting at residential zoned properties.

The methods of analysis utilized for this Study follow the recommended practices established by the Illuminating Engineering Society of North America (IESNA) for the practice of illumination engineering, design, and application, and the actual measurements of light sources and illuminated surfaces.¹ This Study includes measurement of the existing light along Sunset Boulevard and adjacent intersecting streets, and calculations to determine the light added by the Signs.

This Study evaluates the change in lighting conditions created from the Signs that would be authorized by approval of each of the listed Signs in Tables 1 through 3, and as identified within the Conceptual Sign Plans included as Appendix A. As noted above, the Signs evaluated include Digital Display Signs, Billboards, front lighted signs, back lighted signs, as described below in Section 2, Signs Description, and as illustrated in Appendix A. Each individual Sign and the collective light from all Signs that may affect light trespass and or glare at surrounding residential properties are evaluated. This Study evaluates the light from the Signs at residential properties where additional light from the Signs may substantially affect the use of these properties. Commercial use properties such as office buildings or retail stores are not affected by additional light, and are not evaluated in this Study.

Light from the Signs at residential properties are evaluated with respect to light trespass and glare. These two technical terms are defined by the IESNA as follows:

- **Light Trespass²** is excessive stray light on surrounding properties. Light trespass is measured in terms of illuminance (foot-candles or metric units lux), and can be measured at any point and in any direction. Where light trespass is evaluated for this Study, the illuminance is measured perpendicular to and towards the source of light, at the property line, or the location where light would cause an issue. Light trespass is evaluated at night.
- **Glare³** occurs when the eye is unable to comfortably adapt to the visual scene. This may occur when the overall light level is too great, or where there is a large difference of brightness in a visual field. A bright light source, such as a flood light or street light, viewed against a dark sky may be uncomfortable to look at, and may create a temporary sensation of blindness, which is referred to as disability glare. Glare is evaluated by measuring the luminance (which is measured in footlamberts or metric units candelas/m²) of the source of light, such as a digital sign, in comparison to the surrounding adjacent luminance. In this Study the contrast ratios define the extent of Glare within the field of view at any observer position. The contrast ratio is determined by the variation of luminance within the field of view. "High," "Medium," and "Low" contrast

1 IESNA publications: American National Standards Institute (ANSI)/Illuminating Engineering Society (IES) OL-IM-01 Lighting Fundamentals, Metrics and Calculations; ANSI/IES OL-IM-02 Lighting Design, Engineering, and Specifications; ANSI/IES OL-IM-03 Lighting Design Criteria and Illumination Recommendations; ANSI/IES OL-IM-04 Lighting Equipment Testing Procedures and Measurements; and ANSI/IES OL-IM-05 Lighting Roadway and Parking Facilities

2 ANSI/IES LP-2-20, Lighting Practice: Designing Quality Lighting for People in Outdoor Environment, Section 2.3.2 Light Trespass, page 4

3 ANSI/IES LS-8-20, Lighting Science: Vision – Perceptions and Performance, Section 4.4 Glare, page 16

ratios are the comparison of peak measured luminance to the average luminance within a field of view: Contrast ratios above 30:1 are generally uncomfortable for the human eye to perceive, and in a conservative analysis would be perceived as a source of glare. Contrast ratios less than 30:1 and greater than 10:1 are clearly visible (defined as Medium contrast); and below 10:1 are less noticeable (Low contrast). Contrast ratios less than 3 to 1 appear equal. Glare may occur either during the day or night.

The Signs should ultimately comply with the requirements of the Policy as adopted as an amendment to the Sunset Specific Plan (Ordinance No. 19-1063) by the City of West Hollywood. The Policy, included herein as Appendix B, regulates sign types, location, size, and operating characteristics of signage proposed at each Sign site specifically and within the Policy boundaries generally.

This Study utilizes the illumination standards for Sign Lighting defined by the Policy to evaluate the light trespass and glare at residential zoned properties adjacent to Sunset. The Policy stipulates the following illumination requirements for each individual Sign project:

- Light trespass illuminance from off-site advertising signs, architectural lighting, and temporary lighting shall not exceed 1.4 footcandles (fc) at any adjacent residential zoned property line.
- Signs will not exceed 6000 candelas per meter squared (cd/m^2) luminance during the day from sunrise until 20 minutes prior to sunset.
- Maximum luminance at night from sunset until 20 minutes prior to sunrise, or at any time when ambient sunlight is less than 100 (fc) must not exceed 300 cd/m^2 .
- Maximum luminance during the day must not exceed 6000 cd/m^2 .
- From 2:00 a.m. until sunrise no animated content or moving patterns shall be permitted.
- Luminance shall transition smoothly from daytime luminance to nighttime luminance and vice versa.

In addition, this Study includes the following recommended clarifications to the Policy to prevent light trespass greater 1.4 fc at residential zoned properties:

- Illuminated surface area must not exceed 1,000 square feet and the maximum luminance must not exceed 300 cd/m^2 ; if illuminated area is greater than 1,000 square feet the maximum luminance must be reduced proportionally as listed in Table 4 below.
- All Signs (which in this Study includes off-site advertising, architectural lighting, and or temporary event lighting) at properties abutting a residential zoned property must be oriented toward Sunset Boulevard and away from the adjacent residential zoned property lines, with the illuminated face(s) parallel to or no more than 45 degrees to the residential zoned property line. In addition, all Signs must be offset at least 20 feet from the abutting residential zoned property.

This Study demonstrates light trespass from the off-site advertising, architectural lighting, and or temporary event lighting will be less than 1.4 footcandles (fc) at the property line of residential zoned properties adjacent to Sunset Boulevard when off-site advertising, architectural lighting, and or temporary event lighting comply with the Policy illumination requirements, the maximum permitted luminance defined in Table 4, and where abutting residential zoned properties are oriented parallel to or no more than 45 degrees to the adjacent residential zoned property line, and are offset at least 20 feet from the abutting residential zoned property.

This Study also evaluates Sign light trespass illuminance at the property line of residential zoned properties more distant from Sunset Boulevard, which are located beyond the boundary of the Sunset Boulevard Specific

Plan boundary. For these more distant residential zoned properties, the maximum light trespass illuminance is defined by the California Energy Commission (CEC) for urban areas in California. CEC defines all urban areas designated by US Census as Lighting Zone 3 (LZ3), which is assigned a maximum light trespass illuminance of 0.74 fc by CEC and IESNA. This light trespass maximum applies to each individual property or project, and is not aggregated or evaluated cumulatively. This Study evaluates the illuminance from the Signs at residential zoned properties outside of the Sunset Boulevard Specific Plan boundary and demonstrates the light trespass from the Signs at residential zoned properties outside the Sunset Boulevard Specific Plan boundary will be less than 0.74 fc when Signs comply with the Policy illumination requirements, maximum permitted luminance defined in Table 4, and Signs abutting residential zoned properties are oriented parallel to or no more than 45 degrees to the adjacent residential zoned property line, and are offset at least 20 feet from the abutting residential zoned property.

Furthermore, the Signs are evaluated with respect to glare visible at adjacent residential properties or within adjacent roadways. To present a conservative analysis, this Study evaluates the Signs with a maximum luminance of 6000 cd/m² during the day and 300 cd/m² at night with the Signs operating at all white. The existing lighting conditions along Sunset and adjacent properties are measured, documented, and compared to the new lighting conditions which would be created by the Signs. The existing lighting conditions along Sunset Boulevard are relatively bright, in alignment with nighttime entertainment use described within Lighting Zone 4 (LZ4). This Study confirms the contrast ratios, which compares the maximum Sign luminance to the existing average luminance measured at the Monitoring Sites, are less than 30:1. Contrast ratios less than 30:1 indicate the Signs would not create a new glare condition at adjacent residential properties or a substantially different lighting environment from the existing conditions.

The glare at adjacent roadways is also evaluated with respect to the maximum permitted luminance defined within the California Vehicle Code, within a driver's field of view for both day and night. This Study confirms the Sign would not exceed the maximum luminance defined by the California Vehicle Code during the day, at night, and during periods of low sun intensity. Therefore, the results of this Study indicate the Signs would not create a new source of glare for drivers at adjacent roadways. Description of the Signs

The Sunset Boulevard Arts & Advertising Program was launched by the City of West Hollywood to "reimagine the world's premier locations for outdoor advertising" and to include outdoor art to reinvent the idea of what



Figure 1: Sunset Boulevard, City of West Hollywood, and environs

a billboard can be. The Sunset Boulevard Arts & Advertising Program includes signs along the length of Sunset Boulevard within the City of West Hollywood, from the western border with City of Beverly Hills up to the eastern border with the City of Los Angeles.

The City of West Hollywood (WEHO) Sunset Boulevard Specific Plan defines the geographic district along Sunset Boulevard in WEHO where creative and innovative outdoor signs are encouraged, while defining operating limits with regard to the size of the Signs and the intensity of permitted Sign illumination. Figure 1 illustrates the extent of Sunset Boulevard and the adjacent properties within the City of West Hollywood, and the extent of the properties within the City of Los Angeles to the north, and the City of Beverly Hills to the west. New signs along Sunset Boulevard are regulated by the Sunset Boulevard Specific Plan (the "Specific Plan") which regulates lighting with respect to light trespass (i.e., the spillover of light onto adjacent light-sensitive properties). The Specific Plan is illustrated in Figure 2 within the Zoning Plan for the City of West Hollywood, labeled SSP, and shaded light blue. The Specific Plan includes the lighting requirements within the Sunset Boulevard Off-Site Signage Policy (Policy) which are summarized above.



Figure 2: City of West Hollywood Zoning Plan, Sunset Specific Plan Shaded Light Blue

In 2017 Francis Krahe & Associates provided a lighting analysis for the proposed Sunset Boulevard Arts & Advertising Program, which is summarized in the Sunset Strip Off-Site Signage Policy Lighting Report (Report), published June 1, 2017 (attached here as Appendix D). The Report evaluated the light trespass and glare from the proposed signs, and provided recommendations for the lighting requirements which were adopted within the Policy. Key findings of the Report include:

- The existing lighting within the commercial area along Sunset Boulevard included high measured luminance and illuminance from existing signs, exterior building lighting, and street lights.
- The existing measured illuminance supports the recommended adoption of Lighting Zone 4 (LZ4) within California Energy Code regulations and IESNA standards, to formalize the existing lighting within the commercial area along Sunset Boulevard to support the entertainment and artistic environment proposed by the Sunset Boulevard Arts & Advertising Program.
- The Report recommended maximum Sign area and night time luminance to allow Signs along Sunset Boulevard which would not create an excessive light at adjacent residential properties (greater than 1.4 fc). The basis of the Report recommendations included an estimated distance of no less than 250 feet away from the Signs to the nearest residential properties. The distance of 250 feet is identified in the Sunset Strip Off-Site Signage Policy Initial Study / Negative

Declaration, Section 3.1(d), page 252 (attached herein Appendix E), which states:

- "Along Sunset Boulevard, most residential properties are set back behind the commercial properties that front onto Sunset Boulevard. The slope to the north and south of Sunset Boulevard significantly affect the visibility of signs from residential properties. ... The distance from Sunset Strip properties to adjacent residential properties varies considerably. The properties within close proximity are generally 250 feet to 300 feet away from the existing signs on Sunset Boulevard."

This Study serves to further evaluate the effectiveness of the Policy with respect to the actual Signs installed and the future Signs proposed. The following Signs have been proposed within the purview of The Sunset Boulevard Arts & Advertising Program:

- Round 1.0 Signs approved under existing Policy include 19 Sign locations along Sunset Boulevard in the City of West Hollywood.
- Round 1.5 Signs include 6 proposed Sign locations along Sunset Boulevard in the City of West Hollywood.
- Round 2.0 Signs include 10 Sign proposed Sign locations along Sunset Boulevard in the City of West Hollywood.



Figure 3: Sunset Blvd. Arts & Advertising Program Signs

Figure 3 indicates the locations of the Signs included with the Sunset Arts & Advertising Program, Round 1.0, Round 1.5, and Round 2.0. Tables 1 through 3 below list the identification number, address, number of faces, and area for all Signs within the Sunset Arts & Advertising Program. The Signs are located along Sunset Boulevard within the City of West Hollywood, California (see Figure 1).

The Signs include several different methods of illumination: front lighting; backlit acrylic; digital LED, and include architectural lighting or other products not yet specified. All methods of Sign illumination technology have the ability to produce light trespass or glare. In this Study the Signs are evaluated with uniform maximum

luminance of 300 cd/m² applied to the defined surface area of the proposed Sign as listed below in Tables 1 and 2, to present the worst case, most conservative evaluation of Sign light trespass and glare.

Table 1: Round 1.0 Signs⁴

Sign ID #	Location	Sign Faces	Sign Area
			Note: Dimensions of Signs may change through the approval process. Sign dimensions below are as listed from the initial Sign application plans
1.0-1	9201 Sunset	2	(1) 6,156 SQFT - south facing (1) 3,000 SQFT - east facing
1.0-2	9200 Sunset	2	(1) 1,000 SQFT - east facing (1) 500 SQFT - west facing
1.0-3	9165-69 Sunset	2	(1) 900 SQFT - south facing (2) 600 SQFT - south facing
1.0-4	9157 Sunset	1	(1) 1,023 SQFT - south facing
1.0-5	9101 Sunset	2	(1) 360 SQFT - east facing (1) 360 SQFT - west facing
1.0-6	9015 Sunset	2	(1) 672 SQFT - east facing (1) 672 SQFT - west facing
1.0-7	9009 Sunset	1	(1) 800 SQFT - west facing
1.0-8	8901 Sunset	3	(2) 672 SQFT - east, west (1) 70 SQFT - south facing
1.0-9	8760 Sunset	2	(1) 1,000 SQFT - west facing
1.0-10	8752 Sunset	2	(2) 532 SQFT - east, west facing
1.0-11	8743 Sunset	1	(1) 672 SQFT - southwest facing
1.0-12	8730 Sunset	2	(1) 1,500 SQFT - northeast (1) 963 SQFT - southwest
1.0-13	8590 Sunset	2	(1) 1200 SQFT - east facing (1) 1200 SQFT - west facing
1.0-14	8501 Sunset	2	(1) 1,000 SQFT - west facing (1) 1,000 SQFT - east facing
1.0-15	8497 Sunset	3	(1) 1,200 SQFT - south facing (1) 811 SQFT - east facing (1) 676 SQFT - down facing
1.0-16	8439 Sunset	2	(1) 672 SQFT - east facing (1) 672 SQFT - west facing
1.0-17	8433 Sunset	2	(1) 500 SQFT - east facing (1) 500 SQFT - west facing
1.0-18	8301 Sunset	1	(1) 1,500 SQFT - east facing
1.0-19	8240 Sunset	1	(1) 1,000 SQFT - west facing

⁴ Sign information is based on the latest information received through the City of West Hollywood as of June 1, 2023.

Table 2. Round 1.5 Signs⁵

Sign ID #	Location	# of Sign Faces	Sign Area
1.5-1	9039 Sunset	4	(2) 960 SQFT - east, west (1) 499 SQFT - south facing (1) 244 SQFT - east facing
1.5-2	8440 Sunset	2	(2) 800 SQFT - east, west
1.5-3	8410 Sunset	4	(1) 803 SQFT - north facing (1) 668 SQFT - north facing (1) 551 SQFT - east facing (1) 446 SQFT - west facing
1.5-4	8371 Sunset	1	(1) 1,000 SQFT - south facing
1.5-5	8300 Sunset	1	(1) 989 SQFT - west facing
1.5-6	8222 Sunset	2	(1) 1,000 SQFT - east facing (1) 500 SQFT - west facing

Table 3. Round 2.0 Signs⁶

Sign ID #	Location	# of Sign Faces	Sign Area
2.0-1	9229 Sunset	1	(1) 5,640 SQFT total - east facing
2.0-2	9176 Sunset	2	(1) 2234 SQFT - north facing (1) 428 SQFT - west facing
2.0-3	9121 Sunset	2	(1) 1000 SQFT - west facing (1) 500 SQFT - east facing
2.0-4	8919 Sunset	2	(1) 1,000 SQFT - west facing (1) 500 SQFT - south facing
2.0-5	8906 Sunset	3	(1) 1,000 SQFT - east facing (2) 1,000 SQFT - south, west facing
2.0-6	8873 Sunset	2	(1) 1,000 SQFT - west facing (1) 500 SQFT - east facing
2.0-7	8850 Sunset	2	(1) 1,000 SQFT - west facing (1) 1,000 SQFT - east facing

⁵ Sign information is based on the latest information received through the City of West Hollywood as of June 1, 2023.

⁶ Sign information is based on the latest information received through the City of West Hollywood as of June 1, 2023.

2.0-8	8801 Sunset	2	(1) 1,000 SQFT - west facing (1) 500 SQFT - east facing
2.0-9	8481 Sunset	2	(1) 1,000 SQFT - south facing (1) 500 SQFT - west facing
2.0-10	8250 Sunset	1	(1) 1,000 SQFT - east facing

1. Methodology

1.1 Existing Conditions Procedures

Existing conditions lighting observations were conducted following recommended practice procedures defined by the IESNA in RP-33-00 Lighting for Outdoor Environments, TM-10-00 Addressing Obtrusive Light (Urban Sky Glow and Light trespass) in Conjunction with Roadway Lighting, and TM-11-00 Light Trespass: Research, Results and Recommendations.

Field illuminance and luminance measurements were conducted to accurately document all existing incident and visible light at each Monitoring Site location. Incident light can be understood as a vector of luminous flux moving through space. As the vector (light) is incident upon a surface, the intensity of the resulting illuminance will vary depending upon the relative orientation of the vector to the surface. The greatest illuminance will result when the surface and vector are perpendicular. The least illuminance will result when the surface and vector are parallel. In the field conditions, where there are multiple sources of light originating from varied positions, illuminance measurements are recorded horizontally



Figure 4: Minolta LS-100 meter

with the photosensor facing up at 3 feet above grade, and vertically with the photosensor facing the Signs as per as per IESNA standards. These measurements document the total horizontal illuminance received at a Monitoring Site as well as the direction and intensity of light converging on the Monitoring Site from the direction of the Signs. This study utilizes a vertical and horizontal illuminance analysis. The existing Illuminance is measured with a Minolta Illuminance meter.

The existing luminance is measured from a Monitoring Site to light sources and surfaces within the field of view toward the Property from that Monitoring Site. The existing conditions luminance data is measured with a Minolta LS-100 Luminance meter with procedures consistent with best practices for field measurement of luminance as per IESNA standards. The LS-100 meter utilized by Francis Krahe & Associates, Inc. reports luminance data in either candelas per square meter or footlamberts (fL). All existing luminance data measured and reported in this Study are recorded as cd/m^2 .

1.2 Lighting Analysis

The analysis of the Signs includes evaluation of the light trespass illuminance from the Signs at adjacent residential zoned properties, and an evaluation of glare from the Sign visible at residential zoned properties, or at adjacent roadway locations.

This Study presents a conservative analysis with respect to light trespass and glare. The Signs presented in Appendix A are evaluated with all lighting permitted within the limits of the Policy, with all sign faces operating simultaneously at the maximum night luminance of 300 cd/m², all white.

a. Signs Light Trespass Analysis

Light trespass illuminance is evaluated in this Study with respect to vertical illuminance at nearby residential property lines. Light trespass illuminance is calculated by the illumination modeling software program AGI32 in accordance with the procedures defined by IESNA⁷. This software utilizes the three-dimensional computer models of the topography along Sunset Boulevard, the buildings, and Signs to generate an accurate prediction of future illuminance from the Signs identified within Appendix A. The calculated illuminance data is presented at 10 feet on center within a vertical planar surface at the residential property lines adjacent to Sunset Boulevard. The calculation plane simulates the illumination (fc) captured by light meters. The extent of Sign locations along Sunset Boulevard varies in density and proximity to residential properties. This Study evaluates the highest density of Signs with the greatest proximity to the residential properties in order to provide the most conservative evaluation of the Signs' potential for light trespass illuminance. Residential zoned properties located farther away from the Signs or locations with lower density of Sign locations will receive less light trespass illuminance due to the reduced illuminance with distance as results of the inverse square law.



Figure 5: Signs Light Distribution Diagram

Figure 5 presents a graphic representation of the light distribution from the Signs along the length of Sunset Boulevard within the City of West Hollywood. The highest density of Signs with close proximity to residential properties is within the portion of Sunset Boulevard from the intersection with Hillsdale Street at the west, to

⁷ ANSI/IESNA Technical Memorandum: Calculation Procedures and Specification Criteria for Lighting Calculations

the eastern boundary of 8721 Sunset. This region of Sunset Boulevard is defined in this Study as Study Area A, and is illustrated in Figure 6. There are ten Signs located within Study Area A, with variations in size and direction of orientation. Study Area A represents the worst-case condition along Sunset Boulevard where multiple Signs are adjacent to each other and are located within less than 250 feet of residential zoned properties. Therefore, the following detailed analysis utilizes Study Area A to evaluate light trespass. The other portions of Sunset Boulevard beyond Study Area A where residential zoned properties are located more than 250 feet from Sunset Boulevard will receive similar or less light than Study Area A.

The light trespass from all Signs within Study Area A operating simultaneously is calculated at the nearest residential property lines defined by the Vertical Planes within Figure 7, and the calculation data is presented in Tables 9 and 11. Within Study Area A all Signs are analyzed individually for compliance with the Policy limit of 1.4 fc at the nearest residential property line to each individual Sign and the calculation data is presented in Table 10. The Sign area included in the calculations are listed in Tables 1 through 3 above; Architectural sign lighting is not included in the lighting analysis.



Figure 6: Study Area A, Sign Locations

Light trespass illuminance from the Signs is evaluated in this Study at the nearest residential property line within Study Area A, as illustrated in Figure 7. The calculations simulate light meters measuring the illuminance at ten feet on center from the ground to the maximum height. Light trespass illuminance is evaluated within these

vertical planes at each adjacent residential zoned property line extending from grade at the residential zoned property to the height of the tallest adjacent Sign or structure. For this Study, the vertical calculation planes extend from grade to 150 feet above grade. Residential properties abutting the Specific Plan boundary are analyzed as part of the Specific Plan.

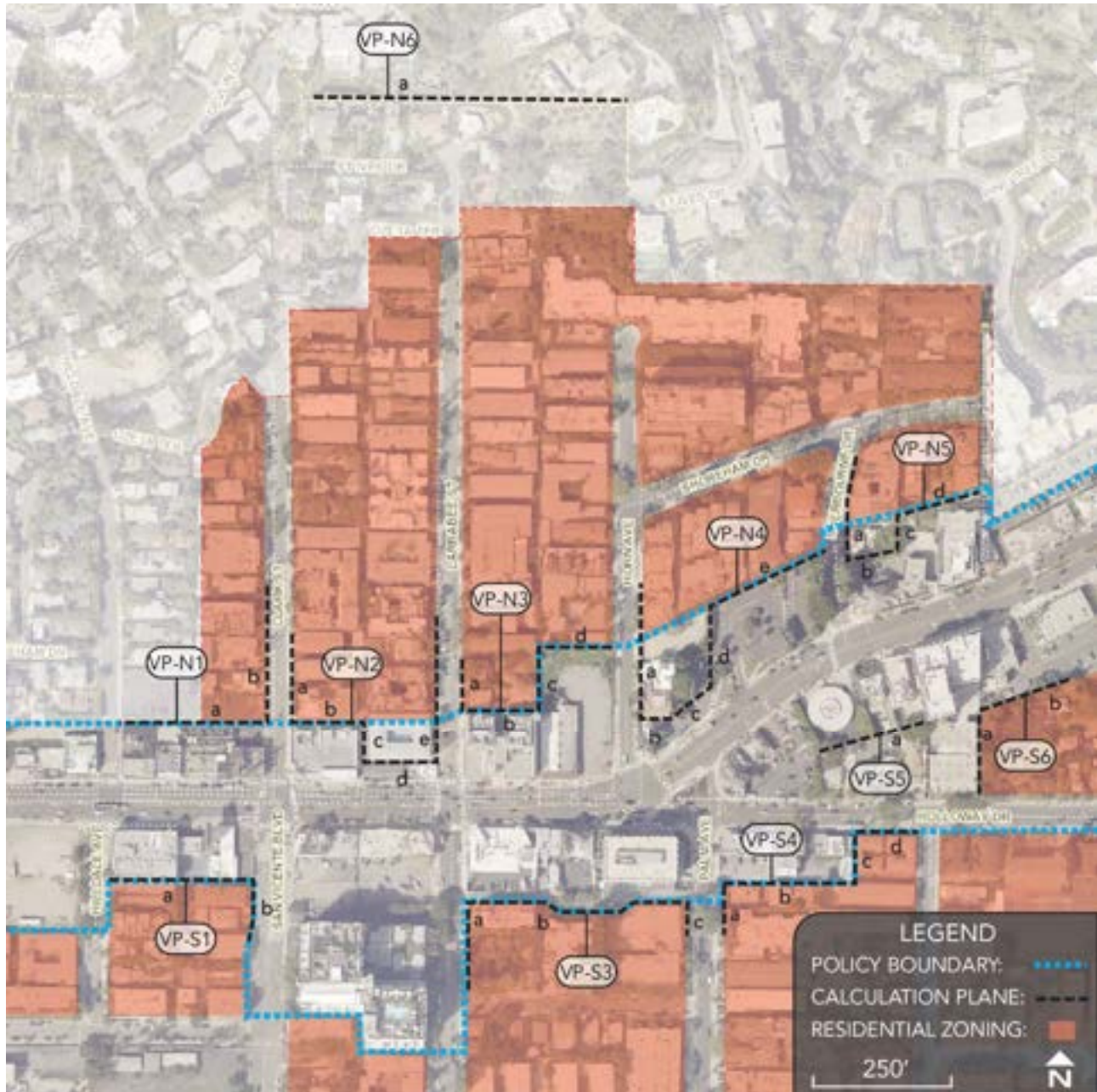


Figure 7: Calculation Plane Locations at Residential Zoned Property Lines

The distance to adjacent residential properties varies considerably. There are existing residential properties located north and south of the Signs, including the abutting residential properties to the north of Sunset Boulevard. Residential properties also exist to the south of Sunset Boulevard, approximately 60 feet from the nearest Sign.

b. Signs Glare Analysis

Glare from the Signs is evaluated at nearby residential zoned properties and for drivers on adjacent streets. The Signs' maximum luminance is evaluated by the contrast ratio, which equals the maximum Sign luminance divided by the measured average existing luminance within the field of view as measured at the Monitoring Sites identified in the field survey of existing conditions (see Section II.1 below). Contrast ratios greater than 30:1 are considered potential glare conditions.

Luminance is independent of distance for large area sources, such as illuminated signs, where the viewing locations are relatively close to the sign and the sign fills a large portion of the field of view. At viewing locations less than 19 times the height or width of the illuminated surface, the sampled area viewed or measured by a luminance meter increases with distance, cancelling the inverse square losses. The standard meter for luminance measurement utilizes a 3 degree lens, thus the 3 degree view translates to approximately 19.1 times the height or width dimension. At viewing locations beyond 19 times the height or width the illuminated surface becomes a point source, and the inverse square relationship will again predict the measured luminance or perceived brightness. The luminance of the Signs is analyzed with a constant luminance of 300 cd/m² for all viewing distances up to 1,000 feet.

Glare to drivers traveling on adjacent roadways is analyzed with respect to the Signs' luminance compliance with the California Vehicle Code requirements for both night and day conditions. According to California Vehicle Code Section 21466.5, the Signs would create a glare condition if:

- The maximum measured brightness of a light source within 10 degrees from a driver's normal line of sight exceed 1,000 times the minimum measured brightness in the driver's field of view, except when the minimum values are less than 10 footlamberts (fL).
- At minimum luminance less than 10 footlamberts (fL) the source brightness shall not exceed 500 fL plus 100 times the angle, in degrees, between the driver's line of sight and the light source

2. Conclusions

This Study analyzes the lighting associated with the proposed illuminated Sign locations along Sunset Boulevard within the City of West Hollywood, California and determines the proposed Signs which are compliant with the Policy will not create a substantial change to the nighttime environment along Sunset Boulevard or at adjacent residential use properties. The majority of Signs analyzed in Study area A (8 of 10) do not create light trespass or glare impacts at adjacent residential properties and do not significantly alter the existing lighting conditions within or adjacent to the Sunset Specific Plan. Two proposed projects within Study area A either exceed the size limits within the Policy, or are located immediately adjacent to and facing residential properties. These proposed projects do not comply with the Policy and should not proceed as currently designed. The Study includes recommended revisions to effect compliance with the Policy.

This Study evaluates potential future lighting conditions associated with these Signs, which would be authorized by approval of each of the proposed Signs presented in Appendix A. This Study analyzes light from each individual Sign and the collective light from all Signs that may affect the light trespass and glare conditions at surrounding properties. For this Study the light from the Signs are analyzed at residential zoned properties where additional light from the Signs may substantially affect the use of these properties, and at sensitive natural habitats. Light from the Signs at commercial use properties such as office buildings or retail stores are not considered in this Study, as the additional light from the Signs will not adversely affect the operations of these properties.

When all Signs are analyzed simultaneously, the calculation results indicate four (4) of the twenty-four (24) vertical plane locations within the Specific Plan boundary, may receive light trespass Illuminance exceeding 1.4

footcandles (fc). These four (4) vertical planes (VP-N2c, VP-N2d, VP-S1a, VP-S1b) where light trespass illuminance exceeds 1.4 fc are located adjacent to the intersection of San Vicente Boulevard and Sunset Boulevard, where the measured existing vertical illuminance is 2.93 fc. The high illuminance at each of these four vertical plane locations is attributed to individual adjacent signs which do not comply with the Policy. The illuminance from these signs exceeds 1.4 fc at the adjacent residential property line due to the Sign orientation toward the abutting residential property. Generally, Signs will not comply with the Policy where the distance from the Sign to the residential property line is less than 250 feet. When these Signs are analyzed individually with revised orientation to aim away from the adjacent residential properties, and comply with the Policy light trespass, the resulting light trespass with all Signs operating simultaneously will also be less than the 1.4 fc maximum at 23 of 24 locations where light trespass is reviewed within the Specific Plan boundary.

The one vertical plane location that exceeds the 1.4 fc when Sign illuminance is calculated simultaneously for all Signs, is VP-N1a, where two (2) Signs are adjacent and oriented toward VP-N1a. Vertical plane VP-N1a is located at the residential property line to the north of Sunset Boulevard, between Hilldale Avenue and San Vicente Blvd, where multiple signs are located nearby. Each individual nearby Sign independently complies with the Policy with a maximum illuminance less than 1.4 fc. However, when analyzed together the light trespass exceeds 1.4 fc. However, both adjacent Signs are compliant with the Policy, and the Policy does not regulate the ambient illuminance or the collective illuminance from Signs at any given property line. Therefore, the effect of multiple adjacent Signs may exceed 1.4 fc when these Signs are both: 1) located directly adjacent to a residential property line; and 2) Signs are oriented perpendicular or toward the adjacent residential property line. This Study includes recommendations regarding orientation and setback of Signs to minimize the potential for Signs to create high illuminance at adjacent residential properties.

This Study confirms residential zoned properties outside of the Specific Plan boundary to the north and or south of Sunset Boulevard within WEHO will not receive light trespass greater than 0.74 fc from the Signs when analyzed individually, and at 7 of the 8 locations analyzed with all Signs operating simultaneously. In the simultaneously operating analysis, the Sign light trespass exceeds 0.74 fc at Vertical Plane VP-N2a, located at the residential property lines to the north of Sunset Boulevard along the east side of Clark Street. The higher illuminance is due to multiple adjacent Signs that independently comply with the Policy but cause light trespass exceeding the 0.74 fc limit when calculated simultaneously. Therefore, the Signs individually comply the Policy at all residentially zoned properties outside the Specific Plan. Light trespass illuminance will not exceed 0.74 fc at 7 of 8 locations where light trespass is reviewed in this Study at locations outside of the Specific Plan boundary, with all Sign operating simultaneously.

At locations identified above where light trespass exceeds 1.4 fc from multiple adjacent Signs (VP-N1a, and VP-N2a), one or more of the adjacent Signs are less than 250 feet away from the residential property line and are visible. This Study's conclusions align with the lighting study completed by Francis Krahe and Associates in 2017 (Appendix D) which states that Signs located less than 250 away feet from a residential property may create excessive light trespass at residential properties.

This Study demonstrates that visibility at the Monitoring Sites to Sunset Boulevard and the proposed Signs locations is reduced as distance increases. Visibility is substantially reduced at locations farther away from Sunset Boulevard, greater than 250 feet. The data presented in Table 8 indicates that the greatest visibility occurs at Sunset Boulevard and visibility reduces substantially as distance from Sunset Boulevard increases. Visibility of Signs are blocked, obscured, or more oblique as distance to Sunset increases.

This Study also concludes the Signs will not create a new source of glare, or high contrast conditions. The Signs will be less than 30:1 contrast conditions with a maximum sign luminance of 300 cd/m² at night, during twilight, and overcast conditions, and will not create glare at residential zoned properties. This Study also confirms the Signs will not create a new source of glare to drivers on adjacent roadways. The maximum Signs luminance from the Signs at 300 cd/m² (87.6 fL) luminance at night, or during overcast sky conditions, and at 6,000 cd/m²

(1,751 fL) during the day is less than the California Vehicle Code required maximum allowable luminance. Therefore the Signs will not create a new source of Glare.

3. Recommendations

As stated in the conclusions of this Study, several locations exceed the light trespass limits within and outside of the Specific Plan boundary. Implementing the following recommendations would prevent excessive light trespass from the Signs at residential zoned property lines. Specifically, these recommendations would reduce light trespass at residential zoned properties to less than 1.4 fc within the Specific Plan boundary and less than 0.74 fc outside of the Specific Plan boundary.

Signs which exceed the Policy maximum Sign face area have greater potential to produce excessive light trespass at residential zoned properties. Therefore, Signs should be limited to sign illuminated face area of 1,000 square feet, or reduce Sign nighttime maximum luminance proportionally, so as to limit light trespass illuminance at residential zoned properties to less than the Policy maximum of 1.4 fc inside the Specific Plan boundary and 0.74 fc outside the Specific Plan Boundary.

Modify the Policy to include the following:

- a. Recommendation 1: Sign Nighttime luminance is limited by the Policy to prevent excessive light trespass. Nighttime luminance is reduced from 300 cd/m² for all Signs exceeding 1,000 square feet in proportion to the increased sign area as defined below in Table 4. Projects with multiple Sign faces oriented in the same direction (parallel to each other or 0 degrees, and up to and including 45 degrees from each other) shall be added together in reference to Table 4. Projects with Sign faces oriented in opposite directions (46 degrees from each other up to 180 degrees from each other) shall be considered individually. See Figure 8 below.

Table 4: Maximum Luminance by Sign Size

Sign Size (sq ft)	Maximum Allowable Nighttime Luminance (cd/m ²)
0 - 1000	300.0
1001 - 1500	200.0
1501 - 2000	150.0
2001 - 3000	100.0
3001 - 5000	60.0
5001 - 7000	40.0

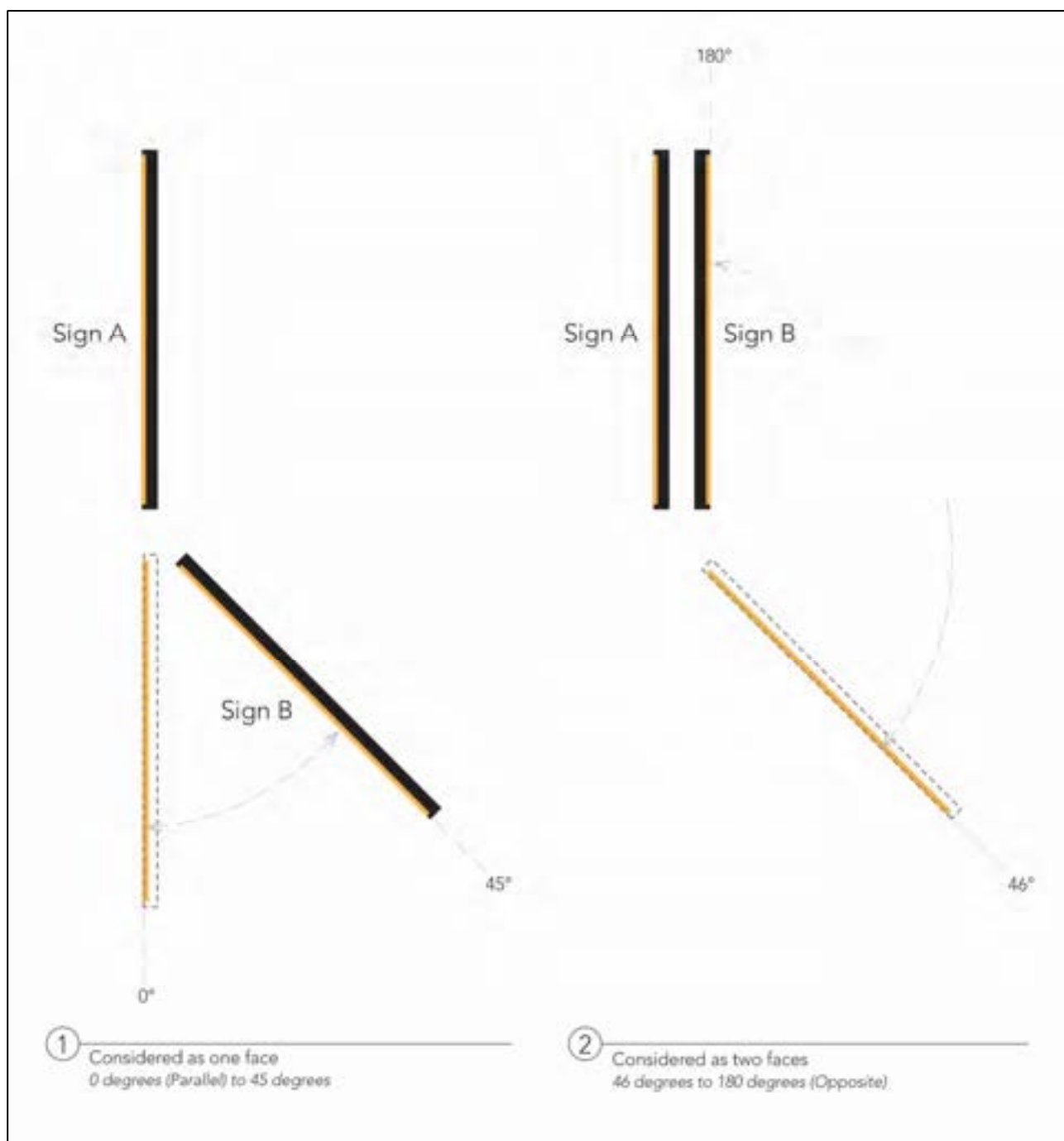


Figure 8: Sign Face Areas Considered Together Versus Separate

Signs abutting any residential zoned property line should be oriented away and offset from the abutting residential zoned property line, since the distance from the Sign to the residential zoned property line will be less than 250 feet and the Signs may cause light trespass exceeding the Policy limit of 1.4 fc.

Modify the Policy to include the following:

- b. Recommendation 2: Sign faces abutting any residentially zoned property shall be oriented toward Sunset Boulevard, and away from any abutting residentially zoned property line. Sign faces at 16 degrees to 45 degrees to the abutting residentially zoned property line shall be offset at least 20 feet from the abutting residentially zoned property line. Sign faces located more than 70 feet from an abutting residentially zoned property line may be oriented up to a maximum of 90 degrees to the abutting property line. Figure 9 below diagrams the sign face orientation allowed, and minimum offset from an abutting residentially zoned property.

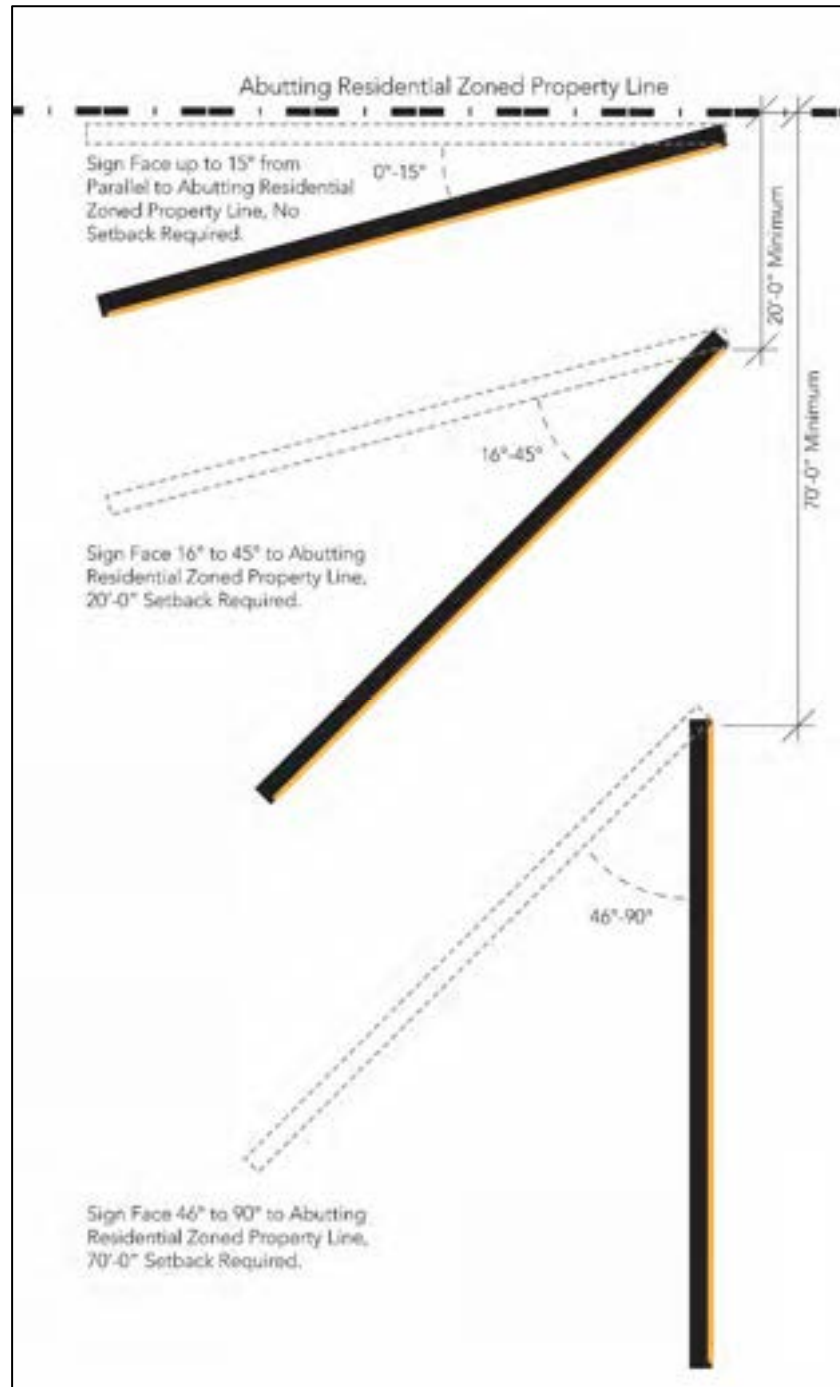


Figure 9: Sign Orientation Diagram

Implementing recommendations 1. and 2. above will reduce light trespass from Signs and result in all Sign light trespass less than 1.4 fc maximum at residential zoned property lines within the Specific Plan boundary and less than 0.74 fc maximum at residential zoned property lines outside the Specific Plan boundary.

II. Lighting Study

This lighting Study includes a detailed evaluation of existing conditions and future Sign illumination within a portion of Sunset Boulevard where the Signs are in close proximity to residential zoned properties to provide a conservative analysis of the potential for light from the Signs to create excessive light trespass or glare at residential zoned properties.

1. Existing Lighting Conditions Along Sunset Boulevard

Monitoring sites are utilized to describe and evaluate the existing lighting conditions along Sunset Boulevard and the surrounding intersecting streets within Study Area A. The lighting data collected at the Monitoring Sites establishes the existing lighting conditions and context for comparison to the future conditions that may result from light or glare from the future Signs. All Monitoring Site locations are within close proximity of Sunset Boulevard and have views toward Sunset Boulevard. Monitoring Sites are located adjacent to existing residential zoned properties or along Sunset Boulevard.

The following criteria are used to select potential Monitoring Site locations:

Sign Light Visibility – Monitoring sites are analyzed that provide direct view of the Signs or direct view areas of greatest light intensity from the Signs.

Proximity – Monitoring sites at the least distance to the Sunset Boulevard are analyzed. These locations are selected because light intensity decreases exponentially with distance. Locations at a greater distance will experience less light intensity than nearby locations (see Inverse Square Law below).

Figure 10 shows the Study Area A, Monitoring Site locations and the properties surrounding the Signs within Study Area A. Monitoring Site locations were selected for observation and field lighting measurements to evaluate the views to the Signs from adjacent residential zoned properties and to determine the extent and intensity of existing light sources within and surrounding the Signs. The Monitoring Sites are within the public right of way or adjacent to residences or residential zoning. These locations are representative of the views to the Signs from the vicinity of the residential zoned properties surrounding Sunset Boulevard to the north, east, south and west.

Figure 10 illustrates the following Monitoring Site locations:

Monitoring Site M-HI1: Monitoring Site M-HI1 is located at 1121 Hilldale Ave, to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 196 feet. Sunset Blvd. is in partial view to the South of M-HI1. The existing lighting conditions at M-HI1 are relatively low illumination from street and parking lot lighting. Prominent light sources visible in the field of view from M-HI1 to the South toward Sunset include streetlights, billboard lighting, Parking lot lighting and building lighting.

Monitoring Site M-HI2: Monitoring Site M-HI2 is located at 1207 Hilldale Ave., to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 355 feet. Sunset Blvd. is in partial view to the west of M-HI2. The existing lighting conditions at M-HI2 are low illumination by adjacent street lighting. Prominent light sources visible in the field of view from M-HI2 to the south toward Sunset include streetlights, parking lot lights, and city lights beyond Sunset.

Monitoring Site M-C1: Monitoring Site M-C1 is located at 1119 North Clark St., to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 200 feet. Sunset Blvd. is in partial view to the South of M-C1. The existing lighting conditions at M-C1 are low illumination by street lighting. Prominent light sources visible in the field of view from M-C1 toward Sunset to the south include street lighting, traffic lighting, billboard and building lighting.

Monitoring Site M-C2: Monitoring Site M-C2 is located at 1140 North Clark St., to evaluate the Signs located at Sunset Blvd. to the south. The distance Sunset Blvd. to the south is approximately 467 feet. Sunset Blvd. is in partial view to the south of M-C2. The existing lighting conditions at M-C2 are low illumination by adjacent street lighting. Prominent light sources visible in the field of view from M-C2 toward Sunset to the south include streetlights, billboard and building lighting, traffic lighting and lighting from nearby apartments.

Monitoring Site M-C3: Monitoring Site M-C3 is located at the Northeast Corner of Sunset and Clark St., to evaluate the lighting on Sunset Blvd. to the southwest. The existing lighting conditions at M-C3 are high illumination by street lighting, traffic lighting, billboard lighting, and building lighting. Prominent light sources visible in the field of view from M-C3 to the southwest along Sunset include streetlights, traffic lights, building store fronts and billboard lighting.

Monitoring Site M-C4: Monitoring Site M-C4 is located at the Southeast Corner of Sunset and San Vicente Blvd., to evaluate the lighting on Sunset Blvd. to the northeast. The existing lighting conditions at M-C4 are moderate vertical high horizontal illumination by street lighting, traffic lighting billboard and building lighting. Prominent light sources visible in the field of view from M-C4 to the southwest along Sunset include streetlights, traffic lights, building store fronts and billboard lighting.

Monitoring Site M-C5: Monitoring Site M-C5 is located at 1020 N. San Vicente Blvd, to evaluate the Signs located at Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 164 feet. Sunset Blvd. is in partial view to the North of M-C5. The existing lighting conditions at M-C5 are low illumination by street lighting. Prominent light sources visible in the field of view from M-C5 toward Sunset to the north include street lighting, traffic lighting, billboard lighting, parking lot lighting, building lighting.

Monitoring Site M-C6: Monitoring Site M-C6 is located at 1000 N. San Vicente Blvd, to evaluate the Signs located at Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 365 feet. Sunset Blvd. is in partial view to the North of M-C6. The existing lighting conditions at M-C6 are low illumination by street lighting. Prominent light sources visible in the field of view from M-C6 toward Sunset to the north include street lighting, traffic lighting, billboard lighting, parking lot lighting, building lighting.

Monitoring Site M-L1: Monitoring Site M-L1 is located at 1115 Larrabee St., to evaluate the Signs located at Sunset Blvd, to the south. The distance to Sunset Blvd. to the south is approximately 186 feet. Sunset Blvd. is in limited view to the South of M-L1. The existing lighting conditions at M-L1 are moderate illumination from, street lighting, traffic signal. Prominent light sources visible in the field of view from M-L1 toward Sunset to the south include, street lighting, traffic lighting, and lighting reflected off building surface.

Monitoring Site M-L2: Monitoring Site M-L2 is located at 1128 Larrabee St., to evaluate the Signs located at Sunset Blvd to the south. The distance to Sunset Blvd. to the south is approximately 275 feet. Sunset Blvd. is in limited view to the South of M-L2. The existing lighting conditions at M-L2 are moderate illumination from street lighting. Prominent light sources visible in the field of view from M-L2 toward Sunset to the south include street lighting, traffic lighting, billboard lighting and building lighting.

Monitoring Site M-L3: Monitoring Site M-L3 is located at the Northeast Corner of Sunset and Larrabee St., to evaluate the lighting on Sunset Blvd. to the southwest. The existing lighting conditions at M-L3 are high illumination by street lighting, traffic lighting billboard and building lighting. Prominent light sources visible in the field of view from M-L3 to the southwest along Sunset include streetlights, traffic lights, building store fronts and billboard lighting.

Monitoring Site M-L4: Monitoring Site M-L4 is located at the Southeast Corner of Sunset and Larrabee St., to evaluate the lighting on Sunset Blvd. to the northeast. The existing lighting conditions at M-L4 are high illumination by street lighting, traffic lighting billboard and building lighting. Prominent light sources visible in

the field of view from M-L4 to the northeast along Sunset include streetlights, traffic lights, building store fronts and billboard lighting.

Monitoring Site M-L5: Monitoring Site M-L5 is located at 1014 N. Larrabee St., to evaluate the Signs located at Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 160 feet. Sunset Blvd. is in partial view to the North of M-L5. The existing lighting conditions at M-L5 are Moderate illumination by street lighting, Parking lot lighting. Prominent light sources visible in the field of view from M-L5 toward Sunset to the north include street lighting, traffic lighting, billboard lighting, parking lot lighting, building lighting.

Monitoring Site M-L6: Monitoring Site M-L6 is located at 1000 N. Larrabee St., to evaluate the Signs located at Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 315 feet. Sunset Blvd. is in partial view to the North of M-L6. The existing lighting conditions at M-L6 are High Horizontal, Low Vertical illumination by street lighting, Parking lot lighting. Prominent light sources visible in the field of view from M-L6 toward Sunset to the north include street lighting, traffic lighting, parking lot lighting, building lighting.

Monitoring Site M-H1: Monitoring Site M-H1 is Located at 1114 Horn Ave., to evaluate the Signs located at Sunset Blvd to the south. The distance to Sunset Blvd. to the south is approximately 132 feet. Sunset Blvd. is in partial view to the South of M-H1. The existing lighting conditions at M-H1 are low illumination from street lighting. Prominent light sources visible in the field of view from M-H1 toward Sunset to the south include street and traffic lighting, billboard lighting and building lighting.



Figure 10: Monitoring Site Locations

Monitoring Site M-H2: Monitoring Site M-H2 is located at 1127 Horn Ave., to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 305 feet. Sunset Blvd. is in partial view to the South of M-H2. The existing lighting conditions at M-H2 are moderate illumination by adjacent streetlights. Prominent light sources visible in the field of view from M-H2 toward Sunset to the south include street lighting, traffic lighting, billboard and building lighting.

Monitoring Site M-S1: Monitoring Site M-S1 is located at 1112 Sherbourne Dr., to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 167 feet. Sunset Blvd. is in limited view to the South of M-S1. The existing lighting conditions at M-S1 are High illumination from, street lighting. Prominent light sources visible in the field of view from M-S1 toward Sunset to the south include, street lighting, limited billboard lighting and building lighting.

Monitoring Site M-S2: Monitoring Site M-S2 is located at 1124 Sherbourne Dr., to evaluate the Signs located at Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 324 feet. Sunset Blvd. is in limited view to the South of M-S2. The existing lighting conditions at M-S2 are moderate illumination from street lighting. Prominent light sources visible in the field of view from M-S2 toward Sunset to the south include street lighting, limited billboard lighting and building lighting.

Table 5 summarizes the criteria and methods of measurement and or evaluation used to assess the existing lighting conditions at each Monitoring Site:

Table 5. Existing Conditions Lighting Criteria

Criteria	Metric	Procedure
Light trespass - Illuminance	Measured illuminance (footcandle) documented at each Monitoring Site	Measured illuminance recorded each Monitoring Site with Minolta illuminance meter.
Glare – Contrast Ratio	Measured luminance candelas per meter squared, documented at each Monitoring Site Observed existing conditions	Measured luminance recorded at each Monitoring Site with Minolta luminance meter. Day and night photograph to record the evaluation of the view to the Signs from the Monitoring Site in terms of visibility and prominent light sources, lighted surfaces, and illuminated signs.

The visibility of the Signs at each Monitoring Site is evaluated during field surveys during the day and at night. Distance to the Signs and visibility from each Monitoring Site is presented in Table 8. Visibility of Sign locations within the visual field is observed from each Monitoring Site toward Sunset Boulevard.

2. Monitoring Site Survey Data

The observations and measurement of existing lighting conditions within and surrounding Study Area A are summarized below in relation to the evaluation factors established in Section 3.5, Applicable Reference Standards:

Illuminance: The Illuminance listed in Table 6, below, summarize the measured Illuminance at the Monitoring Sites. The measured illuminance is consistent with an urban lighting condition, with relatively high illuminance at the street and sidewalk within the public right of way and nearby commercial properties, and lower illuminance within the residential zoned properties, but sufficient light for safety and security.

Table 6. Measured Illuminance (fc) at Monitoring Sites

Monitoring Site	Illuminance (fc)		Location	Evaluation
	Horizontal	Vertical		
M-HI1	0.44	0.40	1121 Hilldale Ave.	Low Horizontal, Low Vertical illuminance
M-HI2	0.29	0.68	1207 Hilldale Ave.	Low Horizontal, Low Vertical illuminance
M-C1	0.51	0.76	1119 North Clark St.	Low Horizontal, Medium Vertical illuminance

M-C2	1.10	1.60	1140 North Clark St.	Medium Horizontal, High Vertical illuminance
M-C3	2.20	2.93	Northeast intersection of Sunset Blvd. and Clark St.	High Horizontal, High Vertical illuminance
M-C4	3.55	1.12	Southeast intersection of Sunset Blvd., San Vicente Blvd.	High Horizontal, Medium Vertical illuminance
M-C5	0.42	1.30	1020 N. San Vicente Blvd.	Low Horizontal, Medium Vertical illuminance
M-C6	0.86	0.16	1000 N. San Vicente Blvd.	Medium Horizontal, Low Vertical illuminance
M-L1	0.39	0.15	1115 Larrabee St.	Low Horizontal, Low Vertical illuminance
M-L2	0.30	0.25	1128 Larrabee St.	Low Horizontal, Low Vertical illuminance
M-L3	1.74	1.95	Northeast intersection of Sunset Blvd. and Larrabee St.	High Horizontal, High Vertical illuminance
M-L4	1.66	1.49	Southeast intersection of Sunset Blvd. and Larrabee St.	High Horizontal, High Vertical illuminance
M-L5	1.27	1.28	1020 Larrabee St.	Medium Horizontal, Medium Vertical illuminance
M-L6	1.55	0.44	1000 Larrabee St	High Horizontal, Low Vertical illuminance
M-H1	0.25	0.18	1114 Horn Ave.	Low Horizontal, Low Vertical illuminance
M-H2	0.98	0.60	1127 Horn Ave.	Medium Horizontal, Low Vertical illuminance
M-S1	2.01	1.01	1112 Sherbourne Dr.	High Horizontal, Medium Vertical illuminance
M-S2	1.89	0.90	1124 Sherbourne Dr.	High Horizontal, Medium Vertical illuminance

Measured illuminance greater than 1.4 fc is evaluated as high illuminance, from 0.75 fc to 1.4 fc is evaluated as medium illuminance, and from 0.74 fc or less as low illuminance.

The highest existing horizontal illuminance level was recorded at Monitoring Site at M-C4 with 3.55 fc, while the lowest horizontal illuminance was recorded at Monitoring Site M-H1 at 0.25 fc. The highest existing vertical illuminance level was recorded at Monitoring Site M-C3 at 2.93 fc, while the lowest vertical illuminance was recorded at Monitoring Site M-L1 at 0.15 fc.

The existing lighting conditions along Sunset Boulevard are relatively bright, in alignment with entertainment districts in LZ4. This ambient condition is defined by the existing vertical illuminance measurements along Sunset Boulevard at Monitoring Sites M-C3, M-C4, M-L3, and M-L4, which are described as High horizontal and vertical illuminance, summarized in Study Table 6, which range from 2.93 fc, 1.12 fc, 1.95 fc, and 1.49 fc respectively. The measured illuminance along the adjacent residential properties to the north and south of Sunset varies considerably, with measured illuminance from medium to low.

Contrast/Glare: The visual evaluation of High, Medium and Low Contrast describes the perception of how bright a visible object appears to the surrounding objects within any given field of view and context. High Contrast indicates a potential glare condition for residential zoned properties nearby.

Contrast is the ratio of one surface luminance to a second surface luminance or to the field of view. Contrast exceeding 30 to 1 are usually deemed uncomfortable and evaluated as high; less than 30 to 1 to greater than 10 to 1 is medium contrast; 10 to 1 are clearly visible and evaluated as low; and less than 3 to 1 appear to be equal and evaluated as very low.

The measured luminance recorded at the Monitoring Sites within the view toward Sunset Blvd. includes prominent, high brightness light sources and illuminated surfaces, such as streetlights, illuminated signs, and flood lighted buildings, as well as lower brightness surfaces such as sidewalks, parking lots, and un-illuminated walls or landscape areas. The existing conditions vary from high brightness conditions along and immediately adjacent to Sunset Blvd. to low brightness conditions adjacent to residential zoned properties more than 250 feet from Sunset Blvd. The range of recorded luminance is summarized in Table 7.

For this Study, the following luminance criteria are applied to measured and calculated luminance: Luminance below 10 cd/m² is evaluated as Low luminance; Luminance greater than 10 cd/m² and less than 300 cd/m² is evaluated as medium luminance; Luminance greater than 300 cd/m² is evaluated as high luminance.

The highest average luminance was recorded at Monitoring Site M-C3 at 1008 cd/m², while the lowest average luminance was measured at Monitoring Site M-C6 at 49 cd/m². The measured average luminance is evaluated as Medium Luminance (greater than 10 cd/m² and less than 300 cd/m²) at 12 of the 18 monitoring sites. The measured average luminance at 6 Monitoring Site is evaluated as high Luminance (above 300 cd/m²). The highest maximum luminance was recorded at Monitoring Site M-L3 with 9347 cd/m², while the lowest maximum luminance was measured at Monitoring Site M-C6 at 677 cd/m². The measured maximum luminance is High Luminance (greater than 300 cd/m²) at all 18 monitoring sites.

The existing contrast ratios (maximum luminance / average luminance) varies from a minimum ratio of 6 to 1 at Monitoring Site M-C3 to a maximum ratio of 24 to 1 at Monitoring Site M-H1 and M-L5. The calculated existing contrast ratio at 16 of 18 Monitoring Site locations is evaluated as Medium Contrast (less than 30 to 1, and greater than 10 to 1). The calculated existing contrast ratio at Monitoring Sites M-C1 and M-C3 is evaluated as low (less than 10 to 1).

The visibility of existing signs and future Signs is evaluated at each Monitoring Site with field surveys during the day and at night. The distance to nearby Signs and potential view of Signs from each Monitoring Site is presented in Table 8. Visibility of the Signs within the visual field is observed from each Monitoring Site looking toward Sunset Blvd.

The existing properties within and along Sunset Blvd., within the Sunset Specific Plan are predominantly commercial properties, with several residential and hotel use properties. The properties within Sunset Specific Plan include hotel, entertainment venues, restaurants, retail, and other commercial uses which operate during the day and evening until approximately 2:00 am. There is extensive pedestrian and vehicular activity along Sunset Blvd at night. Existing lighting along the Sunset Blvd. right of way is generally bright and continuous. The existing light levels decrease rapidly as distance from Sunset Blvd. increases, as evidenced by the Monitoring Site data.

Table 7. Measured Luminance, (cd/m²) at Monitoring Sites

Monitoring Site	Luminance (cd/m ²)		Contrast Ratio (Max / Average)	Location	Evaluation
	Average	Maximum			
M-HI1	148	2514	17 : 1	1121 Hilldale Ave.	Medium average luminance, medium contrast
M-HI2	143	1956	14 : 1	1207 Hilldale Ave.	Medium average luminance, medium contrast
M-C1	141	1212	9 : 1	1119 North Clark St.	Medium average luminance, low contrast
M-C2	206	3781	18 : 1	1140 North Clark St.	Medium average luminance, medium contrast
M-C3	1008	6413	6 : 1	Northeast intersection of Sunset Blvd. and Clark St.	High average luminance, low contrast
M-C4	393	8876	23 : 1	Southeast intersection Sunset Blvd. / San Vicente	High average luminance, medium contrast
M-C5	282	6241	22 : 1	1020 N. San Vicente Blvd.	Medium average luminance, medium contrast
M-C6	49	676.6	14 : 1	1000 N. San Vicente Blvd.	Medium average luminance, medium contrast
M-L1	114	2299	20 : 1	1115 Larrabee St.	Medium average luminance, medium contrast
M-L2	229	4019	18 : 1	1128 Larrabee St.	Medium average luminance, medium contrast
M-L3	464	9347	20 : 1	Northeast intersection of Sunset Blvd. and Larrabee	High average luminance, medium contrast
M-L4	612	9153	15 : 1	Southeast intersection Sunset Blvd./ Larrabee St.	High average luminance, medium contrast
M-L5	405	9587	24 : 1	1020 Larrabee St.	High average luminance, medium contrast
M-L6	177	3117	18 : 1	1000 Larrabee St	Medium average luminance, medium contrast
M-H1	206	4900	24 : 1	1114 Horn Ave.	Medium average luminance, medium contrast
M-H2	552	8772	16 : 1	1127 Horn Ave.	High average luminance, medium contrast
M-S1	248	2684	11 : 1	1112 Sherbourne Dr.	Medium average luminance, medium contrast
M-S2	112	2490	22 : 1	1124 Sherbourne Dr.	Medium average luminance, medium contrast

Table 8. Distance & Visibility to Sunset Boulevard

Monitoring Site	Distance to Sunset	Sign Visibility from Monitoring Site
M-HI1	196 ft	Signs 1.0-8, 2.0-4, and 2.0-5 would be visible to the south and east along Sunset Blvd. No Signs visible west due to trees and buildings obstructing view.
M-HI2	355 ft	Sign 2.0-4 would be visible near the intersection of Sunset Blvd. and Hilldale Ave. at a sharp angle. No other Signs visible due to trees and buildings obstructing views on both sides of Hilldale Ave.
M-C1	200 ft	Sign 2.0-6 would be obliquely visible at the intersection of North Clark St. and Sunset Blvd. No Signs visible east or west due to buildings obstructing view. The rear of Sign 1.0-8 would be visible, which does not contain sign area.
M-C2	467 ft	Oblique view of Sign 2.0-6 at the intersection of Clark St. and Sunset Blvd. may be possible. No Signs visible east or west along Sunset Blvd. The backside of Sign 1.0-8 would be partially visible.
M-C3	0 ft	Signs 1.0-8 and 2.0-5 would be prominent in the view to the west. An obstructed view of Sign 2.0-4 may be visible from the monitoring site.
M-C4	0 ft	Signs 2.0-6, 2.0-7, and 2.0-8 along Sunset Blvd. would be visible along Sunset Blvd. to the east. Signs further west would likely be obscured by buildings, trees, and existing signage.
M-C5	164 ft	Signs 1.0-8, 2.0-4, and 2.0-5 would be clearly visible to the east. Sign 2.0-6 at the corner of Clark St. and Sunset Blvd. may be partially visible.
M-C6	365 ft	There would be a partially obstructed view of Sign 1.0-8 and 2.0-4 from the monitoring site. There would be no visibility of Signs to the east.
M-L1	186 ft	Visibility of Sign 2.0-7 at the intersection of Larrabee St. and Sunset Blvd. would be mostly obstructed. Trees and buildings on both sides of the Larrabee St. right of way would block the view of all other Signs.
M-L2	275 ft	View of Sign 2.0-7 at the intersection of Larrabee St. and Sunset Blvd. may be partially visible. Trees and buildings on both sides of the Larrabee St. right of way would block the view of all other Signs.
M-L3	0 ft	Signs 2.0-5 and 2.0-7 along Sunset Blvd. would be fully visible towards the west.
M-L4	0 ft	Sign 2.0-8 would be visible in the view towards the east along Sunset Blvd. All other Signs to the east would not be visible as Sunset Blvd. curves toward the north.
M-L5	160 ft	There would be an oblique view of Sign 2.0-7 at the corner of Larrabee St. and Sunset Blvd. In addition, there would be a partially obstructed view of Sign 2.0-5 to the west.
M-L6	315 ft	Oblique view of Sign 2.0-7 may be possible. Visibility to the east and west along Sunset Blvd. is obstructed by trees and buildings.
M-H1	132 ft	Sign 2.0-8 would be obliquely visible from the monitoring site. Sign 2.0-7 may be visible in the distance toward the west.
M-H2	305 ft	Obscured and oblique view of Sign 2.0-8 may be possible from the monitoring site.
M-S1	167 ft	Signs 1.0-9 and 1.0-10 would be visible across the Sunset Blvd. to the south. All other Signs are blocked by trees and buildings along Sherbourne Dr.
M-S2	324 ft	Sign 1.0-9 would be partially visible from the monitoring site.

Visibility at the Monitoring Sites to Sunset Blvd. and the proposed Signs locations are reduced due to adjacent buildings and trees between the Monitoring Sites and Sunset Blvd. Visibility is substantially reduced at locations farther away from Sunset Blvd., greater than 250 feet. The data presented in Table 7 indicates that the highest brightness occurs at Sunset Blvd. and reduces substantially as distance from Sunset Blvd. increases. Similarly, visibility of the Signs becomes blocked, obscured, or more oblique as distance to Sunset Blvd. increases.

2.1 Monitoring Site M-HI1:

Monitoring Site M-HI1 is located at 1121 Hilldale Ave, to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 196 feet.



Figure 11: M-HI1 – 07/12/2023, 3:32 pm



Figure 12: M-HI1 – 07/12/2023, 9:12 pm

2.2 Monitoring Site M-HI2:

Monitoring Site M-HI2 is located at 1207 Hilldale Ave., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 355 feet.



Figure 13: M-HI2 – 07/12/2023, 3:33 pm



Figure 14: M-HI2 – 07/12/2023, 8:59 pm

2.3 Monitoring Site M-C1:

Monitoring Site M-C1 is located at 1119 North Clark St., to evaluate the nearby existing lighting and the view Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 200 feet.



Figure 15: M-C1 – 05/03/2023, 3:45 pm

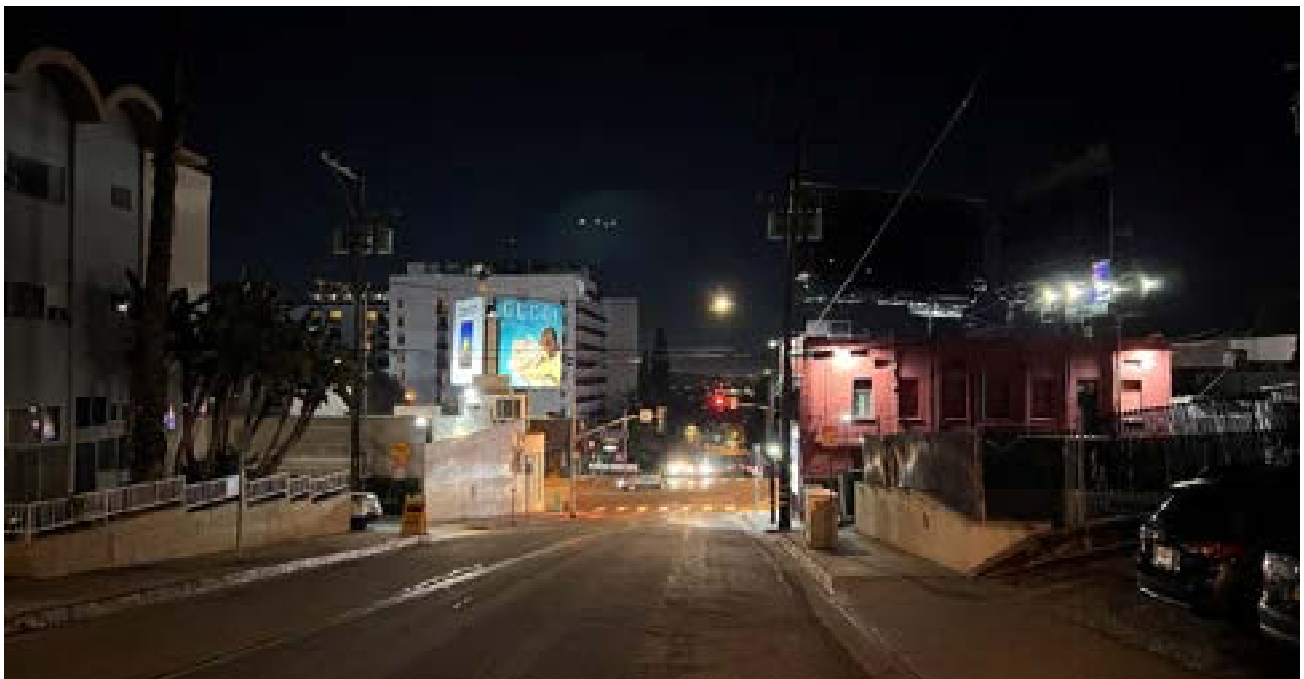


Figure 16: M-C1 -07/12/2023, 9:40 pm

2.4 Monitoring Site M-C2:

Monitoring Site M-C2 is located at 1140 North Clark St., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 467 feet.



Figure 17: M-C2 – 05/03/2023, 3:44 pm



Figure 18: M-C2 -07/12/2023, 9:13 pm

2.5 Monitoring Site M-C3:

Monitoring Site M-C3 is located at the Northeast Corner of Sunset Blvd. and Clark St., to evaluate the existing lighting along Sunset Blvd. and the view to the southwest along Sunset Blvd.



Figure 19: M-C3 – 08/24/2023, 8:31 am

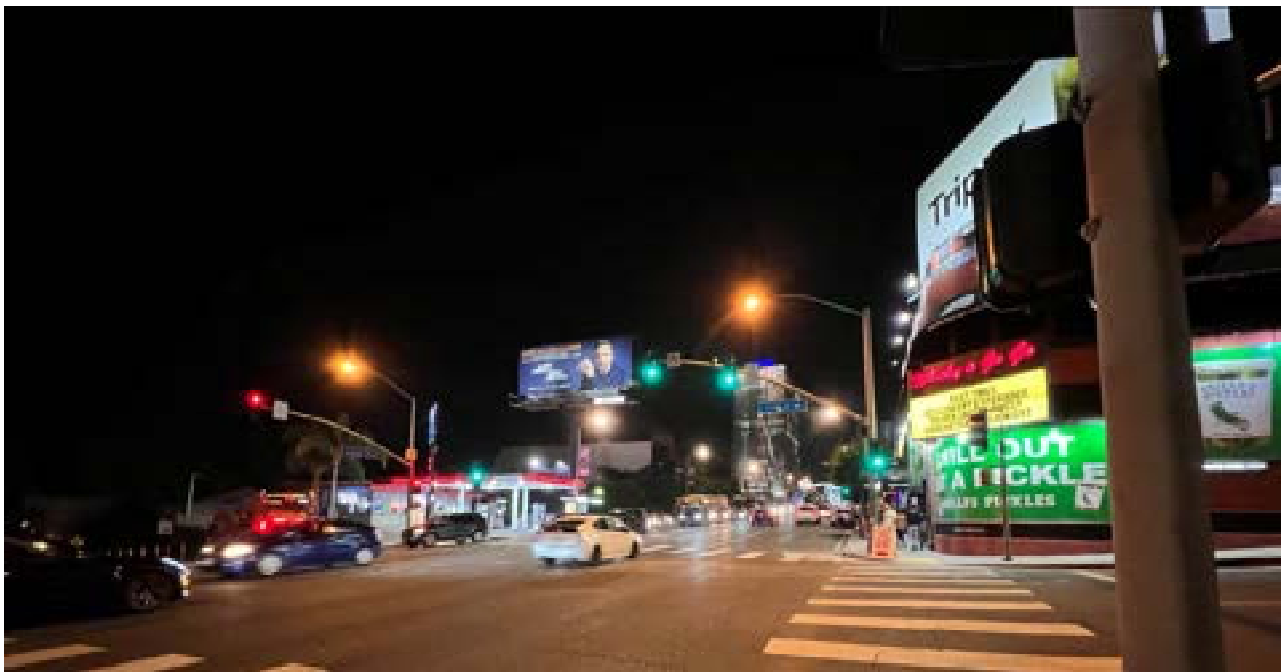


Figure 20: M-C3 – 08/28/2023, 9:17 pm

2.6 Monitoring Site M-C4:

Monitoring Site M-C4 is located at the Southeast Corner of Sunset Blvd. and San Vicente Blvd., to evaluate the existing lighting along Sunset Blvd. and the view to the northeast along Sunset Blvd.



Figure 21: M-C4 – 08/24/2023, 8:34 am

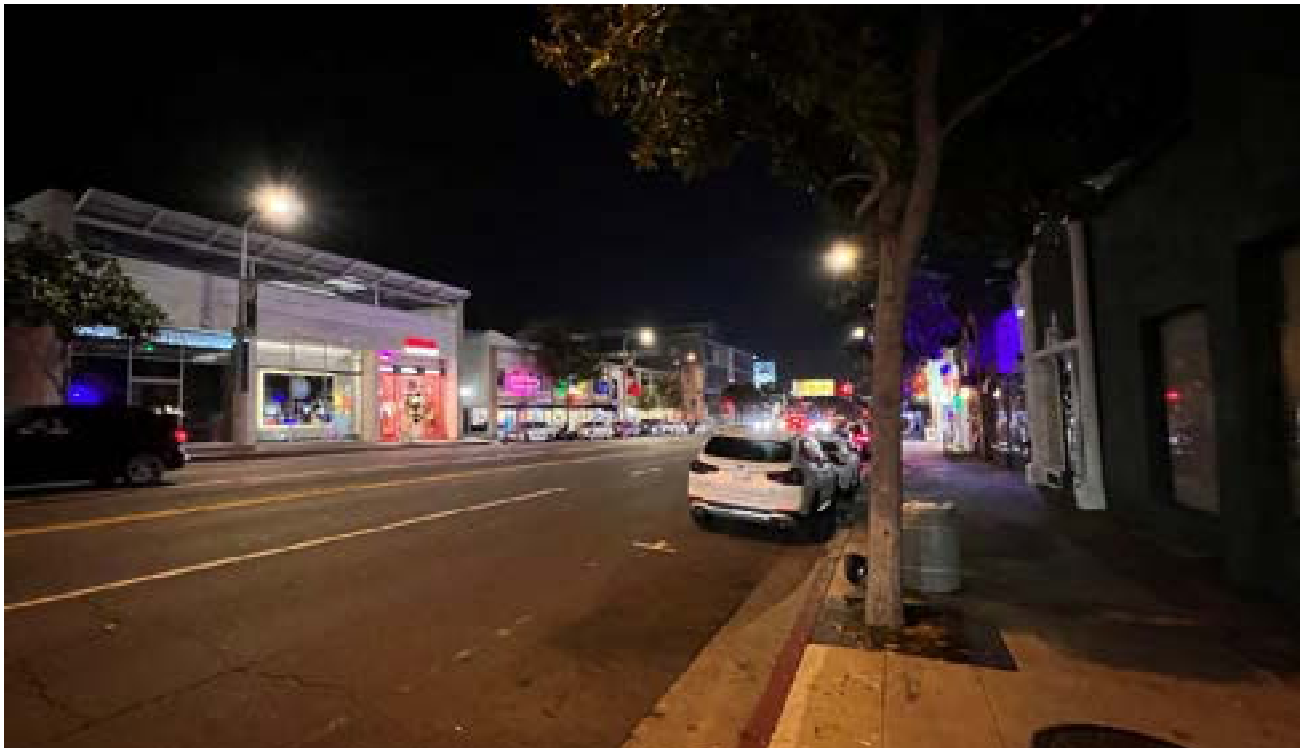


Figure 22: M-C4 – 08/28/2023, 8:48 pm

2.7 Monitoring Site M-C5:

Monitoring Site M-C5 is located at 1020 N. San Vicente Blvd., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 164 feet.



Figure 23: M-C5 – 08/24/2023, 8:35 am

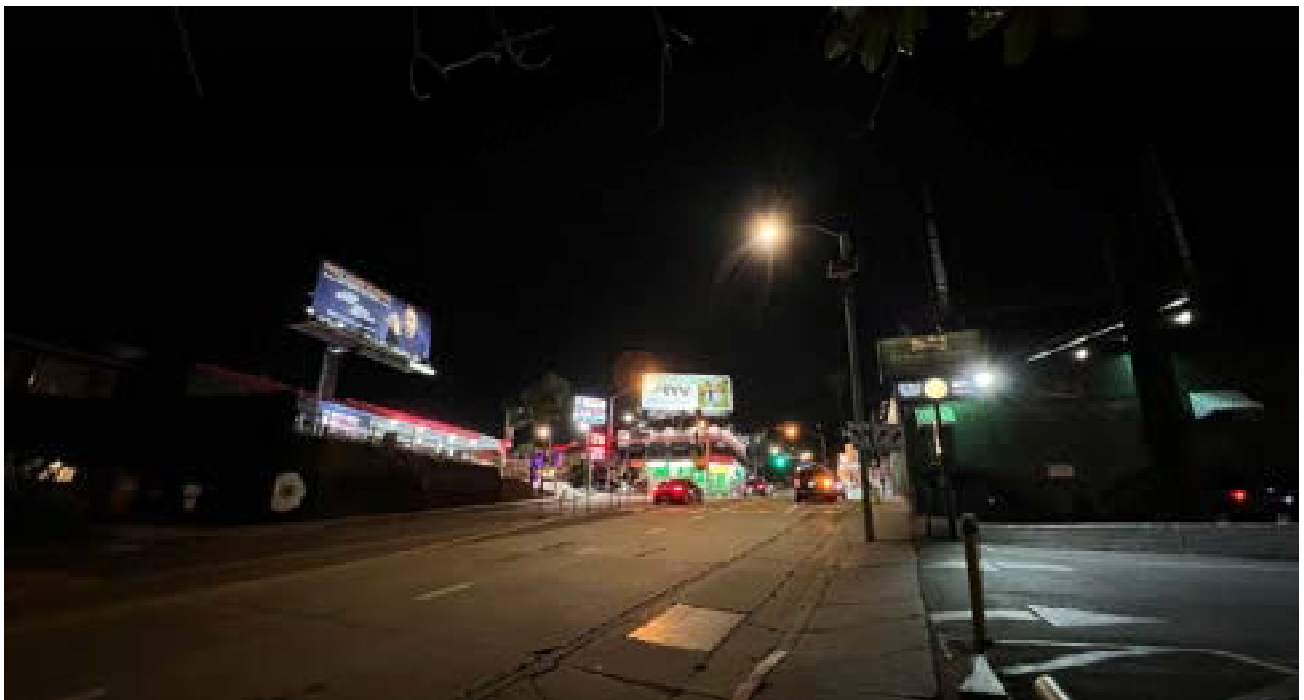


Figure 24: M-C5 – 08/28/2023, 9:08 pm

2.8 Monitoring Site M-C6:

Monitoring Site M-C6 is located at 1000 N. San Vicente Blvd, to evaluate the nearby existing lighting and the view to Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 365 feet.



Figure 25: M-C6 – 08/24/2023, 8:37 am



Figure 26: M-C6 – 08/28/2023, 8:58 pm

2.9 Monitoring Site M-L1:

Monitoring Site M-L1 is located at 1115 Larrabee St., to evaluate the nearby existing lighting and the view to Sunset Blvd, to the south. The distance to Sunset Blvd. is approximately 186 feet.



Figure 27: M-L1 – 05/03/2023, 3:52 pm



Figure 28: M-L1 -07/12/2023, 10:07 pm

2.10 Monitoring Site M-L2:

Monitoring Site M-L2 is located at 1128 Larrabee St., to evaluate the nearby existing lighting and the view to Sunset Blvd to the south. The distance to Sunset Blvd. to the south is approximately 275 feet.



Figure 29: M-L2 – 05/03/2023, 3:48 pm



Figure 30: M-L2 -07/12/2023, 9:55 pm

2.11 Monitoring Site M-L3

Monitoring Site M-L4 is located at the northeast corner of Sunset Blvd. and Larrabee St., to evaluate the existing lighting on Sunset Blvd. and the view along Sunset Blvd. to the southwest.



Figure 31: M-L3 – 08/24/2023, 8:47 am



Figure 32: M-L3 – 08/28/2023, 8:10 pm

2.12 Monitoring Site M-L4

Monitoring Site M-L4 is located at the southeast corner of Sunset and Larrabee St., to evaluate the existing lighting on Sunset Blvd. and the view along Sunset Blvd. to the northeast.



Figure 33: M-L4 – 08/24/2023, 8:47 am

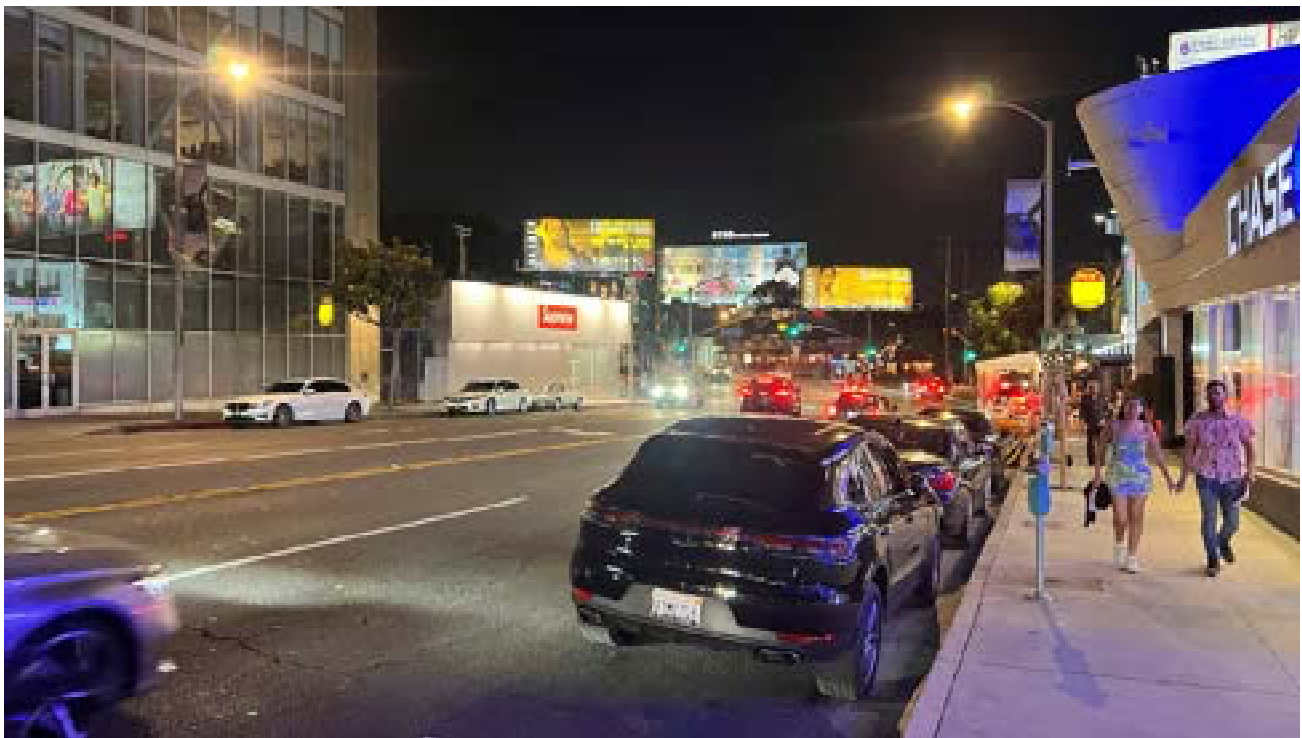


Figure 34: M-L4 – 08/28/2023, 8:19 pm

2.13 Monitoring Site M-L5

Monitoring Site M-L5 is located at 1014 N. Larrabee St., to evaluate the nearby existing lighting and the view to at Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 160 feet.



Figure 35: M-L5 – 08/24/2023, 8:44 am



Figure 36: M-L5 – 08/28/2023, 8:38 pm

2.14 Monitoring Site M-L6:

Monitoring Site M-L6 is located at 1000 N. Larrabee St., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the north. The distance to Sunset Blvd. to the north is approximately 315 feet.



Figure 37: M-L6 – 08/24/2023, 8:43 am



Figure 38: M-L6 – 08/28/2023, 8:28 pm

2.15 Monitoring Site M-H1:

Monitoring Site M-H1 is Located at 1114 Horn Ave., to evaluate the nearby existing lighting and the view to Sunset Blvd to the south. The distance to Sunset Blvd. to the south is approximately 132 feet.



Figure 39: M-H1 – 05/03/2023, 3:59 pm



Figure 40: M-H1 -07/12/2023, 10:27 pm

2.16 Monitoring Site M-H2:

Monitoring Site M-E4 is located at 1127 Horn Ave., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 305 feet.



Figure 41: M-H2 – 05/03/2023, 3:55pm



Figure 42: M-H2 -07/12/2023, 9:55 pm

2.17 Monitoring Site M-S1:

Monitoring Site M-S1 is located at 1112 Sherbourne Dr., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 167 feet.



Figure 43: M-S1 – 05/03/2023, 4:04 pm

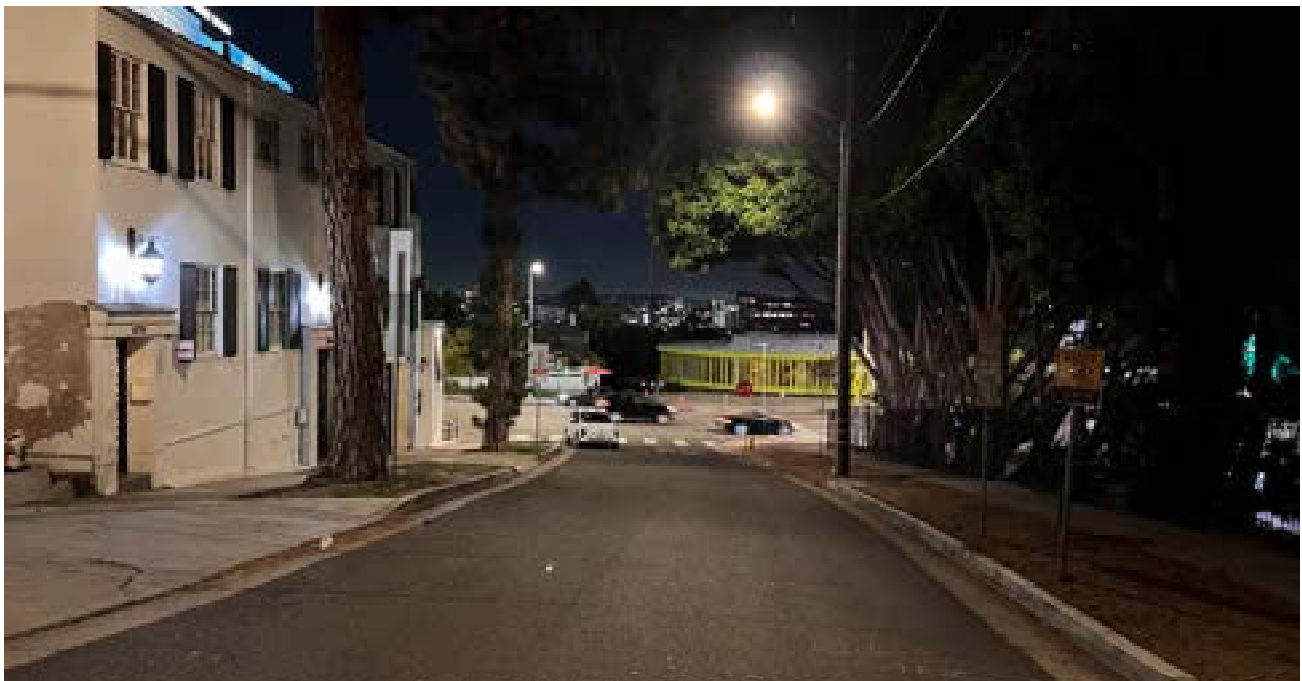


Figure 44: M-S1 -07/12/2023, 10:46 pm

2.18 Monitoring Site M-S2:

Monitoring Site M-S2 is located at 1124 Sherbourne Dr., to evaluate the nearby existing lighting and the view to Sunset Blvd. to the south. The distance to Sunset Blvd. to the south is approximately 324 feet.



Figure 45: M-S2 – 05/03/2023, 4:03pm



Figure 46: M-S2 -07/12/2023, 10:37 pm

3. Sign Lighting Analysis

The location and size of the Signs are identified in detail within Appendix A. The light from the Signs is evaluated by a lighting calculation model which utilizes the size, shape, orientation, and luminance of the Signs to predict the light adjacent to the Signs and at the nearby residential zoned properties. The calculation simulates the worst case condition with all Signs operating simultaneously at the maximum permitted night time luminance of 300 cd/m², in all white mode. The Signs will not operate in this manner in practice. However, this analysis presents a very conservative evaluation of the Signs' potential for offsite light trespass illuminance and glare. All Signs are evaluated individually to test compliance with the Policy, and simultaneously to define the additional ambient illumination from the Signs operating together.

3.1 Sign Light Trespass Illuminance Analysis

The Sign light trespass analysis evaluates the illuminance (fc) from the Sign leaving the Sign and landing at adjacent residential zoned properties. Tables 9 and 10 summarize the Sign light trespass illuminance calculation data with all Signs operating simultaneously at the nearest residential zoned properties. The calculations are presented at the vertical plane locations illustrated in Figure 7, which are located at the nearest residentially zoned property line within and, or abutting the Specific Plan boundary. Complete calculated data is presented in Appendix L.



Figure 47: Aerial View of Signs and Calculation Planes

The maximum calculated light trespass illuminance in Table 9 varies from 0.10 fc at vertical plane VP-S6b to 39.80 fc at vertical plane VP-N2c. Figure 47 shows an aerial, 3-D view of Study Area A, the Signs within the Study area, and the calculation data within the various vertical planes. Calculation data which are less than 1.4 fc appear in white text to indicate at these locations the maximum light trespass illuminance is less than 1.4 fc. Where the illuminance is greater than 1.4 fc the data appear as red text. 19 of 24 locations, or 79%, of the calculation planes receive light trespass below 1.4 fc maximum, while 5 vertical planes (21%) receive illuminance greater than 1.4 fc.

The calculated maximum illuminance from the Signs with the Signs operating simultaneously exceed 1.4 fc at vertical planes VP-S1b (1.70 fc), VP-N2d (3.20 fc), VP-N1a (3.40 fc), VP-S1a (7.70 fc), and VP-N2c (39.80 fc). Figure 48 is an enlarged view of the western edge of Study Area A where the illuminance at vertical planes exceed 1.4 fc.

Table 9: Simultaneous Sign Trespass Illuminance (fc) Within Policy Boundary, 300 cd/m²

Vertical Plane	Illuminance (fc)		
	Maximum	Minimum	Average
VP-N1a	3.40	0.00	1.15
VP-N2b	1.00	0.00	0.56
VP-N2c	39.80	0.00	2.25
VP-N2d	3.20	0.00	0.45
VP-N3b	0.50	0.00	0.21
VP-N3c	0.50	0.00	0.23
VP-N3d	0.20	0.00	0.12
VP-N4b	0.50	0.00	0.28
VP-N4c	0.60	0.00	0.36
VP-N4d	1.00	0.00	0.77
VP-N4e	0.70	0.00	0.49
VP-N5b	1.10	0.00	0.71
VP-N5c	0.60	0.00	0.29
VP-N5d	0.70	0.00	0.44
VP-S1a	7.70	0.00	2.16
VP-S1b	1.70	0.30	0.75
VP-S3a	0.40	0.00	0.27
VP-S3b	1.00	0.00	0.30
VP-S4b	0.30	0.00	0.16
VP-S4c	0.20	0.00	0.09
VP-S4d	0.30	0.00	0.15
VP-S5a	1.00	0.00	0.61
VP-S6a	0.20	0.00	0.09
VP-S6b	0.10	0.00	0.06

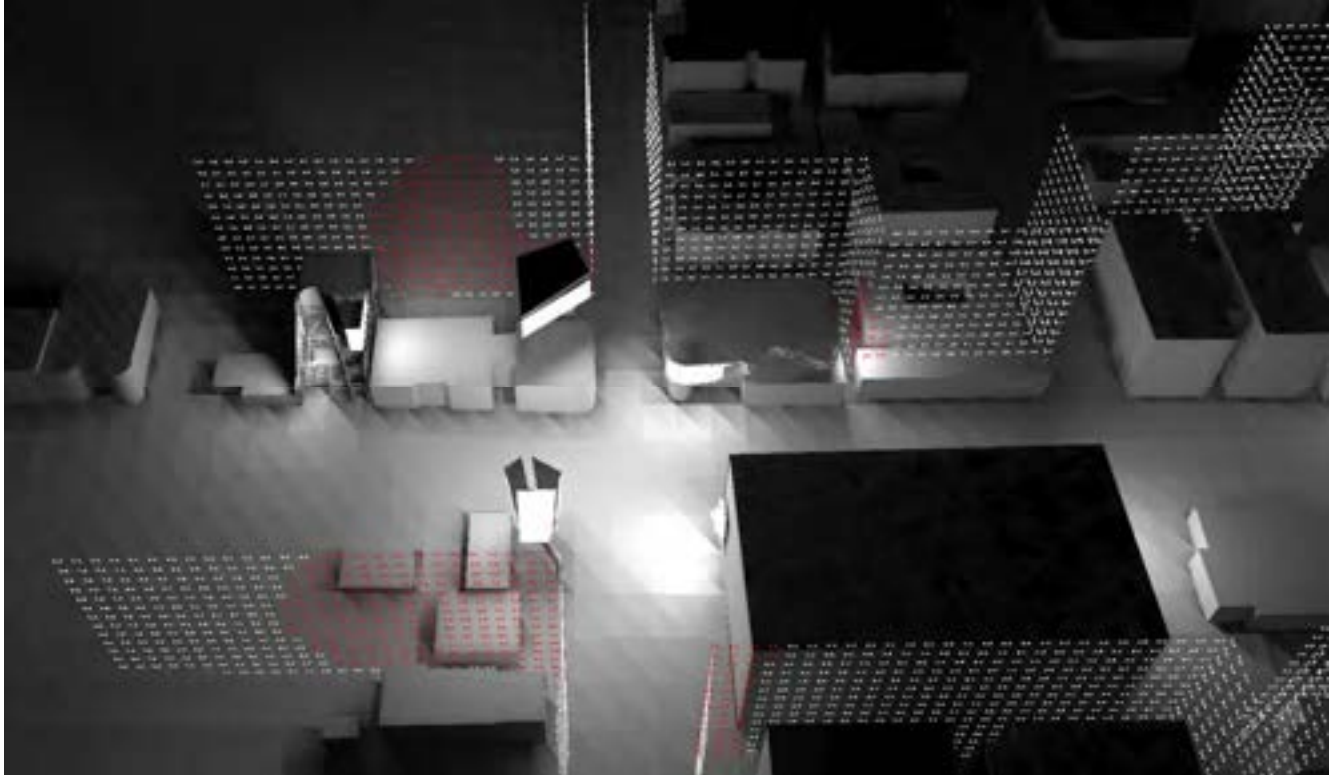


Figure 48: Enlarged View of Signs and Calculation Planes

a. Vertical Plane VP-S1b

Vertical calculation plane VP-S1b is east facing and located at the east residential property line of 1023 San Vicente Blvd, to the south of Sunset Boulevard. The calculated maximum illuminance at vertical plane VP-S1b with adjacent Signs 2.0-7 and 2.0-5 operating simultaneously at maximum 300 cd/m² luminance is 1.7 fc. The calculated illuminance data for all adjacent Signs operating simultaneously is illustrated in Figure 49 within the vertical calculation plane VP-S1b. Illuminance data less than 1.4 fc appears as white text while data above 1.4 fc appear as red text.

The calculated maximum illuminance at vertical plane VP-S1b when Signs 2.0-7 and 2.0-5 are analyzed simultaneously exceeds 1.4 fc with maximum illuminance of 1.7 fc. The west facing portion of Sign 2.0-7 contributes the majority of the illuminance at VP-S1b with additional reflected light from Sign 2.0-5. The distance from the Sign 2.0-7 to the VP-S1b is approximately 115 feet. The portion of the calculation plane that exceeds the 1.4 fc is located at the north end toward Sunset Blvd.

When Signs 2.0-7 and 2.0-5 are analyzed separately, light trespass does not exceed the Policy limit of 1.4 fc, and therefore, these Signs comply with the Policy. However, when analyzed together, as illustrated in Figure 49, the maximum Sign illuminance is 1.7 fc at calculation plan VP-S1b. The Policy does not regulate the collective illuminance from the adjacent Signs or the total ambient illuminance within the Specific Plan. These adjacent Signs are located less than 250 feet from the residential property line at VP-S1b. The orientation of Signs 2.0-7 and 2.0-5 toward the residential property lines causes the higher illuminance when these Signs are analyzed simultaneously. This analysis aligns with the conclusions within the Report published in 2017 (see Appendix D) which identified Signs located less than 250 feet from a residential zoned property may cause excessive light trespass. In order to reduce the maximum light trespass at residential properties immediately adjacent to or abutting the Sign properties, the Signs should be oriented toward Sunset or at no less than 45 degrees to the adjacent residential property. Rotating the signs toward Sunset will reduce the direct illumination of the residential properties.

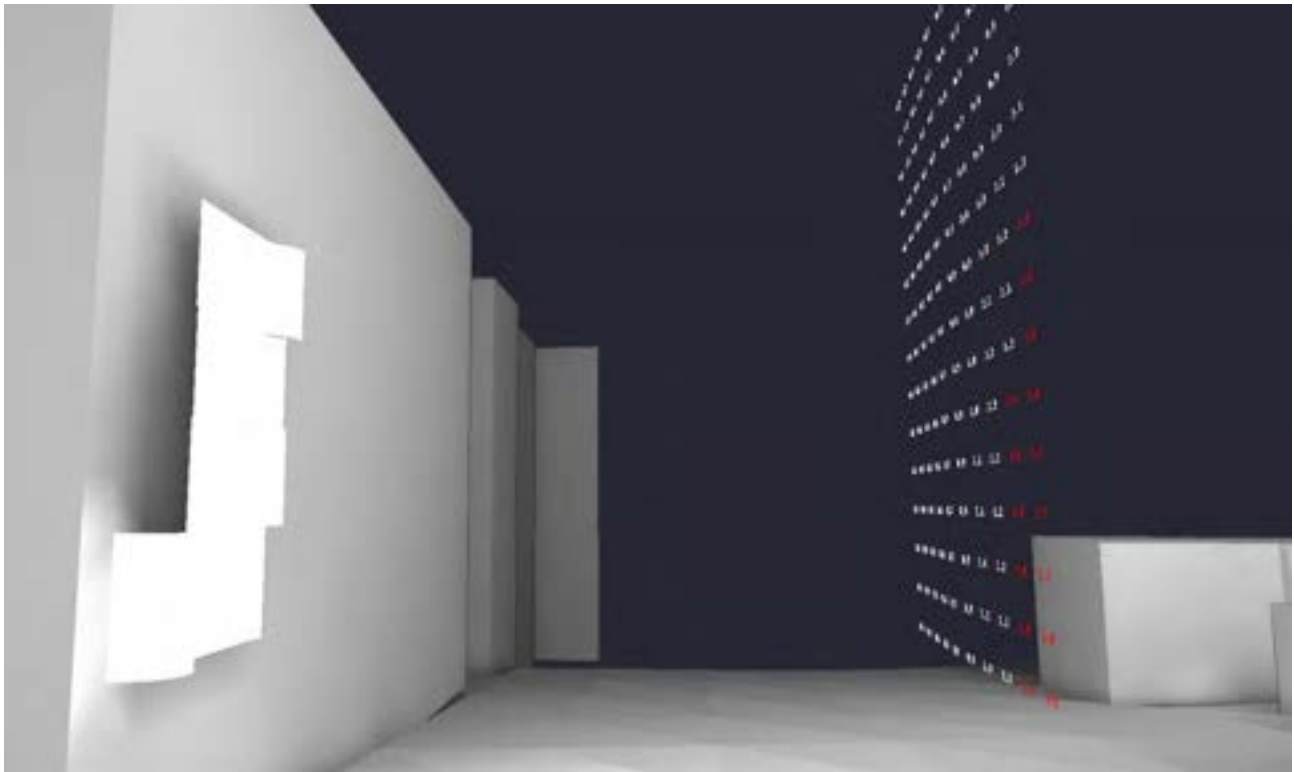


Figure 49: Calculation Plane VP-S1b

b. Vertical Plane VP-N1a:

Vertical calculation plane VP-N1a is located at the residential property line of 1113 Clark St to the north of Sunset Boulevard, to the west of Clark Street. Figure 50 provides a 3-dimensional view of Signs 2.0-4, 1.0-8, immediately adjacent to VP-N1a, and Sign 2.0-5 to the south of Sunset Boulevard. The calculated maximum illuminance with all adjacent Signs operating at maximum 300 cd/m² luminance at vertical plane VP-N1a is 3.4 fc. The calculated illuminance data for all adjacent Signs operating simultaneously is illustrated in Figure 50 within the vertical calculation plane VP-N1a. Illuminance data less than 1.4 fc appears as white text while data above 1.4 fc appear as red text.

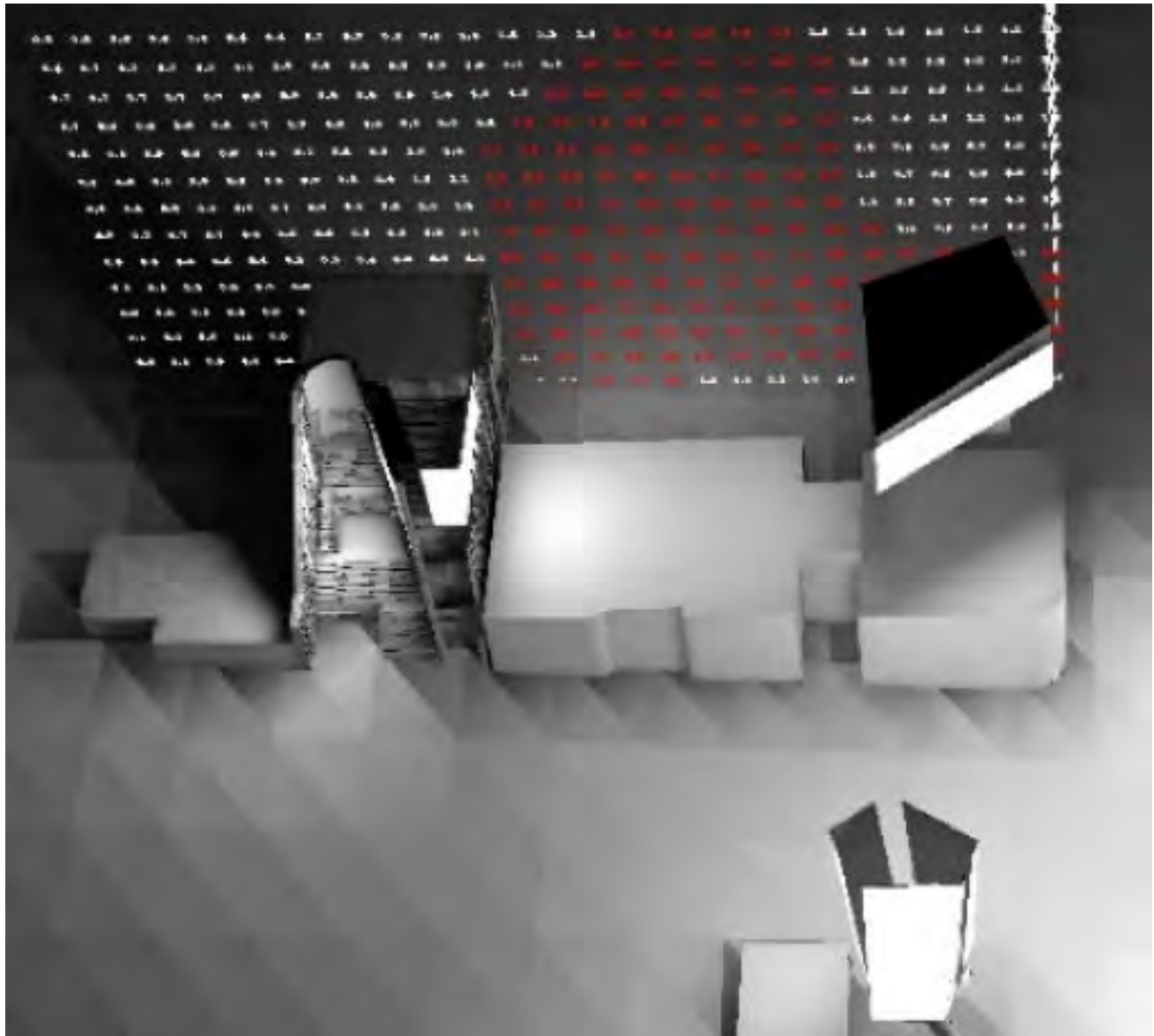


Figure 50: Calculation Plane VP-N1a

When Signs 2.0-4, 1.0-8, and 2.0-5 are analyzed separately, light trespass does not exceed the Policy limit of 1.4 fc, and therefore, these Signs comply with the Policy. However, when analyzed together, as illustrated in Figure 50, the maximum Sign illuminance is 3.4 fc at calculation plan VP-N1a. The Policy does not regulate the collective illuminance from the adjacent Signs or the total ambient illuminance within the Specific Plan. All

three adjacent Signs are located less than 250 feet from the residential property line at VP-N1a. The orientation of Signs 2.0-4, 1.0-8 toward the residential property lines causes the higher illuminance when these Signs are analyzed simultaneously. This analysis aligns with the conclusions within the Report published in 2017 (see Appendix D) which identified Signs located less than 250 feet from a residential zoned property may cause excessive light trespass. In order to reduce the maximum light trespass at residential properties immediately adjacent to or abutting the Sign properties, the Signs should be oriented toward Sunset or no less than 45 degrees to the adjacent residential property. Rotating the signs toward Sunset will reduce the direct illumination of the residential properties.

c. Vertical Plane VP-S1a

Vertical calculation plane VP-S1a is located at the north residential property line of 1023 San Vicente Blvd, south of Sunset Boulevard. Figure 51 shows vertical plane VP-S1a and the adjacent Sign 2.0-5. Illuminance data which are below the 1.4 fc Policy limit appear as white text while data above 1.4 fc appear as red text. The calculated maximum illuminance at vertical plane VP-S1a exceeds the Policy limit of 1.4 fc with maximum illuminance of 7.7 fc. Light trespass illuminance maximum of 7.70 at VP-S1a is caused by the south facing

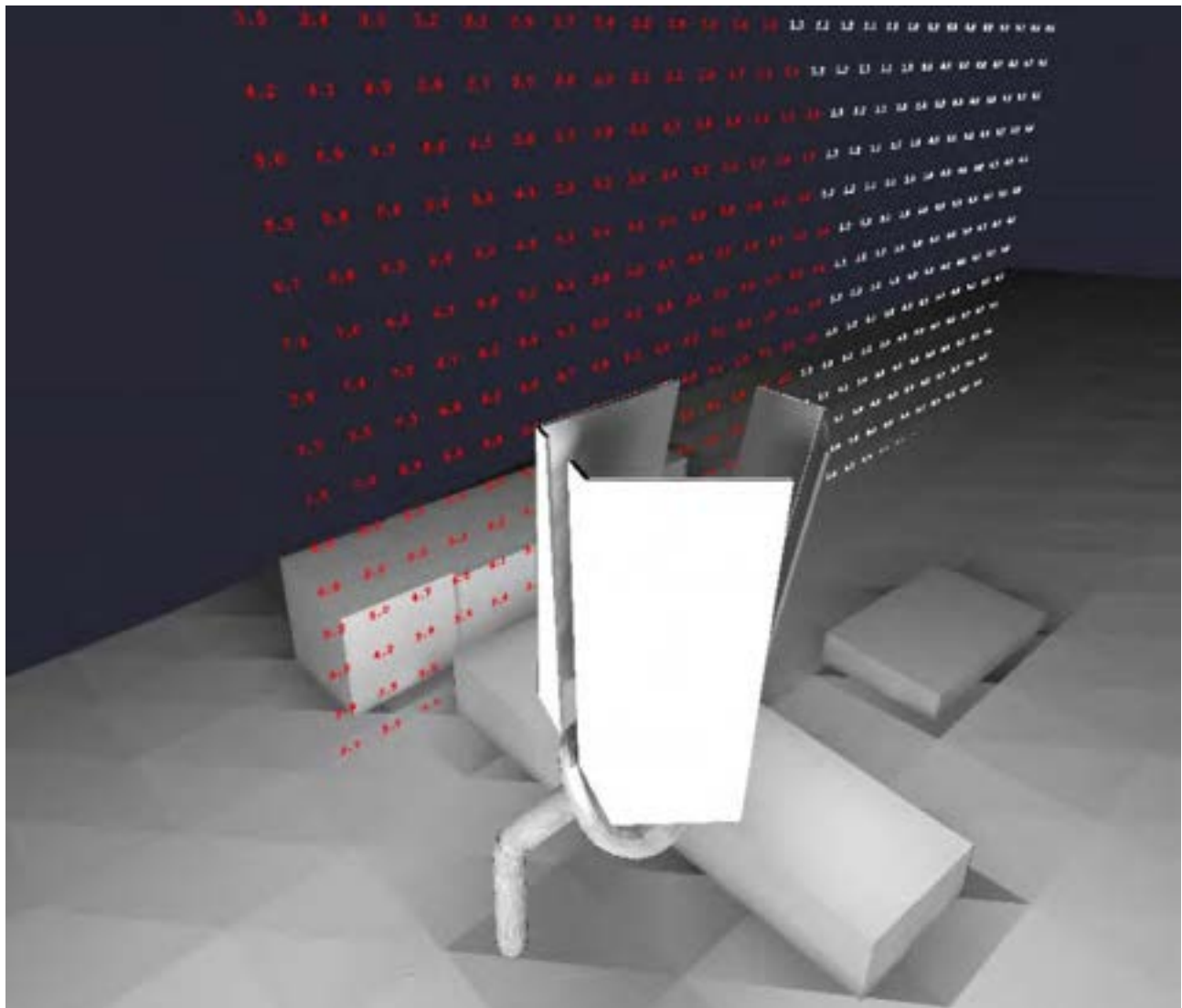


Figure 51: Calculation Plane VP-S1a

portion of Sign 2.0-5. The distance from the Sign to the Calculation Plane is approximately 60 feet. Sign 2.0-5 does not comply with the Policy light trespass limits when calculated independently of other Signs.

The orientation of Sign 2.0-5 toward the abutting residential property line causes the high illuminance, and Sign 2.0-5 does not comply with the Policy. This analysis aligns with the conclusions within the Report published in 2017 (see Appendix D) which identified Signs located less than 250 feet from a residential zoned property may cause excessive light trespass. To reduce the maximum light trespass at residential properties immediately adjacent to or abutting the Sign properties, the Sign should be oriented toward Sunset or at no less than 45 degrees to the adjacent residential property. Rotating the Sign toward Sunset will reduce the direct illumination of adjacent residential properties.

d. Vertical Planes VP-N2c & VP-N2d

Vertical Planes VP-N2c and VP-N2d are located north of Sunset Boulevard adjacent to the residential property at 1111 Larrabee. Figure 52 shows vertical planes VP-N2c and VP-N2d and the adjacent Sign 2.0-6. Illuminance data below the 1.4 fc Policy limit appear as white text while data above 1.4 fc appear as red text.

The calculated maximum illuminance from Sign 2.0-6 exceeds the Policy limit of 1.4 fc at vertical plane VP-N2c with maximum illuminance of 39.80 fc, and at VP-N2d with maximum illuminance of 3.20 fc. Therefore, Sign 2.0-6 does not comply with the Policy. The high illuminance at VP-N2c and VP-N2d is caused by the east face of Sign 2.0-6, which is approximately 10 feet away from the adjacent residential property at 1111 Larrabee. Sign 2.0-6 does not comply with the Policy light trespass limits when calculated independently of other Signs. Furthermore, adjacent Signs to the east and west of VP-N2c and VP-N2d do not contribute any additional illuminance at these two vertical planes.

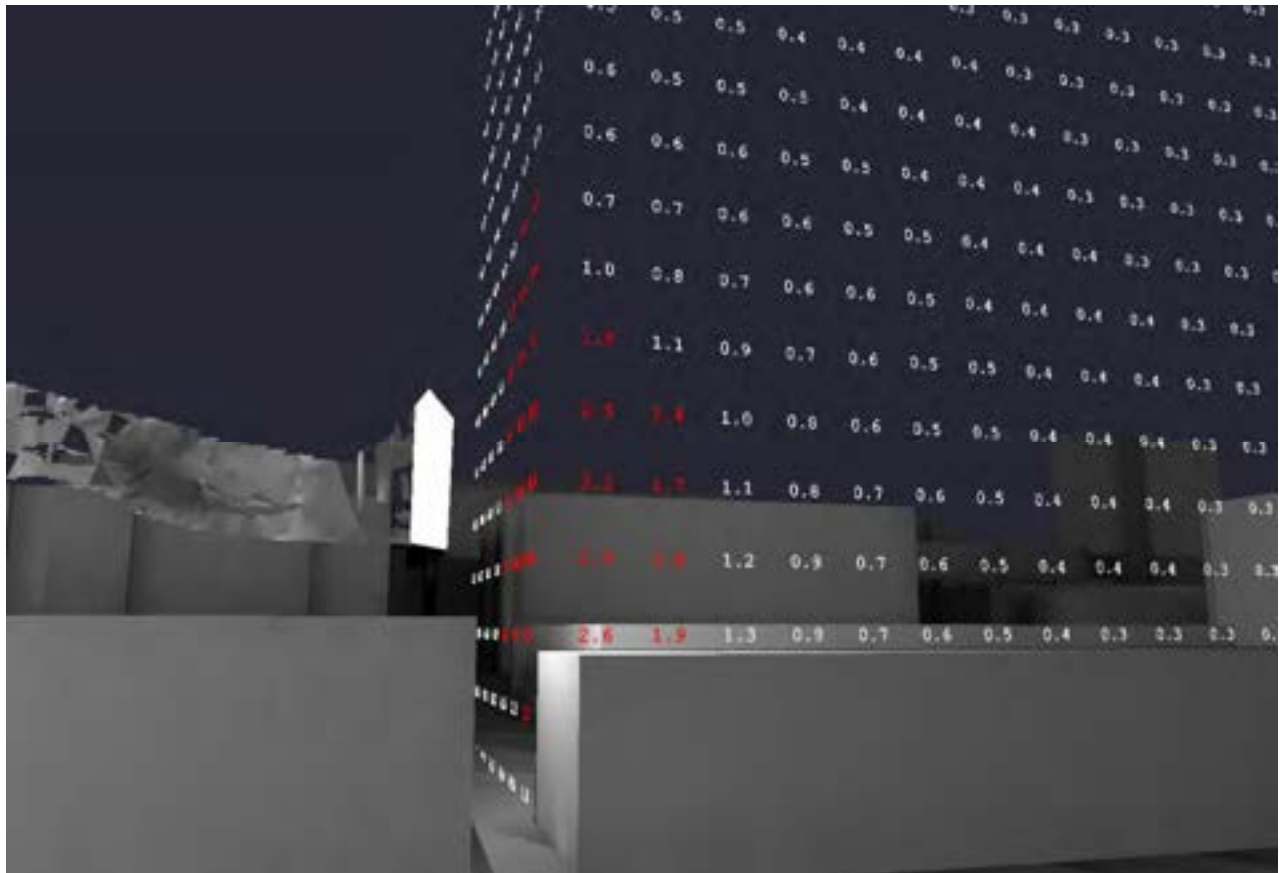


Figure 52: Calculation Planes VP-N2c and VP-N2d

Signs 1.0-8, 2.0-4, 2.0-5, 2.0-6, and 2.0-7 are analyzed individually to determine compliance with the Policy and define each Sign's contribution of light trespass at nearby residential zoned properties. Table 10 below lists the maximum light trespass from each individual Sign surrounding the intersection of San Vicente and Sunset Boulevard. All other Signs are not included in Table 10 are not near calculation planes which exceed 1.4 fc when calculated simultaneously, and therefore independently will not exceed 1.4 fc.

Table 10: Individual Sign Trespass Illuminance (fc) WHMC, 300 cd/m²

Sign	Maximum Trespass Illuminance (fc)	Maximum Trespass Location	Analysis (1.4 fc Policy Maximum)
1.0-8	0.90	VP-N1a	Complies
2.0-4	1.40	VP-N1a	Complies
2.0-5	6.20	VP-S1a	Exceeds Policy
2.0-6	39.80	VP-N2c	Exceeds Policy
2.0-7	1.10	VP-S1b	Complies

e. Analysis of Sign Illuminance Beyond the Specific Plan Boundary

This Study also evaluates Sign light trespass illuminance (fc) toward residential zoned properties which are not within the Sunset Specific Plan boundary. Light trespass illuminance at residential zoned properties in urban areas within the City of West Hollywood beyond the boundaries of the Sunset Specific Plan, or the within the City of Los Angeles, are evaluated with respect to the CalGreen maximum light trespass limit of 0.74 fc. The Los Angeles Municipal Code allows light trespass from signs up to 3.0 fc. However, to provide a conservative analysis, this Study applies the 0.74 fc CalGreen threshold to evaluate the light trespass at residential zoned properties within the City of Los Angeles. The Signs are defined and illustrated in Appendix A.

Table 11 summarizes the Sign light trespass illuminance calculation data at the vertical planes located outside of the boundary of the Sunset Specific Plan, as illustrated in Figure 7. Complete calculated data is presented in Appendix L.

The Sign maximum calculated illuminance in Table 11 varies from a minimum of 0.00 fc at vertical plane VP-N3a to a maximum of 0.80 fc at vertical plane VP-N2a. Eight of the nine (89%) Calculation Plane locations where light trespass outside of the Specific Plan boundary is analyzed comply with the CalGreen 0.74 fc limit.

Vertical calculation plane VP-N2a is located at the west residential property line of 1114 Clark St facing west. See Figure 53 below which illustrates VP-N2a and adjacent Signs 2.0-4, 2.0-5, 1.0-8, 2.0-6, and 2.0-7. The calculated illuminance data below the 0.74 CalGreen limit appear as white text while values above 0.74 fc appear as red text. The calculated maximum illuminance at vertical plane VP-N2a exceeds the CalGreen limit of 0.74 fc with maximum illuminance of 0.80 fc. The portion of the calculation plane exceeding the CALGreen limit is at the south end, nearest Sunset Blvd.

Table 11: Sign Trespass Illuminance (fc) Outside Policy Boundary, 300 cd/m²

Vertical Plane	Illuminance (fc)		
	Max	Min	Avg
VP-N1b	0.20	0.00	0.12
VP-N2a	0.80	0.00	0.36
VP-N2e	0.40	0.10	0.21
VP-N3a	0.00	0.00	0.00
VP-N4a	0.40	0.00	0.14
VP-N5a	0.20	0.00	0.09
VP-N6a	0.06	0.00	0.01
VP-S3c	0.10	0.00	0.01
VP-S4a	0.20	0.00	0.06

The excessive light trespass is due to adjacent Signs 2.0-4 and the north face of Sign 2.0-5, which are located less than 250 feet away from the residential property line at VP-N2a and oriented toward VP-N2a. While each sign individually complies with the Policy, the proximity and orientation toward residential properties cause the light trespass to exceed the 0.74 fc limit. This analysis aligns with the previous lighting study by Francis Krahe & Associates published in 2017 (see Appendix D), which identified Signs located less than 250 feet from a residential property may cause excessive light trespass.

Properties located farther away will receive less light trespass from the Sign than ones that are near, due to the Inverse Square Law. Therefore, light trespass from the Signs at any residential zoned properties located farther away would not receive excessive light trespass.



Figure 53: Calculation Plane VP-N2a and adjacent Signs

Furthermore, light trespass illuminance from the Signs was reviewed at the nearest biologically sensitive area in the vicinity of the Signs. The nearest biologically significant area is directly north of Larrabee St., approximately 1200 feet north of Sunset Blvd. Vertical Plane VP-N6a (see Figure 7) corresponds to the location where the light trespass illuminance was analyzed from all Signs in Study Area A. Table 11 includes the calculated maximum light trespass from the Signs as 0.06 fc at vertical plane VP-N6a. The light trespass illuminance calculated from the Signs is very low, and therefore will not affect biological processes within the biological area.

The existing light trespass conditions along Sunset boulevard are bright and continuous (See Table 6), consistent with the characteristics of Lighting Zone 4. The illumination calculated from the Signs is generally less than or equal to the existing illumination, and less than the Policy limit of 1.4 fc. Signs that exceed 1.4 fc are not compliant with the Policy. While the lighting condition if Signs are installed and operating, the lighting character will not be substantially changed

3.2 Signs Glare Analysis

Glare from Signs lighting occurs when the light source is visible against a dark background, such as a dark sky. For this Study, the maximum nighttime sign luminance is 300 cd/m², which is the maximum Sign luminance permitted by the Policy. The measured existing luminance along Sunset Boulevard and adjacent residential zoned properties is summarized in Table 7 within Section II.2 above. Table 12 summarizes the contrast ratio calculated for the Sign maximum night luminance versus the average existing measured luminance in Table 7 at each Monitoring Site.

Table 12: Contrast Ratio: Comparison of existing measured to Signs @ 300 cd/m²

Monitoring Site	Existing Measured Average Luminance (cd/m ²)	Sign Luminance		Evaluation
		Maximum (cd/m ²)	Contrast Ratio	
M-HI1	148	300	2.0 : 1	Low Contrast
M-HI2	143	300	2.1 : 1	Low Contrast
M-C1	141	300	2.1 : 1	Low Contrast
M-C2	206	300	1.5 : 1	Low Contrast
M-C3	1008	300	0.3 : 1	Low Contrast
M-C4	393	300	0.8 : 1	Low Contrast
M-C5	282	300	1.1 : 1	Low Contrast
M-C6	49	300	6.1 : 1	Low Contrast
M-L1	114	300	2.6 : 1	Low Contrast
M-L2	229	300	1.3 : 1	Low Contrast
M-L3	464	300	0.6 : 1	Low Contrast
M-L4	611	300	0.5 : 1	Low Contrast
M-L5	405	300	0.7 : 1	Low Contrast
M-L6	177	300	1.7 : 1	Low Contrast
M-H1	206	300	1.5 : 1	Low Contrast
M-H2	552	300	0.5 : 1	Low Contrast
M-S1	248	300	1.2 : 1	Low Contrast
M-S2	112	300	2.7 : 1	Low Contrast

The contrast ratio is less than 10 to 1 at all Monitoring Site locations, which is low contrast and indicates no glare. All Monitoring Sites are near the Signs and have potential direct view of the Signs. The low contrast evaluation at all Monitoring Sites indicates the Signs will not present a glare condition for residential zoned properties more distant from the Signs than the Monitoring Sites.

3.3 Sign Glare Analysis for Roadways

The lighting condition which may affect driver's visibility from the Signs is evaluated by comparison to the requirements stipulated by the California Vehicle Code (CVC). As summarized below, the results of this evaluation demonstrate the light condition resulting from the Signs at the locations where light is under review are below the CVC limit for excessive luminance, or glare, during night, twilight (sunrise/sunset), and day. The Signs comply with the CVC standard for roadways approaching the Signs from all directions.

The glare analysis of the Signs during night assumes use of any or all Signs on full white at the maximum luminance of 300 cd/m² and compares the resulting luminance to the most stringent requirements of the California Vehicle Code to determine if the Signs introduces a source of distracting glare to drivers. The most stringent condition identified within the California Vehicle Code Section 21466.5, states: "except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlamberts (fL) shall not exceed 500 plus 100 times the angle, in roadway degrees, between the driver's field of view and the light source." Thus, a conservative evaluation, occurs where any Sign is visible within the centerline of the driver's field of view, the angle noted above within the field of view is 0, the surrounding surface luminance is less than 10 fL, and therefore the maximum allowable luminance is 500 fL. Therefore, the most conservative condition at night evaluates the Signs against the maximum luminance limit of 500 fL. Sign luminance is not additive or cumulative, therefore the maximum from any Sign represents the highest intensity that may affect the driver's ability to see.

A measured brightness within the driver's field of view of less than 10 fL may occur at night. The Signs are evaluated with a maximum luminance of 300 cd/m². Calculating the equivalent Sign luminance by converting to english units from metric units: 300 cd/m² equals 87.6 fL. The Signs will not exceed 87.6 fL, which is 17.5% of the 500 fL maximum, the most conservative limit stipulated by the California Vehicle Code for conditions where the minimum brightness in the driver's field of view is less than 10 fL.

Where the Signs are located beyond the driver's 10 degree field of view the maximum luminance is permitted to increase under the California Vehicle Code. For example, Signs located 15 degrees from the centerline of the driver's field of view would be limited to a maximum of 1,000 fL (500 fL plus 100 times the angle (5 degrees) = 1,000 fL). The Signs will operate at maximum of 87.6 fL at night, or less than approximately 8.8% of the maximum allowed by the California Vehicle code for those locations at 15 degrees from the center of the driver's field of view. Therefore, at night the Signs beyond the drivers 10 degree field of view will not exceed the 1000 fL limit and will not introduce a new source of glare as defined by the California Vehicle Code Section 21466.5.

The Signs are also evaluated during twilight (the transition period from day to night). Sunlight increases gradually from the minimum brightness at approximately 45 to 50 minutes before sunrise (dawn) to maximum brightness at mid-day, and then decreases gradually to the minimum brightness at 45 to 50 minutes after sunset. Therefore, the minimum ambient luminance occurs between sunset and sunrise. However, in order to analyze the most conservative, low level sunlight conditions, this analysis adjusts the time frame for the minimum ambient luminance condition of 10 fL to sunset and until 20 minutes before sunrise, extending the duration of night. At sunset the ambient sunlight will be greater than the minimum values during the night, and at 20 minutes before sunrise the luminance will also be greater than the minimum at night. At sunset, the minimum luminance values within the driver's field of view will be above the minimum nighttime values (10 fL) due to the light from the setting sun. However, to maintain a conservative analysis, this Study assumes the minimum luminance within the driver's field of view will be less than 10 fL from sunset until 20 minutes before sunrise. Therefore, the maximum luminance limit during this time will remain at 500 fL as noted above in the evaluation of the nighttime luminance limit. The maximum sign luminance allowed by the California Vehicle Code of 500 fL converting to metric units equals 1713 cd/m².

The Signs is required by the Policy to operate at 300 cd/m² (87.6 fL) maximum luminance, from sunset to 20 minutes before sunrise. At 20 minutes before sunset the Sign is specified to begin transition from the maximum daytime luminance of 6,000 cd/m² to the maximum nighttime luminance of 300 candelas/m². This transition must be completed no later than sunset to avoid potential high contrast, glare conditions. Similarly, the Sign is specified to transition from the night maximum luminance of 300 cd/m² to the day maximum luminance of 6,000 cd/m², beginning no earlier than 20 minutes before sunrise. The duration of the transition from the night maximum luminance to maximum day luminance must be completed no earlier than sunrise.

Therefore, the Signs will not exceed 300 cd/m^2 for the period beginning at sunset until sunrise. The Signs remain limited to the 300 cd/m^2 (87.6 fL) maximum luminance value, from sunset to 20 minutes before sunrise. Therefore, at sunset and until 20 minutes before sunrise, the Sign will not exceed the limit of 500 fL, and will therefore not introduce a new source of Glare.

The evaluation of the Signs during the day (sunrise until 20 minutes before sunset) compares the daytime, ambient brightness to the maximum Sign brightness stipulated by the California Vehicle Code during full sun conditions and overcast sky conditions. The California Vehicle Code, Section 21466.5 above permits the Signs to "generate light intensity levels greater than 1,000 times the minimum measured brightness in the driver's field of view, except when the minimum values are less than 10 (fL)."

During the day (after sunrise until 20 minutes before sunset) sunlight with clear sky conditions or light overcast conditions provides sufficient illuminance to generate surface brightness greater than 10 fL and up to 1300 fL on the least reflective surfaces, such as roadway pavement. Utilizing the value of 10 fL as the minimum within the driver's field of view, the maximum allowable brightness would be 1,000 times 10 fL, or 10,000 fL. The Policy requires that the Sign not exceed $6,000 \text{ cd/m}^2$ (1751 fL) during the daytime hours of operation, and Signs will therefore operate at less than 17.5% of the maximum luminance stipulated by the California Vehicle Code. Therefore, the Signs will not create a new source of glare during daytime hours of operation with clear sky or light overcast conditions.

Severe storms, heavy cloud cover, or other atmospheric conditions may occur during the day, which may cause the minimum brightness within the driver's field of view to be less than 10 fL. The Signs are required to include an electronic control system to reduce the maximum Sign luminance from $6,000 \text{ cd/m}^2$ (1,751 fL) to 300 cd/m^2 (87.6 fL) maximum when the ambient sun light falls to illuminance values similar to night, less than 100 fc. During the day, when storms, cloud cover, or other low ambient sunlight conditions occur and when the ambient sunlight is less than 100 fc, the Signs will transition from the daytime $6,000 \text{ cd/m}^2$ (1,751 fL) to 300 cd/m^2 (87.6 fL) maximum, and thereby ensure that the Sign brightness remains less than the maximum brightness stipulated by the California Vehicle Code. Therefore, the Signs will not create a new source of glare during daytime periods with storm or severe overcast weather conditions.

The Signs are required by the Policy to not exceed 300 cd/m^2 (87.6 fL) luminance at night or during overcast sky conditions and, or, exceed $6,000 \text{ cd/m}^2$ (1,751 fL) during the day. The luminance is less than the California Vehicle Code standard, including 17.5% of the maximum allowable luminance identified as the limit for glare during the day. Therefore the Signs will not create a new source of Glare for drivers.

III. Review of Lighting Regulations & Reference Standards

Exterior lighting is regulated throughout California by the local municipal code and the state energy and building codes. Pertinent lighting sections are summarized and discussed for the City of West Hollywood Municipal Code, the West Hollywood Sign Policy, Sunset Boulevard Specific Plan, the State of California Green Building Code (Calgreen), the California Energy Code, and the California Vehicle Code (CVC). Reference standards include model lighting ordinances provided by the Illuminating Engineering Society of North America (IESNA) and the International Dark Sky Organization. Various aspects of these reference standards are included in local regulations to improve the outcomes of any approved project and avoid future disputes or legal challenges to proposed lighting plans. The lighting standards summarized below balance the requirements of property owners for sufficient brightness and flexibility for the use of their property, with minimizing the off-site negative effects of light trespass and glare.

1. Sunset Boulevard Specific Plan

The Sunset Boulevard Specific Plan (the "Specific Plan") regulates lighting with respect to sign and building lighting with respect to light trespass (i.e., the spillover of light onto adjacent residential zoned properties) and glare. The City of West Hollywood also enforces the building code requirements of the West Hollywood Building Code, the California Building Code, the California Green Building Standards Code (CALGreen), and the California Energy Code.

The Specific Plan includes the following requirements which apply in this Study to sign illumination within the Sunset Boulevard Off-Site Signage Policy (Policy).

- Sign luminance will be less than 6,000 candelas per meter squared (cd/m^2) during the day, and less than 300 cd/m^2 from 20 minutes prior to sunset until 20 minutes prior to sunrise.
- Sign luminance shall transition smoothly over no less than 20 minutes, from the daytime to the nighttime (or nighttime to daytime) maximum luminance.
- From 2:00 a.m. until sunrise no animated content or moving patterns shall be permitted.
- Sign illuminance will not exceed 1.4 foot-candles at any adjacent residential zoned property.

In this Study the Policy requirements stated above apply where signs are adjacent to residential zoned properties within the City of West Hollywood and adjacent to, within 250 feet of Sunset Boulevard. The distance of 250 feet is identified in the Sunset Strip Off-Site Signage Policy Initial Study / Negative Declaration, Section 3.1(d), page 252 (attached herein Appendix E), which states:

"Along Sunset Boulevard, most residential properties are set back behind the commercial properties that front onto Sunset Boulevard. The slope to the north and south of Sunset Boulevard significantly affect the visibility of signs from residential properties. ... The distance from Sunset Strip properties to adjacent residential properties varies considerably. The properties within close proximity are generally 250 feet to 300 feet away from the existing signs on Sunset Boulevard."

Therefore, residential zoned properties within 250 feet of Sunset Boulevard are considered within the area included to and subject to the WEHO Policy regulations and the 1.4 fc light trespass illuminance limit applies.

This Study also evaluates Sign light trespass illuminance at residential zoned properties that are not adjacent to Sunset Boulevard, more than 250 feet from Sunset Boulevard, and not a part of the Sunset Specific Plan and directly regulated by the Policy. For those residential zoned properties that are not adjacent to Sunset Boulevard, the regulations of CALGreen would apply as follows:

- CEC defines all urban areas as LZ3 (see below). Maximum light trespass illuminance within LZ3 is 0.74 fc. Therefore, Signs light trespass illuminance will not exceed 0.74 foot-candles at any adjacent residential zoned property more than 250 feet away from Sunset Boulevard.

2. California Code of Regulations, Title 24

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, includes regulations for signs throughout the State of California. The following components of Title 24 include standards related to Sign Lighting:

2.1 2022 California Administrative Code, Administrative Regulations for the California Energy Commission (CEC):

The California Administrative Code, which is Part 1 of Title 24, includes Section 10-114., Determination of Outdoor Lighting Zones and Administrative Rules for Use. This section establishes rules for implementing outdoor lighting zones, and is included herein as Appendix F.

Nighttime lighting environment are defined as Lighting Zones 0 through 4 in Table 10-114-A LIGHTING ZONE CHARACTERISTICS AND RULES FOR AMENDMENTS BY LOCAL JURISDICTIONS. The requirements of Section 10-114 are established to show compliance with Section 140.7 of Title 24, California Code of Regulations, Part 6. The description of nighttime lighting environments in Table 10-114 are similar to IESNA RP-8-22 Table 4-1, discussed below.

The Signs locations and surrounding properties are an urban, mixed use, commercial and residential zone with extensive nighttime use, including nearby industrial, retail, restaurants, and entertainment venues. Current best practices for lighting standards recognize the unique issues related to nighttime use adjacent to residential sites. As noted above, CEC includes designations for Lighting Zones (LZ) 0 through 4, included below in Appendix F, which correspond to the Light trespass Illuminance recommendations within the IESNA Tenth Edition Handbook Table 26.5, included herein Appendix K. The IESNA recommendations for light trespass Illuminance vary based upon the extent of nighttime human activity and the extent of natural habitat.

The existing conditions surrounding the Signs locations and along Sunset Boulevard are consistent with the definition of LZ4 noted above. In addition, the IESNA defines LZ4 as:

“...areas of very high ambient lighting levels. LZ4 should only be used for special cases and is not appropriate for most cities. LZ4 may be used for extremely unusual installations such as high density entertainment districts, and heavy industrial uses.”

IESNA Tenth Edition Handbook Table 26.5, lists a Pre-curfew 15.0 Lux (1.4 footcandles) maximum at the location where trespass is under review for LZ4. As noted above, the City of West Hollywood Ordinance has incorporated the requirements of Lighting Zone 4, 1.4 fc maximum light trespass illuminance, for all residential zoned properties within the Sunset Specific Plan Boundary. Therefore, this Study utilizes the Policy maximum Sign light trespass illuminance of 1.4 fc at residential zoned properties adjacent to Sunset Boulevard.

Per the CEC, California Building Energy Efficiency Standards, Section 10-114, the designations for outdoor lighting zones in urban areas are as follows:

“The default for urban areas, as defined by the U.S. Census Bureau, is Lighting Zone 3. Local AHJs (Authorities Having Jurisdiction) may designate areas to Lighting Zone 4 for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels.”

All urban areas within California are designated LZ3 as default under the CEC. The corresponding light trespass illuminance defined by IESNA for LZ3 limits the maximum light trespass to 8.0 lux or 0.74 footcandles. Therefore, all urban areas within the City of West Hollywood not included within the Sunset Specific Plan, and adjacent neighborhoods within the City of Los Angeles are designated by CEC as Lighting Zone 3. The City of Los Angeles Municipal Code includes sign lighting regulations which permit sign light trespass illuminance not to exceed 3.0 fc (LAMC Chapter 1, Article 4.4, Sec. 14.4.4 E) at residential use properties. However, this Study utilizes the more stringent CEC designation of LZ3, 0.74 fc as the basis of the evaluation of Sign light trespass to present a more conservative analysis for areas not within the Sunset Boulevard Specific Plan.

2.2 California Energy Code 2022, Section 140.7, PRESCRIPTIVE REQUIREMENTS FOR OUTDOOR LIGHTING

The California Energy Code (CEC) stipulates allowable energy use for Outdoor Lighting (see Appendix G herein), including with the aim of reducing energy consumption at night through efficient and effective use of sign lighting equipment. Sign lighting is exempt as per "Section 140.7 (a), Exceptions to Section 140.7(a) 7. Lighting of signs complying with the requirements of Sections 130.3 and 140.8". However, the requirements of CEC are applied in this Study to present a conservative analysis of light trespass illuminance at residential use properties.

2.3 California Energy Code 2022, Section 130.3, SIGN LIGHTING CONTROLS

The California Energy Code (CEC) stipulates control requirements for signs (see Appendix H herein), including with the aim of reducing energy consumption at night through efficient and effective use of sign lighting equipment.

2.4 California Energy Code 2022, Section 140.8, PRESCRIPTIVE REQUIREMENTS FOR SIGNS

The California Energy Code (CEC) stipulates energy and light source requirements for signs (see Appendix I herein), including requirements for "(a) Maximum allowed lighting power.", or "(b) Alternate lighting sources." Both sections require high efficiency light sources, LED, or equivalent.

3. California Vehicle Code, Division 11. Rules of the Road

Chapter 2, Article 3 of the California Vehicle Code stipulates limits to the location of light sources that may cause glare and impair the vision of drivers.

ARTICLE 3. Offenses Relating to Traffic Devices [21450 - 21468] (Article 3 enacted by Stats. 1959, Ch. 3.), Section 21466.5. No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 1-1/2 degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal field of view shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.

This Study analyzes the standard set forth in CVC Section 21466.5 as it applies to the Signs on drivers within adjacent streets.

4. IESNA Recommended Practices

The Illuminating Engineering Society of North America (IESNA) recommends illumination standards for a wide range of building and development types. These recommendations are widely recognized and accepted as best practices and are therefore a consistent predictor of the type and direction of illumination for any given building type. For all areas not stipulated by the regulatory building code, municipal code or specifically defined requirements, the IESNA standards are used as the basis for establishing the amount and direction of light for the Signs.

As stated above, ANSI/IESNA LP-11-20 Section 4.1, included herein as Appendix J, defines Outdoor Lighting Zones relative to a range of human activity versus natural habitat. Section 4.1 establishes the Outdoor Lighting Zone designation for a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. Section 4.1 is referenced by the CEC as noted above in relation to allowable energy use for outdoor lighting. In addition, IESNA Tenth Edition Handbook defines Recommended Light Trespass Limits in Table 26.5 included in Appendix K hereto, relative to the Outdoor Lighting Zones. The Recommended Light Trespass Illuminance Limits describe the maximum light trespass values in Lux at the location where trespass is under review.

The existing conditions surrounding and adjacent to the Sunset Boulevard are best described as Lighting Zone 4 in IESNA RP-8-22 Table 4-1. Therefore, the corresponding maximum Pre-curfew illuminance for Lighting Zone 4 identified in IESNA RP-8-22 Table 4-2 is 15 Lux (1.4 footcandles) maximum at the location where trespass is under review.

5. Applicable Reference Standards

In the context of the regulations listed above, this Study takes into account the following regulations to evaluate the proposed Signs:

The Policy requires Sign light trespass illuminance to be less than 1.4 fc at residential zoned property lines within and abutting the Sunset Specific Plan boundary.

Calgreen requires Sign light trespass illuminance to be less than 0.74 fc at residential use property lines outside of the Sunset Specific Plan boundary, more than 250 feet from Sunset Boulevard.

The Policy requires that the Sign Luminance does not exceed 300 cd/m².

In addition, the Policy requires the Signs to comply with the California Vehicle Code requirements which stipulate the maximum measured brightness of the light source within 10 degrees from the driver's normal field of view shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.⁸

The Signs are evaluated in this Study with regard to the applicable references listed above.

⁸ The driver's field of view from the center of the roadway plus 10 degrees."

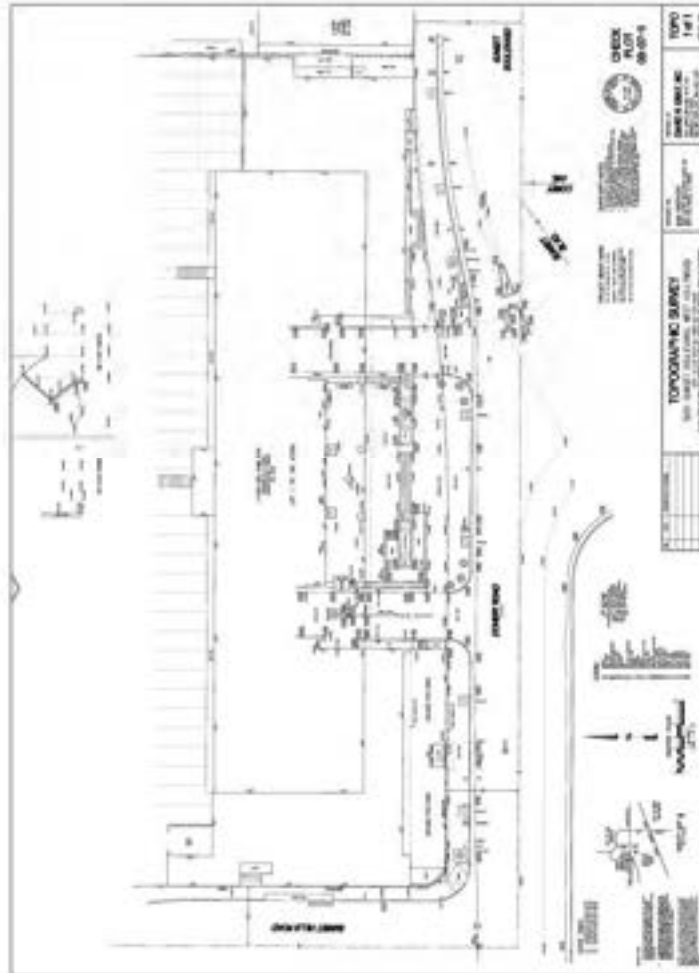
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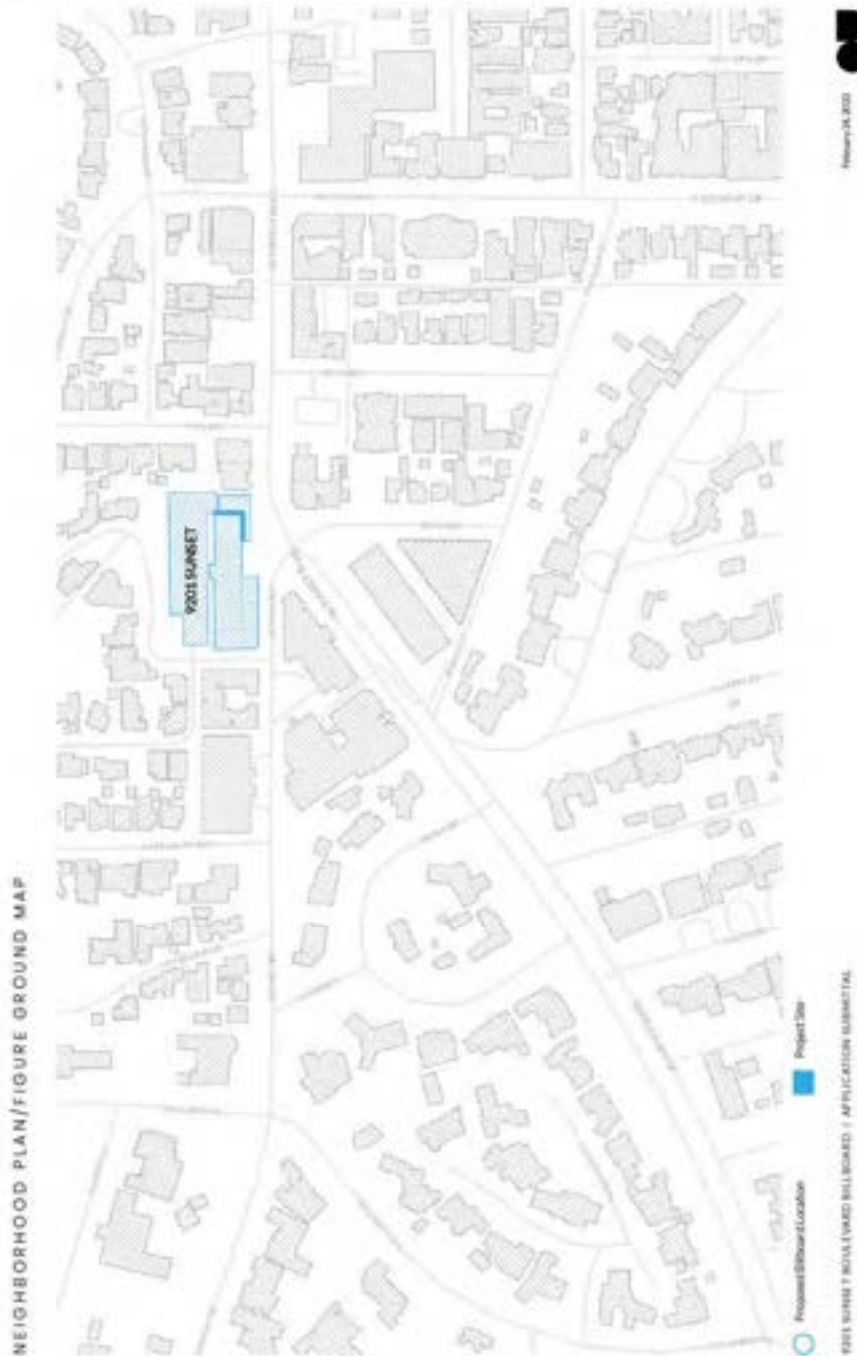


February 24, 2020

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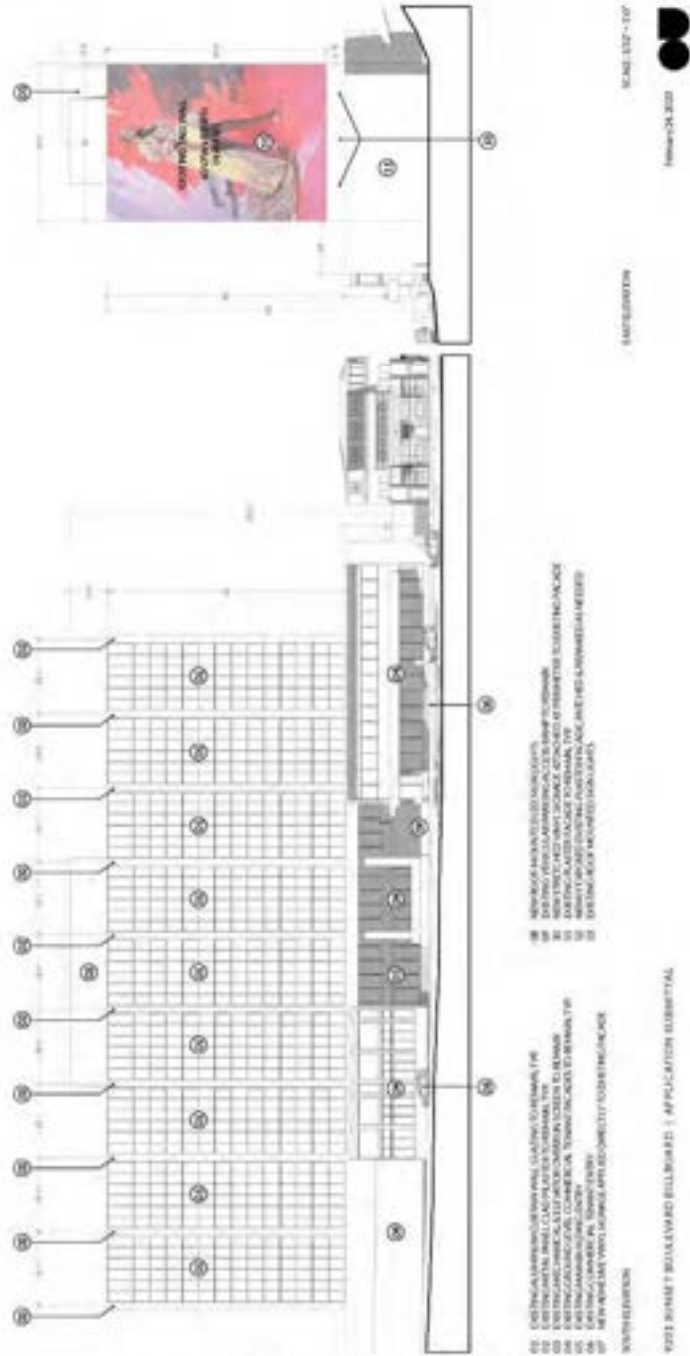
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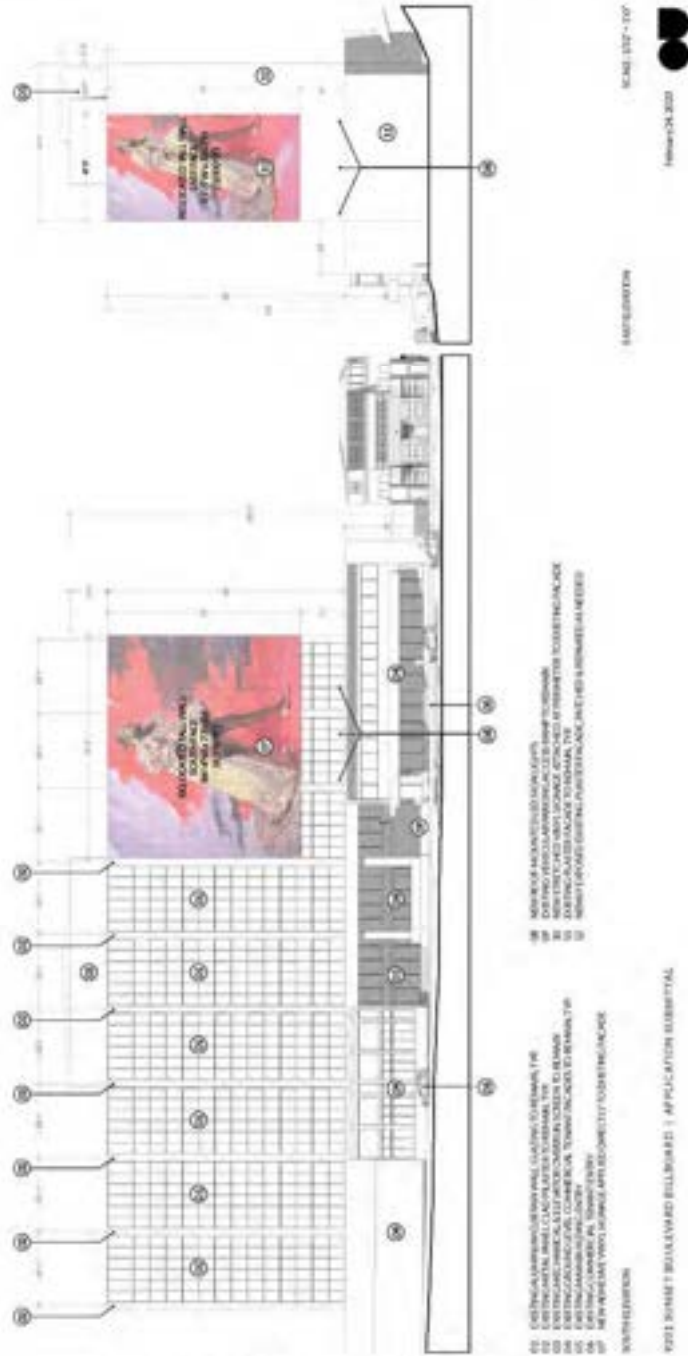
ELEVATIONS | EXISTING |



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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS.

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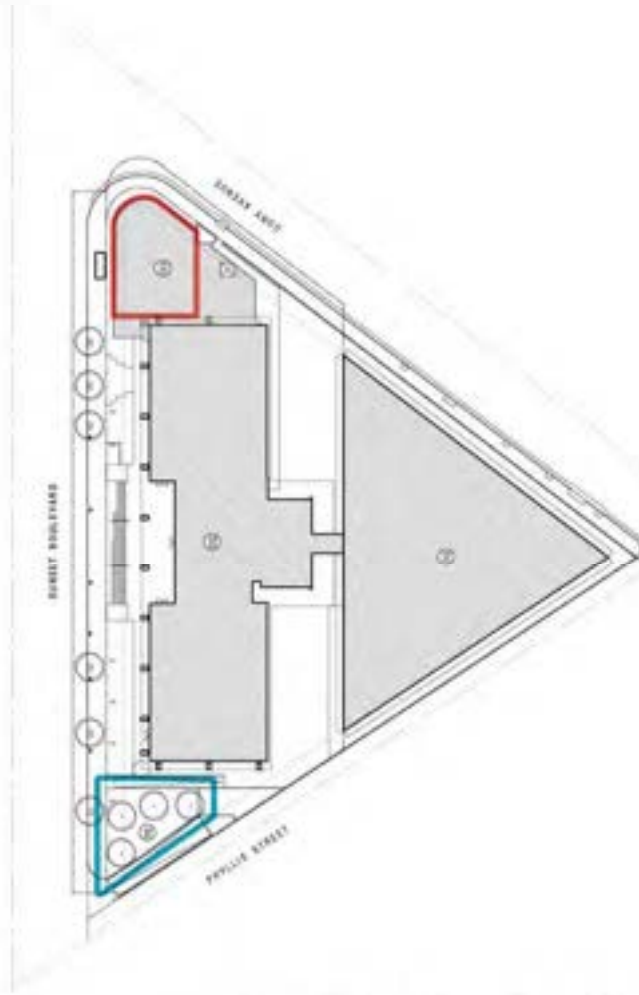


001. AREAS OF INTEREST/STUDY/PROJECT ZONE
002. EXISTING SITE CONDITIONS, TOP AND BOTTOM
003. PROPOSED/EXISTING/CONCEPT/MAINTENANCE
PROJECT AREA

SHEET 1-10-10

June 18, 2020

OVERALL / SCOPING SITE PLAN

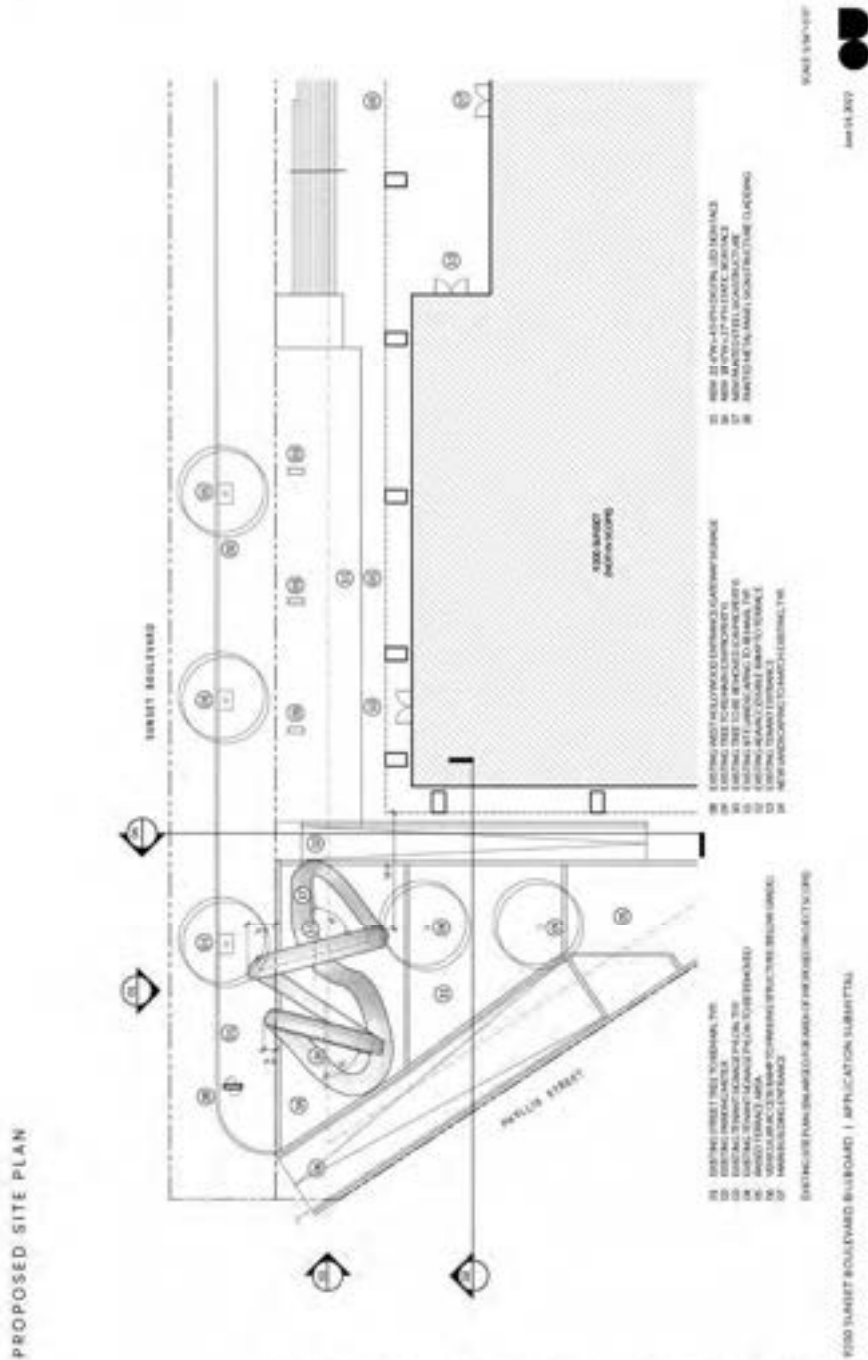


EXISTING SITE CONDITIONS

EXISTING SITE CONDITIONS / APPLICATION SUBMITTAL

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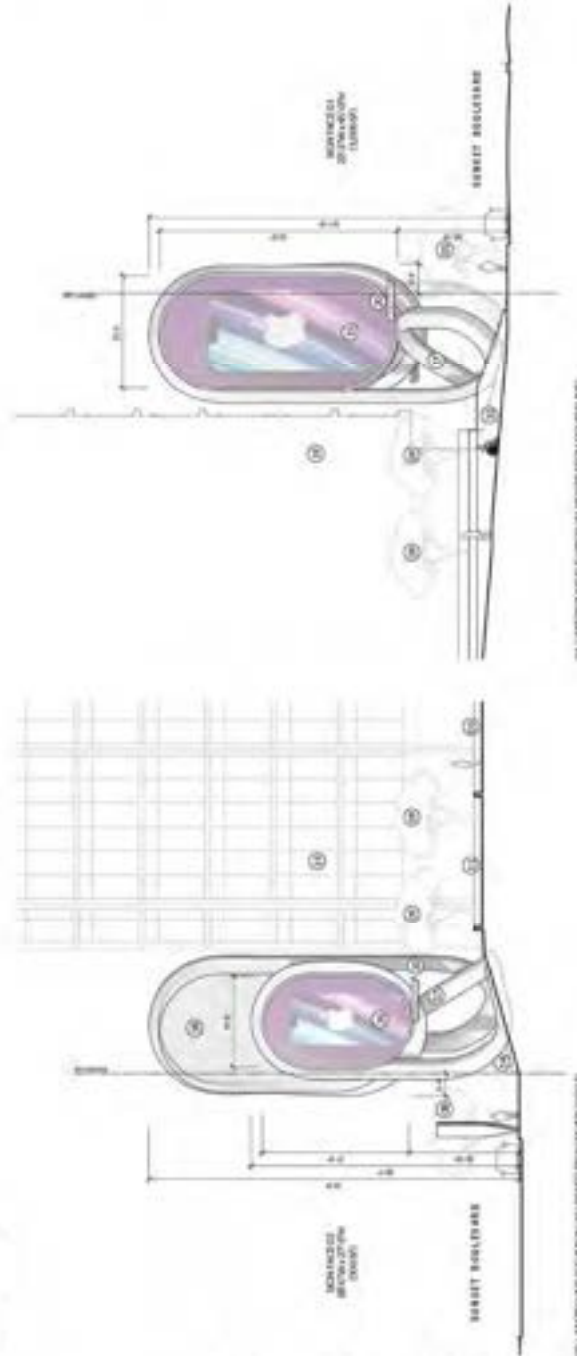


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ELEVATIONS



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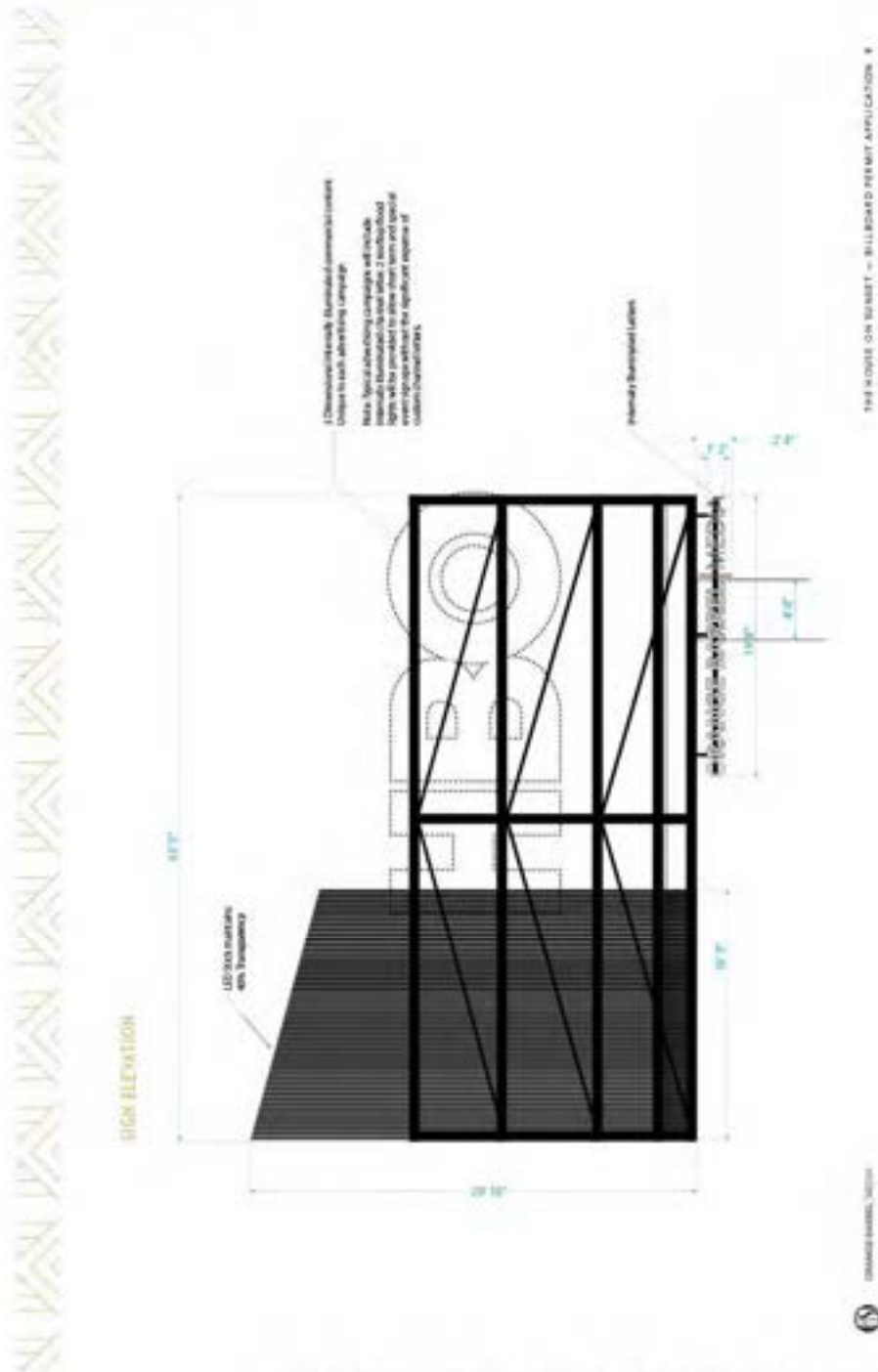
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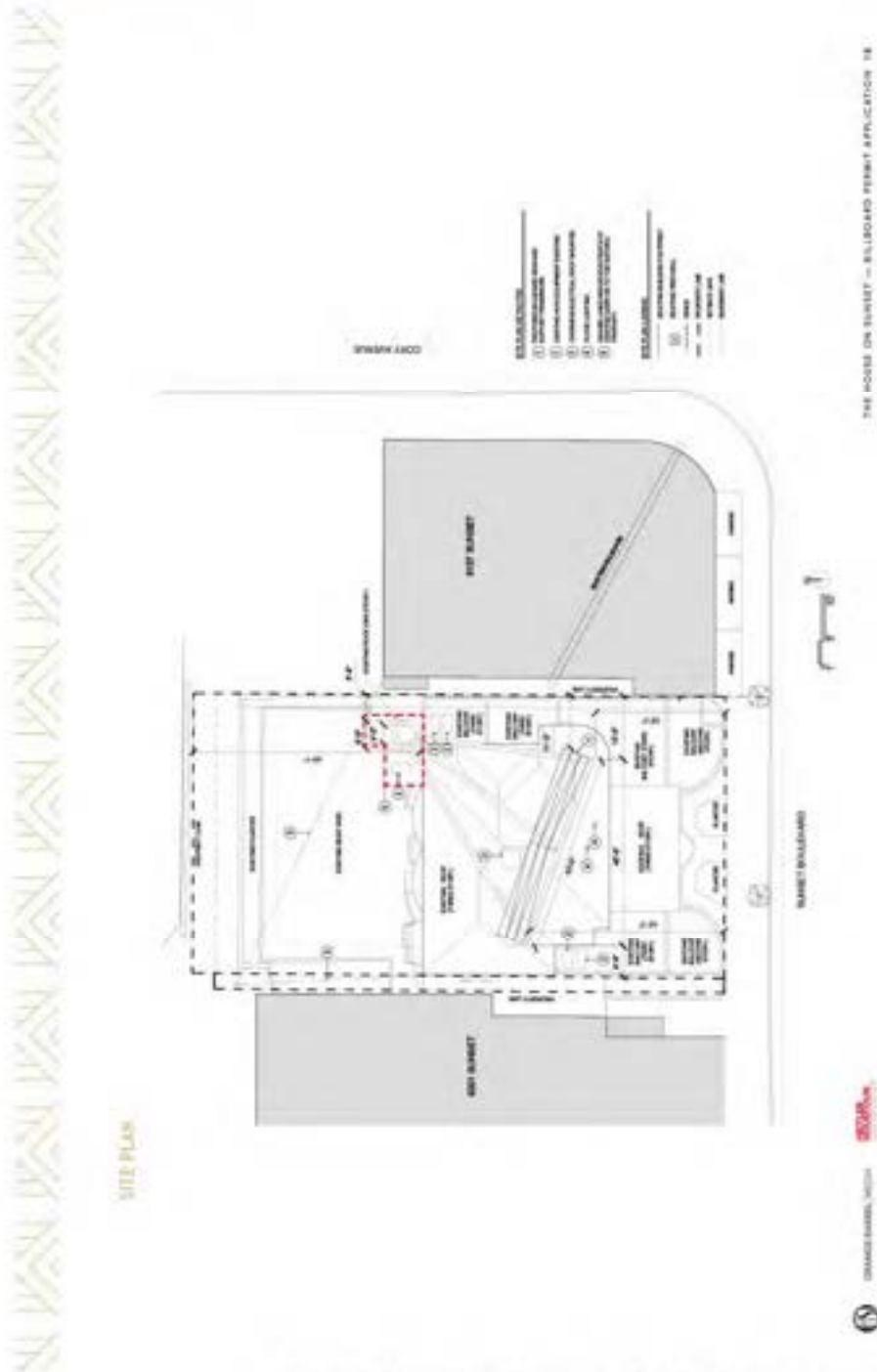
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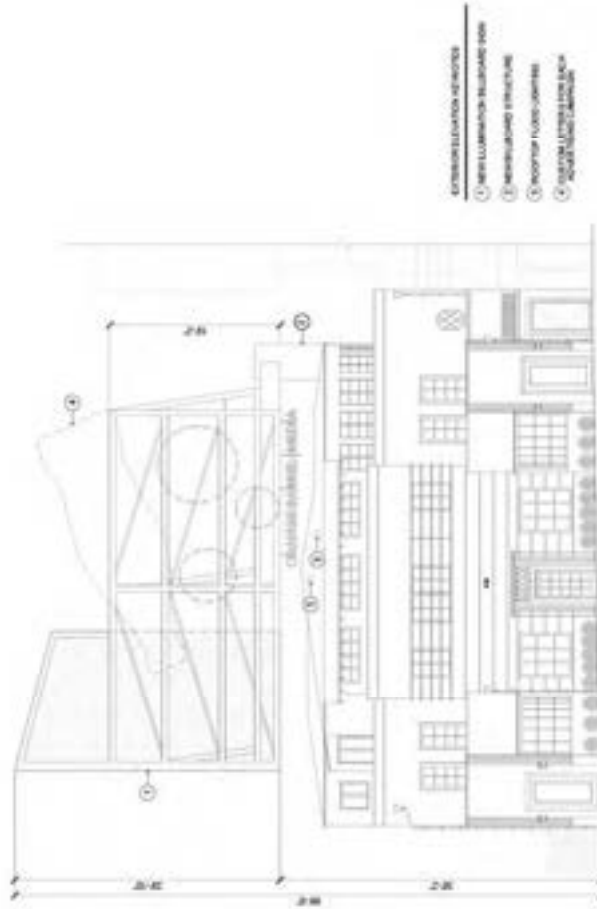
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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SOUTH ORIENTAL ELEVATION

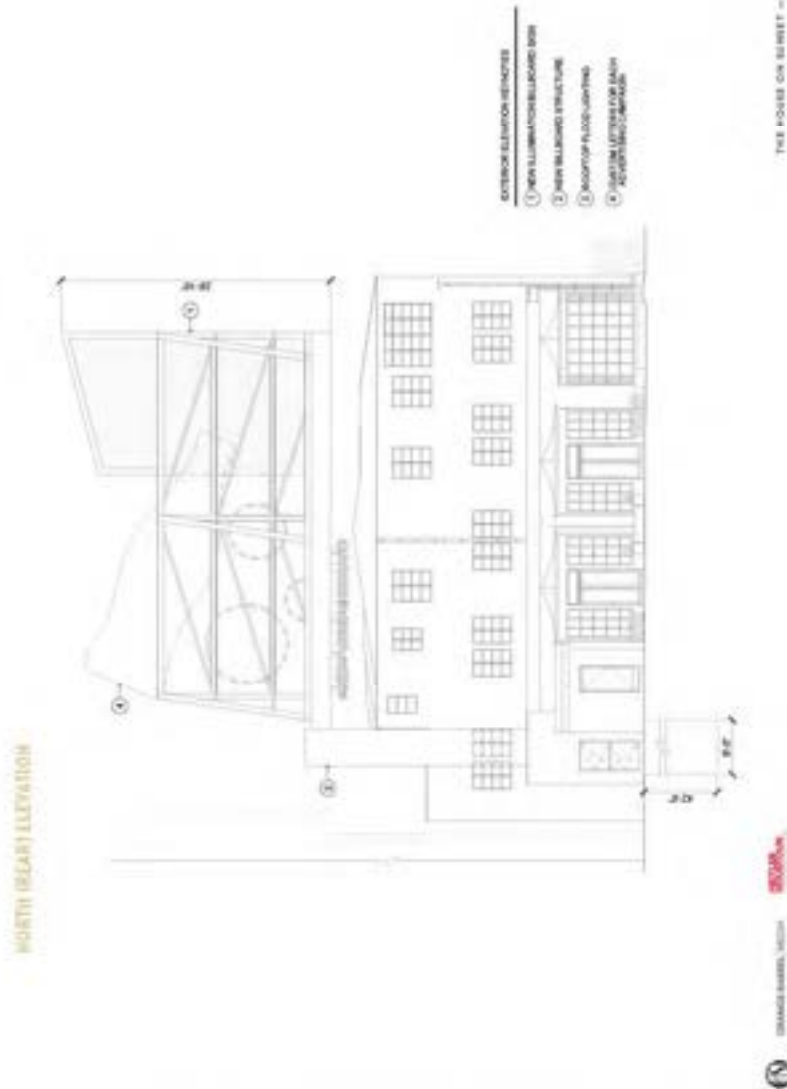


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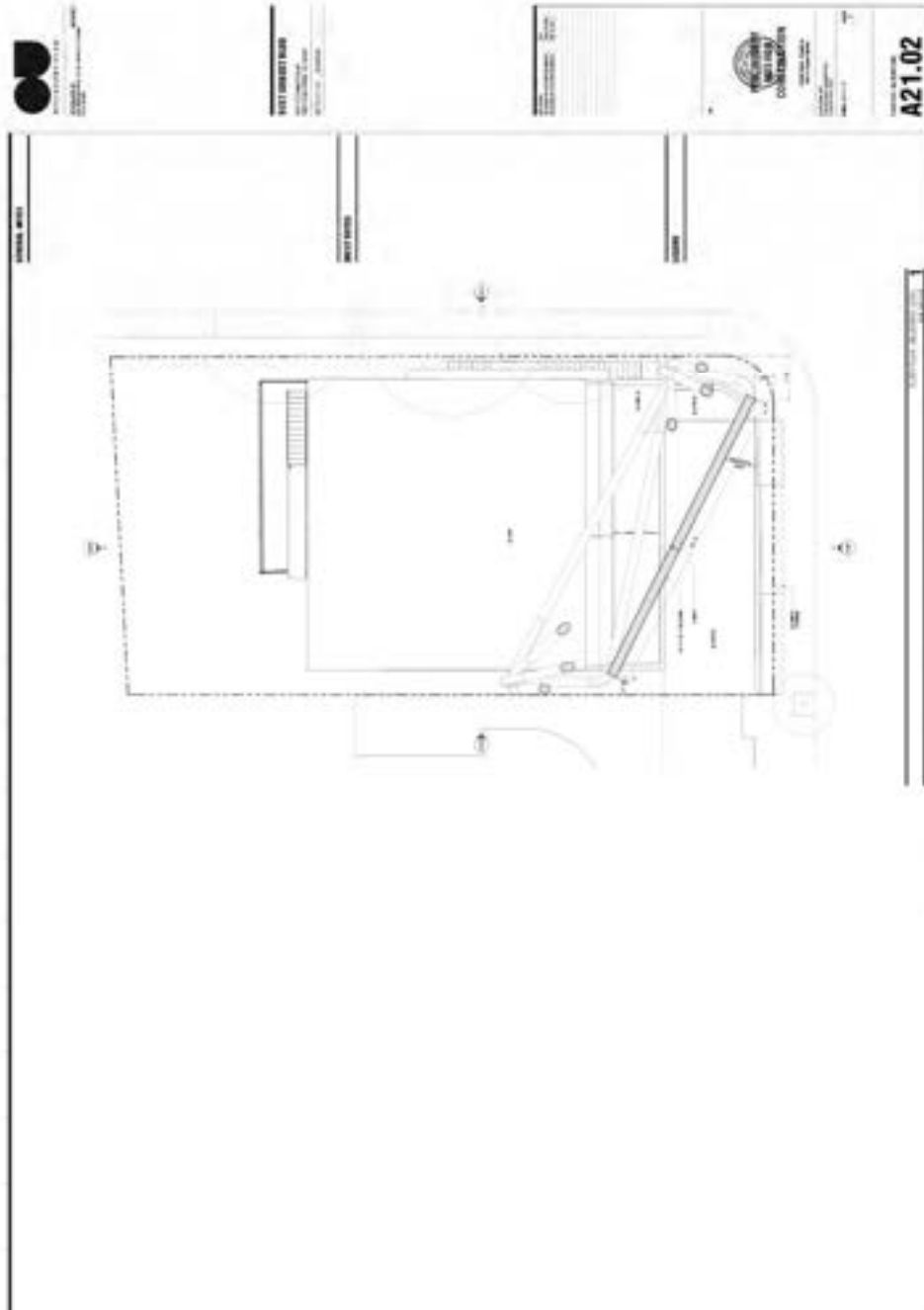
FRANCIS KRAHE & ASSOCIATES

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

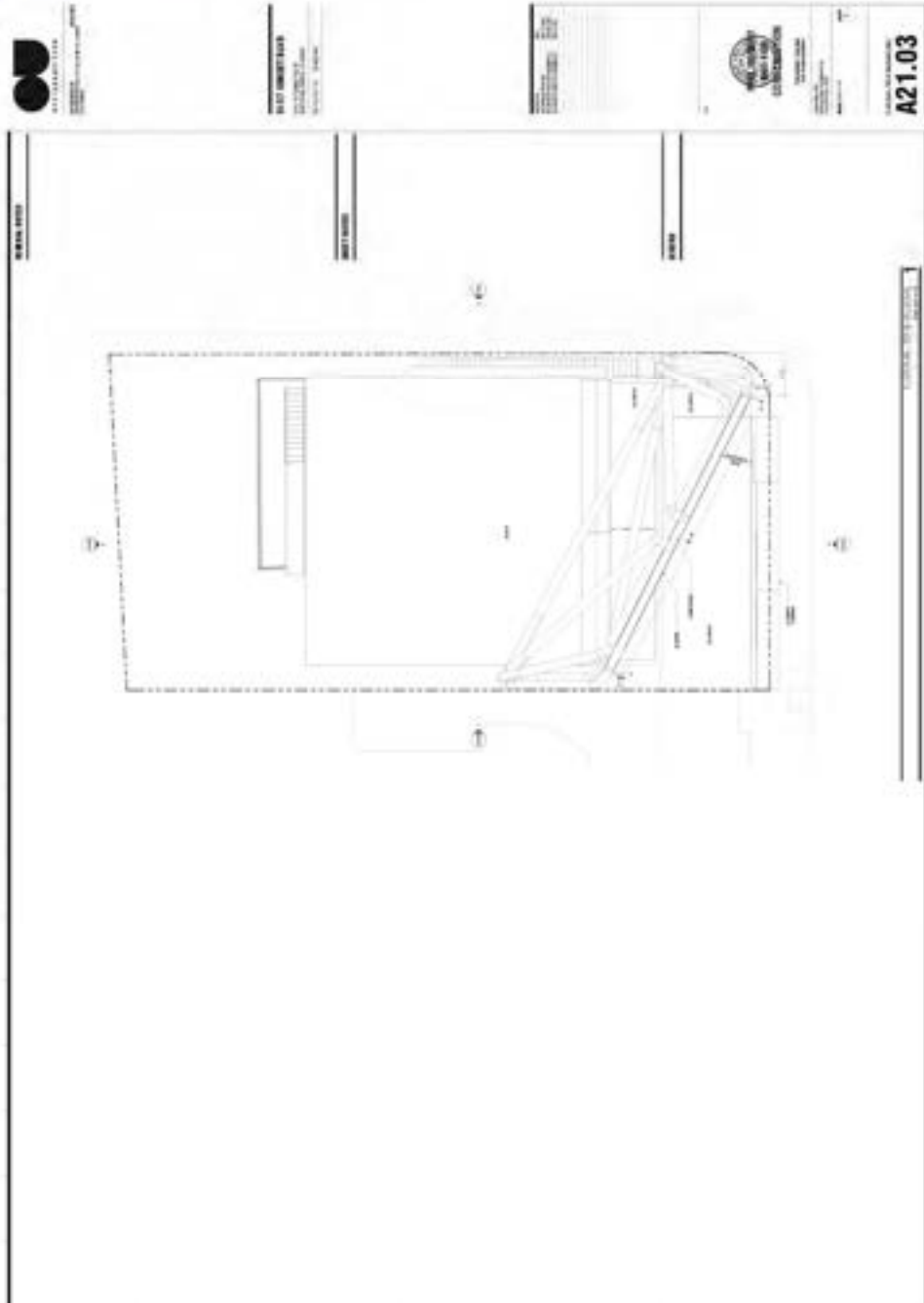
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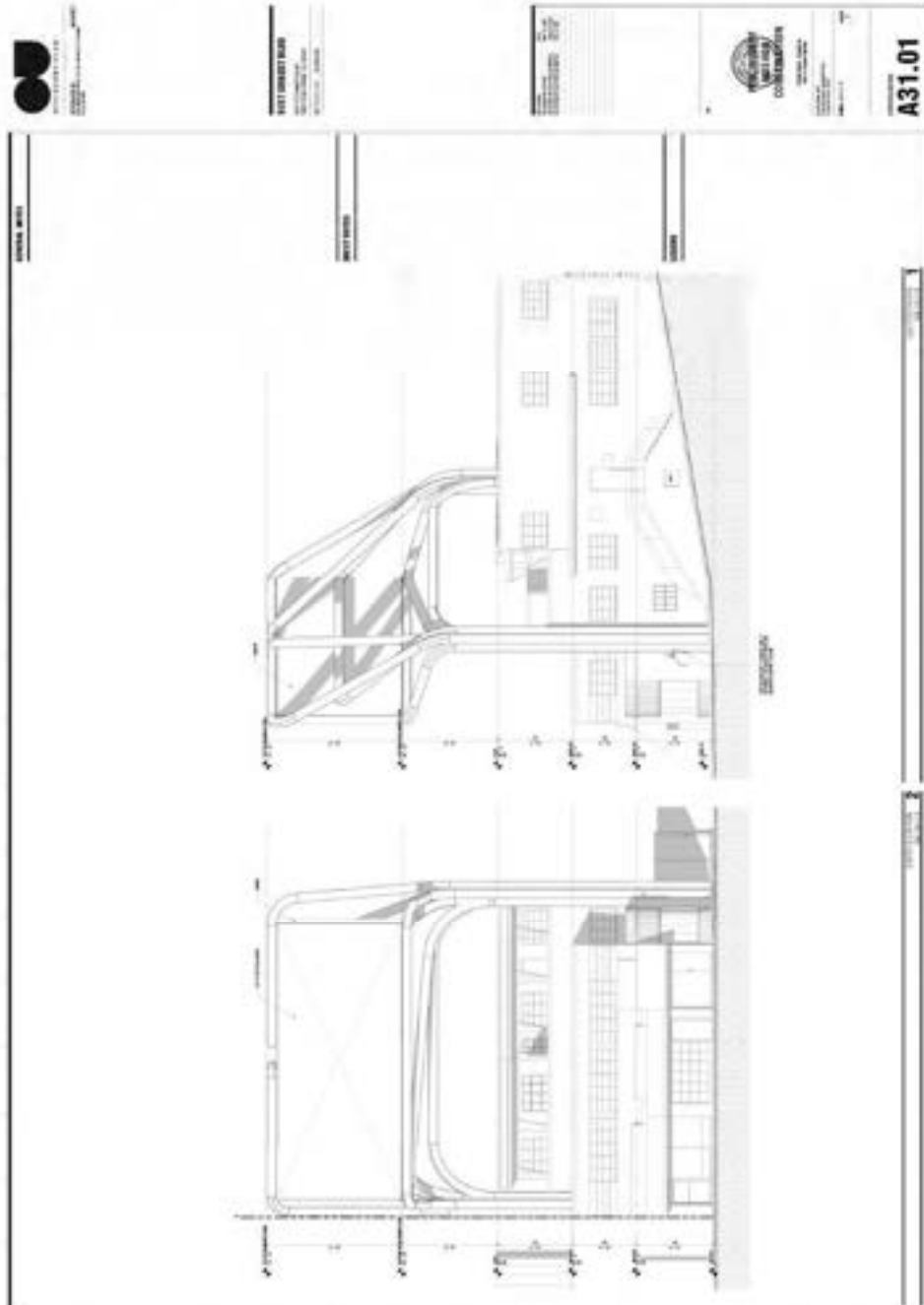
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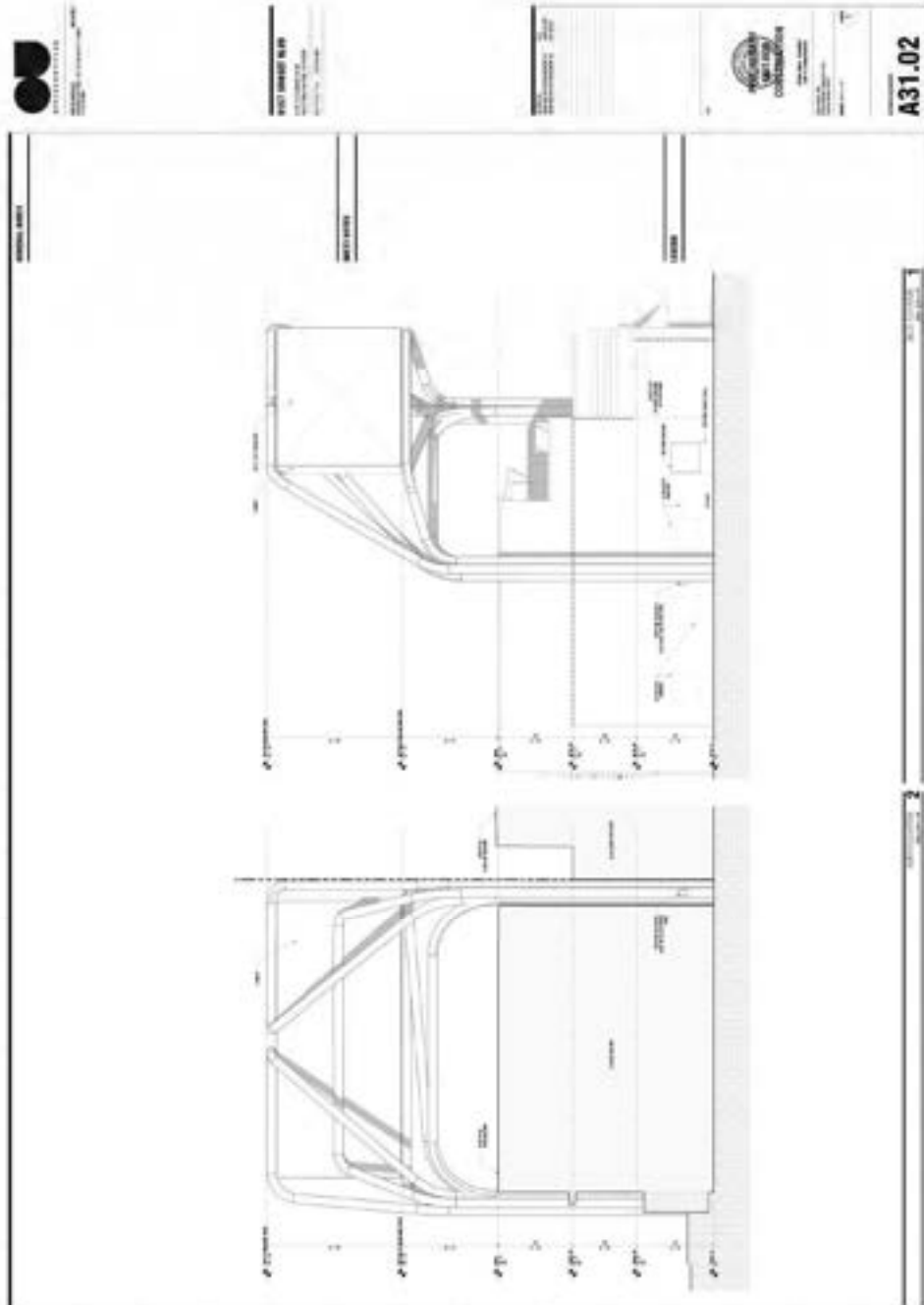


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS
 PROJECT #: WH040
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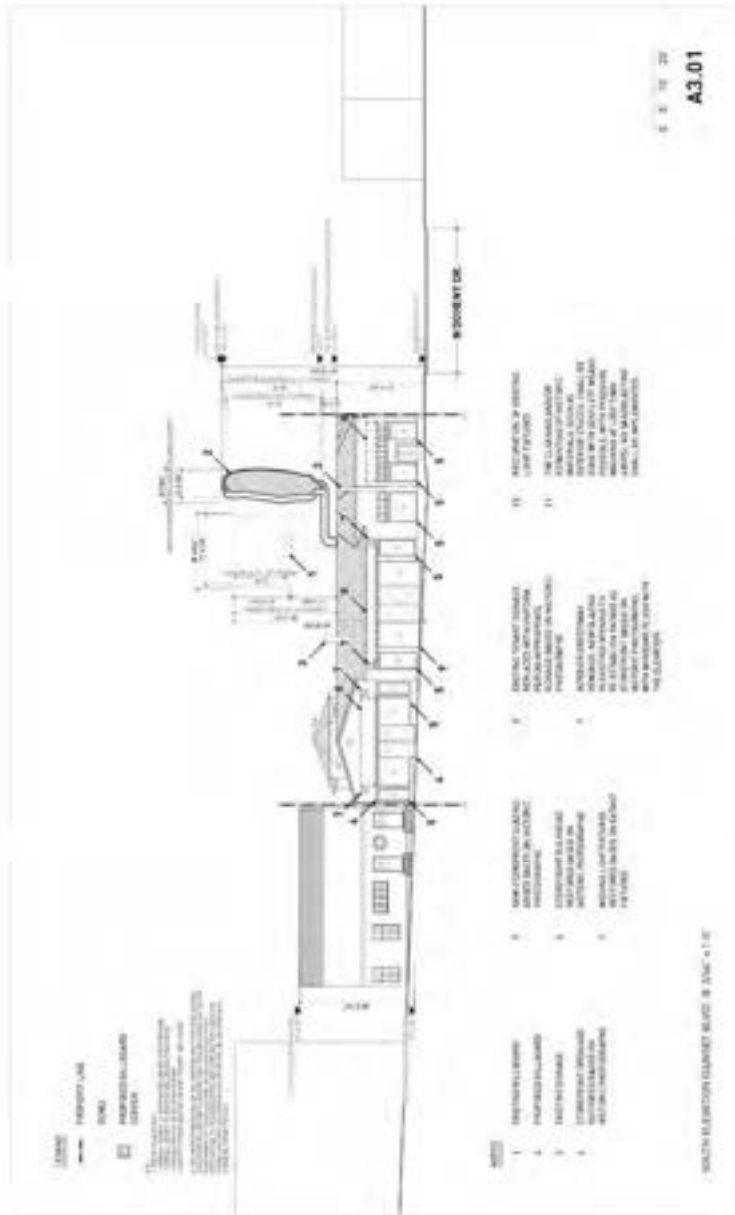
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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5

U. S. A. 1990-1991

www.barnesandnoble.com

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS.

PROJECT #: WH040
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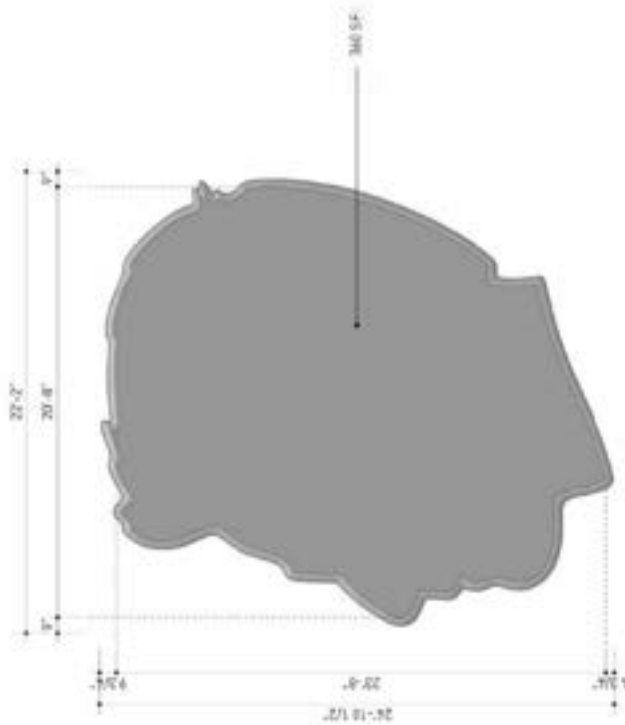


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DEPT. OF ECONOMICS, UNIVERSITY OF MANCHESTER, MANCHESTER, ENGLAND

PROJECT #: WH040
PAGE: 23

1.0-5



18 JUN 2022

15' 0"

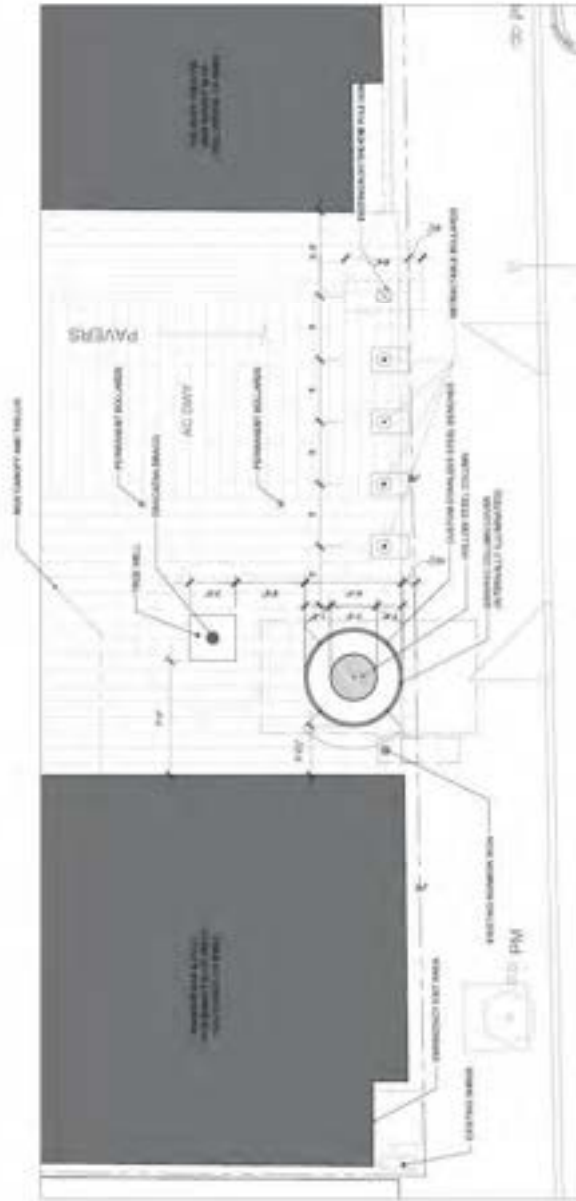
Billboard screen elevation

8' x 6' UPDATED DIMENSIONS

15' 0" SIGN 7 BILLBOARD

ENLARGED BASE PLAN

BILBOARD APPLICATION EXHIBITS

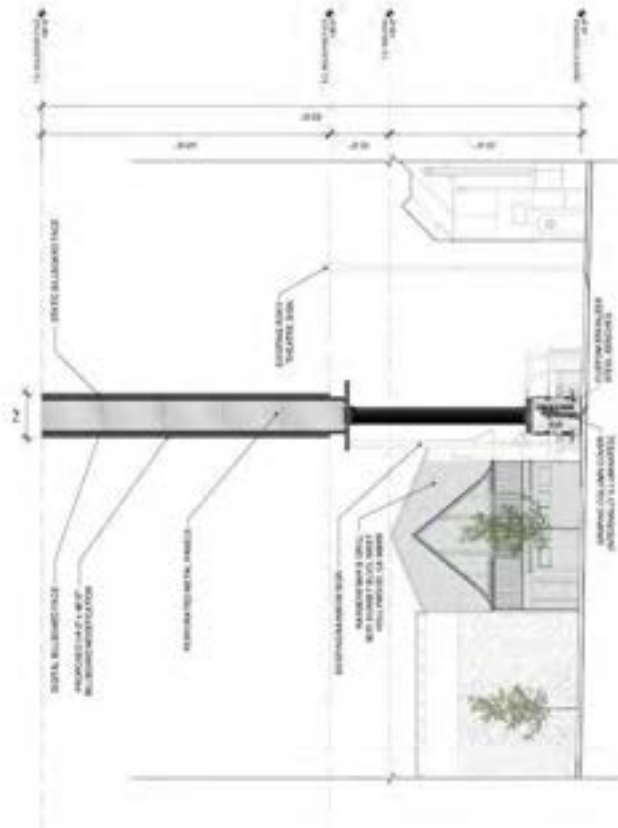


2002

Long short-term memory

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 25

SOUTH ELEVATION



EC 22

BILBOARD APPLICATION EXHIBITS

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Journal of Internal Medicine 247: 115-121

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040

WEST ELEVATION

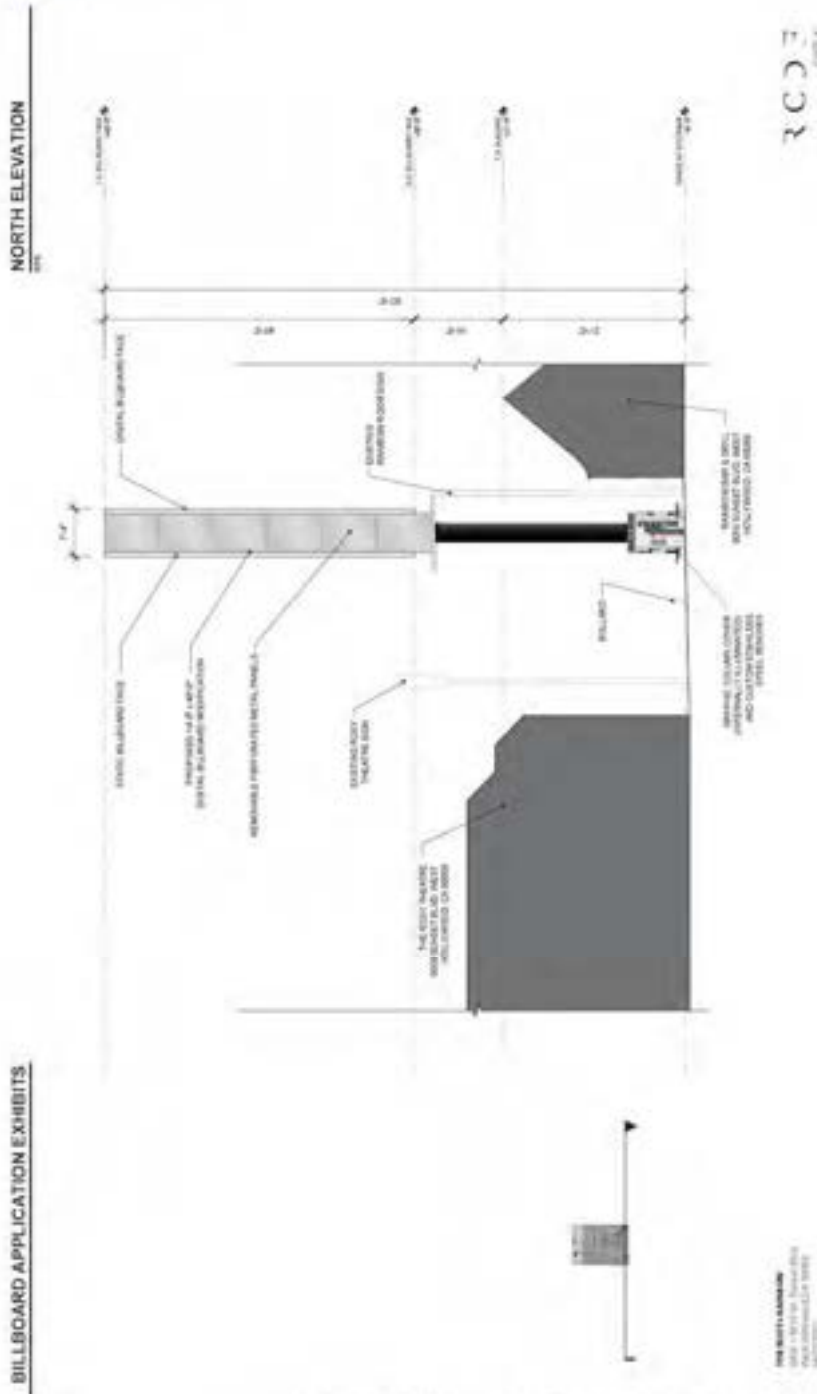


BILLBOARD APPLICATION EXHIBITS

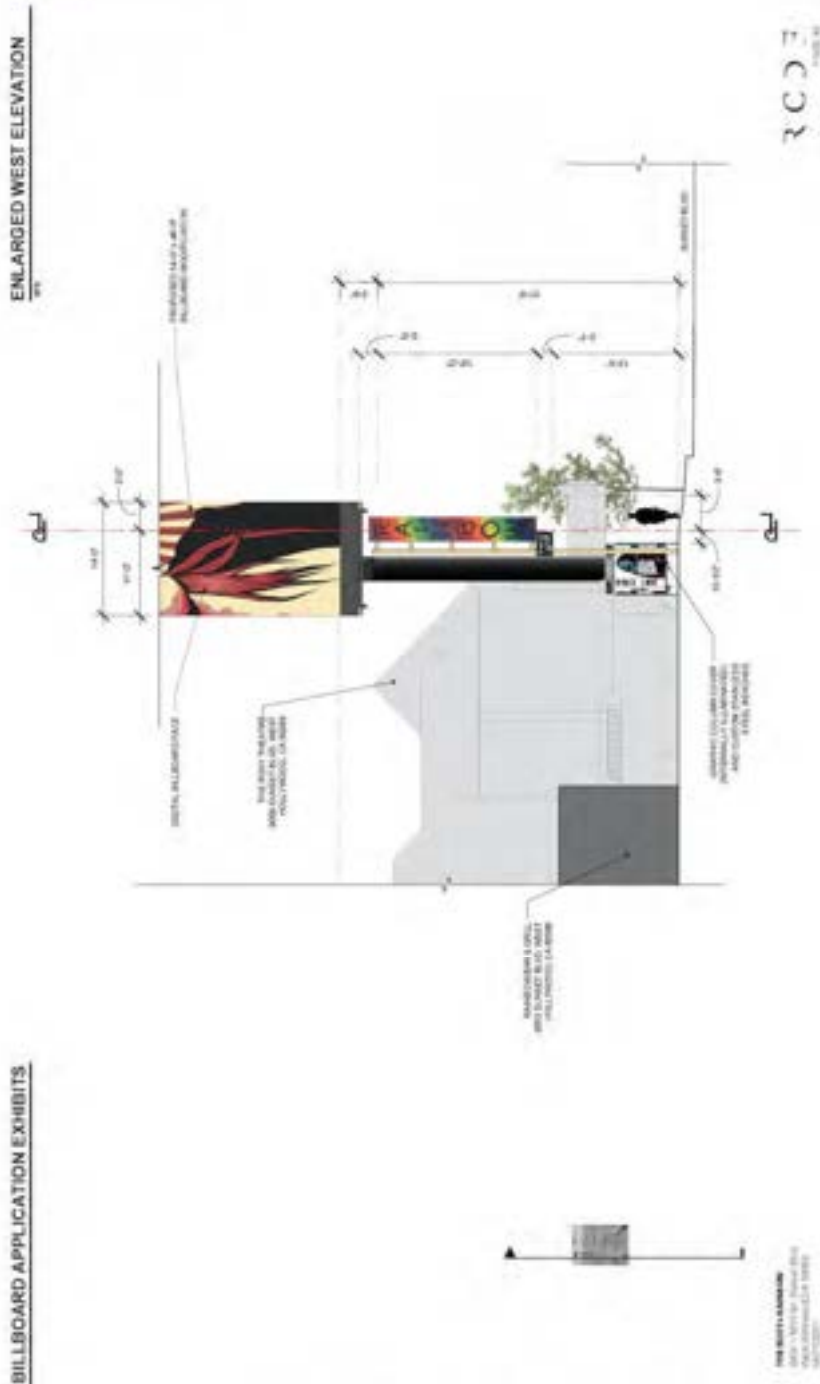


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Journal of Internal Medicine 247: 395-401

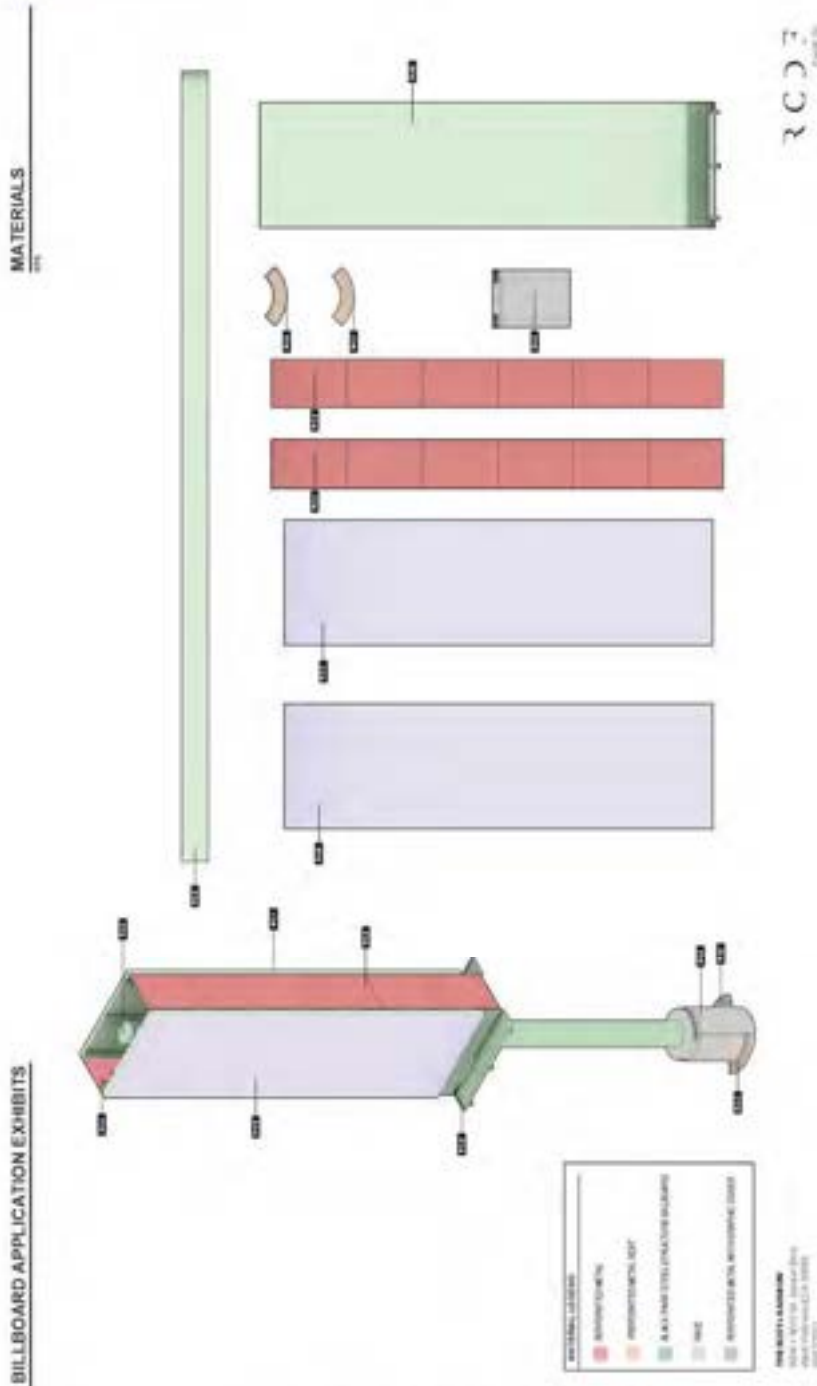
PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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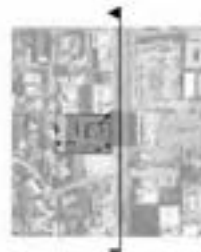
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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SOUTH ELEVATION
PAGE 10

BILLBOARD APPLICATION EXHIBITS



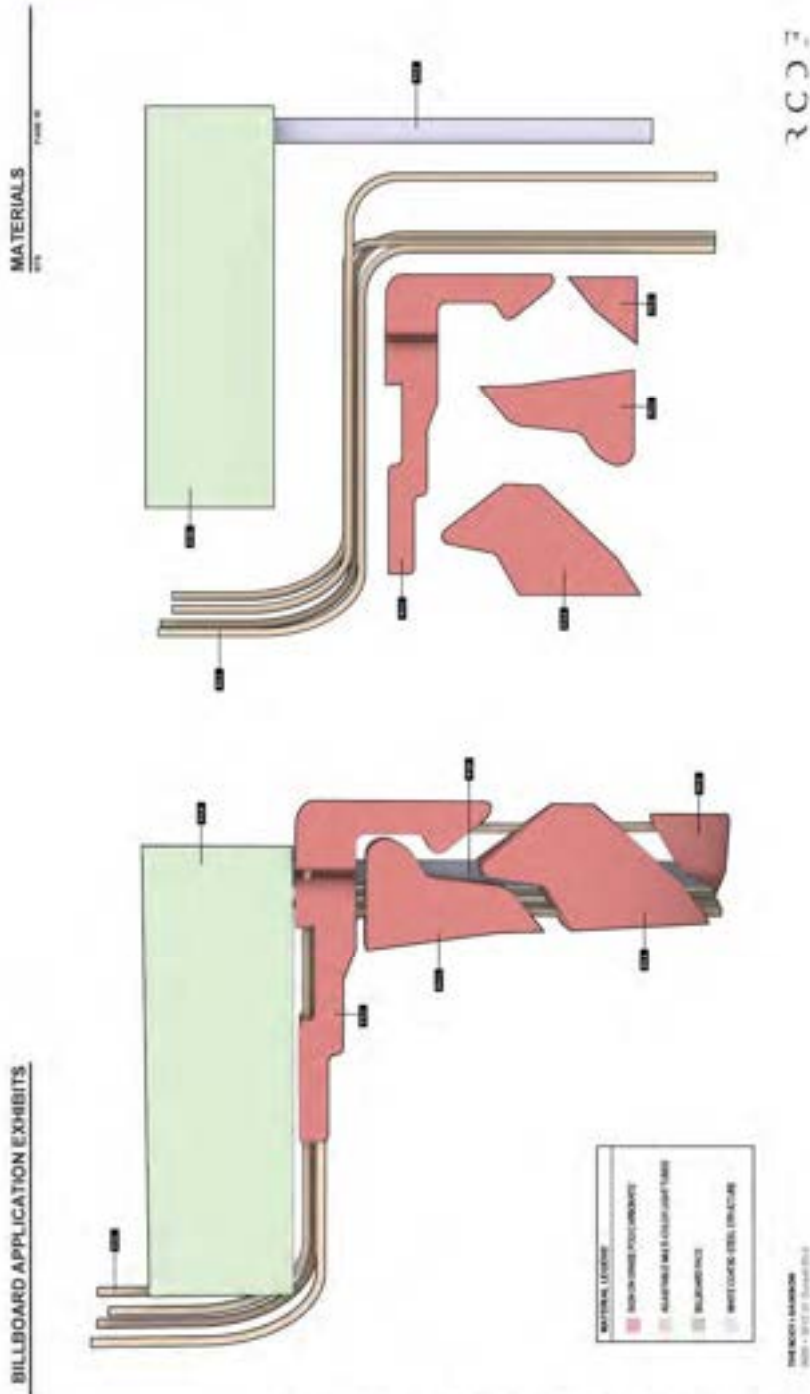
RCCE



THE RIGHT TALKING
SIGN ALBERT BLVD WEST
WILL IMPROVE CIRCULAR
FROM PHOTOGRAPHY AND FILM CORP

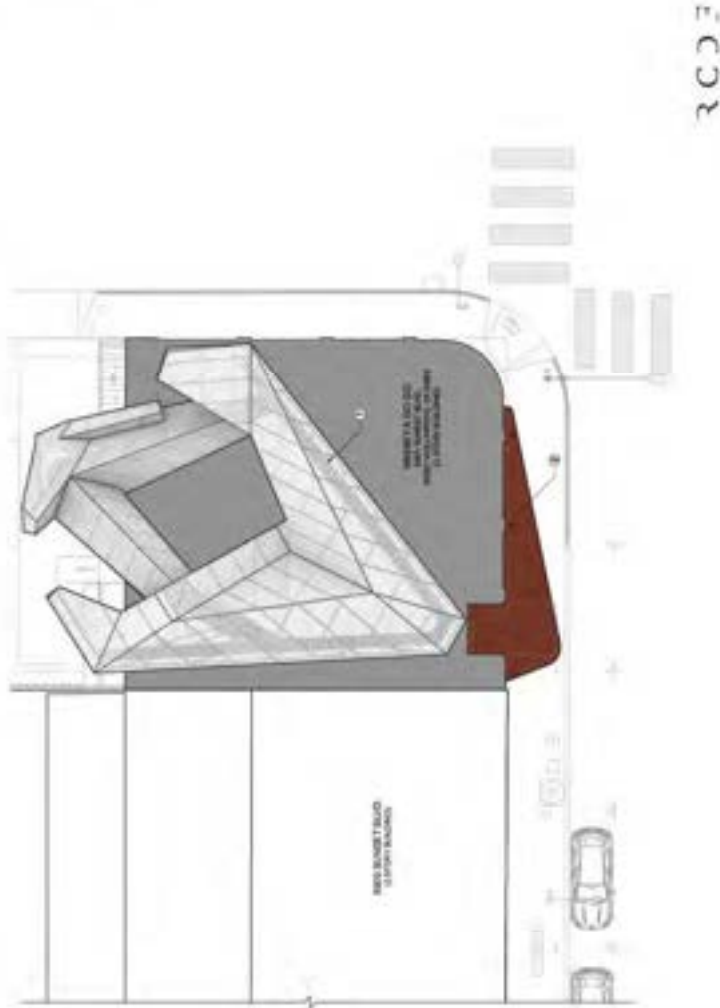
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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SITE PLAN

Page 10

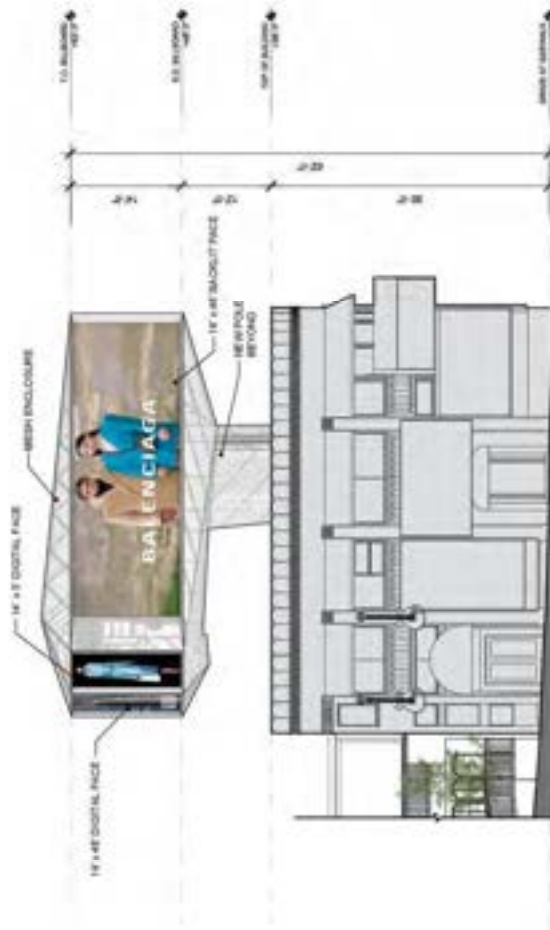


BILLBOARD APPLICATION EXHIBITS

Legend
1. Proposed Billboards
2. Existing Billboards
3. Existing Signs
4. Existing Structures
5. Existing Parking
6. Existing Landscaping
7. Existing Utilities
8. Existing Streets
9. Existing Sidewalks
10. Existing Curbs
11. Existing Trees
12. Existing Fences
13. Existing Walls
14. Existing Gates
15. Existing Driveways
16. Existing Paved Areas
17. Existing Unpaved Areas
18. Existing Water Features
19. Existing Light Fixtures
20. Existing Security Features
21. Existing Other Structures
22. Existing Other Features

Francis Krahe & Associates
10000 Sunset Blvd.
Suite 100
Los Angeles, CA 90046
(310) 350-1000
www.fkandassociates.com

SOUTH ELEVATION
PAGE



3003



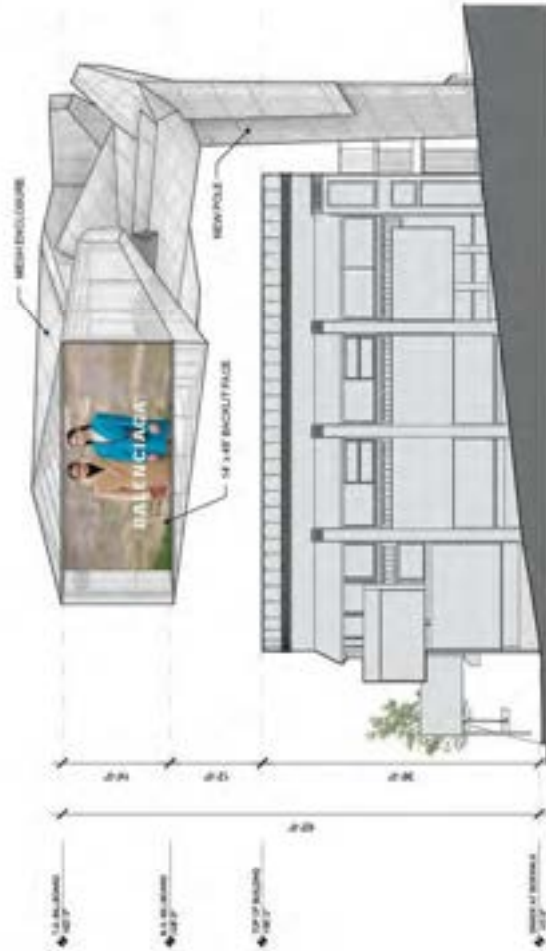
3003
14' x 12' DIGITAL FACE
14' x 12' DIGITAL FACE
14' x 12' DIGITAL FACE
14' x 12' DIGITAL FACE

BILLBOARD APPLICATION EXHIBITS

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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EAST ELEVATION
Page 10



RCCE



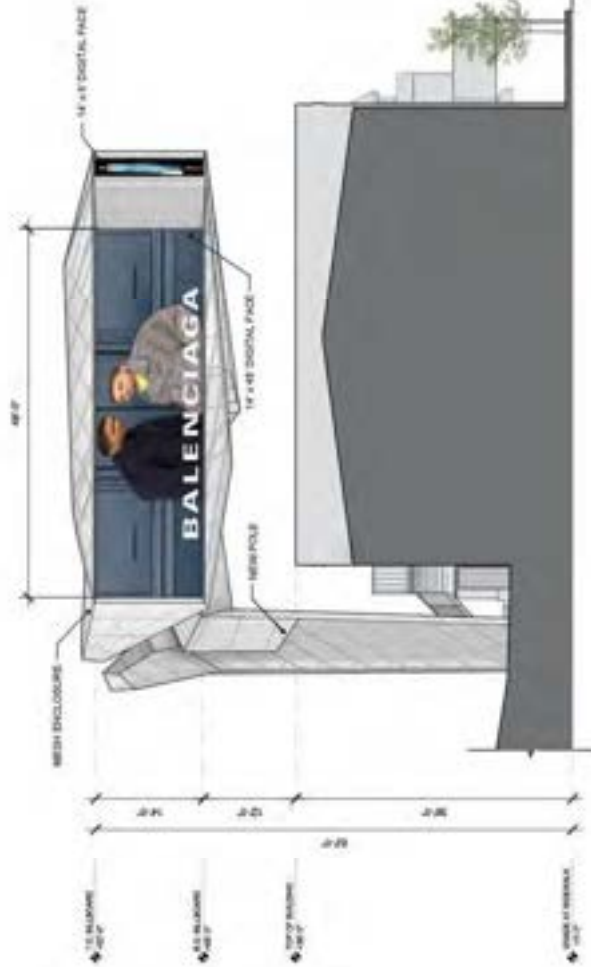
FRANCIS & ASSOCIATES
1000 N. 10th Street, Suite 100
Phoenix, Arizona 85004

BILLBOARD APPLICATION EXHIBITS

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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WEST ELEVATION
1/2" = 1'0"

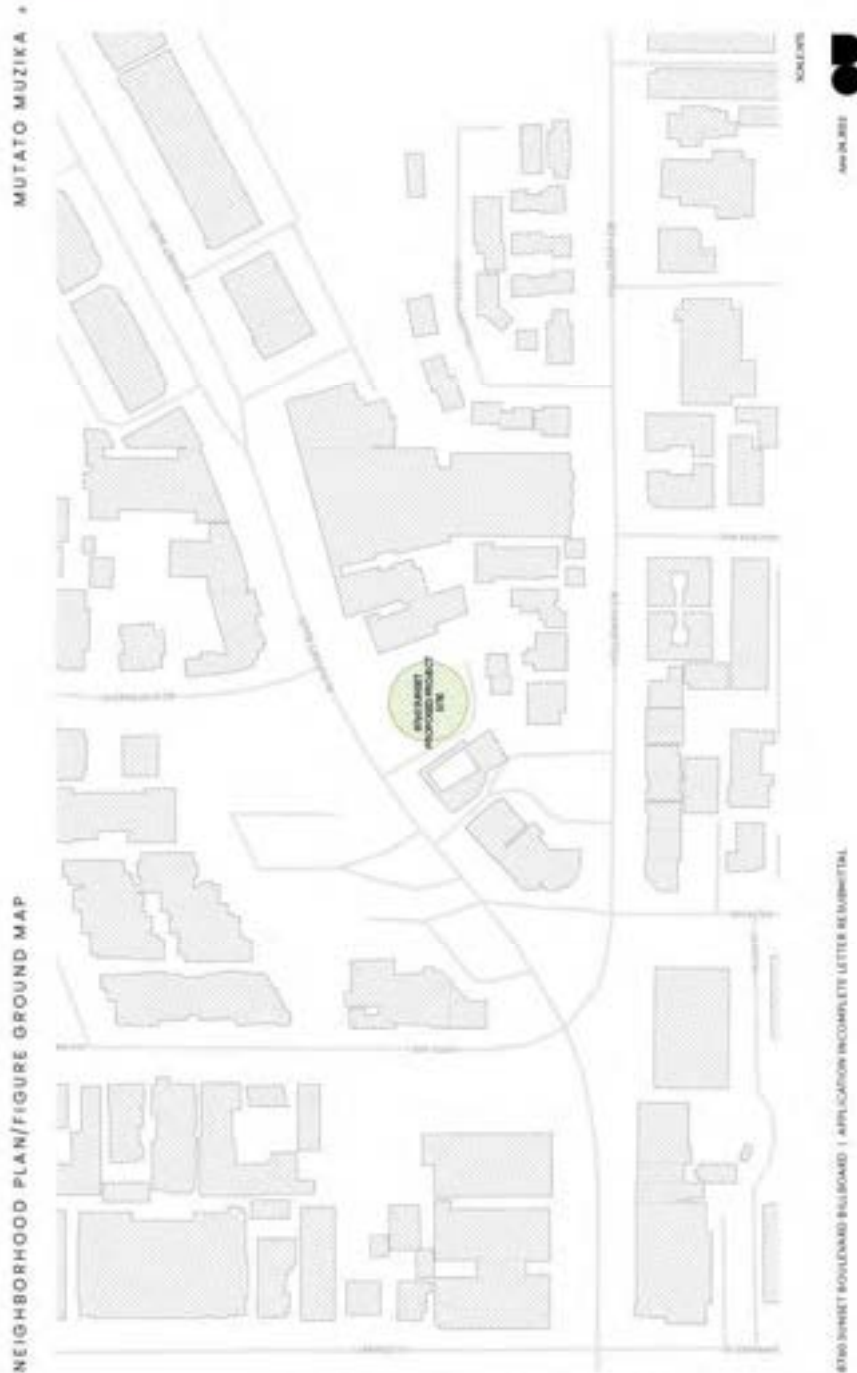


PROPERTY & BILLBOARD
15' x 15' SIGNAGE
10' x 10' SIGNAGE
45' x 15' SIGNAGE

BILLBOARD APPLICATION EXHIBITS

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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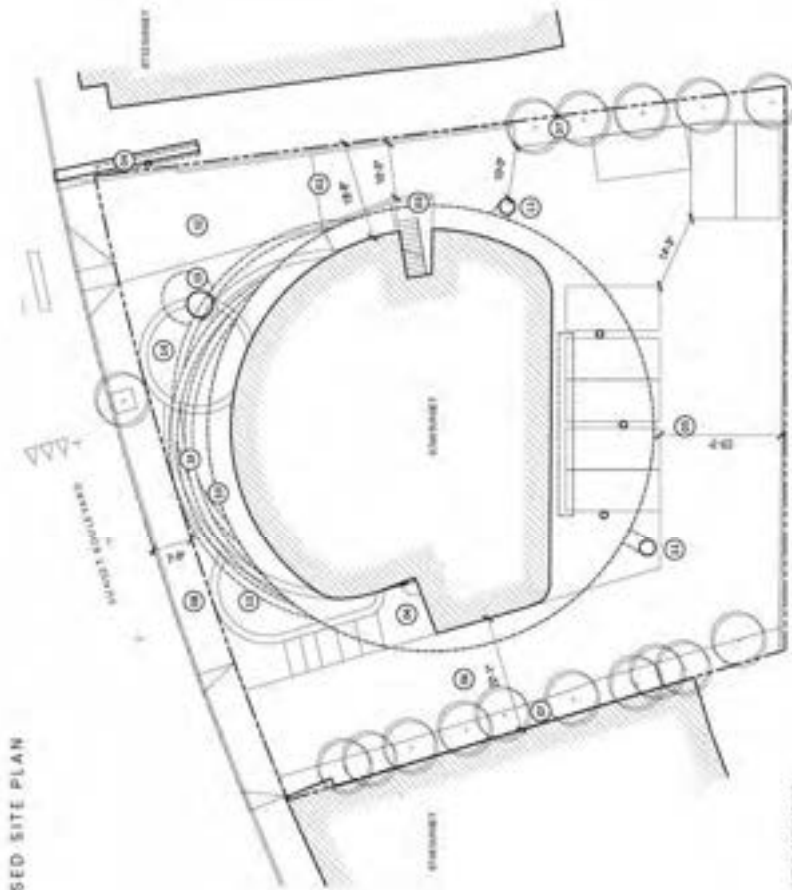
MUTATO MUZIKA

- EXISTING LAMPED HANG PLUCK AREA
- EXISTING VEHICULAR CIRCULAR DRIVE WITH FINE ACCESS
- EXISTING BUILDING ENTRY
- EXISTING BUILDING MAIN ENTRANCE
- EXISTING SIDE WALL AREA
- EXISTING LAMPED HANG PLUCK AREA (EXIST)
- EXISTING LANDSCAPING, TREES TO REMAIN
- EXISTING SIDEWALK
- EXISTING HANGING SIGN SUPPORT STRUCTURE
- TYPE OF BUILDING AREA, TYPE
- PROPOSED HANGING SIGN SUPPORT STRUCTURE
- PROPOSED HANGING SIGN AREA
- PROPOSED HANGING SIGN COLUMN
- PROPOSED PLUCK AREA WITH SIGN AREA
- PROPOSED PLUCK AREA WITH SIGN AREA

SCALE 1/8" = 1'-0"



Jan 14, 2025



PROPOSED SITE PLAN

NOT TO SCALE

RETO SUNSET BOULEVARD BILLBOARD 1 APPLICATION INCOMPLETE LETTER RE SUBMITTAL

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 38

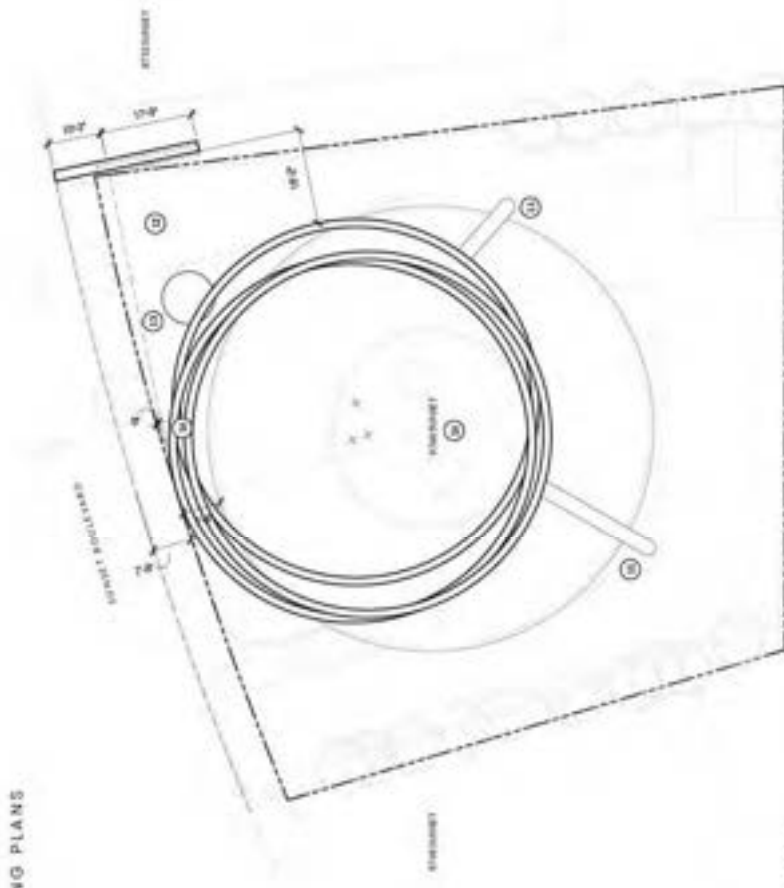
MUTATO MUZIKA

- EXISTING LARGED HANDED PLAZA AREA
- EXISTING VERTICAL CURB CUT & FINE ARTS
- EXISTING BUILDING ENTRY
- EXISTING BUILDING SIGN ENTRANCE
- EXISTING SIDE WALL AREA
- EXISTING LARGED HANDED PLAZA AREA (EXIST)
- EXISTING LANDSCAPING, TREES TO REMAIN
- EXISTING CURBLINE
- EXISTING FENCED IN SUNSET BUILDING
- TYPE OF BUILDING AREA, TYPE
- PROPOSED NEW BUILDING ENTRANCE
- PROPOSED FENCED IN PLAZA AREA
- PROPOSED NEW COLUMN
- PROPOSED PLAZA, ARTS VERTICAL AREA
- PROPOSED PLAZA, ARTS VERTICAL AREA
- PROPOSED BUILDING, HANDED VERTICAL ENTRANCE
- EXISTING BUILDING TO REMAIN

SCALE 1/8" = 1'-0"



Jan 14, 2022



BUILDING PLANS

ROOF PLAN

8750 SUNSET BOULEVARD BUILDING | APPLICATION INCOMPLETE LETTER RE SUBMITTAL

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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MUTATO MUZIKA 11

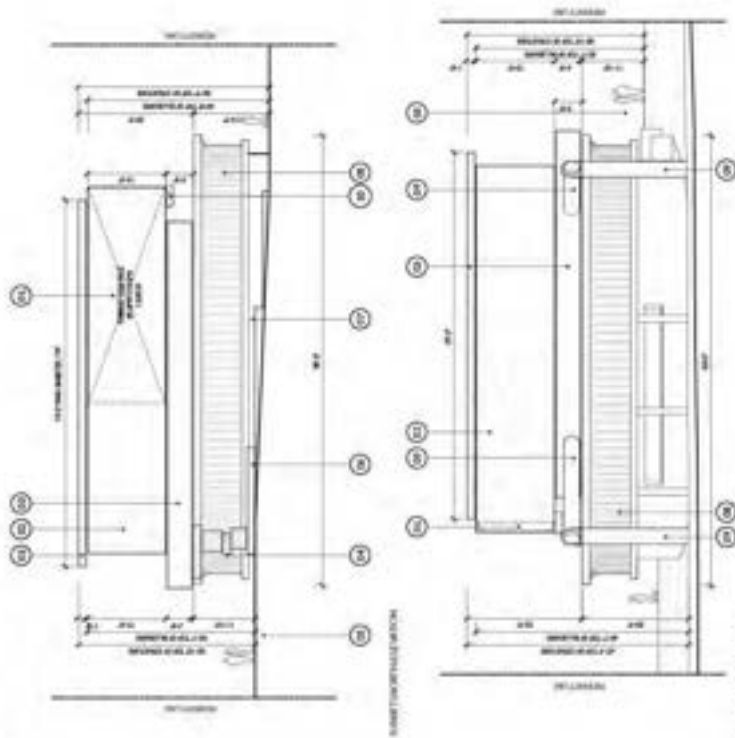
- [illegible]

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1000

BUILDING ELEVATIONS



STAD NUNDTT BILDTANDEDE BILDSKAP I ARBEJDSKRAFTENS UTVIKLING AV MÅNEDSTAL

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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MUTATO MUZIKA II

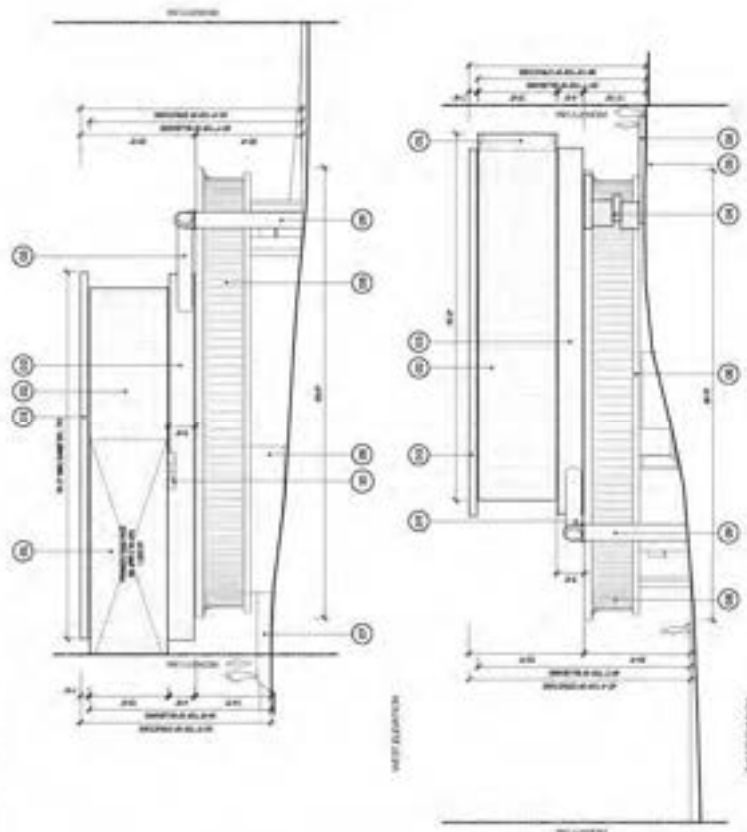


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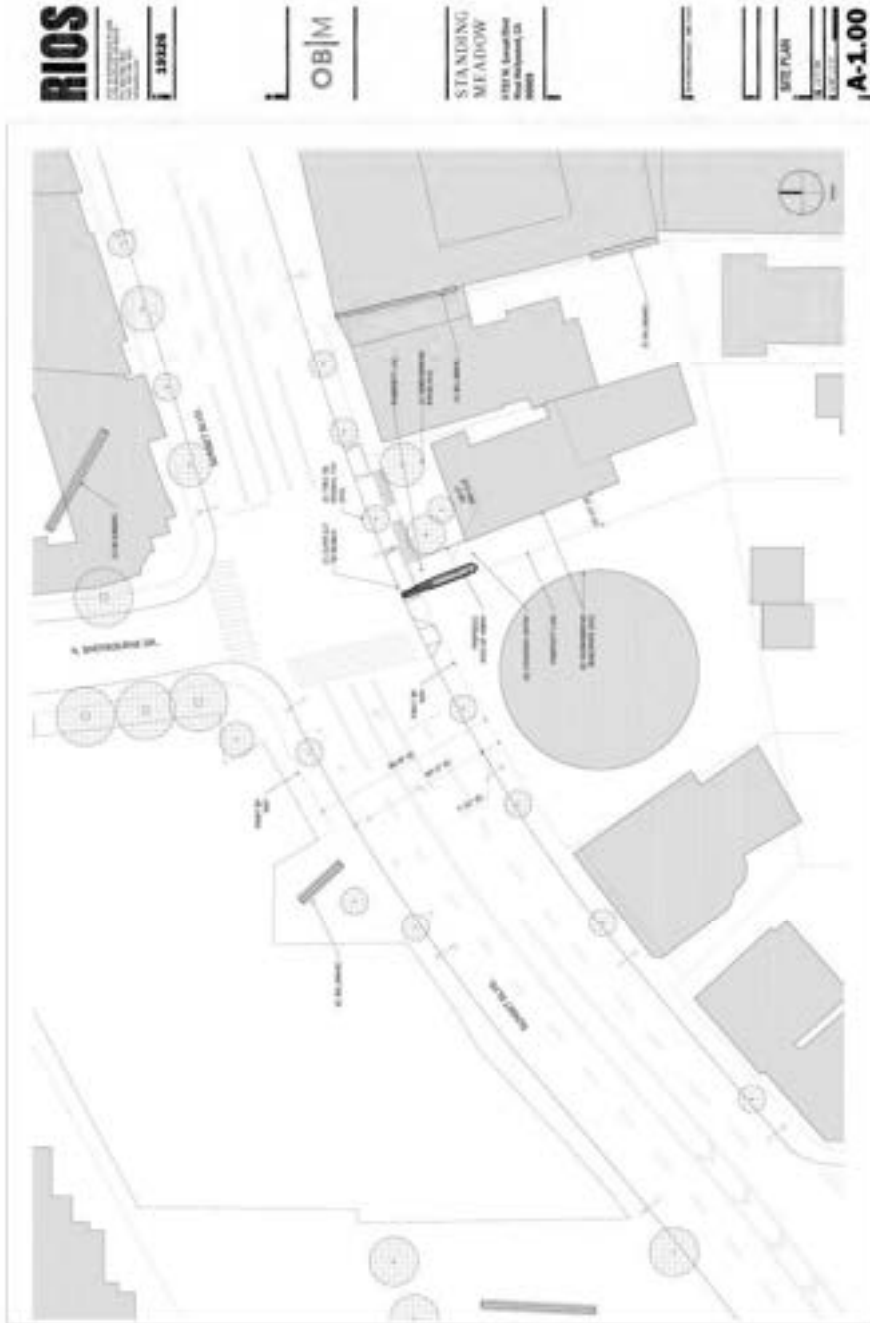


1000

BUILDING ELEVATIONS

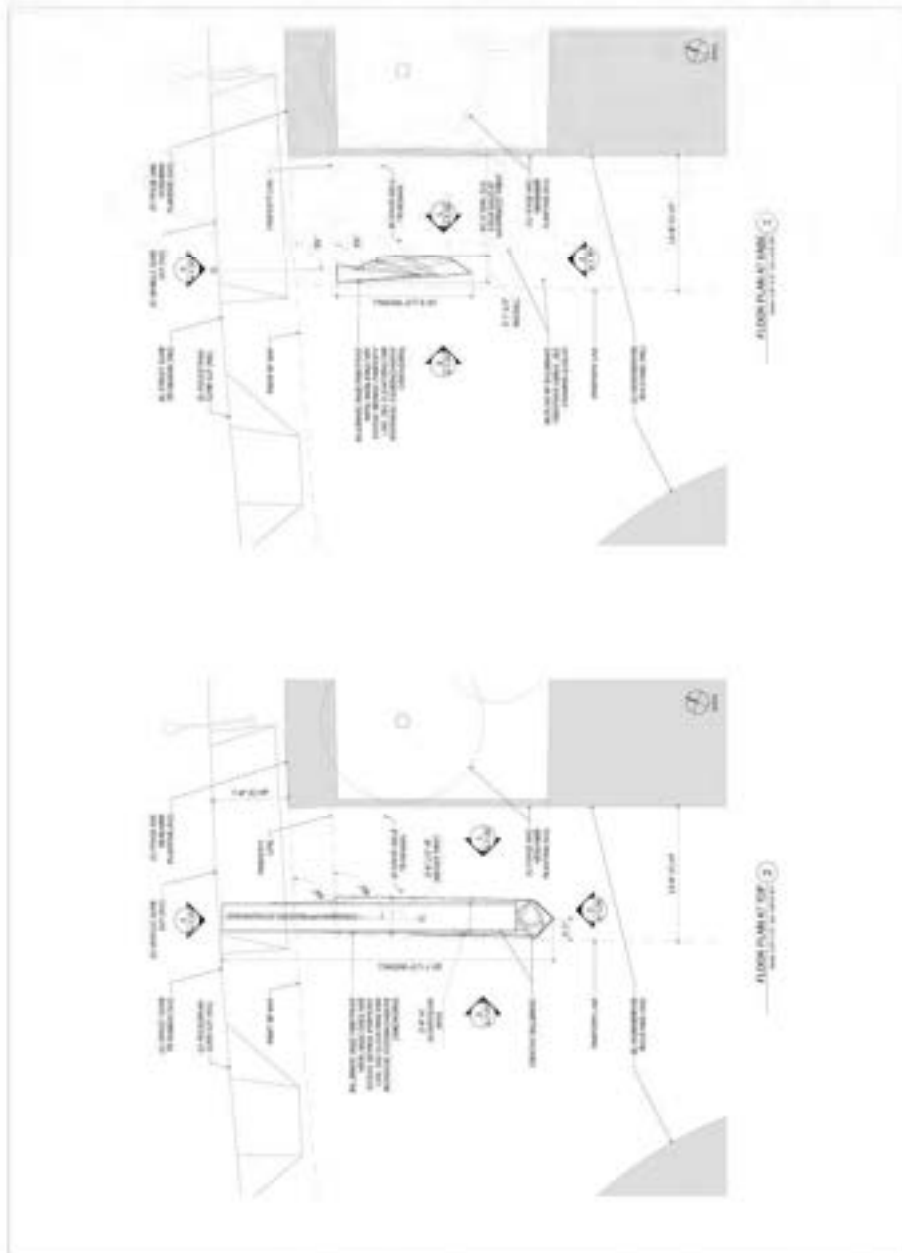
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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RIOS

20250505
1.0-10

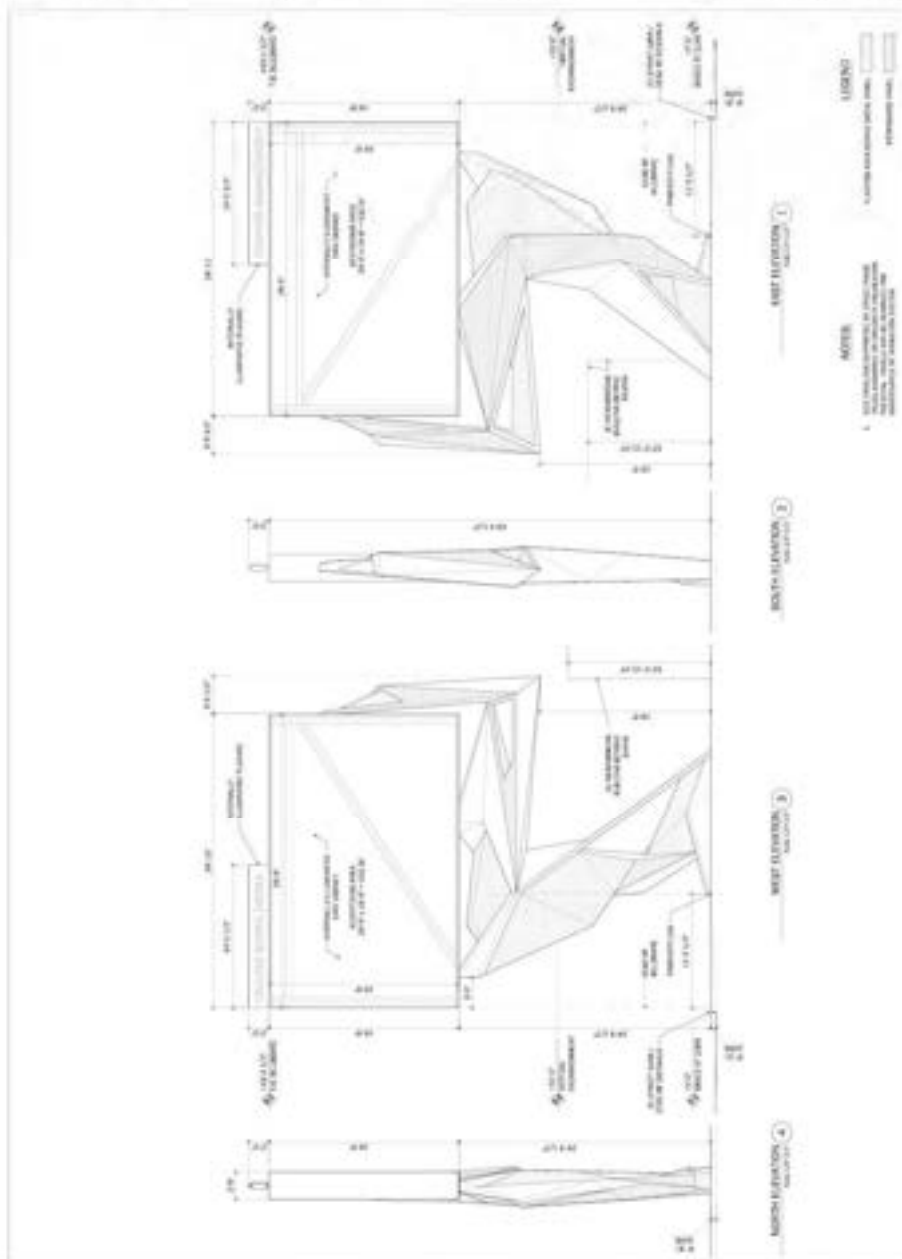
OB|M

STANDING
MEADOW

RT22 Sunset Blvd
West Hollywood, CA
90069

ELEVATIONS

A-7.00

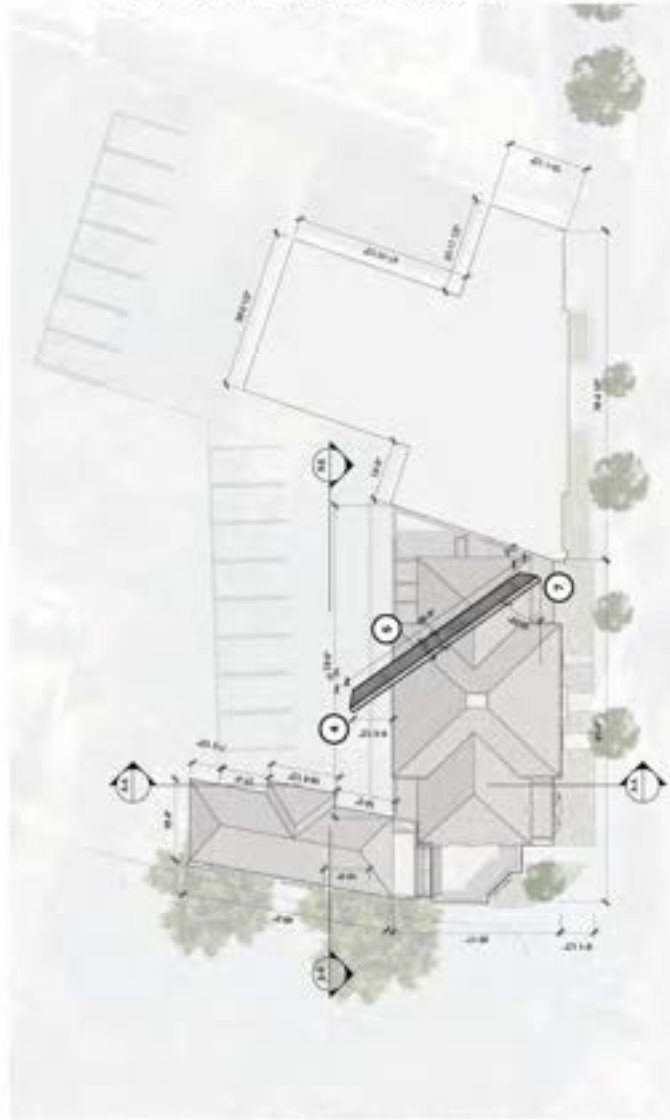


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8743 SUNSET BOULEVARD | BILLBOARD APPLICATION EXHIBITS



0 12' 24'
RESUBMITTAL DATE: JUNE 15, 2009

BILLBOARD APPLICATION EXHIBITS

PLANS

PROPOSED BILLBOARD LEVEL PLAN



8743 SUNSET BOULEVARD

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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8143 SUNSET BOULEVARD | BILLBOARD APPLICATION EXHIBITS



BILLBOARD APPLICATION EXHIBITS

SITE ELEVATIONS



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1.0-11



8743 SUNSET BOULEVARD | BILLBOARD APPLICATION EXHIBITS



BILLBOARD APPLICATION EXHIBITS

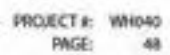
SITE SECTIONS



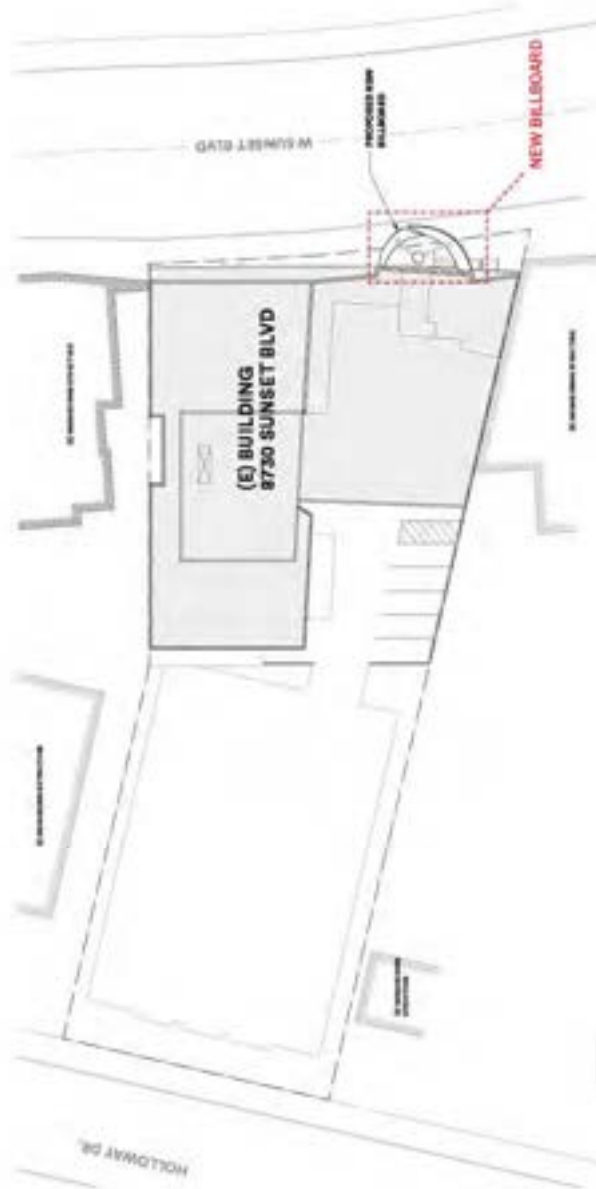
8743 SUNSET BOULEVARD

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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**PROPOSED NEW BILLBOARD
LOCATION**



ARCHITECTURAL SITE PLAN
SCALE: 1/8" = 1'-0"

2

1.0-12

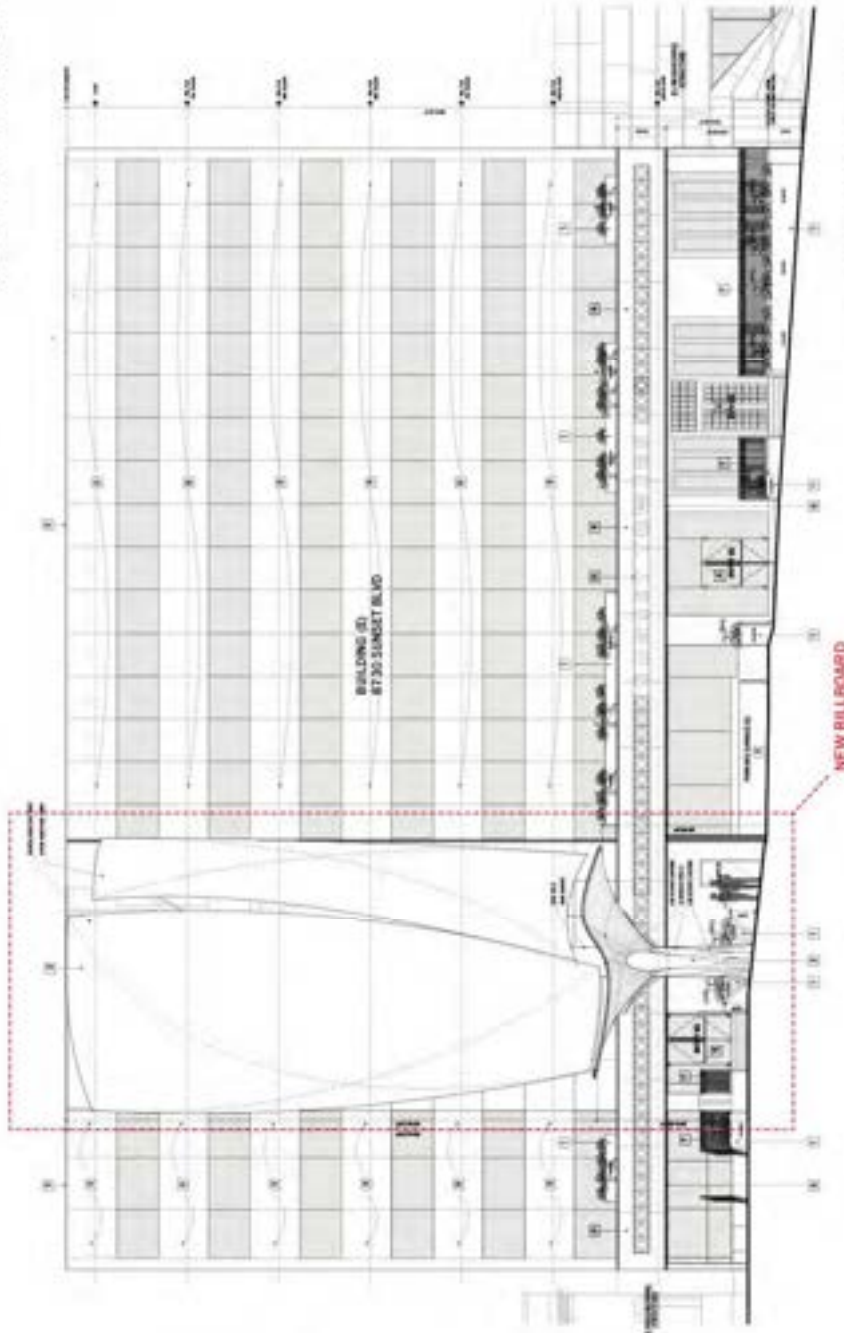
THE SUNSET WORKS
04 / 25 / 2022
8730 N. SUNSET BLVD, WEST HOLLYWOOD, CA 90069
P. 8

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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1.0-12

PROPOSED NEW BILLBOARD
NORTH ELEVATION



1 BLDG ELEVATION - NORTH
DATE: 04/25/2022

8730 W. SUNSET BLVD, WEST HOLLYWOOD, CA 90046

04 / 25 / 2022

THE SUNSET WORKS

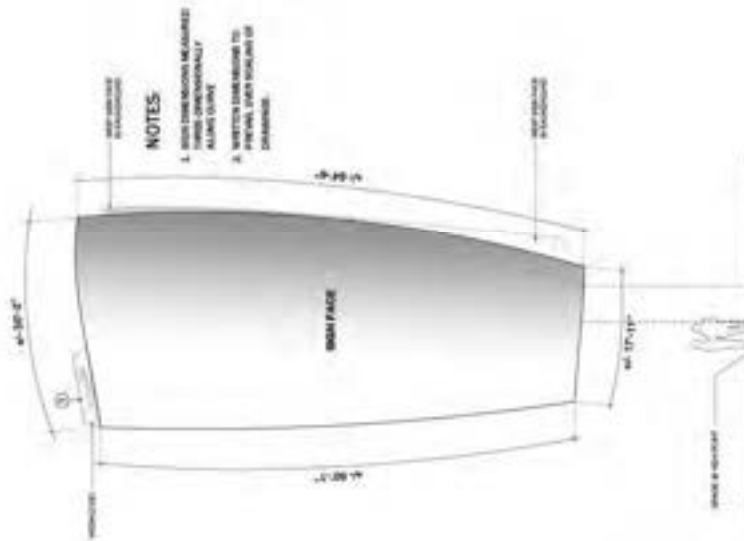
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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DIGITAL EAST FACE DIMENSIONS & DETAILS

LED SPECIFICATIONS	FULL MOTION DIGITAL
DISPLAY TYPE:	LED
TECHNOLOGY:	SINGLE-FACED
SIDE(S):	275+ TRILLION
COLOR:	OUTDOOR
INTERIOR/EXTERIOR:	6MM-8MM
PIXEL PITCH:	3FT x 3FT
BASE MODULE:	FRONT
ACCESSIBILITY:	7000 NITS (nominal)
DISPLAY BRIGHTNESS:	

TYP. LED MODULE



SIGN FACE DIMENSIONS

NOTE:
THE EAST-FACING SIDE OF THE WORK IS DIGITAL, COMPRISING 1753 SQ FT OF WHICH 1,500 SQUARE FEET WILL DISPLAY ADVERTISING CONTENT SURROUNDED BY A BORDER MEASURING 253 SQUARE FEET. THIS BORDER IS ALSO DIGITAL AND PROVIDES A FRAME TO THE ADVERTISING CONTENT. (SEE AD ALLOCATION.)

DIGITAL EAST FACE LIGHTING & OPERATION STANDARDS

CONTROLLER:		
NOVASTAR VXi1000 LED Display Controller	OPERATIONS: THE SUNSET WILL WILL UTILIZE AN INVERTER LEADING MEDIA CONTENT PLAYERS IN COMBINATION WITH ROBUST CLOUD NETWORKING SOLUTIONS FOR COMMERCIAL DIGITAL SIGNALS WITH REMOTE MONITORING CAPABILITIES, MULTISCREEN LAYOUTS AND MORE.	LIGHTING NOTES: LIGHTING AND OPERATION STANDARDS. THE DISPLAY EQUIPMENT AND SOFTWARE SHALL BE ADJUSTED AND SET SO THAT THE DIGITAL DISPLAYS AND BACK TEXTURAL LIGHTING DO NOT EXCEED THE MAXIMUM LUMINANCE LIMITS. THE DISPLAYS WILL HAVE AN AMBIENT LIGHT SENSOR THAT WILL AUTOMATICALLY ADJUST THE LUMINANCE OF THE DISPLAYS UP OR DOWN BASED ON THE AMBIENT LIGHTING OR NIGHTTIME. THE AMBIENT LIGHT SENSOR WILL BE ADJUSTED AND SET TO CONTROLL EXCESSIVE LUMINANCE PURSUANT TO INDUSTRY STANDARDS AND THE CITY OF WEST HOLLYWOOD REGULATIONS. THE SETTINGS SHALL BE PASSED TO THE CITY OF WEST HOLLYWOOD AND DOCUMENTED IN AN INSTALLATION REPORT FOR THE SUNSET BOULEVARD OFF-SITE SIGNAGE POLICY. INCLUDING A LIGHTING REPORTING REPORT SUBMITTED UPON INSTALLATION AND AT THREE-MONTH INTERVALS THEREAFTER TO COMPLY CONFORMANCE WITH THE LIGHTING REPORTING. THE SETTINGS SHALL NOT EXCEED THE
	OPERATIONS: THE SUNSET WILL WILL UTILIZE AN INVERTER LEADING MEDIA CONTENT PLAYERS IN COMBINATION WITH ROBUST CLOUD NETWORKING SOLUTIONS FOR COMMERCIAL DIGITAL SIGNALS WITH REMOTE MONITORING CAPABILITIES, MULTISCREEN LAYOUTS AND MORE.	CITY OF WEST HOLLYWOOD SPALLS FOR DIGITAL BILLBOARDS AS BELOW: • DAYTIME: 6,000 CANDLEGAS PER METER SQUARED FROM SUNSET UNTIL 20 MINUTES PRIOR TO SUNSET. • EVENING: 300 CANDLEGAS PER METER SQUARED FROM SUNSET UNTIL 20 MINUTES PRIOR TO SUNSET. • AFTER HOURS: NO AMBIENT LIGHTING OR MOVING PATTERNS FROM 2:00 AM UNTIL SUNRISE. IF AMBIENT SUNLIGHT LUMINANCE DURING THE DAYTIME IS LESS THAN 300 FOOT CANDLEGAS FOR MORE THAN AN HOUR, THE DIGITAL DISPLAY WILL TRANSITION TO THE EVENING LUMINANCE LEVEL, ALSO AT A SMOOTH RATE OVER A TIME PERIOD OF NO LESS THAN 20 MINUTES. IMAGES DISPLAYED ON A DIGITAL SIGN FACE WOULD NOT BE RE-REFRESHED MORE OFTEN THAN ONCE EVERY EIGHT SECONDS, AND EACH NEW IMAGE DISPLAYED WOULD FADE IN FROM THE PREVIOUS IMAGE OVER NO LESS THAN ONE SECOND.
		
NOVASTAR VXi1000 - THE DEVICE FEATURES STEPLESS OUTPUT SCALING, LOW LATENCY, 3D PIXEL LEVEL BRIGHTNESS AND CHROMA CALIBRATION AND MORE, TO PRESENT YOU WITH AN EXCELLENT IMAGE DISPLAY EXPERIENCE.		
NOVASTAR CAN AUTOMATICALLY OR PROGRAMMATICALLY SET THE BRIGHTNESS OF EACH PIXEL TO ADHERE TO BRIGHTNESS STANDARDS.		

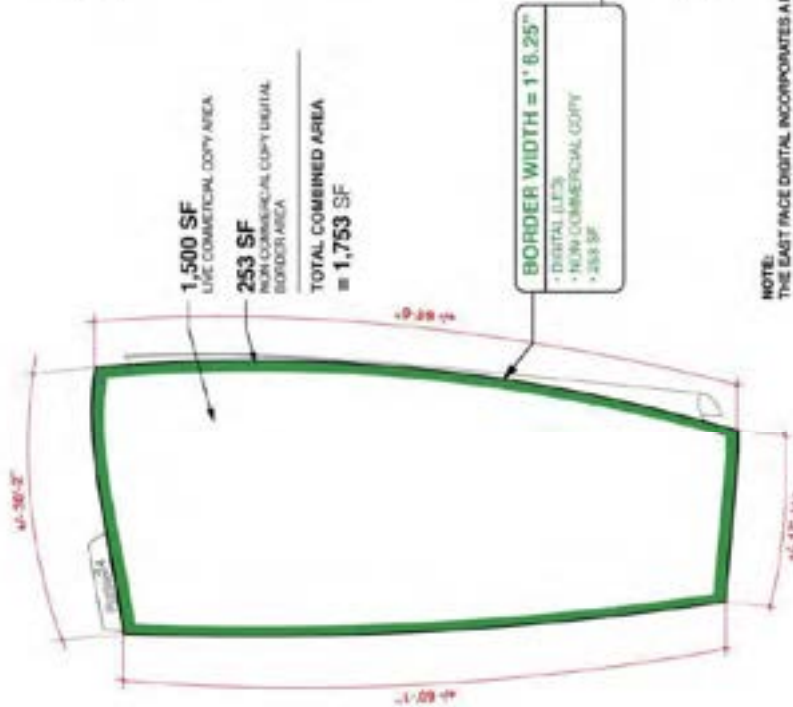


DIGITAL EAST FACE AD ALLOCATION

EXAMPLE AD:
COMMERCIAL COPY SHOWN = 1,500 SF



+1,500 SF MAY ALLOWABLE COMMERCIAL
COPY



NOTE:
THE EAST FACE DIGITAL INCORPORATES A BORDER MEASURING 253 SQUARE FEET. THIS
BORDER ALSO DIGITAL WILL ALWAYS FRAME THE ADVERTISING WITH SOLID COLORS.
COLOR GRADIENTS AND/OR DYNAMIC OR STATIC GRAPHICS THAT ARE NOT A PART OF THE
COMMERCIAL CONTENT

1.0-12

8700 N. SUNSET BLVD., WEST HOLLYWOOD, CA 90069 P 14

04 / 25 / 2022

THE SUNSET WORK

1.0-12

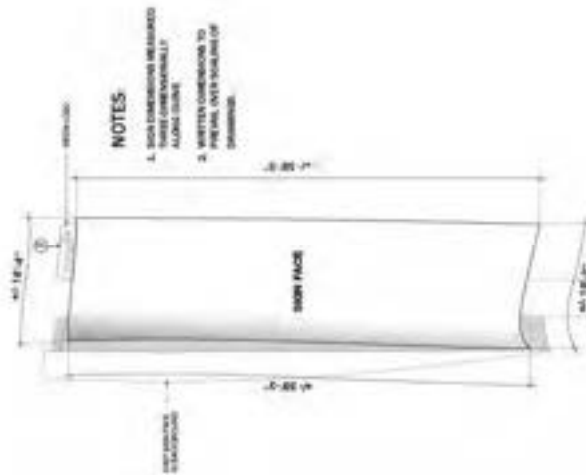
BACKLIT WEST FACE DIMENSIONS & DETAILS

BACKLIT SPECIFICATIONS

Viewing Angle	110°
Input Voltage	120V
Watts	1.44w/ft (2.12w/ft.)
Modules/ft	1.67ft fully assembled
Protection Grade	IP65
Packaging	400 5000 bag, 50 modules (1750) bag
Warranty	5 Year (Product)
Operating Temp.	40 ~ +70 °C / 40 ~ +158 °F
Storage Temp.	25 mod single-ended power lead (pc)
Cascade	50 mod double-ended power lead (pc)

Color	Part#	Color Temp	Lumen
Pure White	1159W011M000114	7000K	940lm/ft (225.4lm/ft.)

TYP. LED MODULE



SIGN FACE DIMENSIONS

NOTE: THE WEST-FACING STATIC SIGN HAS A TOTAL AREA OF 900 SQUARE FEET.

BACKLIT WEST FACE AD ALLOCATION

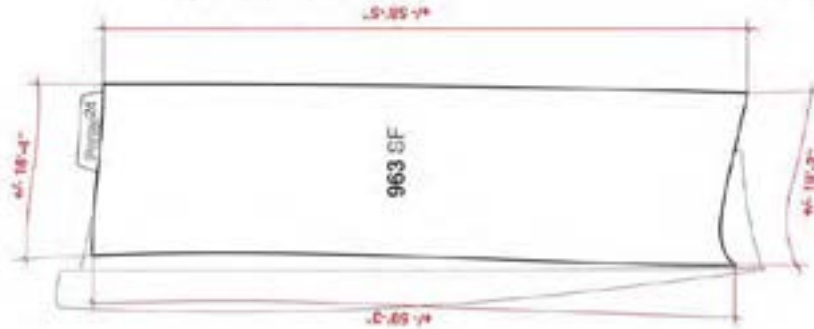
EXAMPLE AD:

COMMERCIAL COPY SHOWN ~ 500 SF



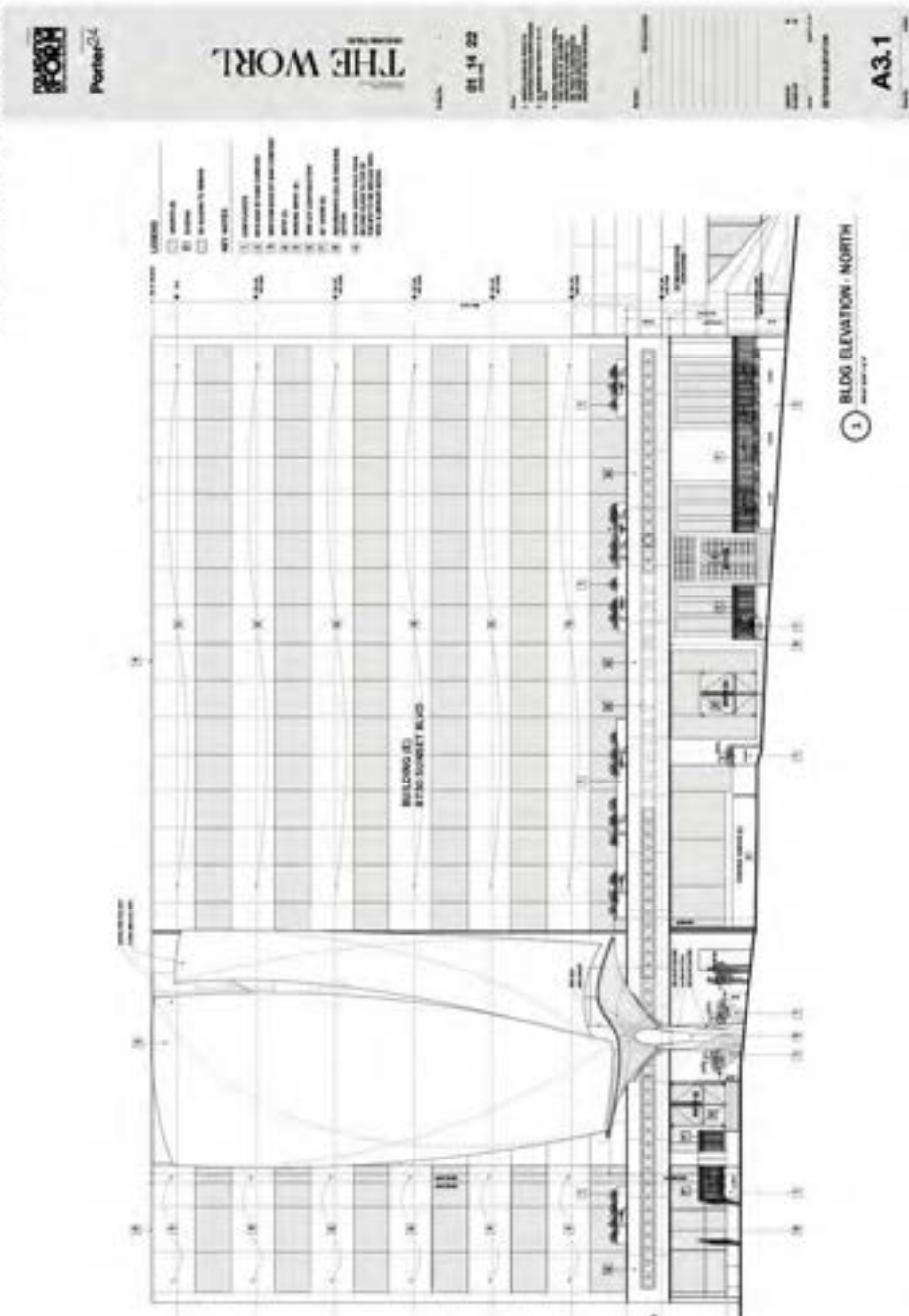
- 500 SF MAX ALLOWABLE COMMERCIAL COPY
- ZONE CLEARANCE REQUIRED FOR EACH COPY CHANGE

500 SF
LINE COMMERCIAL COPY AREA
463 SF
NONE COMMERCIAL AREA
TOTAL COMBINED AREA
= 963 SF



NOTE:
THE WEST-FACING STATIC SIGN HAS A TOTAL AREA OF 963 SQUARE FEET. THE WEST FACE IS LIMITED TO 500 SQUARE FEET OF ADVERTISING COPY AREA. THE REMAINING 463 SQUARE FEET OF THE SPACE WILL BE NON-ADVERTISING SUCH AS SOLID COLORS, COLOR GRADIENTS AND/OR DYNAMIC OR STATIC GRAPHICS THAT ARE NOT A PART OF THE COMMERCIAL CONTENT AND DO NOT CONVEY A COMMERCIAL ADVERTISING MESSAGE. NOR CONTAIN ANY GRAPHICS THAT ARE PART OF THE 500 SQUARE FOOT COMMERCIAL CONTENT.

**FACADE IMPROVEMENTS
BUILDING ELEVATION**

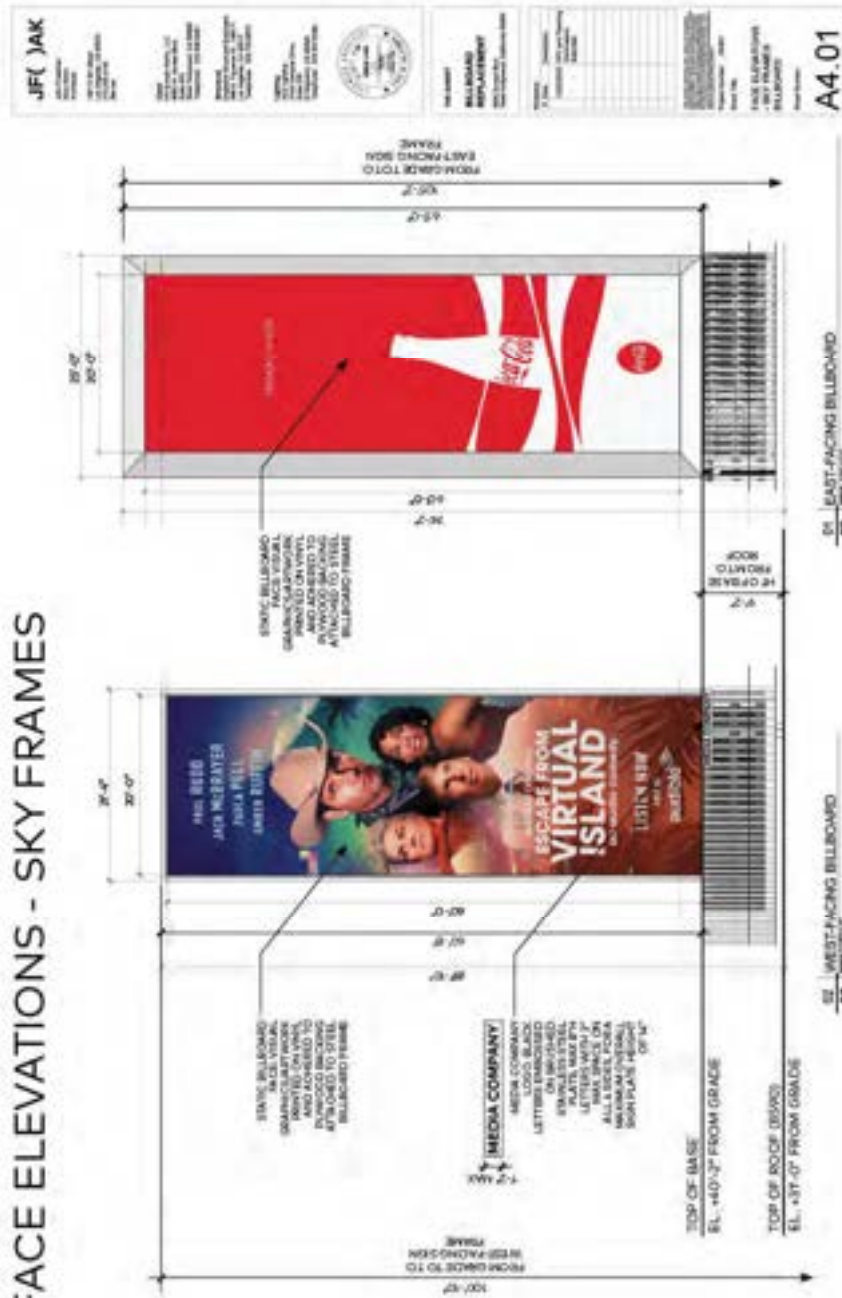


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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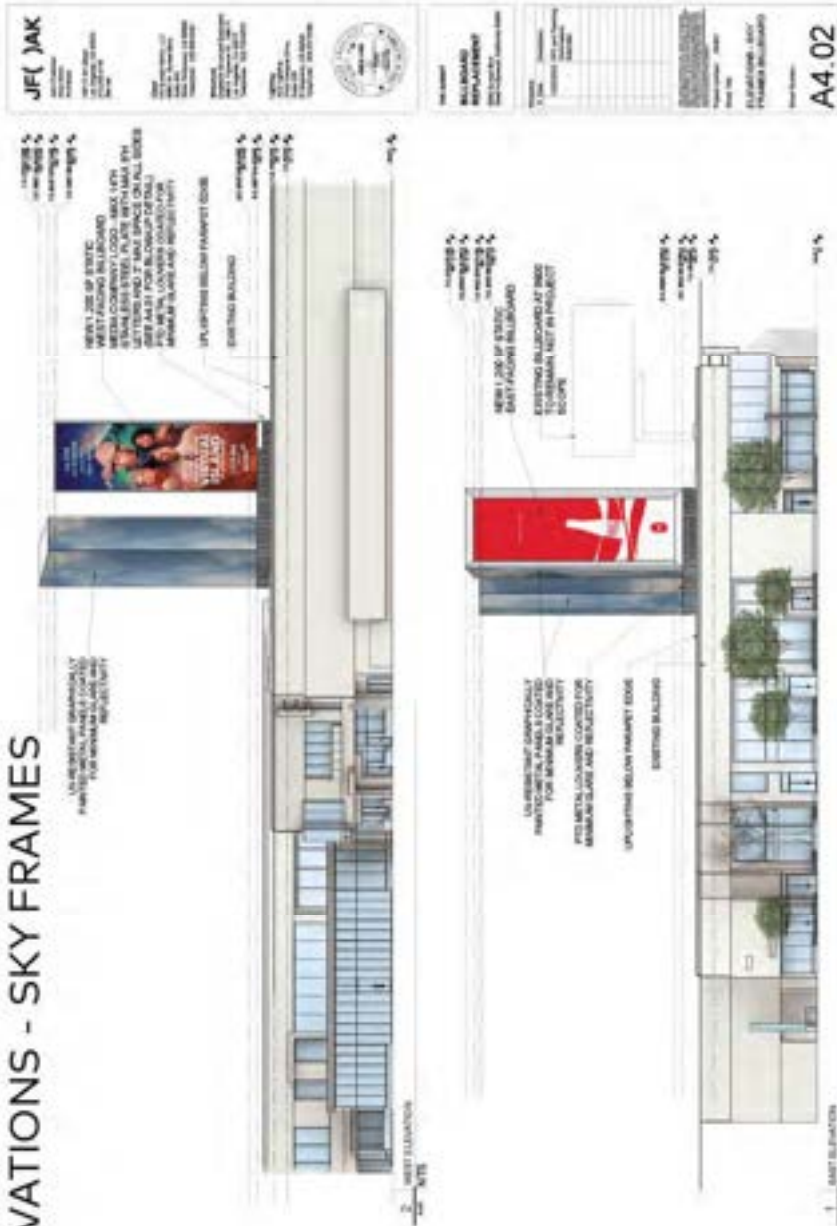
⑧ Pedestrian Plaza Frame - Sun

PROJECT #: WH040
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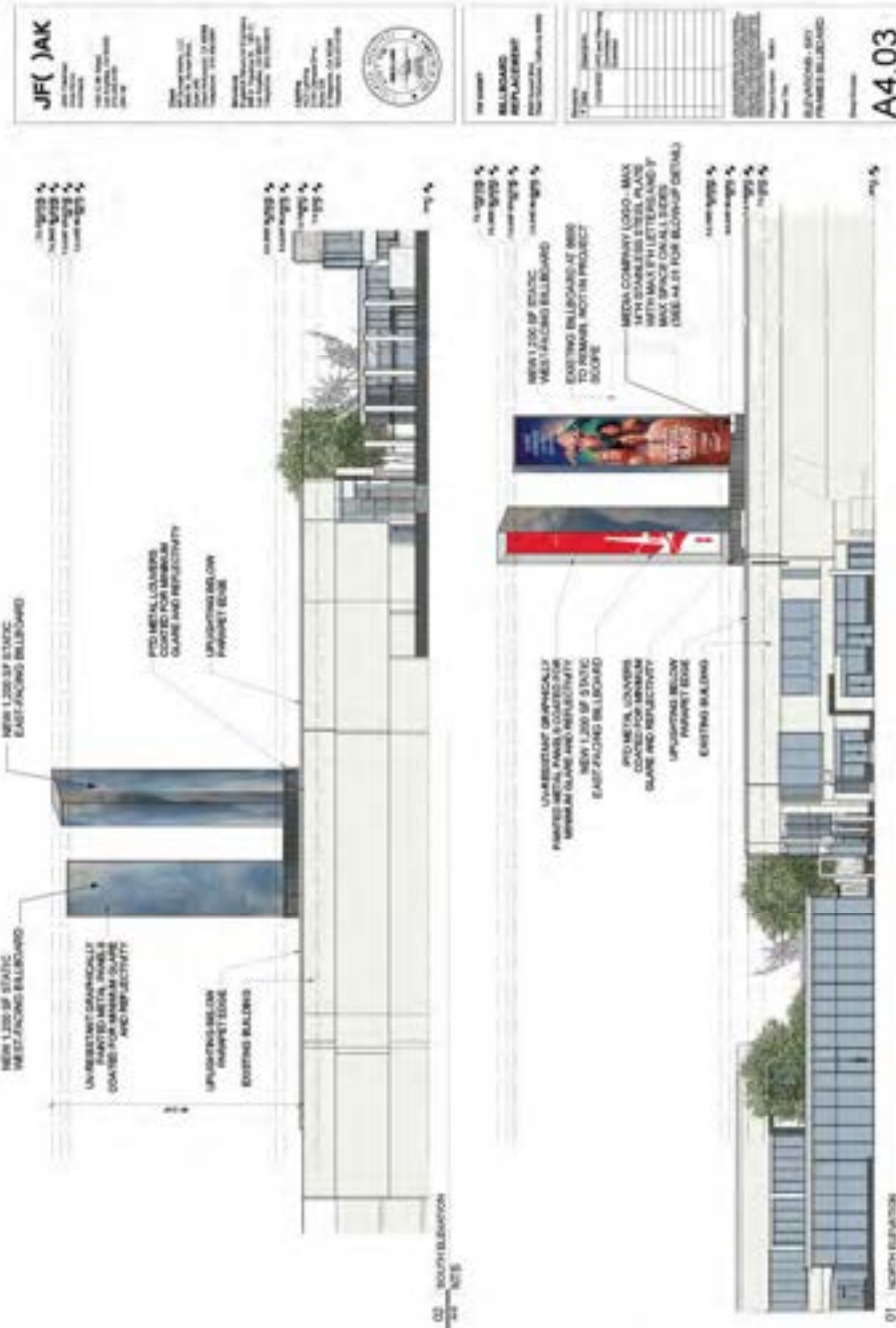


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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ELEVATIONS - SKY FRAMES



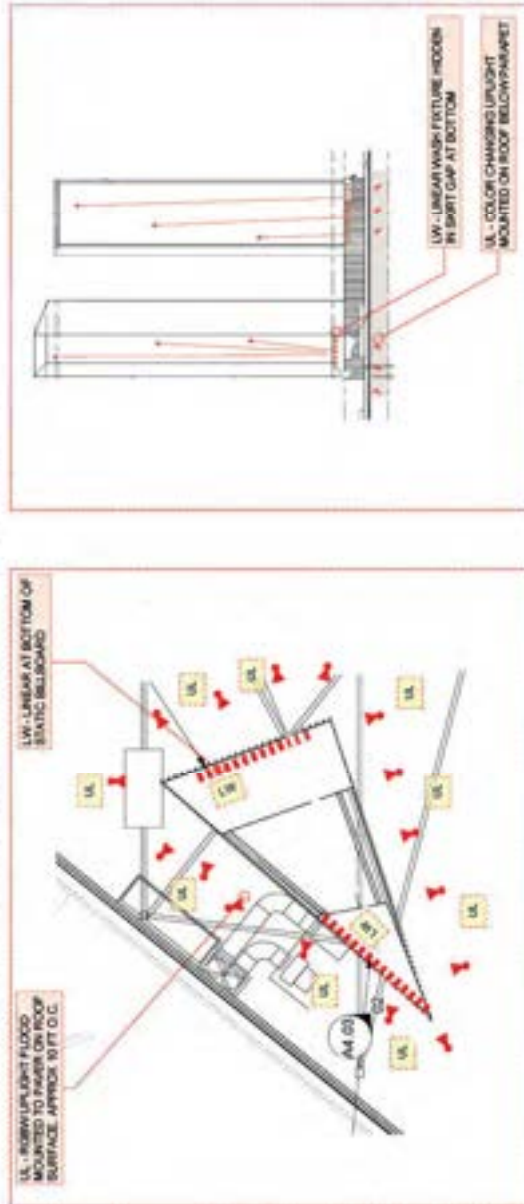
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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JF(JAK Project: WH040 SB Date: 05/05/2025 Drawn: JF Checked: JAK Title: SKY FRAMES BILLBOARD - LIGHTING	BILLBOARD REPLACEMENT 1.0-13	LT1.0 Lighting Plan, Section and Product Info

SKY FRAMES BILLBOARD - LIGHTING



Clipped elevation viewed from Sunset



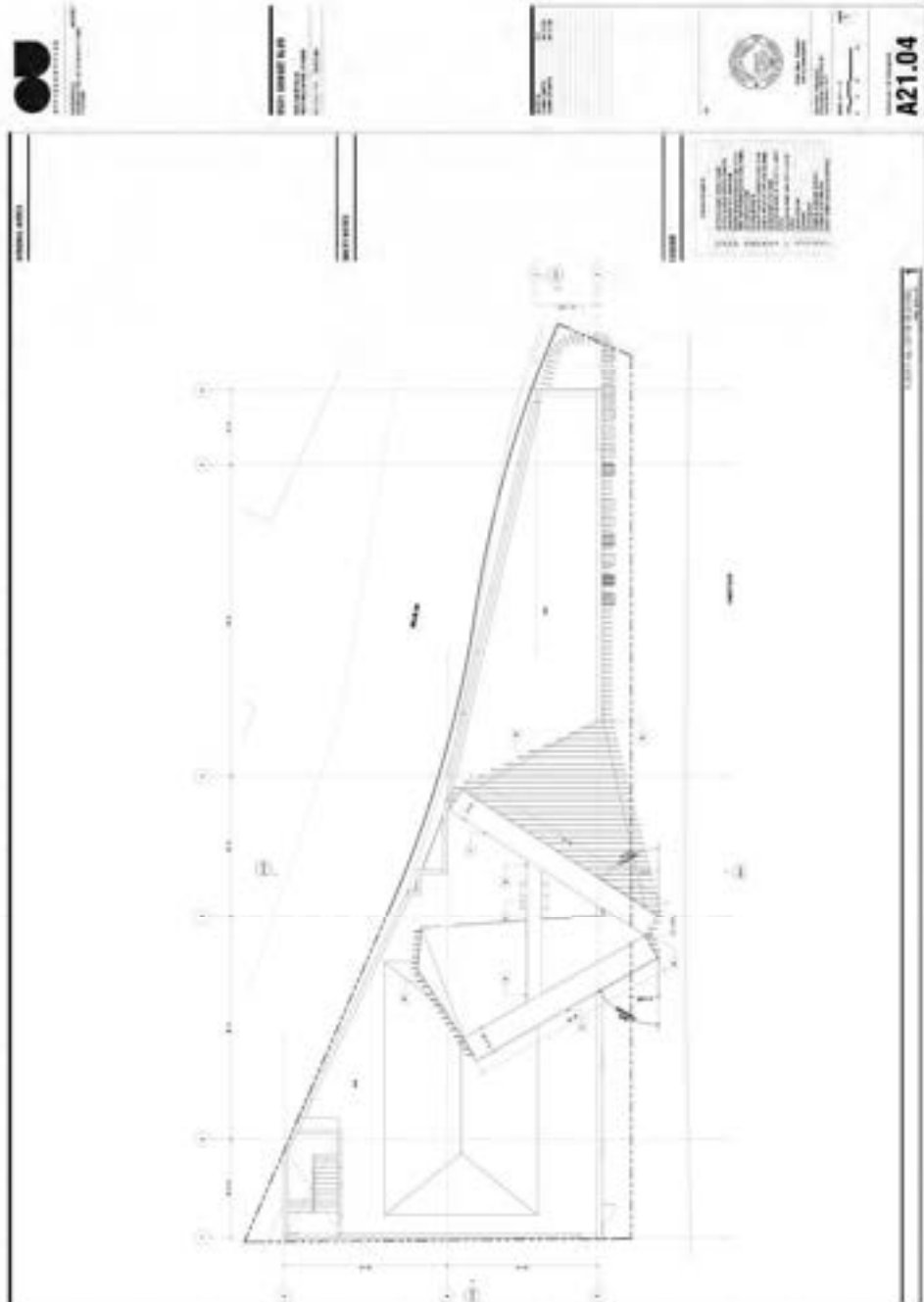
Color changing lights



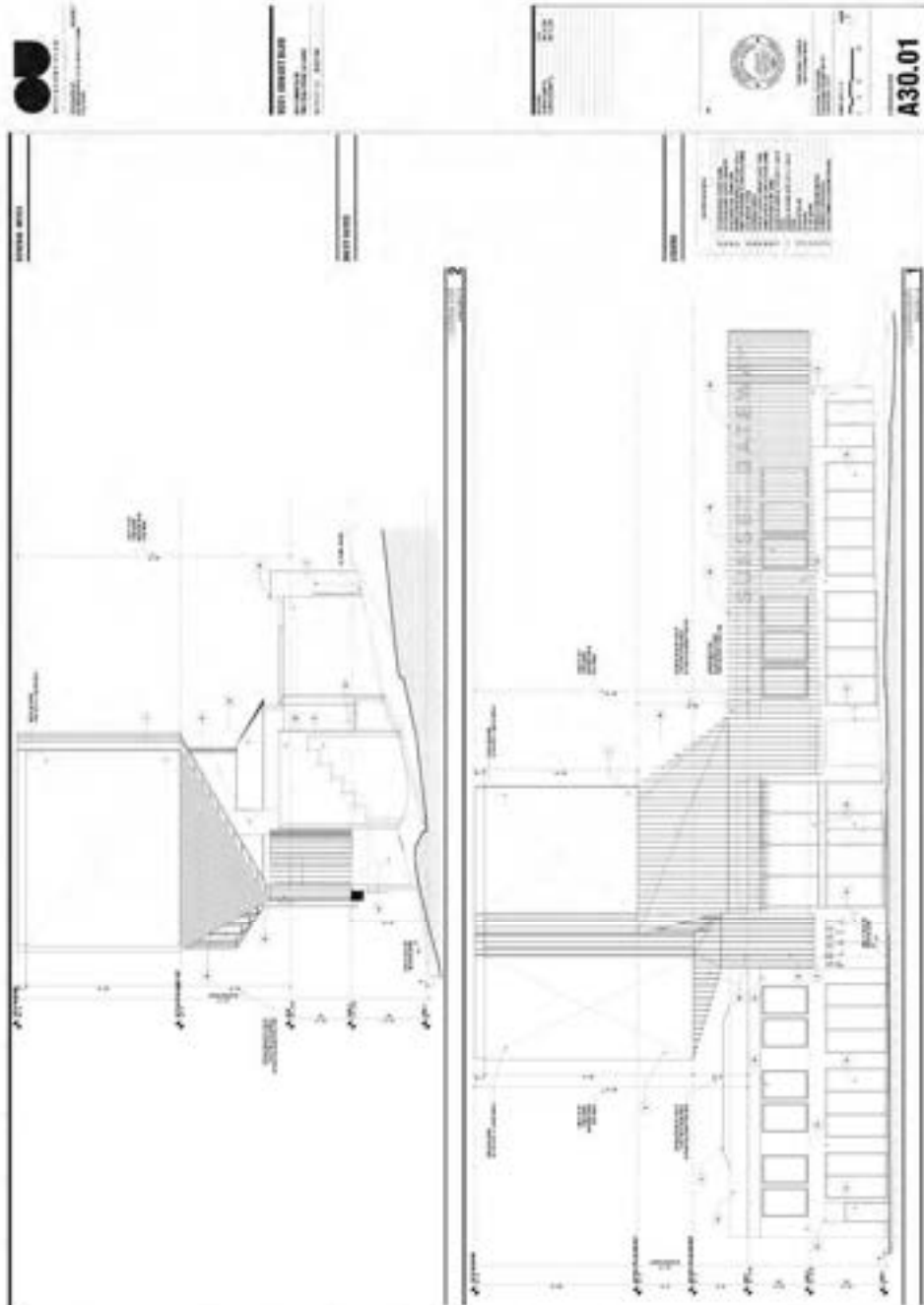
Side plan of structure

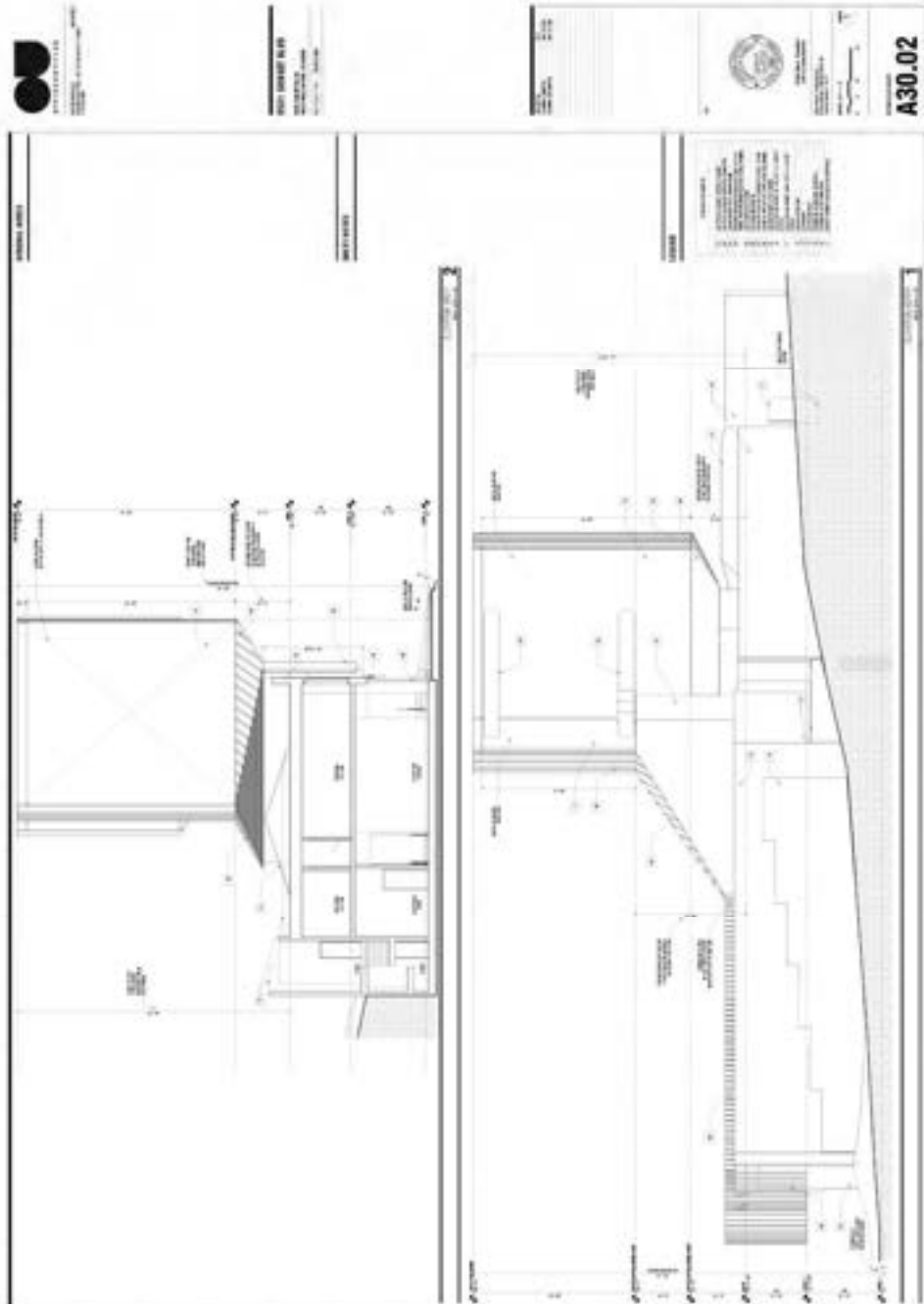
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 63

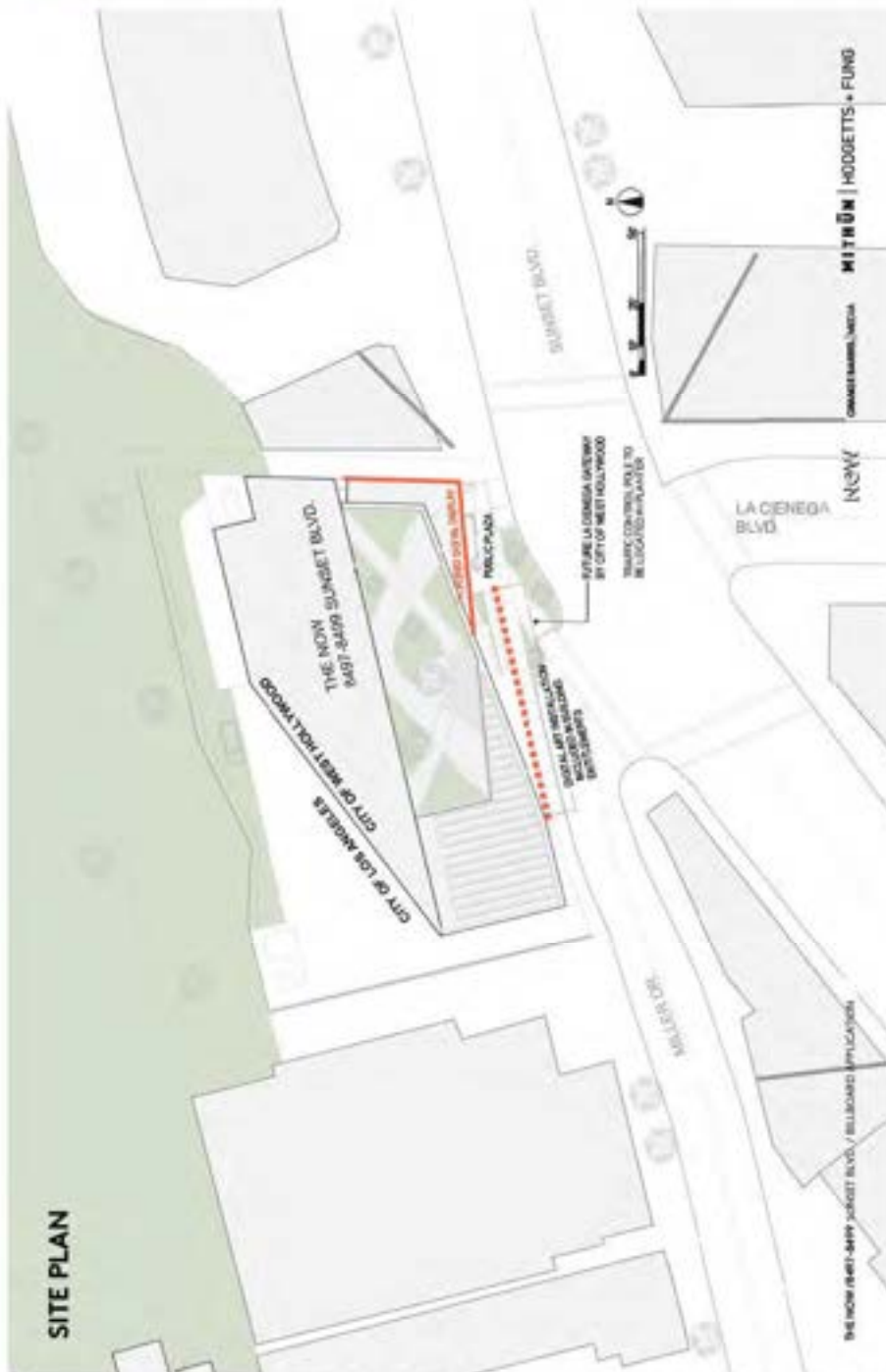


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 64





APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 66

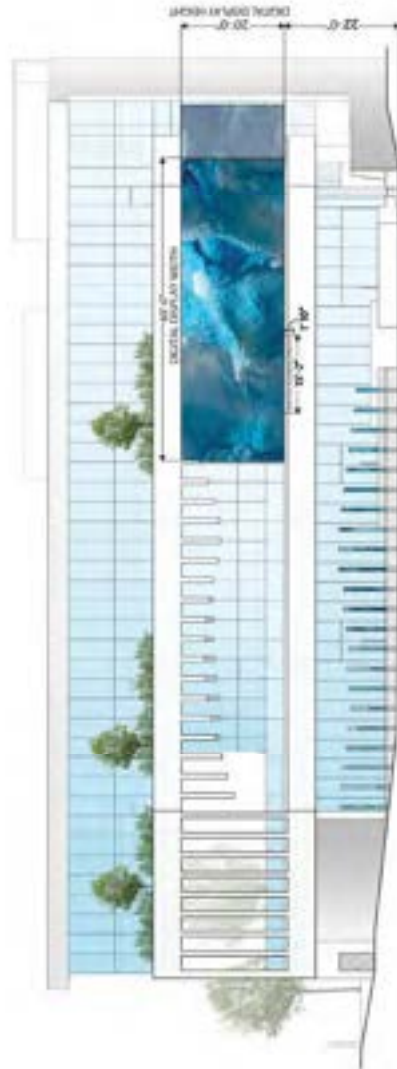


SITE PLAN

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 67

SOUTH ELEVATION

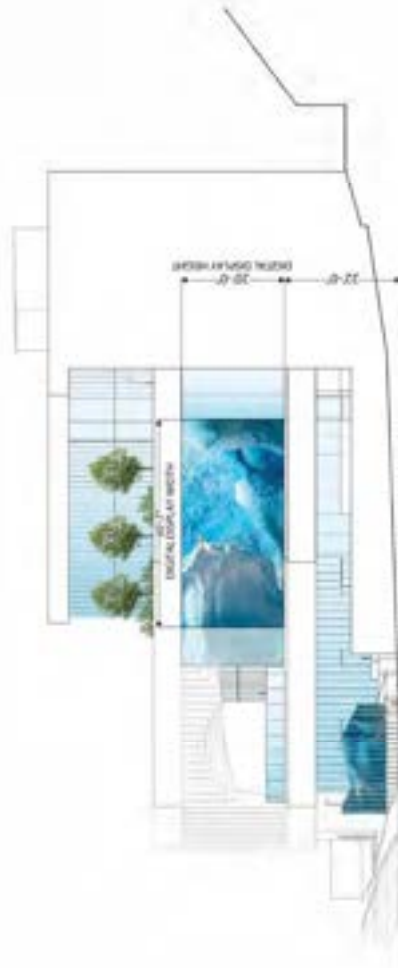


Digital billboards/billboards were approved as part of building and billboard. Billboards will exclusively display art content.
Art programming on billboards was approved by ACAC in April of 2018.

NEW CONCEPT NAME / MEDIA MITNUN HODGETTS + FUND

THE NEW /ART-ART SUNSET BLVD. / BILLBOARD APPLICATION

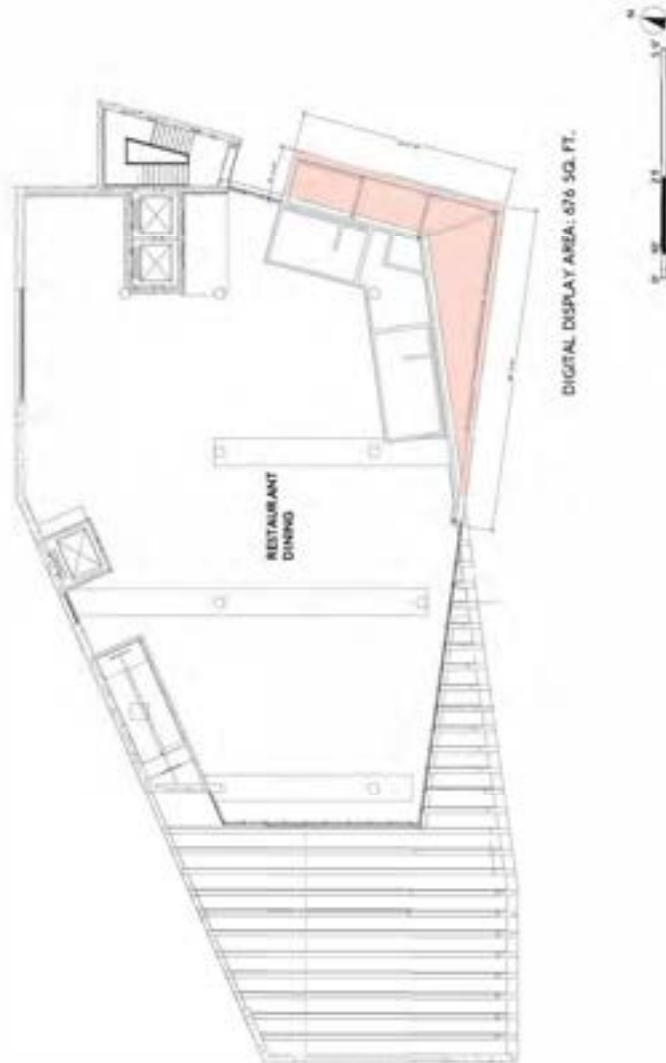
EAST ELEVATION



NEW CONTACT RAILROAD, VICTORIA MITHUN | HODGETTS + FUNG

THE NEW / 1607-1641 SUNSET BLVD. / BILLBOARD APPLICATION

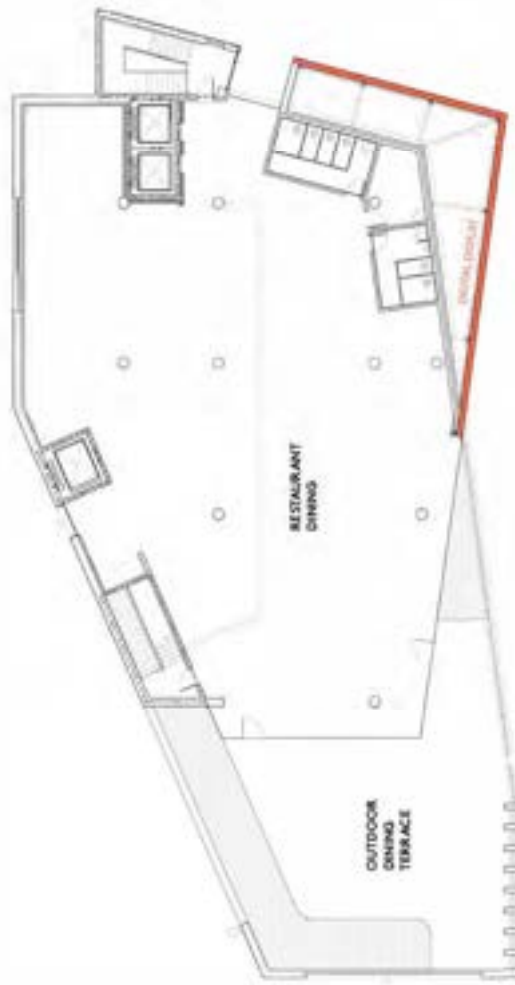
LEVEL 2 - REFLECTED CEILING PLAN



N.W. CHARTERED BY MITNUN HODGETTS + FUND

THE NEW / PART 4 ARTS / SUNSET BLVD. / BILLBOARD APPLICATION

LEVEL 2 PLAN



NEW CONCEPTS BY MITCHELL HODGETTS + FUNG

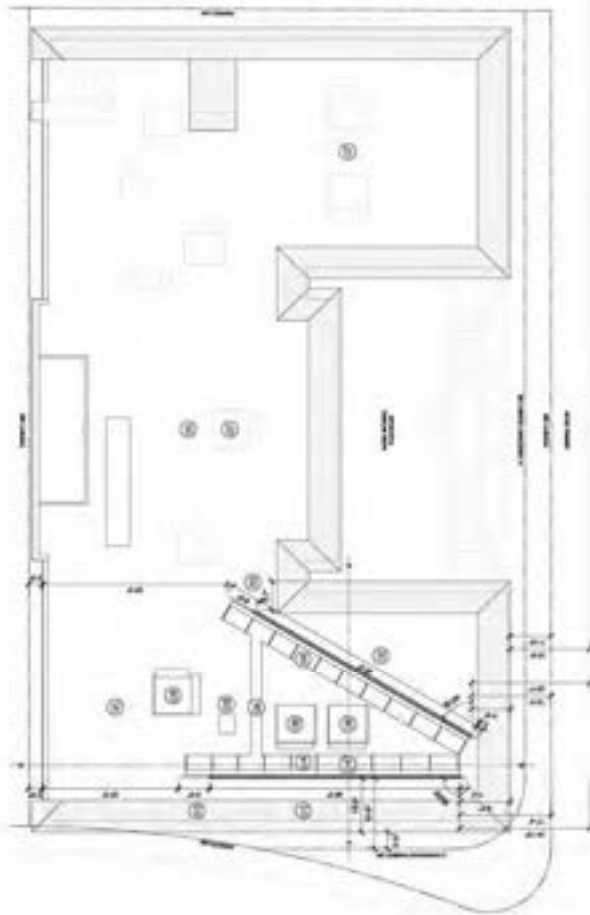
THE NEW / 1407-1447 SUNSET BLVD. / BILLBOARD APPLICATION

PIAZZA DEL SOL 16

THE AUTHOR

DO

June 24, 2010



107. **ANSWER: B** The correct answer is B. The
108. **ANSWER: C** The correct answer is C. The
109. **ANSWER: D** The correct answer is D. The
110. **ANSWER: A** The correct answer is A. The

[illegible]

NOTES

doi:10.1002/ajim.20002

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS.

PROJECT #: WH040

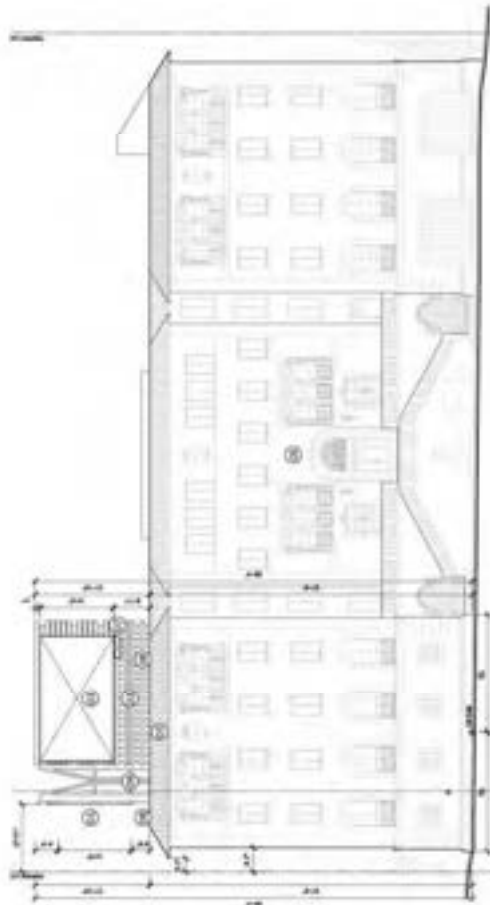
PAGE: 72

PIAZZA DEL SOL 18

SCALE 1/8" = 1'-0"



June 24, 2022



07 ARCHITECTURAL ELEVATION OF BUILDING FACADE
08 ARCHITECTURAL ELEVATION OF BUILDING FACADE
09 ARCHITECTURAL ELEVATION OF BUILDING FACADE
10 ARCHITECTURAL ELEVATION OF BUILDING FACADE

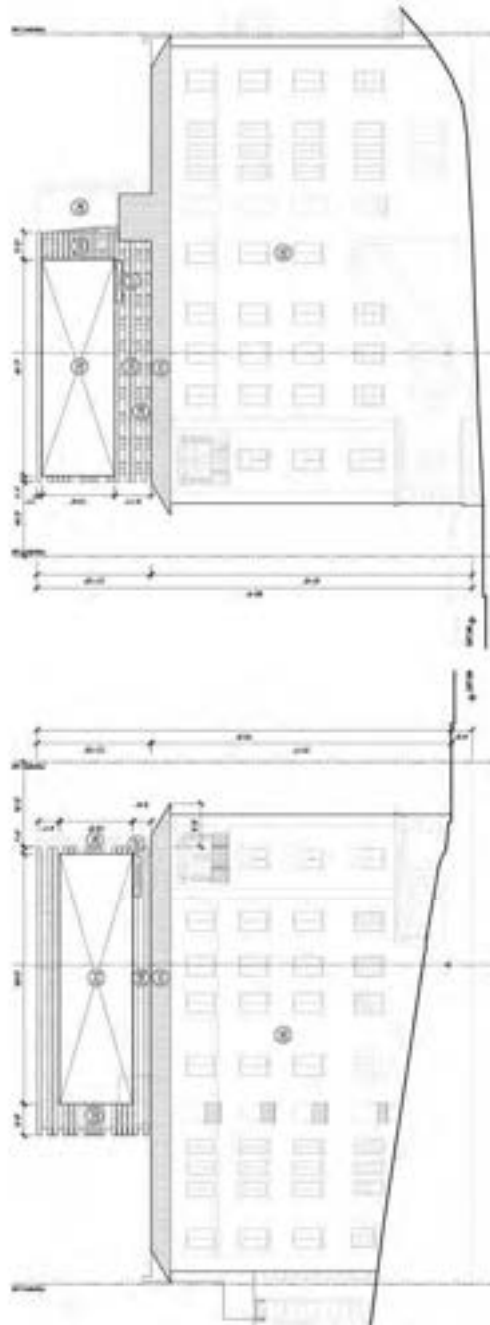
01 ARCHITECTURAL ELEVATION OF BUILDING FACADE
02 ARCHITECTURAL ELEVATION OF BUILDING FACADE
03 ARCHITECTURAL ELEVATION OF BUILDING FACADE
04 ARCHITECTURAL ELEVATION OF BUILDING FACADE
05 ARCHITECTURAL ELEVATION OF BUILDING FACADE
06 ARCHITECTURAL ELEVATION OF BUILDING FACADE
07 ARCHITECTURAL ELEVATION OF BUILDING FACADE
08 ARCHITECTURAL ELEVATION OF BUILDING FACADE
09 ARCHITECTURAL ELEVATION OF BUILDING FACADE
10 ARCHITECTURAL ELEVATION OF BUILDING FACADE

NOTES

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PIAZZA DEL SOL W

ELEVATIONS



SCALE 1/8"=1'-0"



Apr 24, 2022

WEST ELEVATION

WEST ELEVATION
8437 SUNSET BOULEVARD BUILDING | APPLICATION INCOMPLETE LETTER REBUTTAL

1.01. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.02. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.03. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.04. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.05. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.06. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.07. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.08. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.09. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)
1.10. REVISIONS TO SIGNAGE (SEE 1.01.01 FOR DETAILS)

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

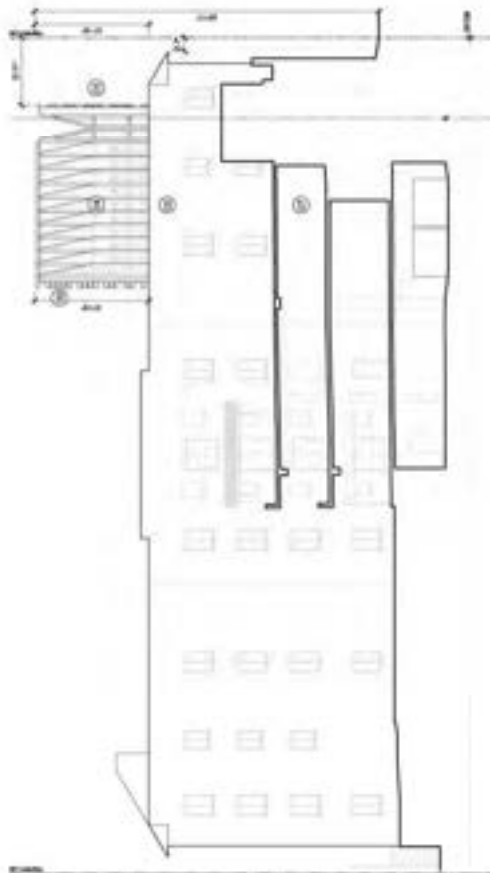
PROJECT #: WH040
PAGE: 74

PIAZZA DEL SOL UP

3.42 1/4" = 1'-0"



JAN 24, 2025



01. EXISTING ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)

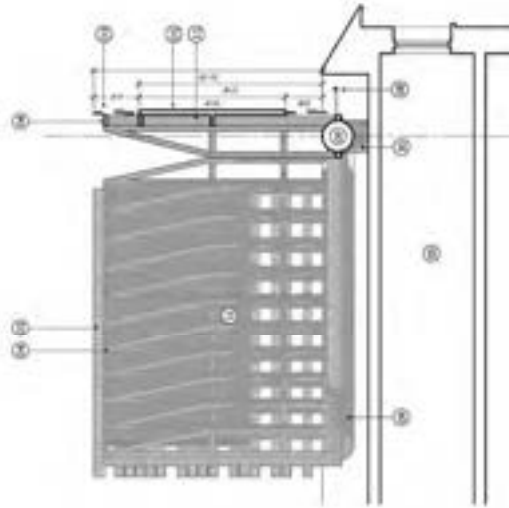
02. PROPOSED ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)
03. PROPOSED ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)
04. PROPOSED ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)
05. PROPOSED ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)
06. PROPOSED ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)

NOT TO SCALE

ARTS & ADVERTISING PROGRAM SIGNAGE (SEE PLAN SHEET 1.0-15)

ELEVATIONS

PIAZZA DEL SOL 18



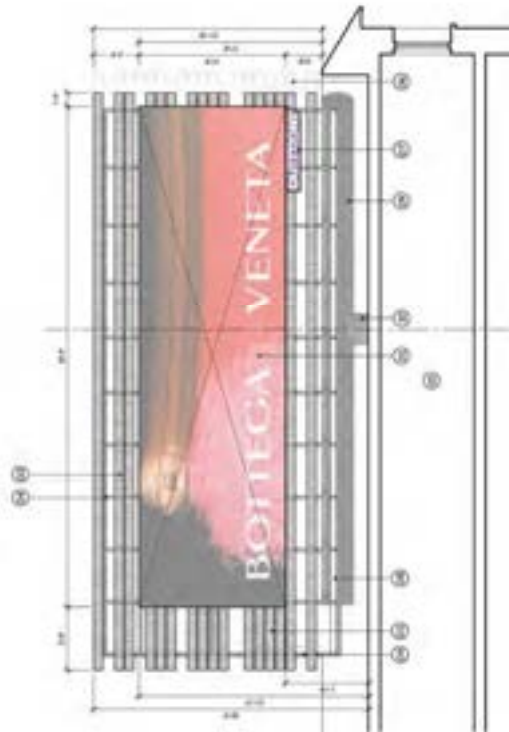
SCALE: 1/8" = 1'-0"



June 24, 2022

WEST SIGN FACE SECTION

ENLARGED ELEVATIONS / SECTIONS | WEST SIGN FACE



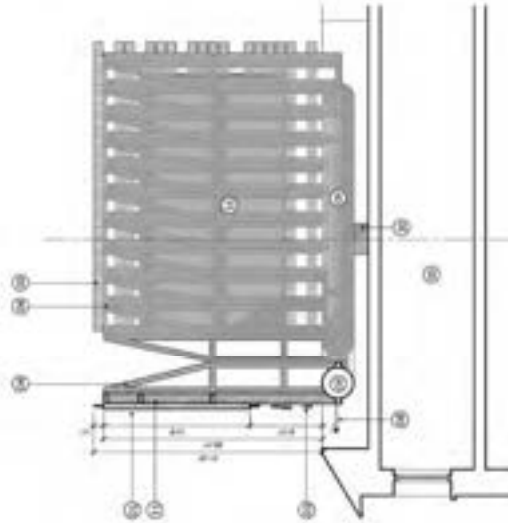
- 07. MEDIAN CURB MOUNT SIGNAGE (BY THE CURB LIGHT)
- 08. ARCHITECTURAL LIGHTING (FOR SIGNAGE AND LIGHTING)
- 09. ARCHITECTURAL LIGHTING (FOR SIGNAGE AND LIGHTING)
- 10. ARCHITECTURAL LIGHTING (FOR SIGNAGE AND LIGHTING)
- 11. ARCHITECTURAL LIGHTING (FOR SIGNAGE AND LIGHTING)

- 01. SIGNAGE (BY THE CURB LIGHT)
- 02. SIGNAGE (BY THE CURB LIGHT)
- 03. SIGNAGE (BY THE CURB LIGHT)
- 04. SIGNAGE (BY THE CURB LIGHT)
- 05. SIGNAGE (BY THE CURB LIGHT)
- 06. SIGNAGE (BY THE CURB LIGHT)
- 07. SIGNAGE (BY THE CURB LIGHT)
- 08. SIGNAGE (BY THE CURB LIGHT)
- 09. SIGNAGE (BY THE CURB LIGHT)
- 10. SIGNAGE (BY THE CURB LIGHT)
- 11. SIGNAGE (BY THE CURB LIGHT)

WEST SIGN FACE ELEVATION

6437 SUNSET BOULEVARD BILLBOARD | APPLICATION INCOMPLETE LETTER REVISIONS

PIAZZA DEL SOL 18

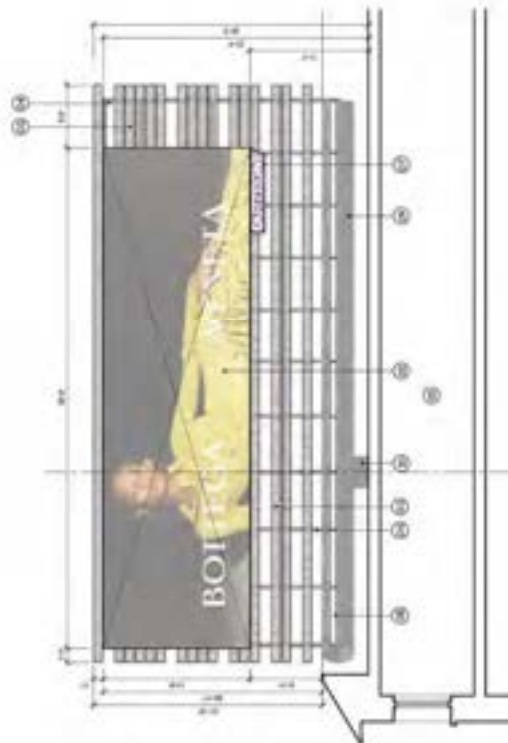


SCALE: 1/8" = 1'-0"



June 24, 2022

EAST SIGN FACE SECTION



- 07. ARCHITECTURAL LIGHTING FIXTURES (SEE DETAIL 101)
- 08. ARCHITECTURAL LIGHTING FIXTURES (SEE DETAIL 101)
- 09. ARCHITECTURAL LIGHTING FIXTURES (SEE DETAIL 101)
- 10. ARCHITECTURAL LIGHTING FIXTURES (SEE DETAIL 101)
- 11. ARCHITECTURAL LIGHTING FIXTURES (SEE DETAIL 101)

- 01. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 02. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 03. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 04. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 05. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 06. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 07. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 08. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 09. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 10. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)
- 11. PROVIDE SIGNAGE FOR THE BUILDING (SEE DETAIL 101)

EAST SIGN FACE SECTION

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

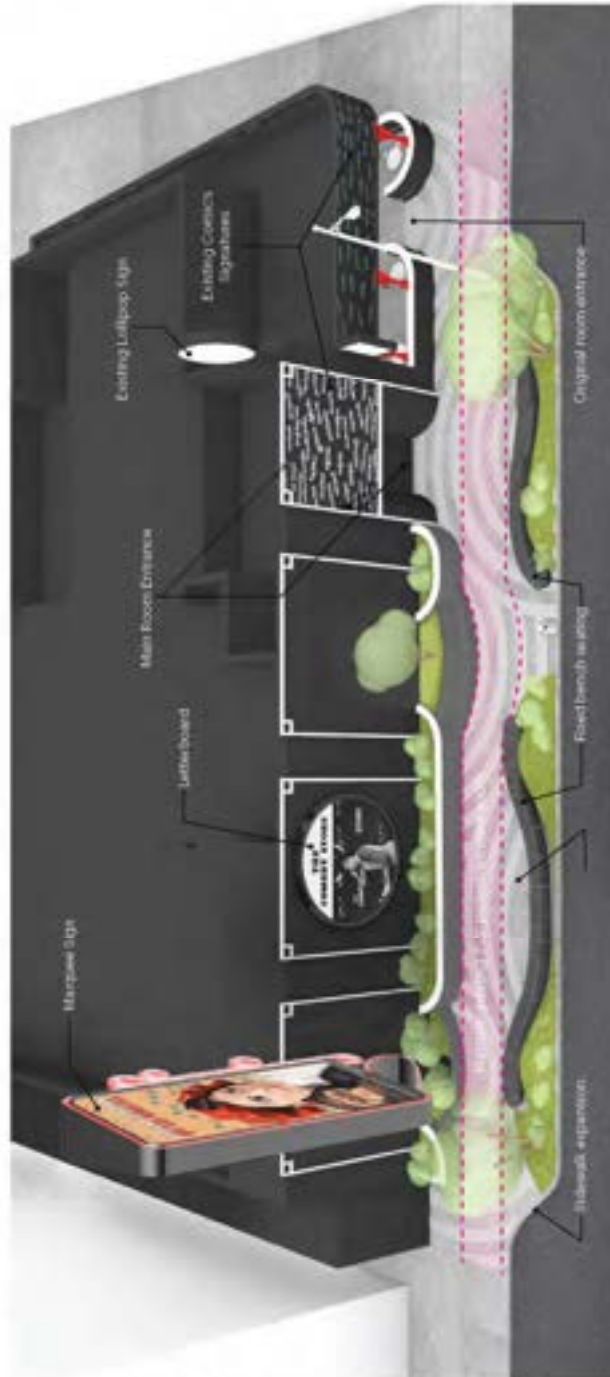
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040

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PROPOSAL ELEMENTS

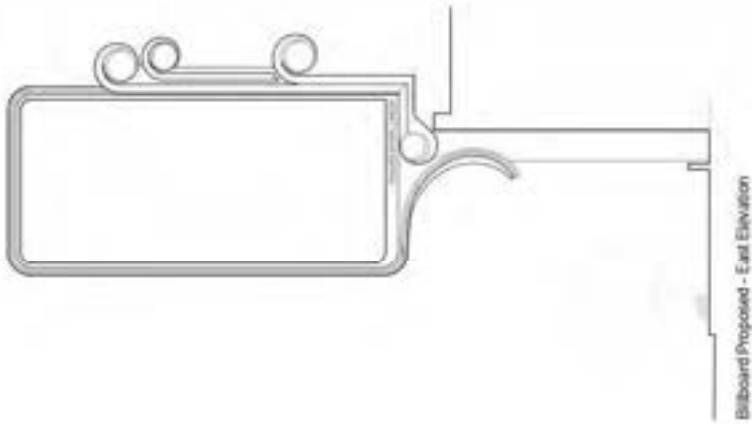
- 2-Sided digital billboard
- Digital letterboard dedicated to non-commercial content. Replaces existing analog letterboard.
- Sidewalk extension with public seating and pollinator friendly planting.



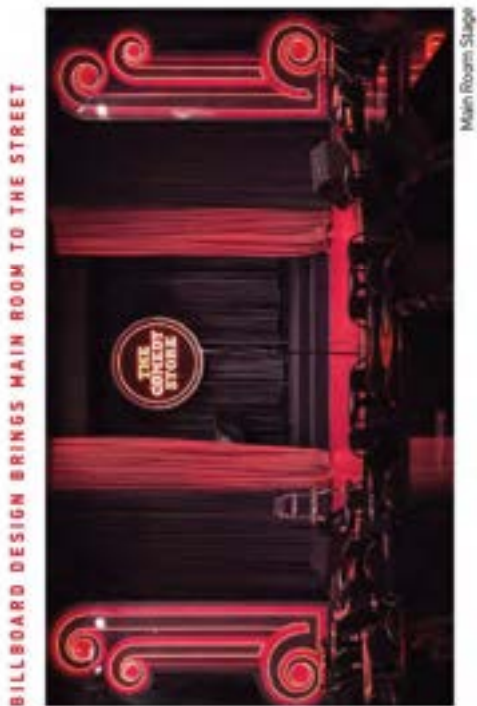
The Creative Team - March 24, 2023

RIOS

OB/M



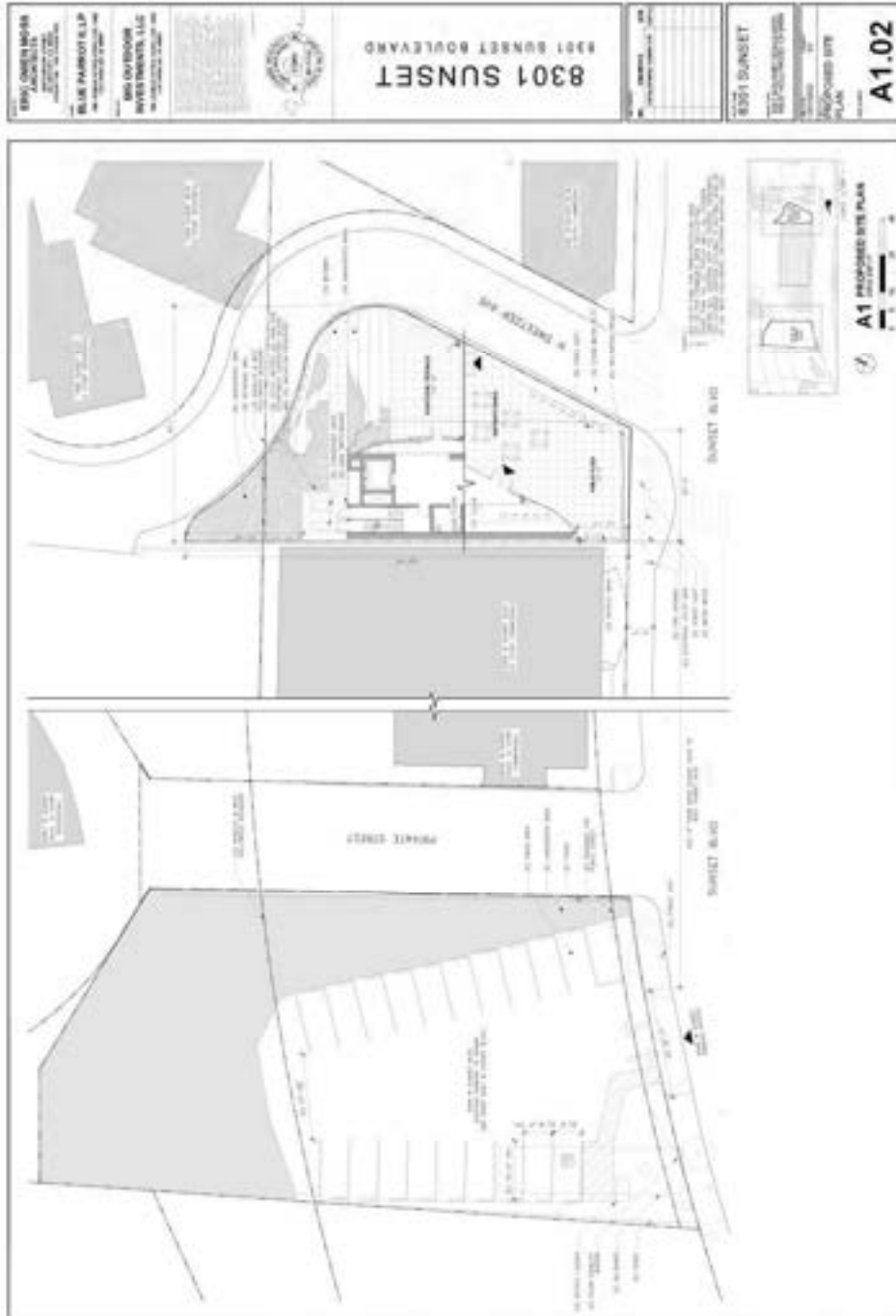
Francis Krahe & Associates, Inc. April 10, 2025 18



OB/M RIOS

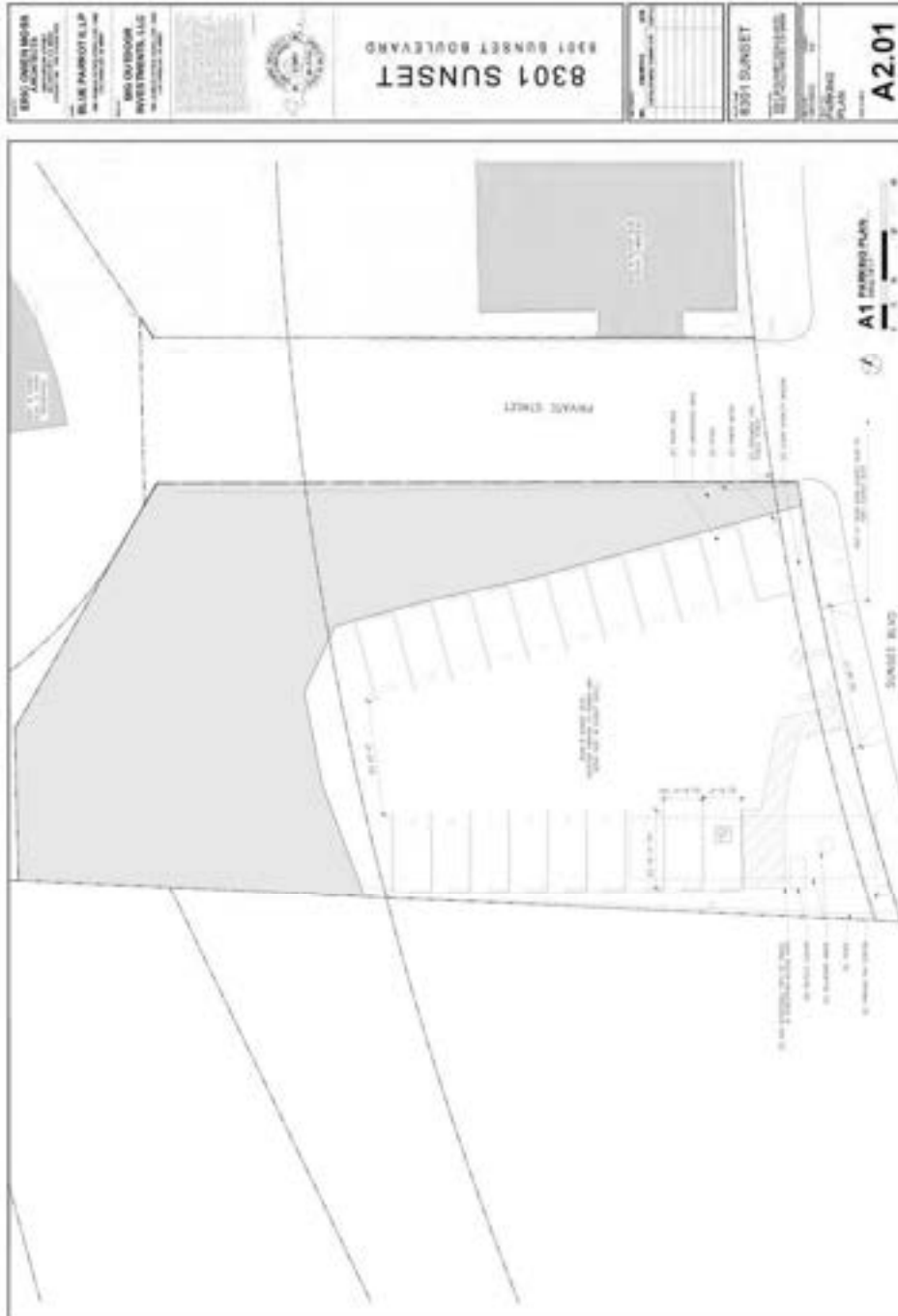
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 79

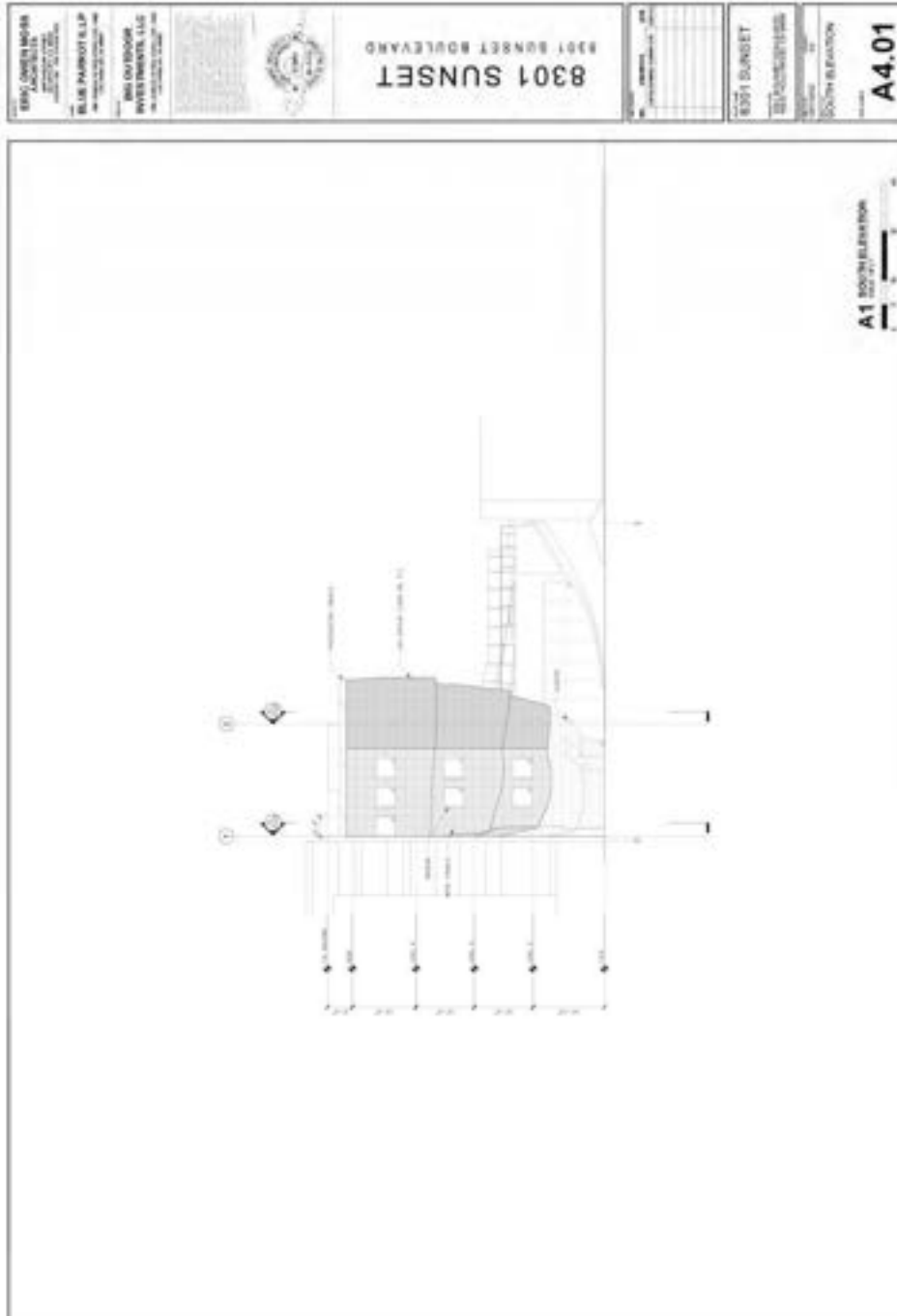


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 80

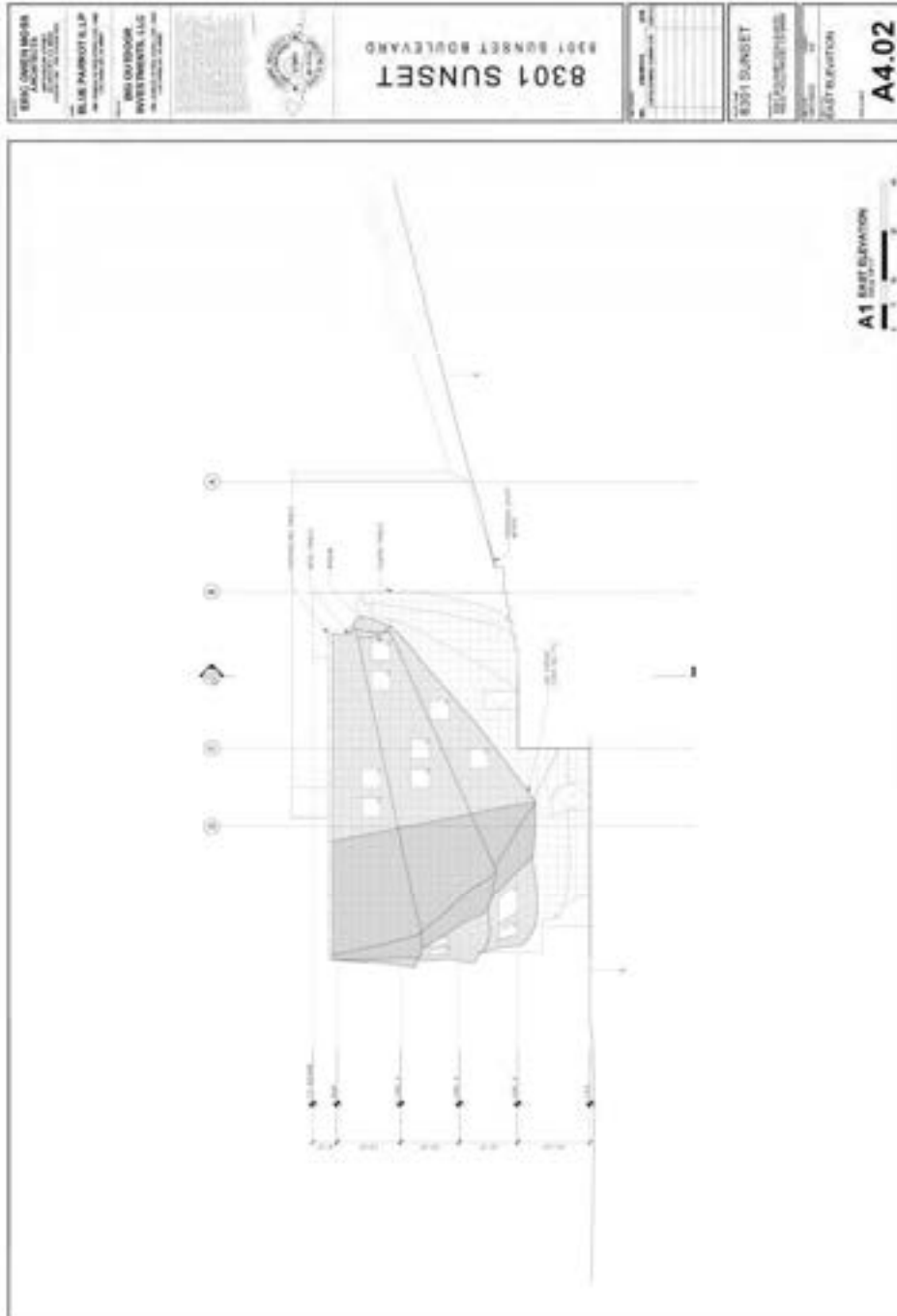


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 81

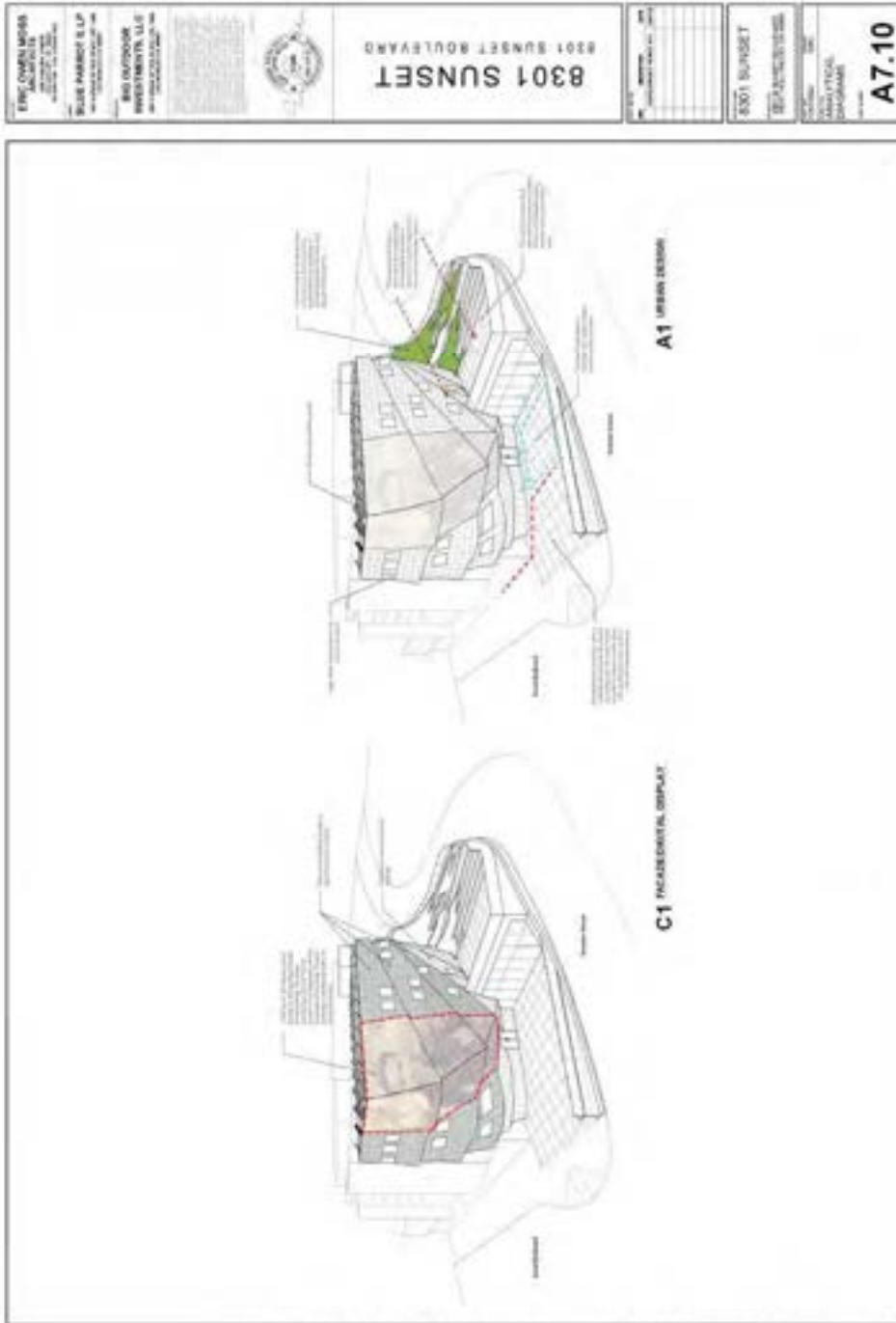


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 82

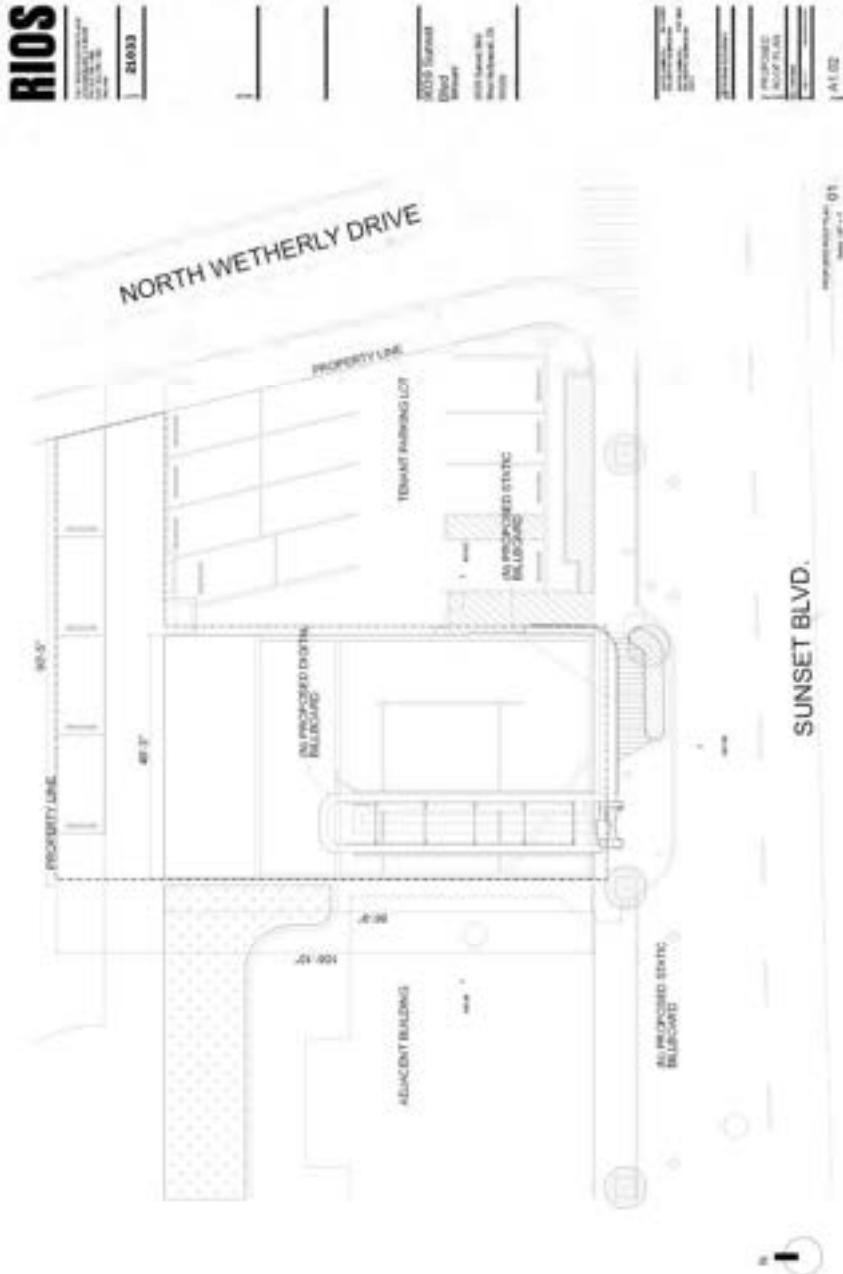


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 83

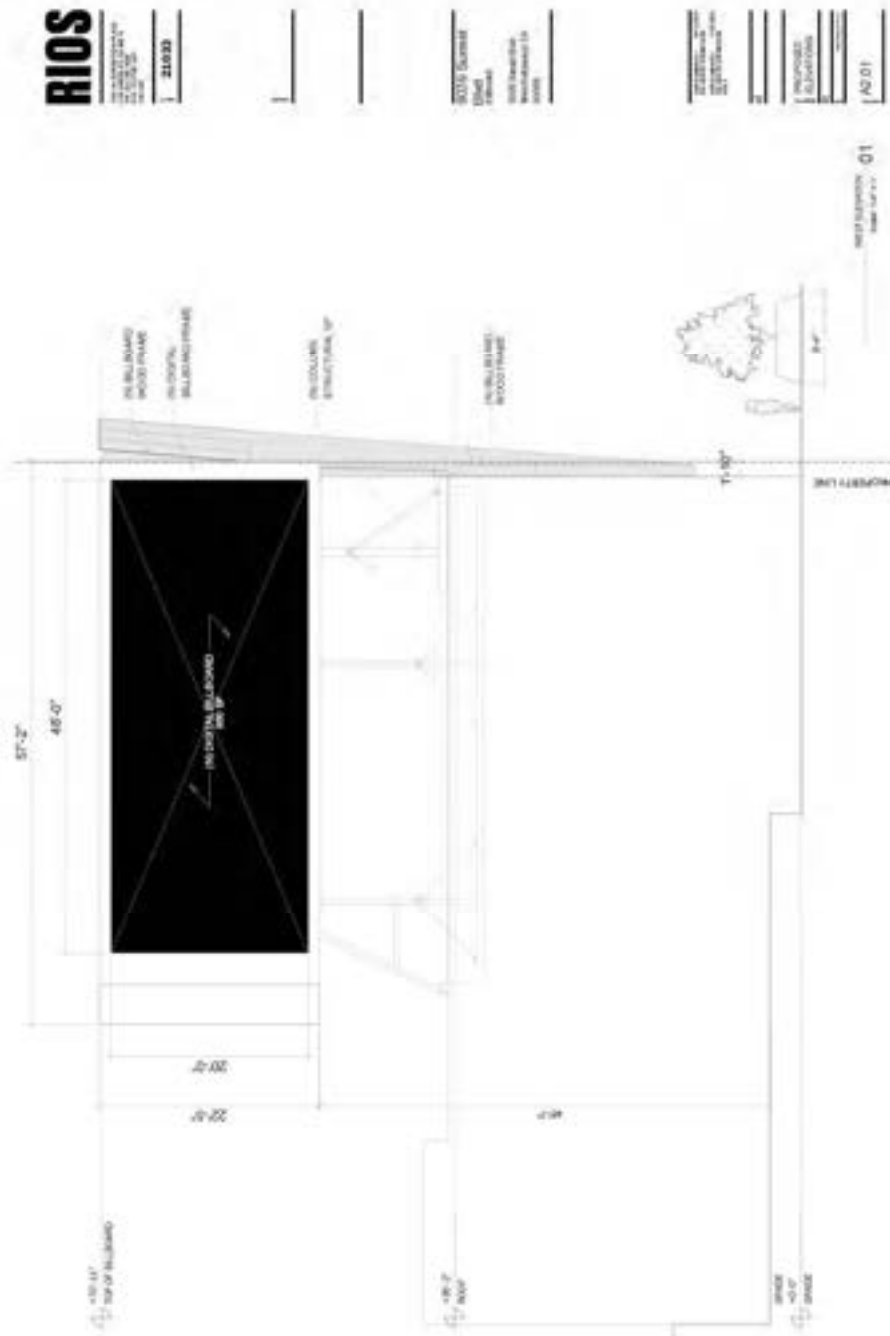


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 84

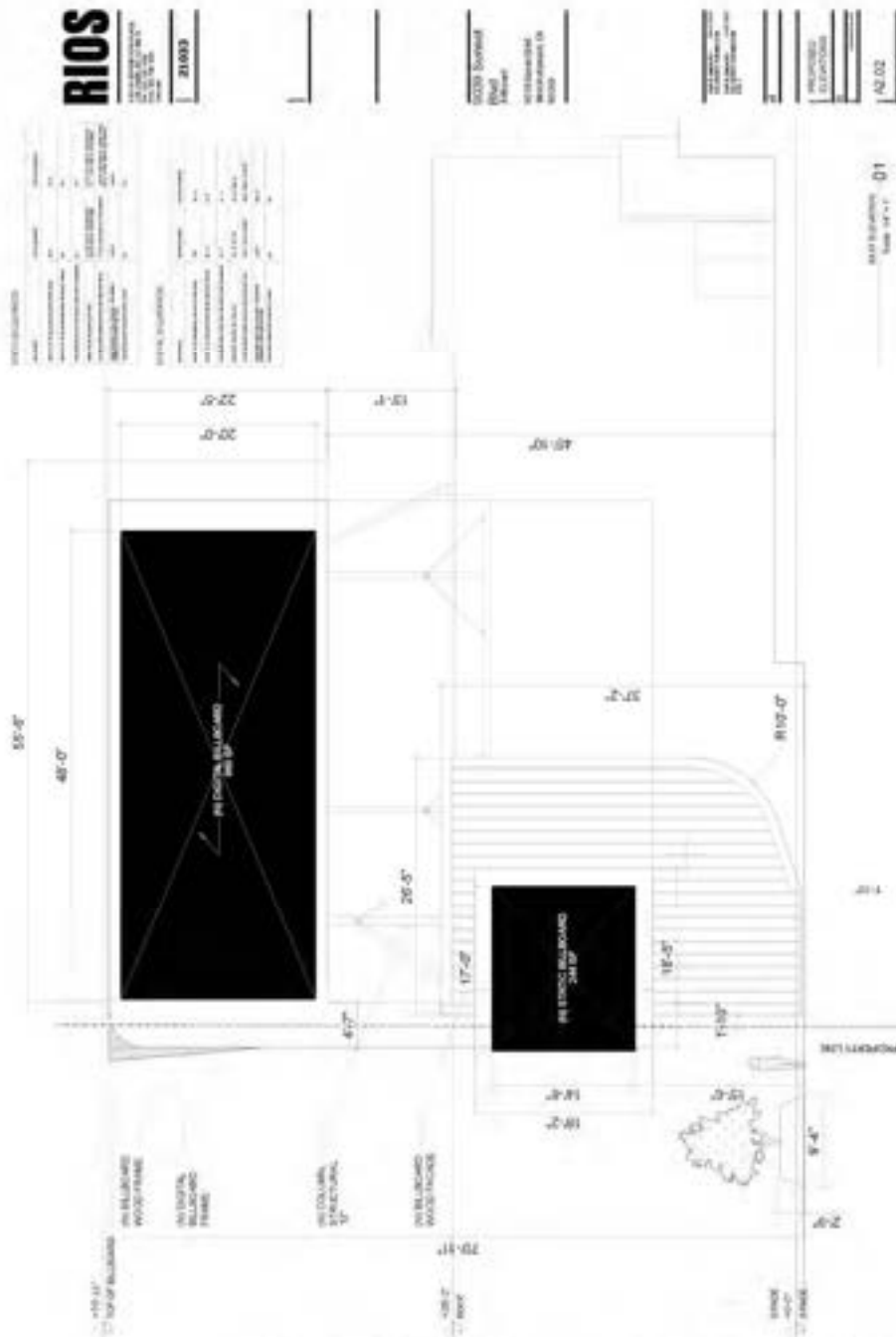


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 88

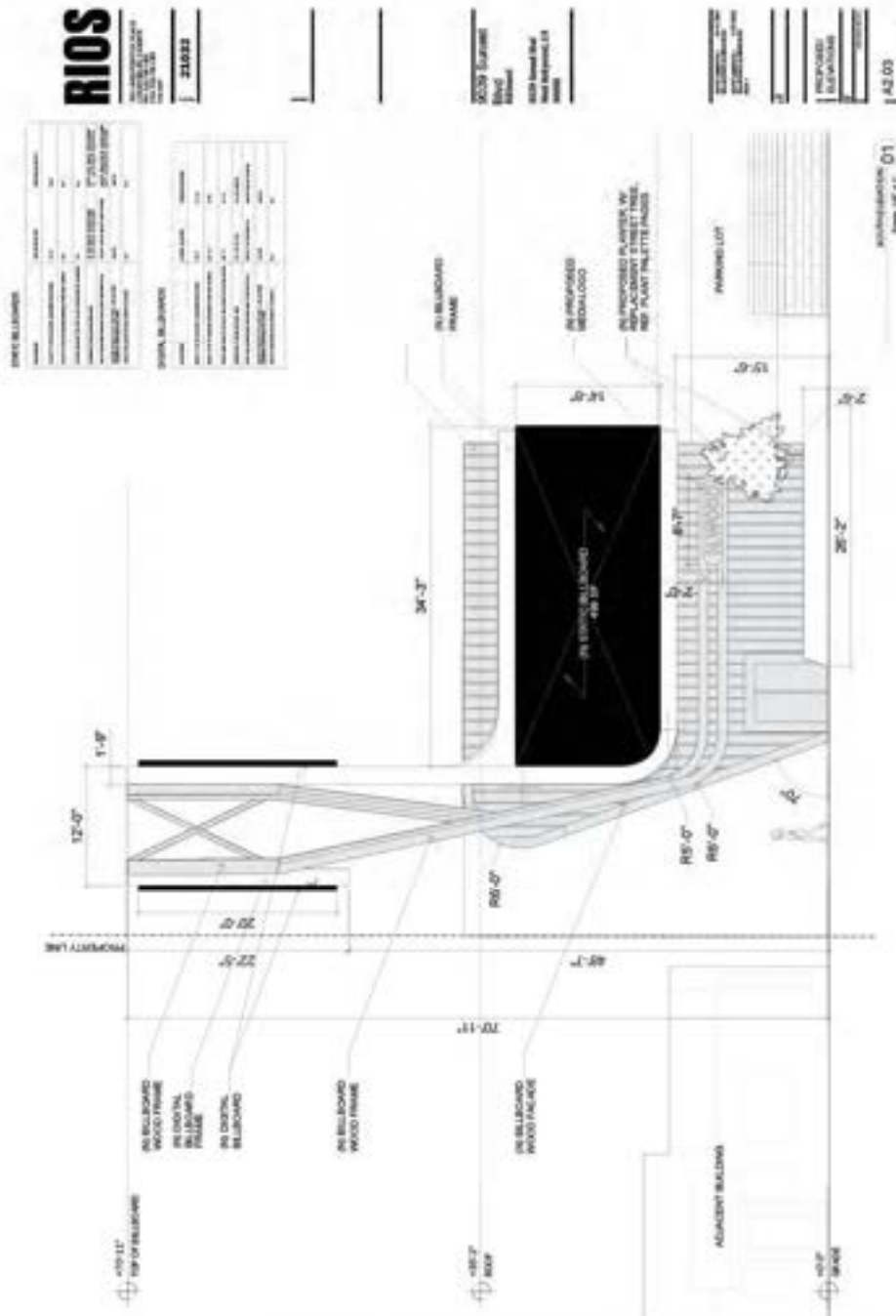


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS. PROJECT #: WH040
PAGE: 90



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

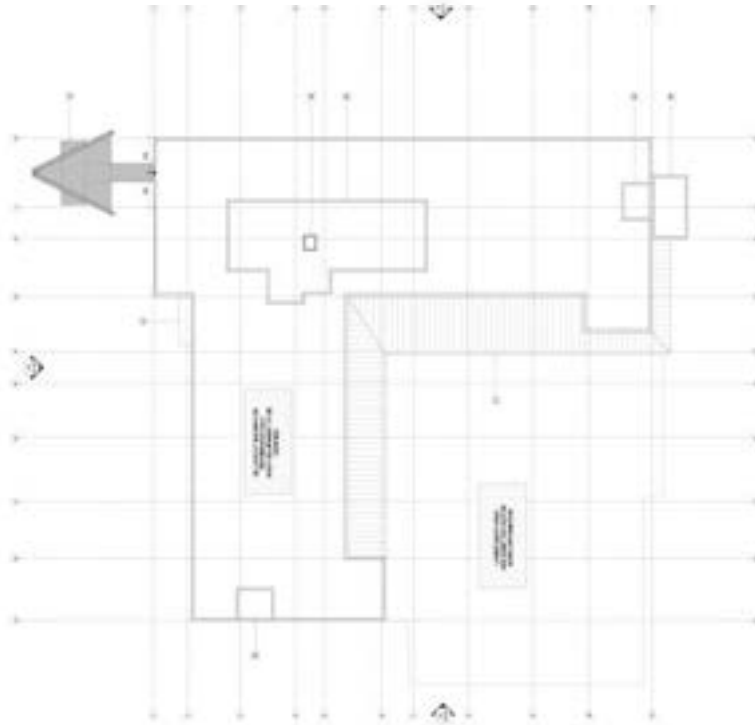
PROJECT #: WH040
PAGE: 91

GOOD PROJECT CO.
1111 1st Street, Suite 200
San Francisco, CA 94104
Tel: 415.398.1234
Fax: 415.398.1235
www.goodprojectco.com

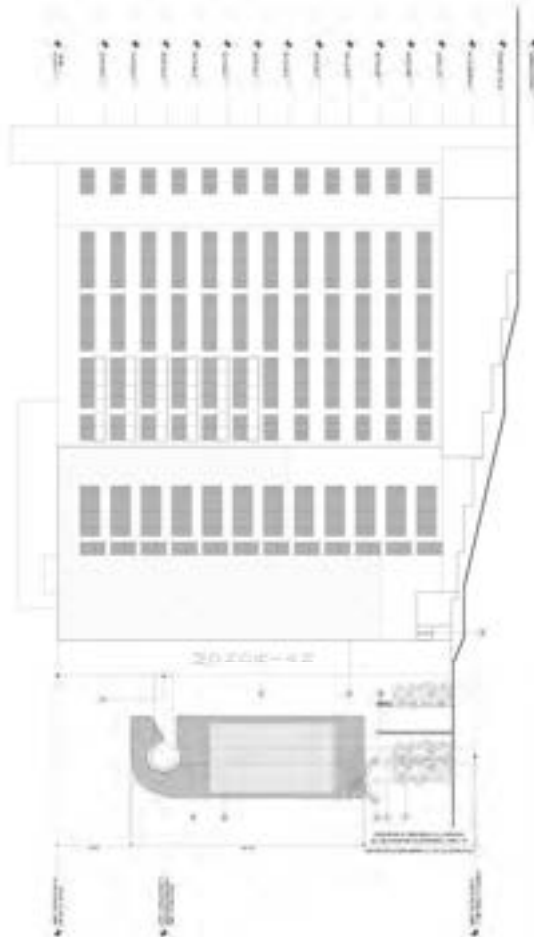
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DATE: 05/05/2025
BY: [Signature]
CHECKED BY: [Signature]
PROJECT NO.: WH040



SCALE: AS SHOWN
DATE: 05/05/2025
BY: [Signature]
CHECKED BY: [Signature]
PROJECT NO.: WH040



NOTE	REVISION	DATE
1. ALL DIMENSIONS ARE IN FEET AND INCHES. UNLESS OTHERWISE SPECIFIED, ALL DIMENSIONS ARE TO THE FACE OF THE MATERIAL.		
2. ALL MATERIALS SHALL BE OF THE HIGHEST QUALITY AND SHALL BE SUBJECT TO INSPECTION AND APPROVAL BY THE ARCHITECT.		
3. ALL MATERIALS SHALL BE OF THE HIGHEST QUALITY AND SHALL BE SUBJECT TO INSPECTION AND APPROVAL BY THE ARCHITECT.		
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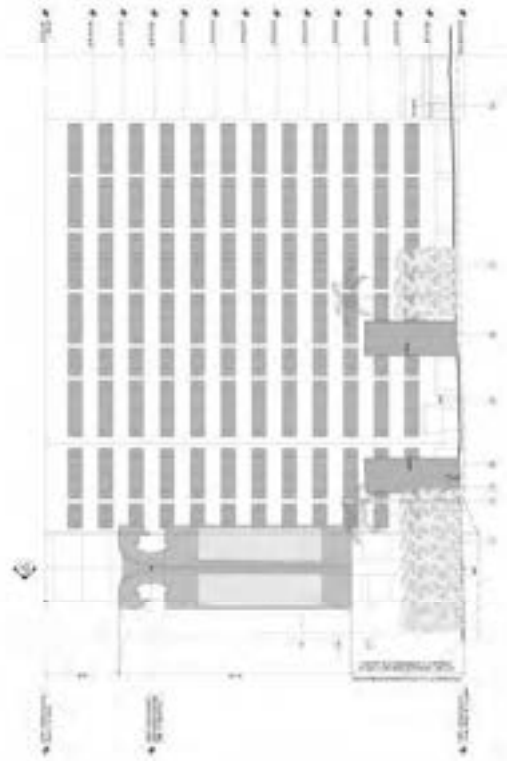


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
PAGE: 93

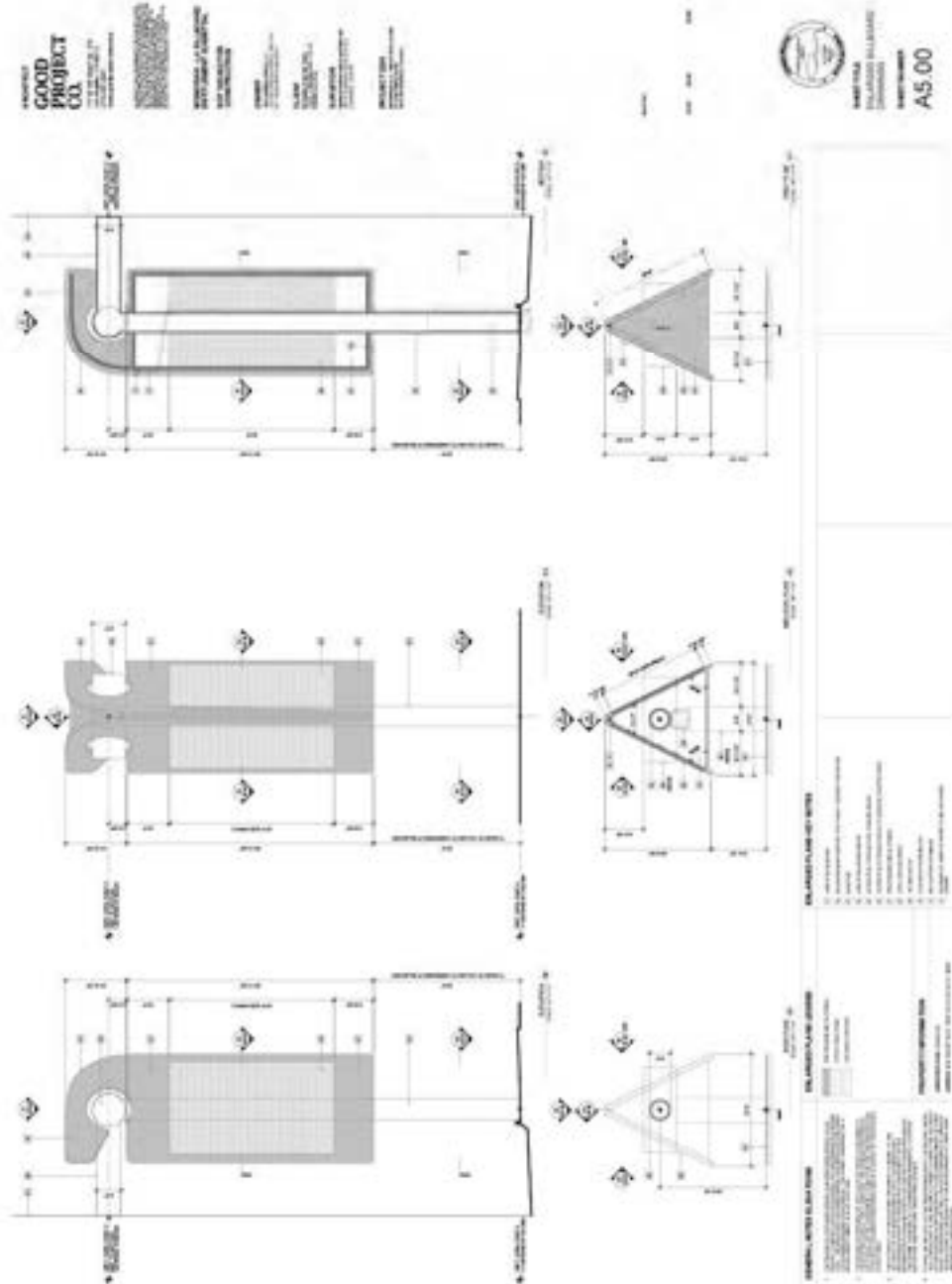
GOOD PROJECT CO.
1000 10th Street, Suite 100
San Francisco, CA 94103
Tel: 415.774.1000
Fax: 415.774.1001
www.goodprojectco.com

PROJECT TEAM
Project Manager: [Name]
Designer: [Name]
Engineer: [Name]
Architect: [Name]
City Engineer: [Name]

PROJECT INFORMATION
Project Name: [Name]
Project Number: [Number]
Sheet Number: A2.02



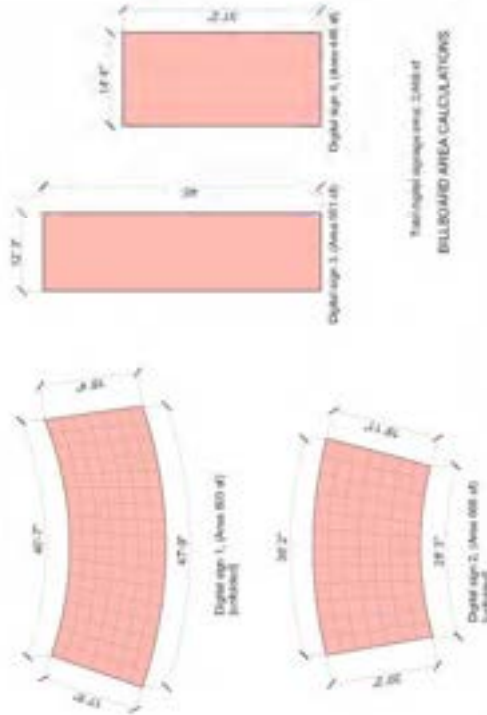
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2	SECTION 2: [Description]	[Date]
3	SECTION 3: [Description]	[Date]
4	SECTION 4: [Description]	[Date]
5	SECTION 5: [Description]	[Date]
6	SECTION 6: [Description]	[Date]
7	SECTION 7: [Description]	[Date]
8	SECTION 8: [Description]	[Date]
9	SECTION 9: [Description]	[Date]
10	SECTION 10: [Description]	[Date]







Volume 4: AUCRA



Training and support costs: £4000

The Spheres will integrate energy-efficient, sustainable features including solar panels, and invite public participation within its interior and below in the Public Plaza. The top sign is 803 sq. ft., the bottom sign area 668 sq. ft., +/-.

The digital screen on the east is 446 sq. ft., +/-, the screen on the west 551 sq. ft., +/-, these vertical signs plus the two screens integrated on the Sphere total 2,468 sq. ft., +/-, of digital signs.

The Spheres exterior includes a whimsical, yet functional design statement not designed for off-site advertising—a safe rotating globe of steel and glass, approximately 6 feet in diameter, rising slowly and continuously on a path from the back of the Sphere to the front.

Measurement	Existing billboard	Proposed billboard
Height to top of billboard, measured from grade. (Citywide height to height of billboard height)	40' - 0"	48' - 0"
Height to top of billboard, measured from roof edge (citywide height to height of billboard height)	22' - 0"	N/A
Distance between top of roof and lower edge of billboard	2' - 0"	N/A
Dimensions of billboard (sign area)	Top: 22' 0" x 32' 0" = 704 sq. ft. Side: 10' 0" x 32' 0" = 320 sq. ft.	Subtotal (sign area): 41 Sign: 42' 0" x 17' 3" = 725 sq. ft. 42 Sign: 42' 0" x 17' 3" = 725 sq. ft. 43 Sign: 42' 0" x 17' 3" = 725 sq. ft. 44 Sign: 42' 0" x 17' 3" = 725 sq. ft. 45 Sign: 42' 0" x 17' 3" = 725 sq. ft. 46 Sign: 42' 0" x 17' 3" = 725 sq. ft. 47 Sign: 42' 0" x 17' 3" = 725 sq. ft. 48 Sign: 42' 0" x 17' 3" = 725 sq. ft. 49 Sign: 42' 0" x 17' 3" = 725 sq. ft. 50 Sign: 42' 0" x 17' 3" = 725 sq. ft. 51 Sign: 42' 0" x 17' 3" = 725 sq. ft. 52 Sign: 42' 0" x 17' 3" = 725 sq. ft. 53 Sign: 42' 0" x 17' 3" = 725 sq. ft. 54 Sign: 42' 0" x 17' 3" = 725 sq. ft. 55 Sign: 42' 0" x 17' 3" = 725 sq. ft. 56 Sign: 42' 0" x 17' 3" = 725 sq. ft. 57 Sign: 42' 0" x 17' 3" = 725 sq. ft. 58 Sign: 42' 0" x 17' 3" = 725 sq. ft. 59 Sign: 42' 0" x 17' 3" = 725 sq. ft. 60 Sign: 42' 0" x 17' 3" = 725 sq. ft. 61 Sign: 42' 0" x 17' 3" = 725 sq. ft. 62 Sign: 42' 0" x 17' 3" = 725 sq. ft. 63 Sign: 42' 0" x 17' 3" = 725 sq. ft. 64 Sign: 42' 0" x 17' 3" = 725 sq. ft. 65 Sign: 42' 0" x 17' 3" = 725 sq. ft. 66 Sign: 42' 0" x 17' 3" = 725 sq. ft. 67 Sign: 42' 0" x 17' 3" = 725 sq. ft. 68 Sign: 42' 0" x 17' 3" = 725 sq. ft. 69 Sign: 42' 0" x 17' 3" = 725 sq. ft. 70 Sign: 42' 0" x 17' 3" = 725 sq. ft. 71 Sign: 42' 0" x 17' 3" = 725 sq. ft. 72 Sign: 42' 0" x 17' 3" = 725 sq. ft. 73 Sign: 42' 0" x 17' 3" = 725 sq. ft. 74 Sign: 42' 0" x 17' 3" = 725 sq. ft. 75 Sign: 42' 0" x 17' 3" = 725 sq. ft. 76 Sign: 42' 0" x 17' 3" = 725 sq. ft. 77 Sign: 42' 0" x 17' 3" = 725 sq. ft. 78 Sign: 42' 0" x 17' 3" = 725 sq. ft. 79 Sign: 42' 0" x 17' 3" = 725 sq. ft. 80 Sign: 42' 0" x 17' 3" = 725 sq. ft. 81 Sign: 42' 0" x 17' 3" = 725 sq. ft. 82 Sign: 42' 0" x 17' 3" = 725 sq. ft. 83 Sign: 42' 0" x 17' 3" = 725 sq. ft. 84 Sign: 42' 0" x 17' 3" = 725 sq. ft. 85 Sign: 42' 0" x 17' 3" = 725 sq. ft. 86 Sign: 42' 0" x 17' 3" = 725 sq. ft. 87 Sign: 42' 0" x 17' 3" = 725 sq. ft. 88 Sign: 42' 0" x 17' 3" = 725 sq. ft. 89 Sign: 42' 0" x 17' 3" = 725 sq. ft. 90 Sign: 42' 0" x 17' 3" = 725 sq. ft. 91 Sign: 42' 0" x 17' 3" = 725 sq. ft. 92 Sign: 42' 0" x 17' 3" = 725 sq. ft. 93 Sign: 42' 0" x 17' 3" = 725 sq. ft. 94 Sign: 42' 0" x 17' 3" = 725 sq. ft. 95 Sign: 42' 0" x 17' 3" = 725 sq. ft. 96 Sign: 42' 0" x 17' 3" = 725 sq. ft. 97 Sign: 42' 0" x 17' 3" = 725 sq. ft. 98 Sign: 42' 0" x 17' 3" = 725 sq. ft. 99 Sign: 42' 0" x 17' 3" = 725 sq. ft. 100 Sign: 42' 0" x 17' 3" = 725 sq. ft.

SALE STUDIOS
1000 10th Ave. Suite 100
San Francisco, CA 94103
Tel: 415.398.1000
Fax: 415.398.1001
www.salestudios.com

SUNSET VIEW PLAZA LLC
1000 10th Ave. Suite 100
San Francisco, CA 94103
Tel: 415.398.1000
Fax: 415.398.1001
www.sunsetviewplaza.com

MOJO ENGINEERING
1000 10th Ave. Suite 100
San Francisco, CA 94103
Tel: 415.398.1000
Fax: 415.398.1001
www.mojoengineering.com

WAYNE ADRIANSON
1000 10th Ave. Suite 100
San Francisco, CA 94103
Tel: 415.398.1000
Fax: 415.398.1001
www.wayneadrianson.com

SOLA LANDSCAPE ARCHITECT
1000 10th Ave. Suite 100
San Francisco, CA 94103
Tel: 415.398.1000
Fax: 415.398.1001
www.sola-landscape.com

Project: SALES SUNSET MOORELAND
Owner: SUNSET VIEW PLAZA LLC
Design Firm: MOJO ENGINEERING
Architect: WAYNE ADRIANSON
Landscaper: SOLA LANDSCAPE ARCHITECT

Billboard Area Calculations

Digital sign 1 (Area 803 sq. ft.)
437' x 17' 3" = 7,441 sq. ft.

Digital sign 2 (Area 668 sq. ft.)
382' x 28' 3" = 10,818 sq. ft.

Digital sign 3 (Area 725 sq. ft.)
427' x 17' 3" = 7,441 sq. ft.

Digital sign 4 (Area 725 sq. ft.)
427' x 17' 3" = 7,441 sq. ft.

Total: 2,468 sq. ft.

Billboard Area Calculations

Digital sign 1 (Area 803 sq. ft.)
437' x 17' 3" = 7,441 sq. ft.

Digital sign 2 (Area 668 sq. ft.)
382' x 28' 3" = 10,818 sq. ft.

Digital sign 3 (Area 725 sq. ft.)
427' x 17' 3" = 7,441 sq. ft.

Digital sign 4 (Area 725 sq. ft.)
427' x 17' 3" = 7,441 sq. ft.

Total: 2,468 sq. ft.

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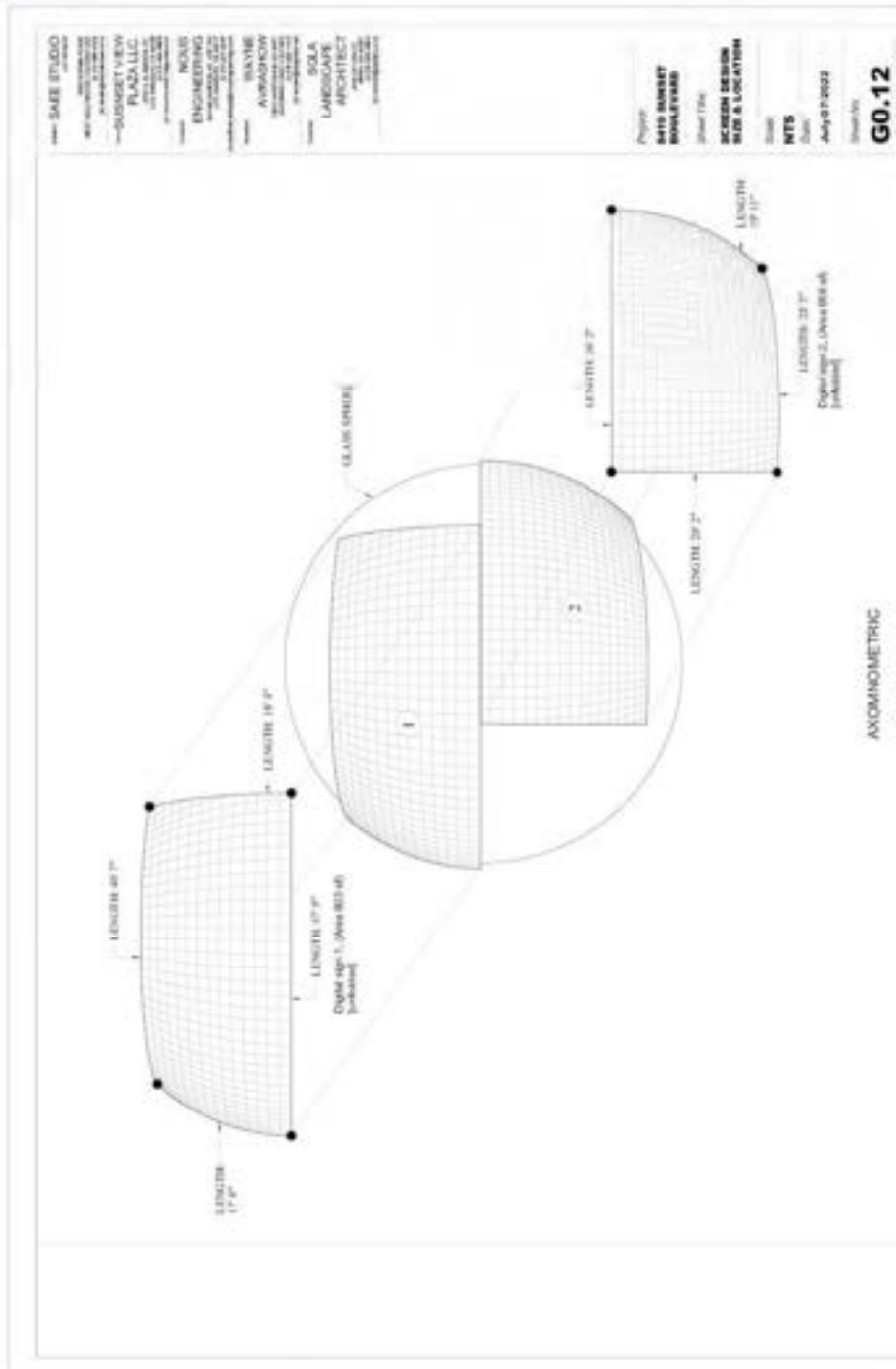
Total: 2,468 sq. ft.

G0.11

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

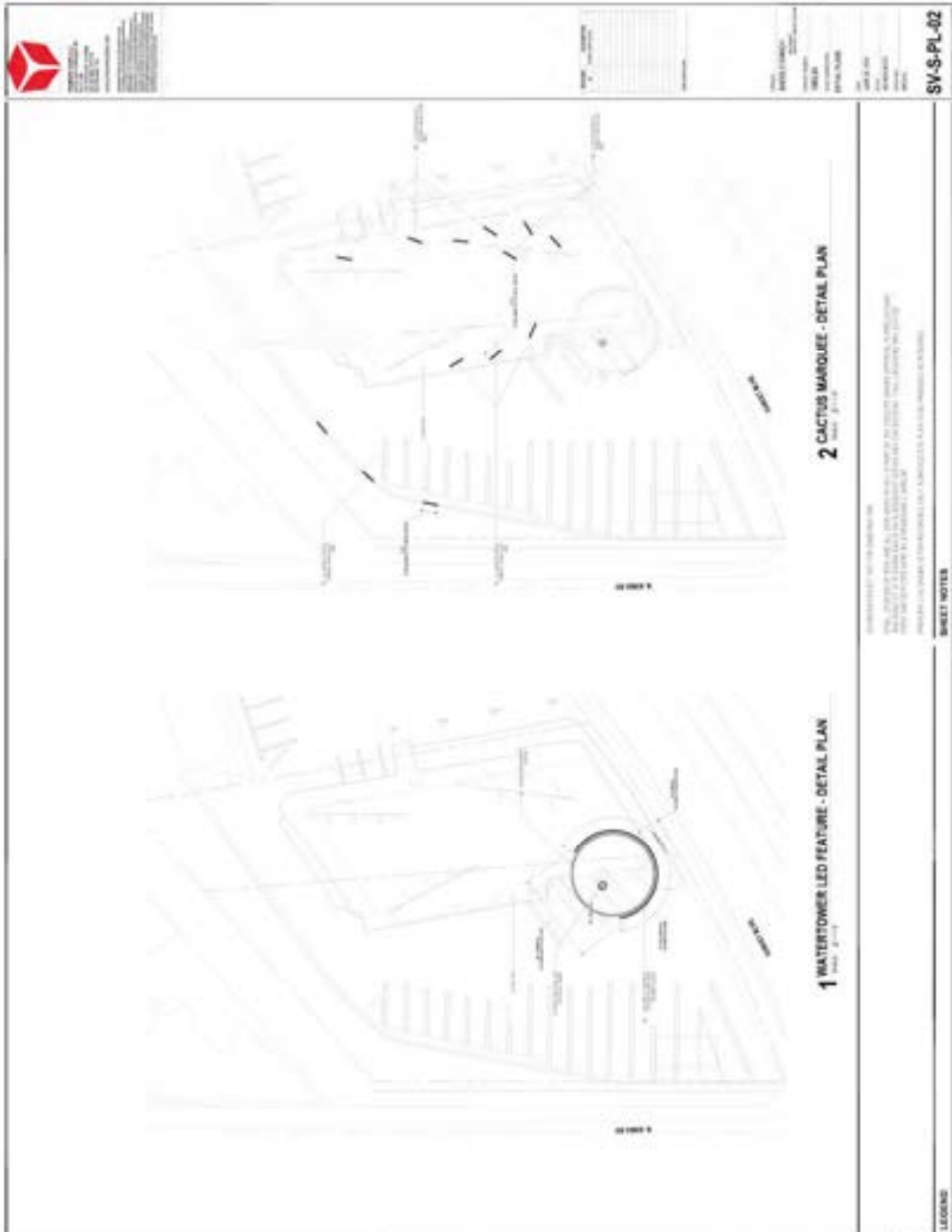
PROJECT #: WH040

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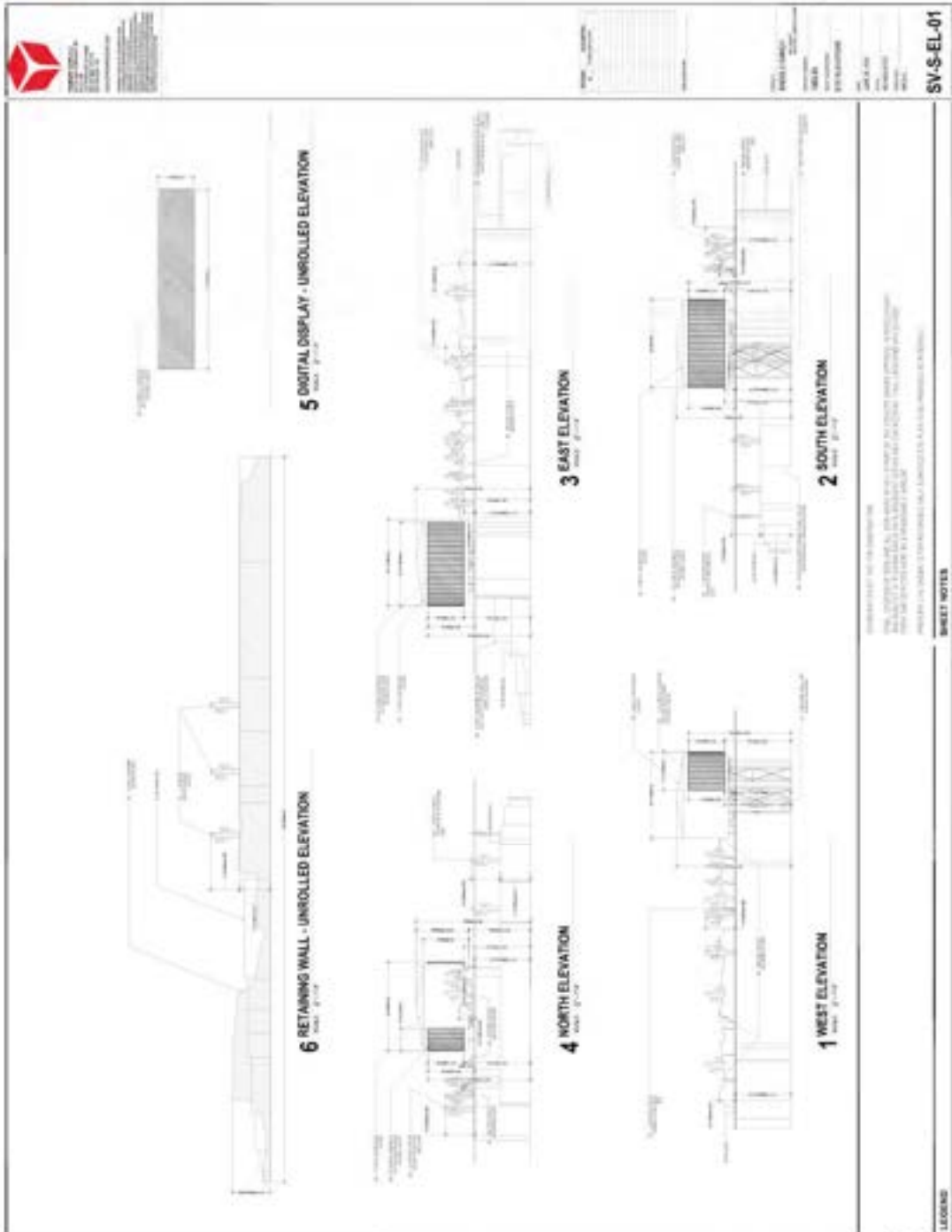
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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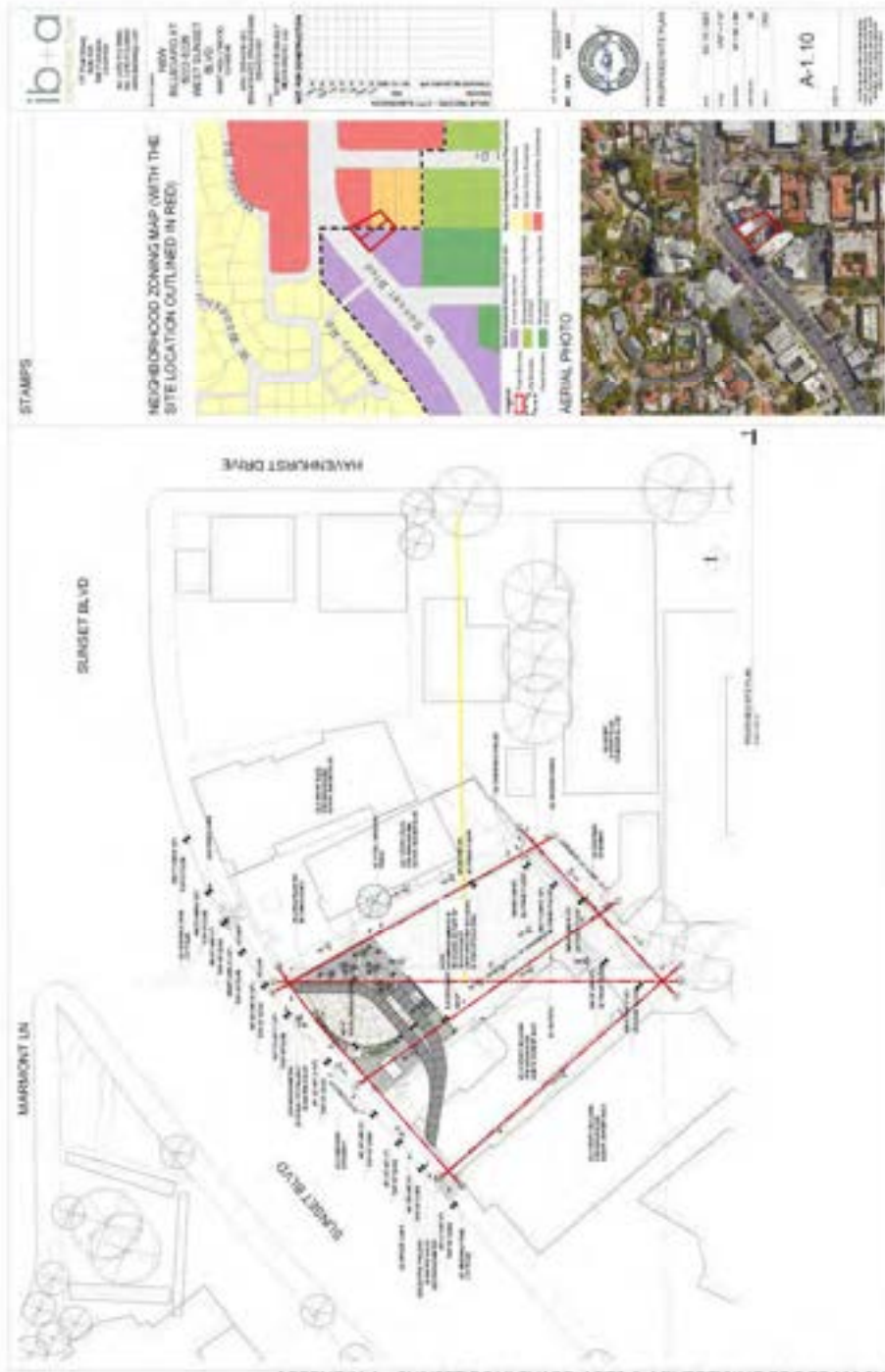
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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100

PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 105

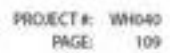


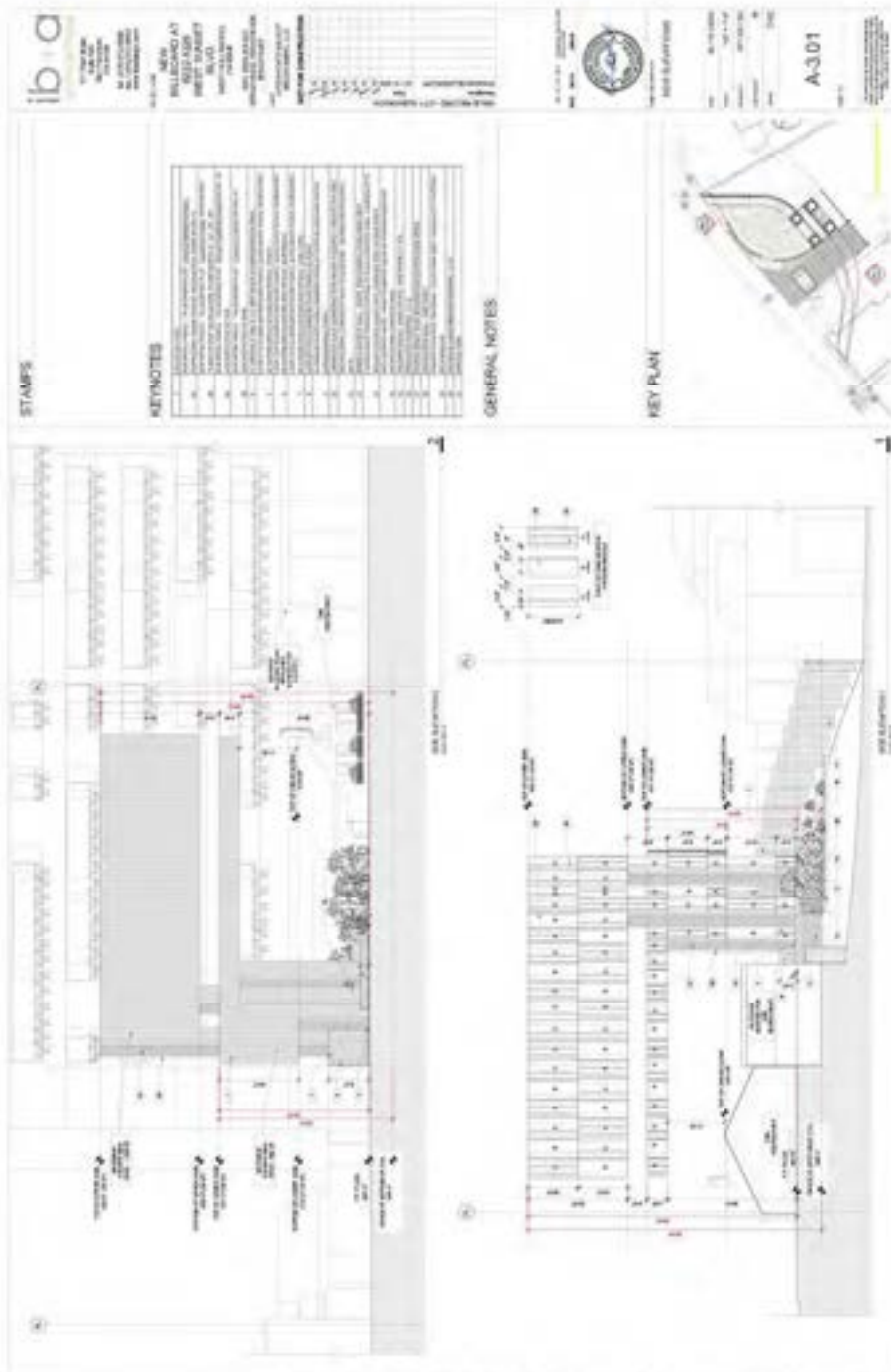
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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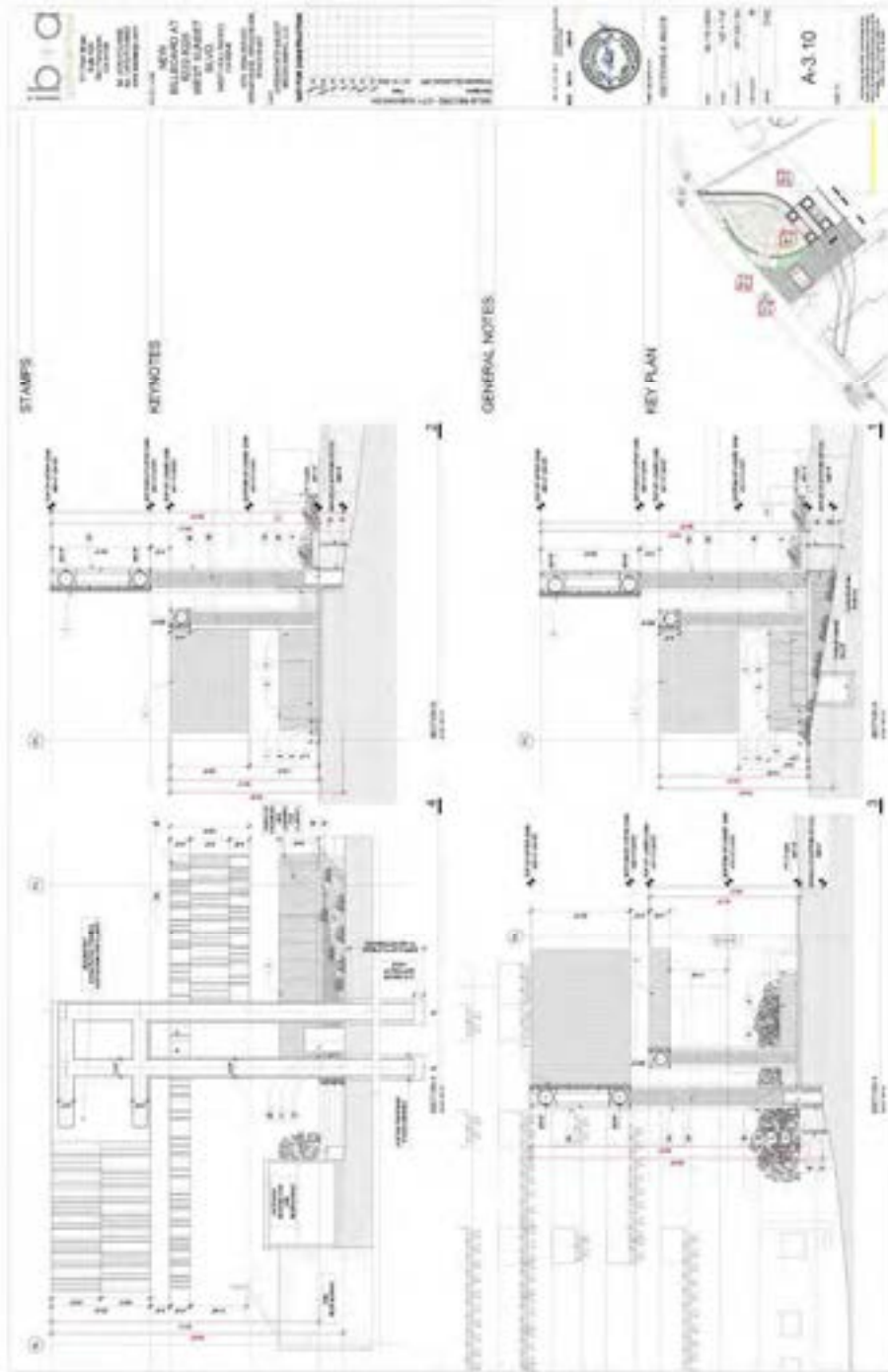
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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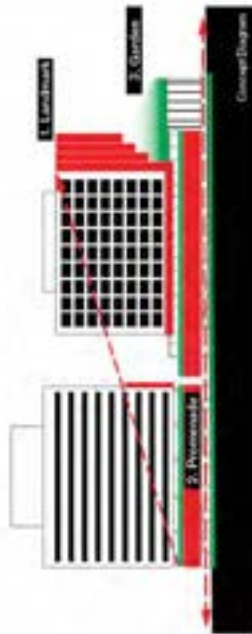
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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Patterns Architecture Culture

Three Elements, One Place

Gateway into WeHo, not only a Landmark but a Place



A new urban destination at the intersection of culture and retail, media and art, landscape, and architecture; a true contemporary gateway. Articulating and integrating, in a single, multi-layered and multidimensional project, a uniquely designed transition between the civic, monumental scale of architectural landmarks, and the more intimate scale of the human body expressed by pedestrian experience.

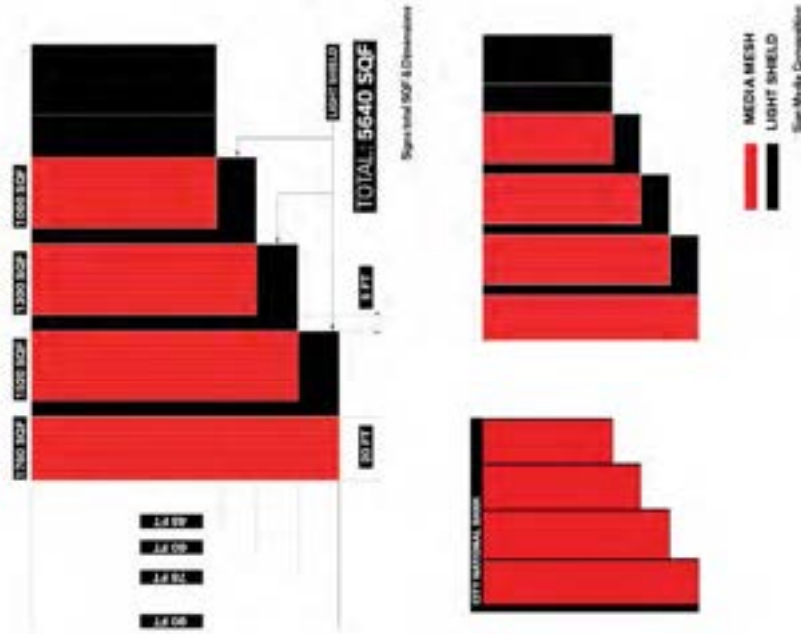
Our proposal for 9220-9265 Sunset Blvd. aims to create a true gateway on the westernmost portion of the Sunset Strip by combining and integrating two ambitions.

First, by creating a new landmark that dramatically celebrates the beginning and end of West Hollywood (depending on the direction one is approaching from), by expressing and enhancing a prominent architectural corner with a colossal digital waterfall, an articulate cascade of media, art and advertisement.

Windowwall | Off-site Advertising Signage Program

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 115



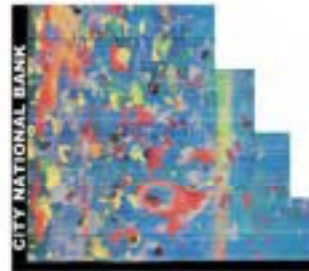
Patterns Architecture Culture

Wonderwall

Media Approach - Integrating Arts & Advertising



Advertisement

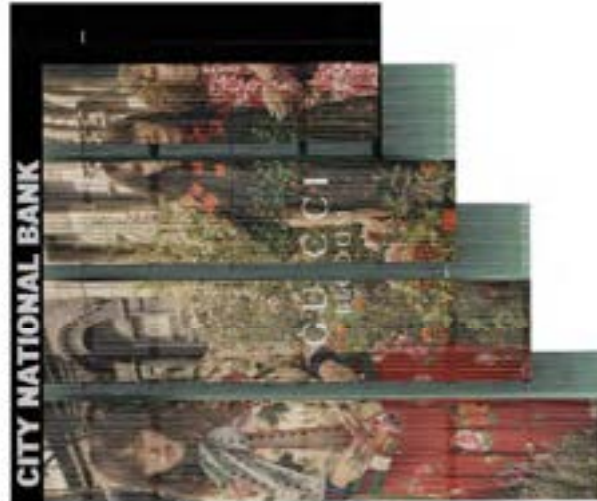


Art on Display

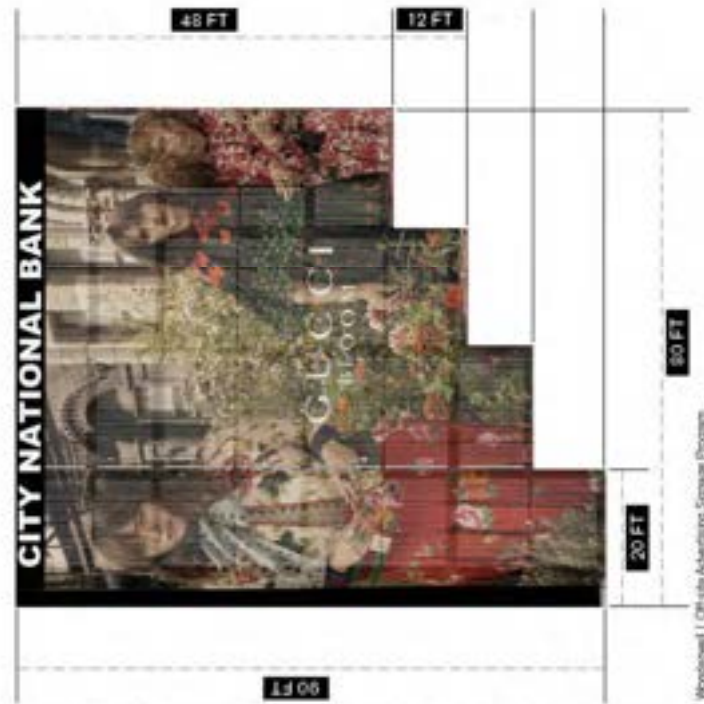
A new landmark that dramatically celebrates the beginning and end of West Hollywood, by expressing and enhancing a prominent architectural corner with a colossal digital waterfall, an articulate cascade of media, art and advertisement leading to a roof garden which along the new sign.

Wonderwall | Off-site Advertising Signage Program

Side Sign Elevation

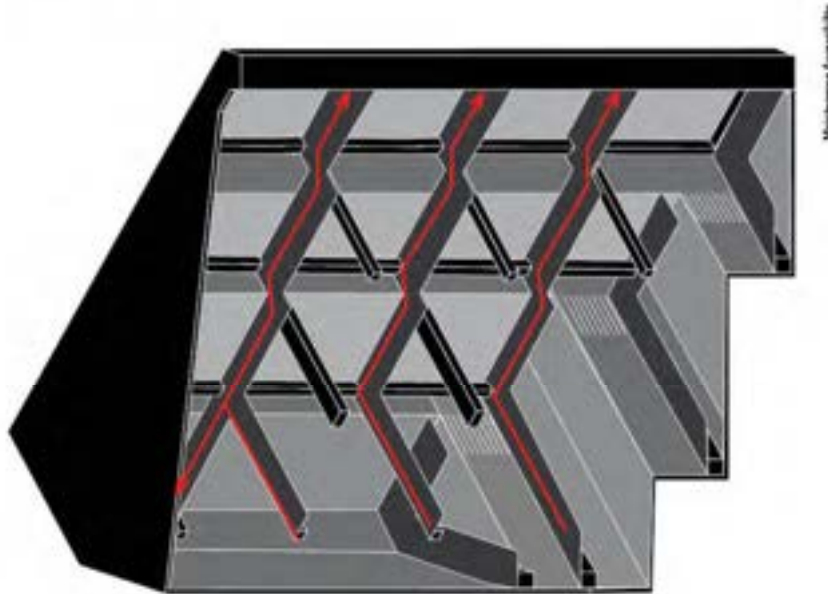


Front Sign Elevation



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

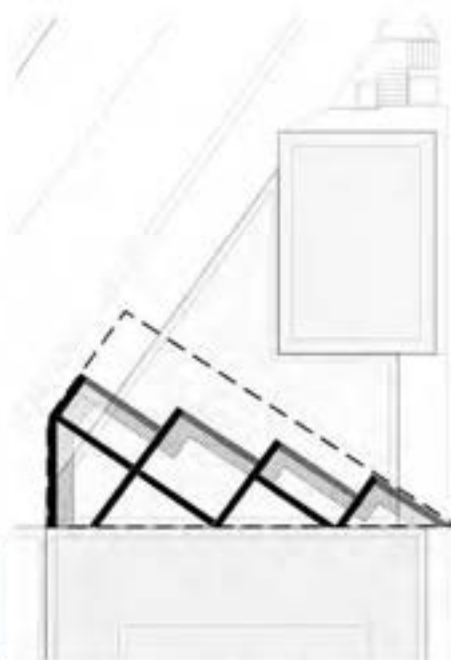
PROJECT #: WH040
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Maintenance Accessibility

Wonderwall
Structure & Maintenance Approach

Fabio Zangoli, S.E.
Principal - Labib Funk + Associates [LFA]



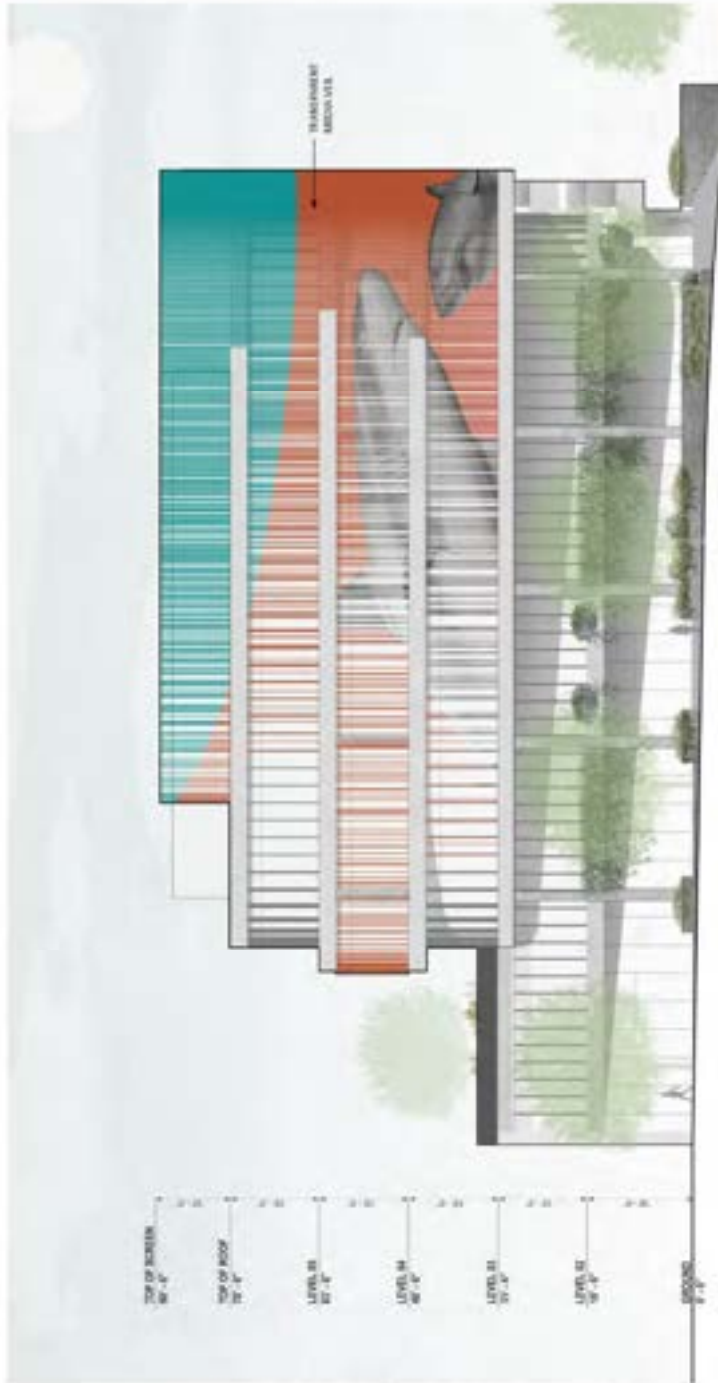
Structure and Overall Plan

Wonderwall | Off-site Advertising Signage Program

Site Plan and Local Context



North Elevation



WEST HAVEN BOULEVARD ARTS & ADVERTISING SIGN SCREEN SPECIFICATIONS | CITY OF WEST HOLLYWOOD

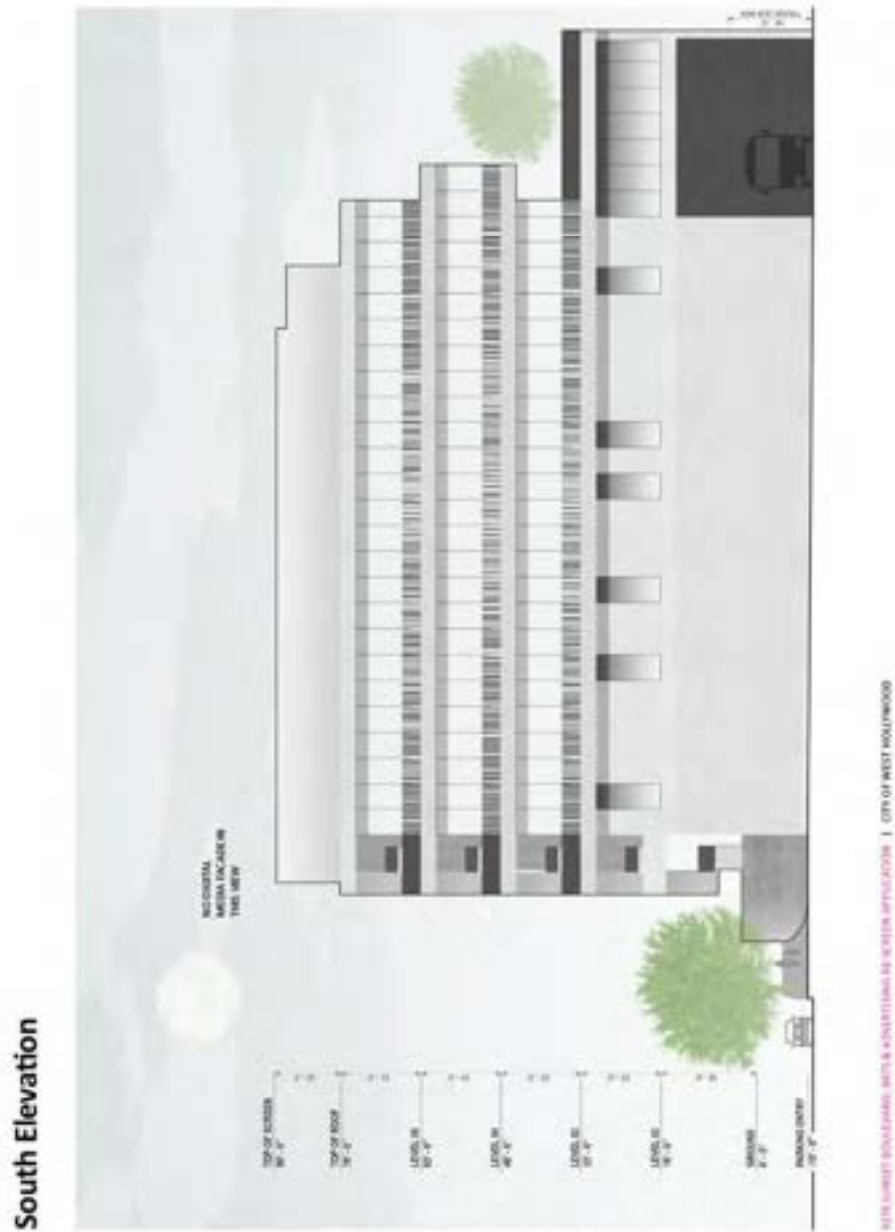
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 120

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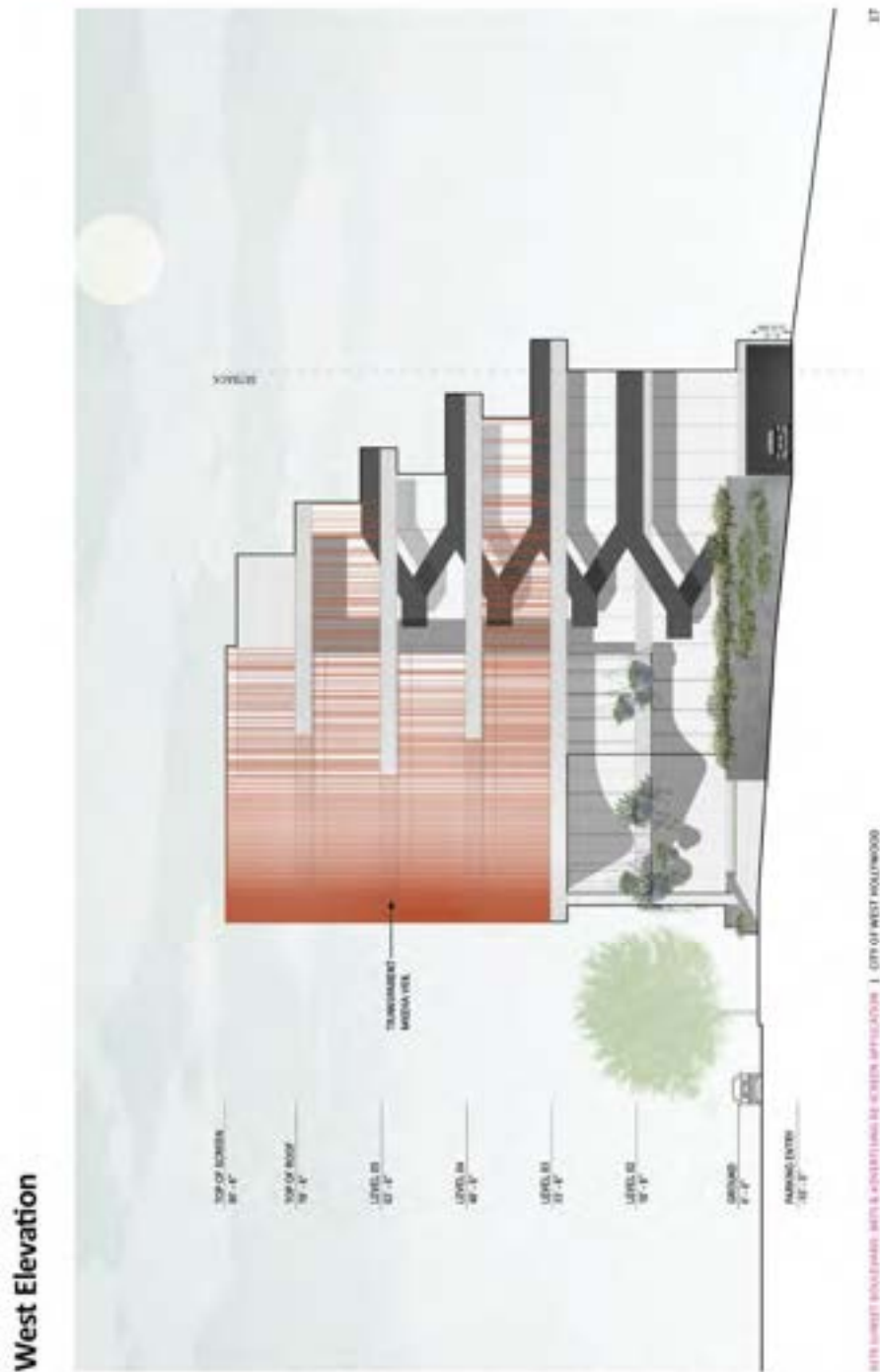


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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH1040
PAGE: 122

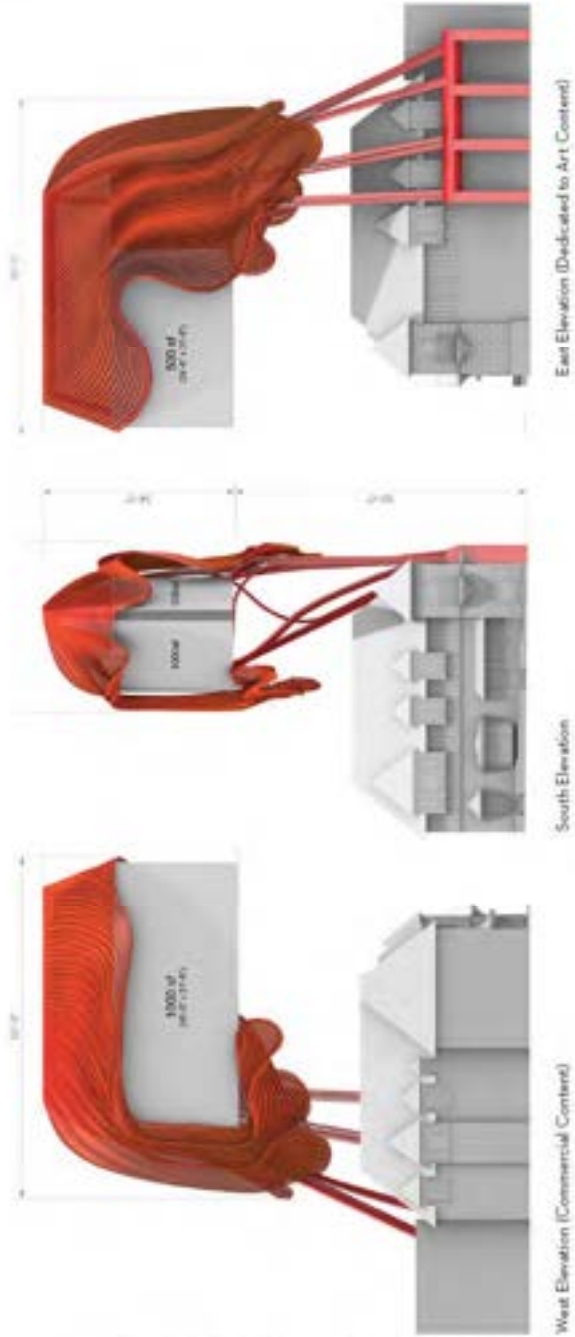


APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
PAGE: 123

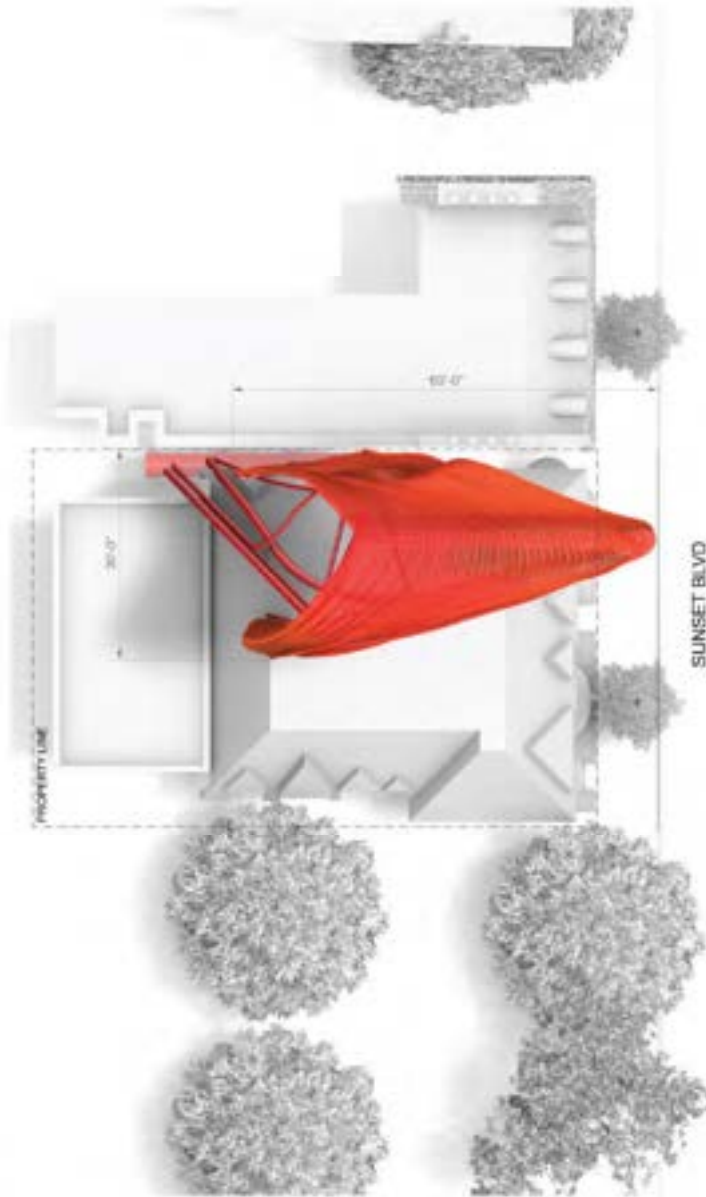


4th Quadrant
BUILDING ELEVATIONS



100 WEST AVENUE - DESIGN EXCELLENCE SCREENING APPLICATION

100 WEST AVENUE - DESIGN EXCELLENCE SCREENING APPLICATION



100 SUNSET BLVD - DESIGN EXCELLENCE SCREENING APPLICATION

100 SUNSET BLVD - DESIGN EXCELLENCE SCREENING APPLICATION

4C. Redesign
SITE PLAN

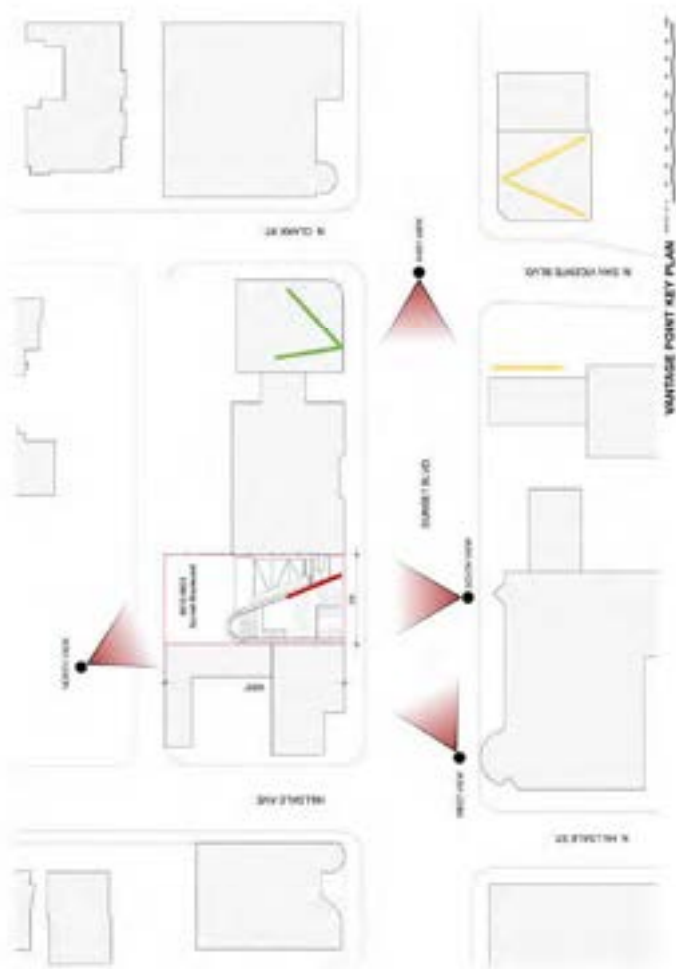
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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This sign is the focal point of The Clearing's celebration of LED parents—setting the mood and driving the storytelling. The display is high-resolution and high-quality, giving the artists' works, public service announcements, and ads appearing within it a special vibrancy.



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Site Plan

PROPOSED: DARTMOUTH BILLBOARD LOCATION

George Lindbeck Business Administration, Lund University

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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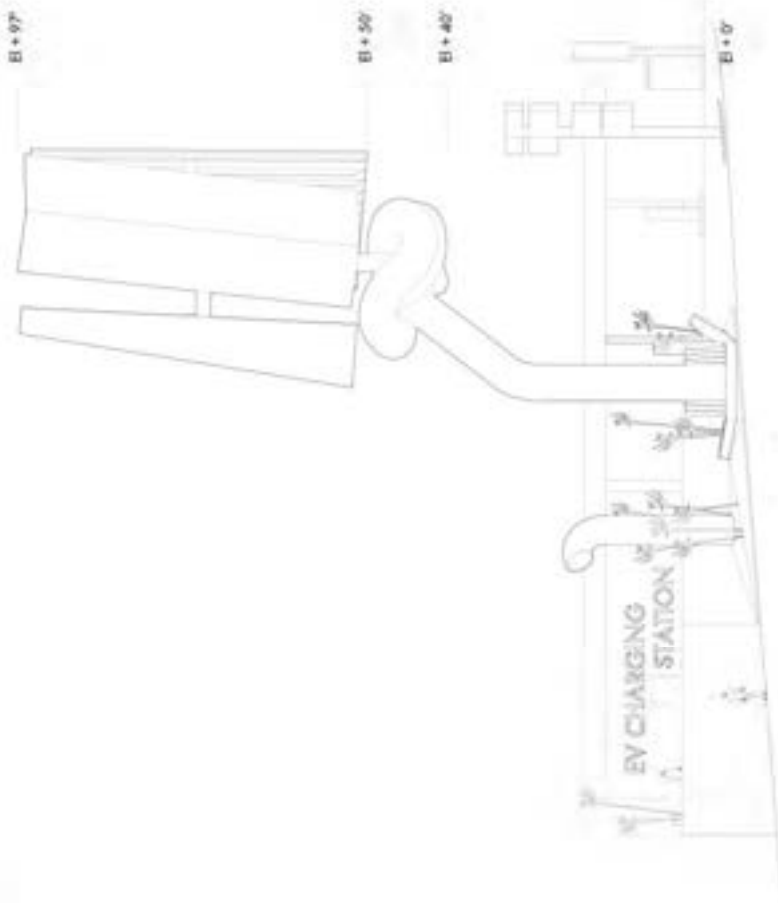
BRUCE T. HANLEY, JR., DEPARTMENT OF CHEMISTRY, UNIVERSITY OF CALIFORNIA

RELIOSO NUT OBIU
SOUWMAN ZAGO

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS.

PROJECT #: WH040
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40. ARCHITECTURE & ART
ELEVATION



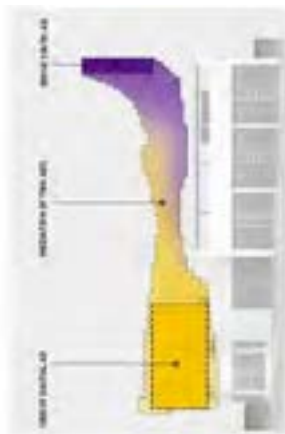
34
BNA SUNSET BLVD - DESIGN EXCELLENCE SCREENING APPLICATION

PROPOSED OBM ROUWMAN ZAGO

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

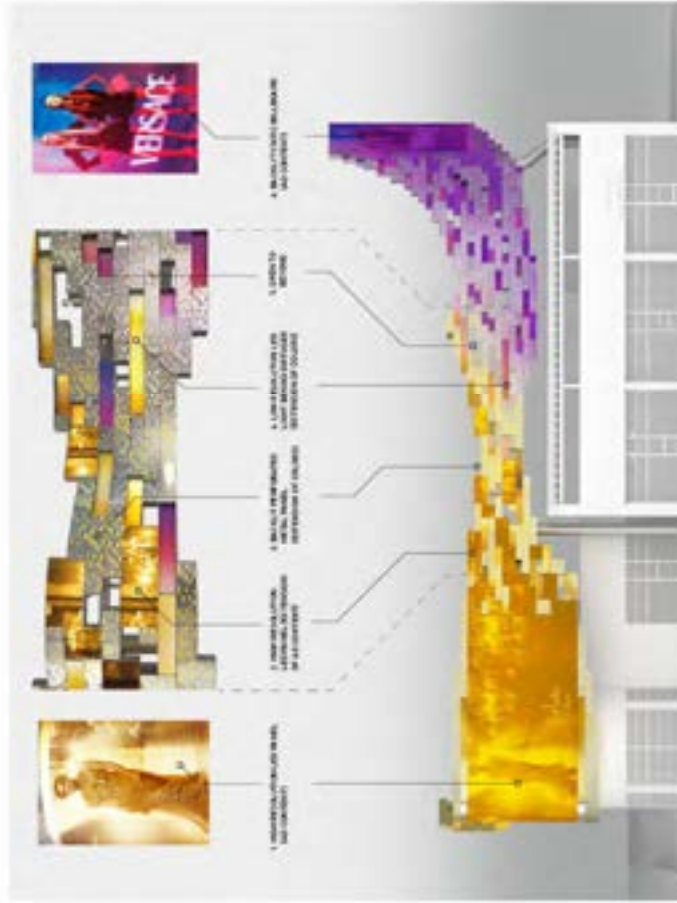
PROJECT #: WH040
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4A. ARCHITECTURE
CONCEPT



MATERIAL EFFECT

The facade displays two advertisements, one digital and one static, and mediates them through a dynamic gesture. The material effect is defined through the relationship of the two images. Each image is dissolved into a constellation of small particles of light, allowing their colors to be carried across the facade and meet in a dynamic interchange before being condensed into the other. The use of LED screen panels, diffused LED lighting, and bacille perforated metal panels allow for the creation of this ambient gradation. This ephemeral effect animates the dynamic flow of energy established by the following forms of the facade.



This Case: OBB/M AHA

WFS/MSH/INT - DESIGN EXPERIENCE & MARKING APPLICATION

13



4C. ARCHITECTURE
SITE PLAN

NOT SUNSET BLVD - DESIGN EXCELLENCE SCREENING APPLICATION

This Case: O/E/M **AHA**

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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NOTE: THESE PLANS ARE A DESIGN PRELIMINARY AND SUBJECT TO CHANGE.

The City of Los Angeles
CIB/AL
AHA

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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4D ARCHITECTURE
BUILDING ELEVATIONS



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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APP: 1.000001 Signage - Appendix A - Sunset Boulevard Arts & Advertising Program Sign Plans

This Case: OB M AHA



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

Thru-Cage QB M AHA



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PROJECT #: WH040
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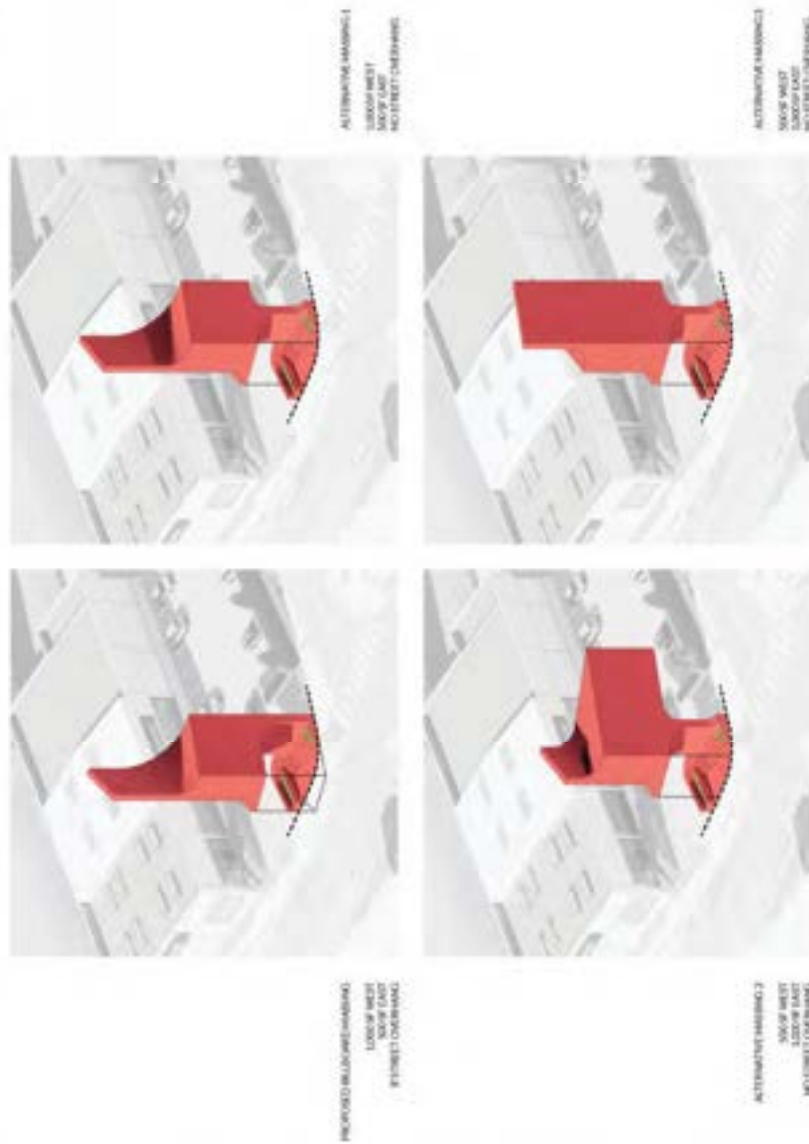
PLANS



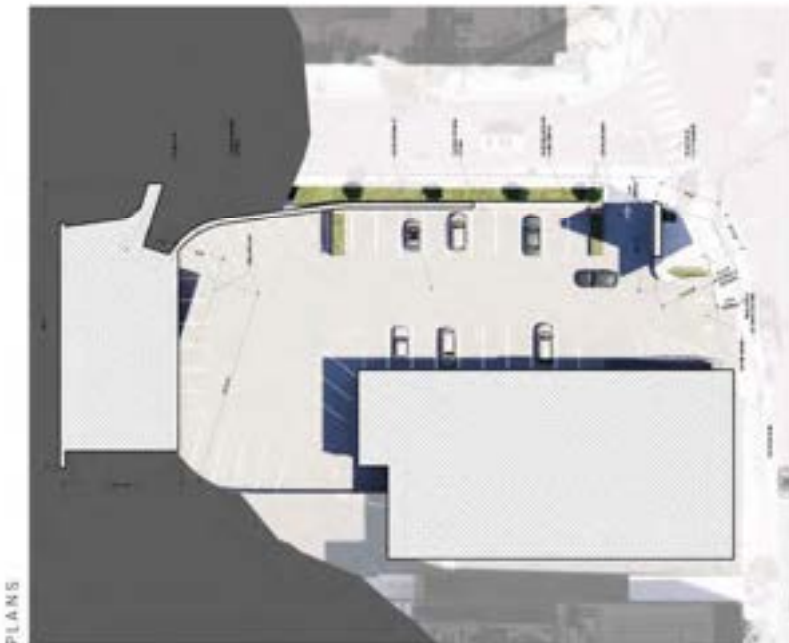
APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

PROJECT #: WH040
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BILLBOARD MASSING RESPONSES TO CONSTRAINTS DON'T LIMIT CREATIVE POTENTIAL OF FINAL DESIGN



8881 SUNSET BOULEVARD / DESIGN EXCELLENCE RESCREEN APPLICATION



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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ELEVATIONS

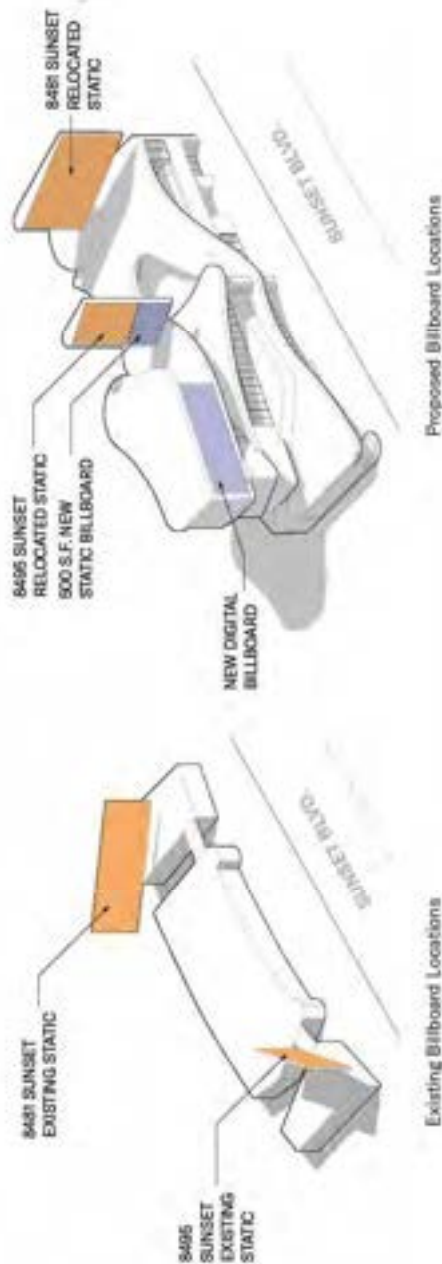


PROPOSAL OVERVIEW

PROJECT SCOPE

The redevelopment of the 3-building parcel will include the relocation of existing static billboards at 8495 Sunset and 8481 Sunset. These relocations will obtain necessary approvals through the administrative process outlined under the City of West Hollywood's Off-Site Signage Policy and are not a part of this application for new signage.

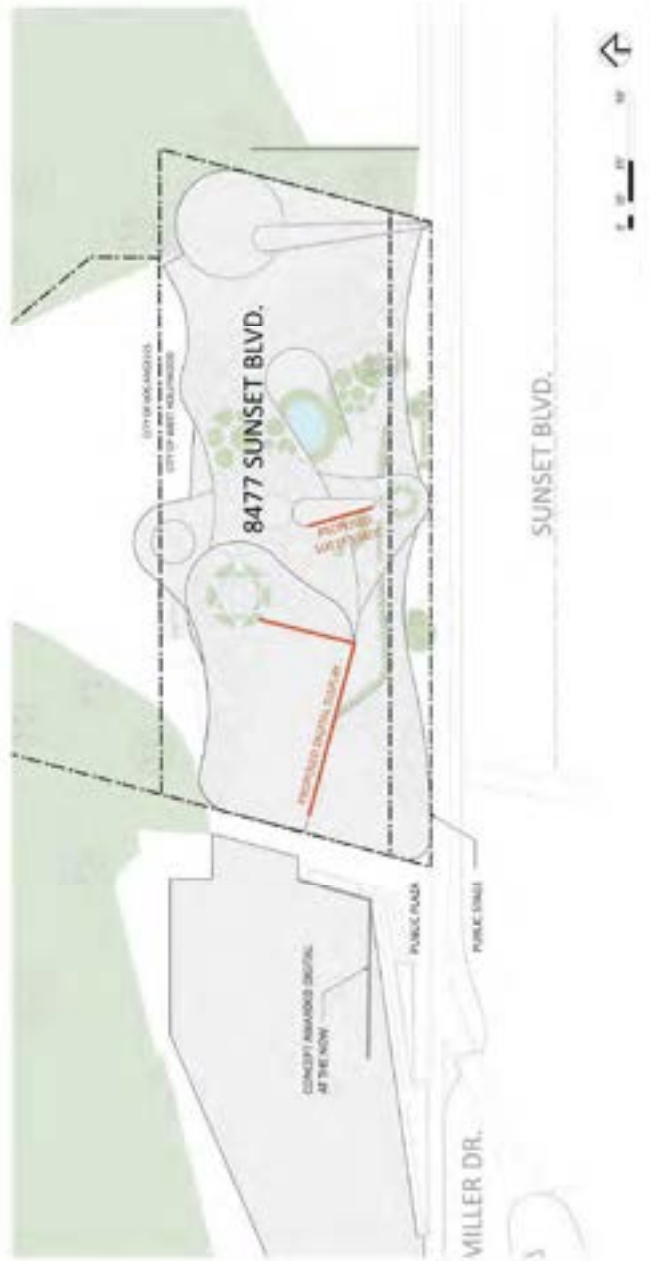
This application is limited to the new digital billboard and 500 SF of supplemental static signage placed adjacent to the relocated 8495 Sunset signage.



THE NOW OR LUNO

8481 SUNSET BLVD - DESIGN EXCELLENCE SIGN/BILLBOARD SOLUTION

40. ARCHITECTURE
SITE PLAN

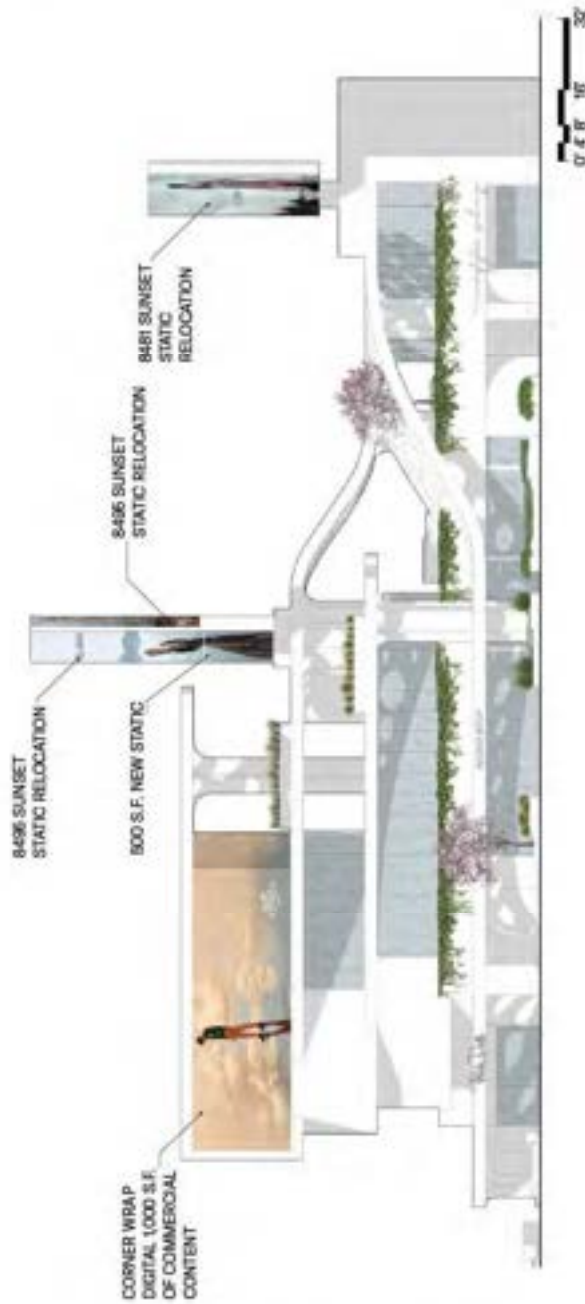


THE NOW OR LUNO

8477 SUNSET BLVD. - DESIGN EXCELLENCE INTERNATIONAL PRODUCTION 3/4

2.0-9

46. ARCHITECTURE
BUILDING ELEVATION



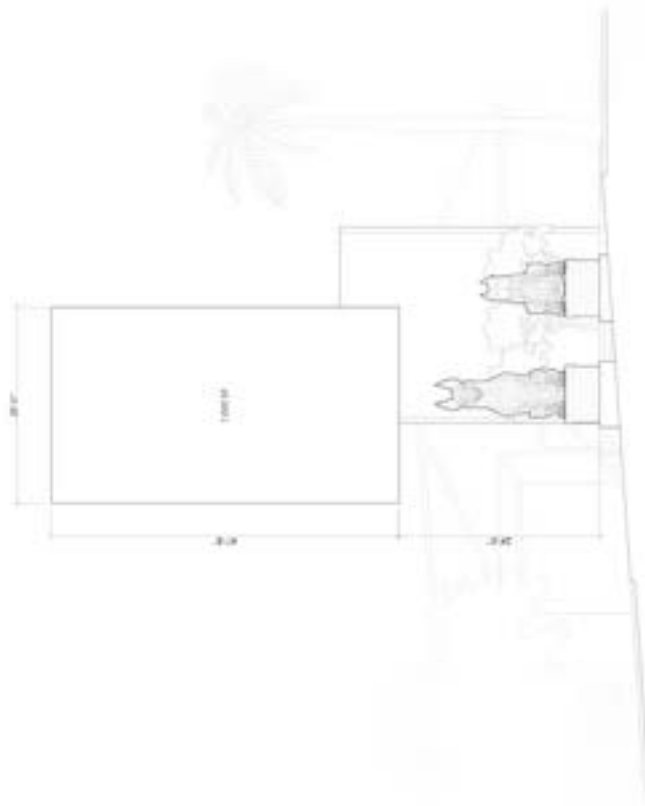
THE NOW ON LUNO

8481 SUNSET BLVD - DESIGN EXCELLENCE INTERMEDIA PRODUCTION 25



APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS PROJECT #: WH040
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4E PUBLIC ART
ELEVATIONS



SEE SHEET 2.0-11 - SIGNAGE INSTALLATION APPLICATIONS

RETRACTED VIEW
SEE SHEET 2.0-11

OBSCURE VISIBILITY

APPENDIX A - SUNSET BOULEVARD ARTS & ADVERTISING PROGRAM SIGN PLANS

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APPENDIX B.

City of West Hollywood Ordinance No. 19-1063, Attachment A, pgs. 13, 14, 15

5. **Lighting and Operational Standards.** All new or modified off-site advertising signs, architectural lighting, and temporary displays shall comply with the following luminance and operational standards.
- a. **Hours of Operation:** All digital billboards shall meet the following limits for time of day and ambient lighting conditions:
 - i. Sign luminance shall change during each day on the following schedule:
 - 1. Daytime: From sunrise until 20 minutes prior to sunset, luminance shall not exceed 6,000 candelas per meter squared. Any portions of signs that are less than 10' above adjacent side shall not exceed 2,400 candelas.
 - 2. Evening: From sunset until 20 minutes prior to sunrise Luminance shall not exceed 300 candelas per meter squared.
 - 3. After Hours: From 2:00 am until sunrise, no animated content or moving patterns shall be permitted.
 - b. **Illuminance**
 - i. Illuminance from signs or architectural lights shall not exceed 1.4 foot candles at any adjacent residential zoned property line.
 - c. **Digital Sign Control and Transitions.**
 - i. Sign luminance shall transition smoothly between the hours of operation limits above over a time period of no less than 20 minutes. All transitions shall be completed so that the maximum allowable luminance is achieved by the stated time listed above.
 - ii. When ambient sunlight illuminance during daytime is less than 100 foot candles for more than one (1) hour, the digital billboard should transition at a smooth rate of change from the daytime luminance level permitted above to the evening luminance level permitted at a suggested rate of no less than 20 minutes.
 - iii. Each image displayed on a digital billboard shall not be refreshed more often than once every 8 seconds.
 - iv. Each image displayed on a digital billboard (i.e., each individual advertisement or artwork) shall fade in from the previous image over no less than one (1) second, and shall fade out over no less than one (1) second to the image of the immediately succeeding content.
 - d. **Visual Comfort and Contrast Control**
 - i. Digital billboards shall not incorporate driver interaction features.
 - ii. No signs shall use colors or images that replicate or could be confused with traffic safety signage.
 - iii. No signs shall use scrolling text.
 - iv. Signs shall not use stroboscopic or flashing images which rapidly change direction, oscillate, flash or reverse in contrast.
 - v. Animated content and moving images shall be designed specifically for the size and format of the digital billboard.
 - vi. Animated content shall not exhibit
 - 1. Rapidly changing images shall use dissolves for transitions between static images, and between static and animated content;
 - 2. Sequences that result in visible brightness change over more than ten percent (10%) of the total display area at a greater rate than three (3) changes per second; or
 - 3. Edits at a rate of more than one (1) edit every three (3) seconds
 - e. **Renewable Energy Use.**

- i. All new billboard operations shall utilize the highest available clean energy tier from the City's energy provider to the extent feasible.
 - ii. The incremental energy usage attributable to digital signs, as defined in 4.c, should be fully offset to the extent feasible through demonstrated improvement in the energy performance for new buildings or major renovations of existing buildings.
- f. Audio. On site sound shall be allowed only during special events.
- g. Monitoring
 - i. All digital billboard operators shall submit a Lighting Monitoring Report to the Director upon installation, and at three year intervals thereafter to confirm conformance with the lighting requirements above. The report shall include:
 - 1. Digital billboard luminance measured in nits (candelas per square meter). Measurements shall be conducted at the property line of the digital billboard site, or in the nearest adjacent public right of way, perpendicular to the digital billboard sign face.
 - 2. Digital billboard sign illuminance measured in foot candles. Measurements shall be conducted perpendicular to the digital billboard sign face, at the property line containing the digital billboard, and at adjoining residential use property or properties. The illuminance meter shall be aimed toward the sign face from the measurement location.
 - 3. All measurements shall include both luminance and illuminance for three conditions:
 - a. The sign off
 - b. The sign illuminated with an image
 - c. The sign illuminated using an all-white display
 - ii. Complaints about lighting will be investigated by the City, and if determined necessary by the Director, the digital billboard operator shall provide an updated Lighting Monitoring Report within 72 hours of the notice from the City. The City shall reserve the right to conduct digital billboard lighting measurements. If the measured luminance and or illuminance exceed the data presented in operator's Lighting Monitoring Report, the findings of the City report shall prevail.

6. Architectural Lighting. Architectural lighting may be integrated into a building façade to enhance the architectural design of the building if the following requirements are met:

- a. Integral large scale architectural lighting, digital or otherwise, shall contain no commercial logos, images, or messages that may be interpreted as advertising.
- b. Architectural lighting shall not be counted towards permitted signage area, either on or off-site, and shall not be considered a billboard.
- c. Architectural lighting is subject to maximum allowable lighting levels of Section 5.
- d. Architectural lighting shall be designed and operated to minimize impact on adjacent buildings.

7. Temporary Creative Billboards or Tall Walls. Temporary modification to existing billboards or tall wall signs may be permitted in compliance with this section. The following regulations are intended to encourage creatively designed short-term installations that make a positive visual contribution to Sunset Boulevard and to the overall image of the city.

- a. **Approval Authority.** Temporary creative billboards and tall walls are subject to approval by the Director.
- b. **Time Limit.** The Director may approve the placement of a temporary creative billboard or tall wall for a maximum period of 12 months. One six-month time extension may be approved or denied by the Director and the temporary creative billboard or tall wall shall be removed immediately upon expiration. Certain types of physical extensions may be installed for a longer period, as allowed by state law.
- c. **Standards:** A temporary creative billboard or tall wall sign shall be designed and located in compliance with all of the following standards:
 - i. The temporary creative billboard or tall wall sign shall alter an existing sign without changing its location. Any enlargement of the sign shall be designed as an integral part of the image and contribute to the overall creativity of its design.
 - ii. The temporary creative billboard or tall wall sign shall be properly sited and well-integrated within the context of its surroundings.
 - iii. Temporary creative billboard or tall wall shall be an inventive and original representation of the product or business being advertised.
 - iv. The temporary creative billboard or tall wall sign shall exhibit one or more of the following elements:
 - 1. Three-dimensional props and extensions.
 - 2. Extensions with cut-out shapes or voids.
 - 3. Integrated thematic lighting such as neon, LED, images which change from day to night through lighting effects, projected light, video projections, or other emerging technologies.
 - 4. Moving or animated mechanical elements.
 - 5. Different day-time and night-time images.
 - 6. Hand-painted graphics or graphics crafted on-site.
 - 7. Alternative textures and materials, such as plants and vegetation.
 - 8. Live action.

APPENDIX C. Glossary of Lighting Terminology⁹

Discussions of lighting issues include precise definitions, descriptions or terminology of the specific lighting technical parameters. The following glossary summarizes explanations of the technical lighting terms utilized in this Study and the related practice standards to facilitate discussion of these issues. The following technical terms are used in this Study.

Brightness:	The magnitude of sensation that results from viewing surfaces from which light comes to the eye. This sensation is determined partly by the measurable luminance of the source and partly by the conditions of observation (Context), such as the state of adaptation of the eye. For example, very bright lamps at night appear dim during the day, because the eye adapts to the higher brightness of daylight.
Candela:	Measure of light energy from a source at a specific standard angle and distance. Candela (cd) is a convenient measure to evaluate output of light from a lamp or light fixture in terms of both the intensity of light and the direction of travel of the light energy away from the source.
Contrast:	Calculated evaluation of high, medium and low contrast of visible light sources or surfaces within the Property by a ratio of luminance. Contrast is the ratio of one surface luminance to a second surface luminance or to the field of view. Contrast exceeding 30 to 1 are usually deemed uncomfortable; 10 to 1 are clearly visible; and less than 3 to 1 appear to be equal.
Electronic Control System:	Integrated hardware and software system which provides sign lighting control functionality for time of day scheduling, response to ambient light, and direct user control with full range of dimming from 0% to 100% full light output, full color, or all white.
Fully Shielded:	A lighting fixture constructed in such a manner that all light emitted by the fixture, either directly from the lamp or a diffusing element, or indirectly by reflection or refraction from any part of the Luminaire, is projected below the horizontal as determined by photometric test or certified by the manufacturer. Any structural part of the light fixture providing this shielding must be permanently affixed. In other words, no light shines above the horizontal from any part of the fixture.
Glare:	Glare is visual discomfort experienced from high luminance or high range of luminance. For exterior environments at night, glare occurs when the range of luminance in a visual field is too large. The light energy incident at a point is measured by a scale of footcandles or lux, and is described in the technical term Illuminance. This incident light is not visible to the eye until it is reflected from a surface, such as pavement, wall, dust in the atmosphere or the surface of a light bulb. The visible brightness of a surface is measured in footlamberts (or metric equivalent candelas per square meter) and is described by the term Luminance.

⁹ ANSI/IES LS-1-22 Lighting Science: Nomenclature and Definitions for Illuminating Engineering

The human eye processes brightness variations across a very broad spectrum of intensities. The range of brightness generated by direct noon sun versus a moonlight evening is over 5000 to 1. Human eyes are capable of accommodating to this range of intensities given adequate time to adjust. However, the eye cannot process brightness ratios of more than 30 to 1 within a view without discomfort.

For the purpose of this analysis, brightness of light sources may be described subjectively by the following criteria:

High Contrast Conditions: View of light fixture emitting surface, such as a lens, reflector, or lamp, where brightness contrast ratio exceeds 30 to 1 (source Luminance to background Luminance ratio in footlamberts).

Medium Contrast Conditions: Brightly lighted surfaces where contrast ratio exceeds 10 to 1, but is less than 30 to 1 (lighted surface Luminance to background Luminance ratio in footlamberts).

Low Contrast Conditions: Illuminated surfaces where contrast ratio exceeds 3 to 1, but less than 10 to 1 (source Luminance to background Luminance ratio in footlamberts).

Illuminance:

Illuminance is the means of evaluating the density of Luminous Flux. Illuminance indicates the amount of Luminous Flux from a light source falling on a given area (See Figure 54). Illuminance is measured in footcandles (fc) which is the lumens per square foot, or Lux (lumens per square meter). Illuminance need not necessarily be related to a real surface since it may be measured at any point within a space. Illuminance is determined from the Luminous intensity of the light source. Illuminance of a point source decreases with the square of the distance from the light source (see Inverse Square Law definition).

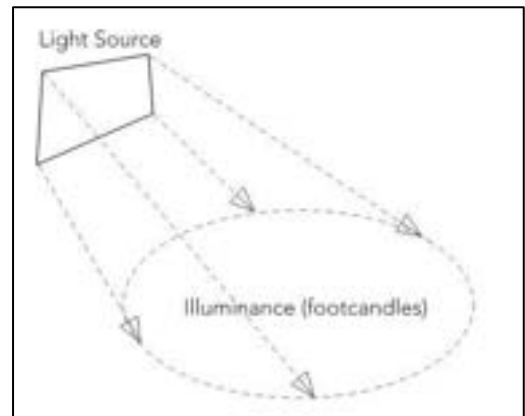


Figure 54: Diagram of Illuminance

For the purposes of this analysis, illuminance may be described subjectively by the following criteria:

High Illuminance: Illuminance greater than the maximum permitted by the Policy, and greater than 1.4 footcandles.

Medium Illuminance: Illuminance less than 1.4 footcandles and greater than the maximum permitted by the CEC 0.74 footcandles.

Low Illuminance: Illuminance less than maximum permitted by the CEC 0.74 footcandles.

Horizontal Illuminance: Illuminance incident upon a horizontal plane. The orientation of the illuminance meter or calculation point will be 180° from Nadir.

Vertical Illuminance: Illuminance incident upon a vertical plane. The orientation of the illuminance meter or calculation point will be 90° from Nadir.

Inverse Square Law: In physics, an inverse-square law is any physical law stating that a specified physical quantity or intensity is inversely proportional to the square of the distance from the source of that physical quantity. The fundamental cause for this relationship can be understood as geometric dilution corresponding to point-source radiation into three-dimensional space (see Figure 55). The divergence of a vector field which is the resultant of radial inverse-square law fields with respect to one or more sources is everywhere proportional to the strength of the local sources, and hence zero outside sources. Newton's law of universal gravitation follows an inverse-square law, as do the effects of electric, magnetic, light, sound, and radiation phenomena. Thus, Illuminance decreases with the square of the distance from the light source.

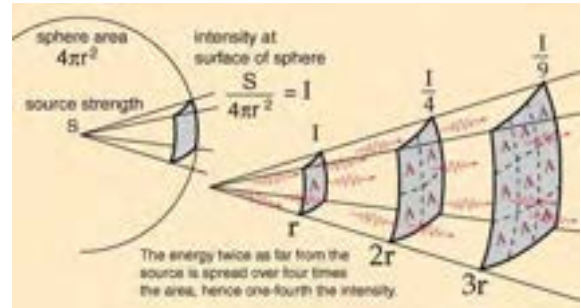


Figure 55: Inverse square law diagram (hyperphysics.phy-astr.gsu.edu)

Output Direction: Luminaires for general lighting are classified in accordance with the percentages of total luminaire output emitted above and below horizontal. The light distribution curves may take many forms within the limits of upward and downward distribution, depending upon the type of light and the design of the luminaire.

Light Source: Device which emits light energy from an electric power source.

Light Trespass: Electric light from subject property incident onto adjacent properties, measured in footcandles or lux, usually analyzed by measurement at or near the adjacent property line.

Lighting Zone (LZ): Defined by IESNA¹⁰ and adopted by CALGreen, Lighting Zones define regions of human activity and corresponding recommended maximum light trespass illuminance.

¹⁰ ANSI LP-11-20 Environmental Considerations for Outdoor Lighting, page 10

Luminaire: A complete lighting unit consisting of a lamp or lamps and ballast(s) (when applicable) together with the parts designed to distribute the light, to position and protect the lamps, and to connect the lamps to the power supply. Also referred to as a Light Fixture.

Luminance: Luminance is a measure of emissive or reflected light from a specific surface in a specific direction over a standard area (See Figure 56). Luminance is measured in footlamberts (fL) ($1/\pi$ Candela per square foot) or cd/m^2 (Candela per square meter). $1\text{fL} = 3.43 \text{ cd}/\text{m}^2$.

Whereas Illuminance indicates the amount of Luminous Flux falling on a given surface, Luminance describes the brightness of an illuminated or luminous surface. Luminance is defined as the ratio of luminous intensity of a surface (Candela) to the projected area of this surface (m^2 or ft^2).

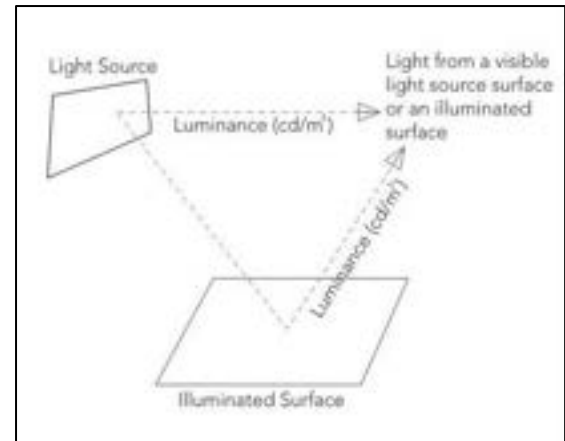


Figure 56: Diagram of Luminance

Luminous Flux: Mean value of total Candelas produced by a light source. Luminous Flux describes the total amount of light emitted by a light source. The unit for measuring Luminous Flux is Lumen (lm).

This radiation could basically be measured or expressed in watts. This does not, however, describe the optical effect of a light source adequately, since the varying spectral sensitivity of the eye is not taken into account. To include the spectral sensitivity of the eye the Luminous Flux is measured in lumen. Radiant Flux or 1 watt emitted at the peak of the spectral sensitivity (in the photopic range at 555 nanometers produces a Luminous Flux of 683 lumen). The unit of lumen does not define direction.

Monitoring Sites: Monitoring Sites are locations selected for observation and field lighting measurements to evaluate the views of the Signs from adjacent residential zoned properties and to determine the extent and intensity of existing light sources within and surrounding the Signs. The Monitoring Sites are within the public right of way, and adjacent to residential zoned properties. These locations are representative of the view to the Signs from the vicinity of the residential zoned properties surrounding the Signs to the north, south, east and west. Figure 11 illustrates the Monitoring Site locations.

Skyglow: Skyglow is the description of luminous atmospheric background and results from both natural and human made conditions. Natural causes of skyglow include sunlight reflected from the surface of the earth and moon, sunlight illuminating the upper atmosphere, and visible illumination from other

interplanetary sources. Human made causes of skyglow include electric light that is emitted directly upward into the sky (Uplight), or reflected off of the ground.

APPENDIX D. SUNSET STRIP OFF-SITE SIGNAGE POLICY LIGHTING REPORT



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**SUNSET STRIP OFF-SITE SIGNAGE POLICY
LIGHTING REPORT**

Prepared for: the City of West Hollywood
Dudek & Associates

June 1, 2017

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Francis Krahe & Associates Inc. is pleased to present the following analysis of lighting for the proposed Sunset Strip Off-Site Signage Policy as follows:

- Recommendations for illuminated signs with the Sunset Strip Off-Site Signage Policy.
- Analysis of the parameters that affect Light Trespass or Glare at adjacent properties or public rights of way in the vicinity of the proposed sign district.
- Review of pertinent lighting regulations, and the best practices for lighting design recommended by the Illuminating Engineering Society of North America (IESNA) and other agencies.
- Discussion of significance thresholds with respect to off-site illuminated signs.

1. Recommendations

The following issues should be addressed in the West Hollywood Sunset Strip Sign District to facilitate an appropriate process of submittal, review, and approval for new or converted illuminated signs.

Lighting impact issues are focused around two key subjects: Light Trespass and Glare.

- **Light Trespass¹** is the light that falls on a property but originates on an adjacent property. Light Trespass is measured in terms of illuminance (foot-candles or metric units lux), and can be measured at any point and at in any direction. Where Light Trespass is evaluated the illuminance is measured perpendicular to the source of light, toward the source of light, at the property line, or the location where light is causing an issue, such as a residential window or balcony.
- **Glare²** occurs when either the luminance is too high or the range of brightness in a visual field is too large. A bright light source, such as a flood light or street light, viewed against a dark sky may be uncomfortable to look at, and may create a temporary sensation of blindness, which is referred to as disability glare. Glare is evaluated by measuring the luminance (footlamberts or metric units candelas/m²) at the source of light, such as a digital display, in comparison to the surrounding adjacent luminance. The term which describes the extent of Glare at an observer position for a view is referred to as contrast, and is determined by the variation of luminance within the field of view. "High," "Medium," and "Low" contrast are terms used to describe contrast ratios. The ratio of peak measured luminance to the average within a field of view: contrast ratios greater than 30:1, between 10:1 and 30:1, and below 10:1, respectively. Contrast ratios above 30:1 are generally uncomfortable for the human eye to perceive. Any source luminance that is

¹ IESNA Handbook, 10th Edition, 19.3: Light Pollution and Trespass, page 19.7

² IESNA Handbook, 10th Edition, 4.10: Glare, page 4.25



more than 50 times the adjacent background will be viewed as prominent, and may be viewed as distracting.

Illumination limits should be clearly stipulated in the Sign District regulations to prevent signs that create excessive Light Trespass and/or Glare, to allow the illuminated sign conversions to be evaluated efficiently, and provide a consistent lighting performance standard for property owners, applicants, and the general public. Currently there is no regulation of these lighting factors within the City of West Hollywood Municipal code. Clear standards would improve the operations for digital off-site signage process for all parties.

The IESNA lists multiple visual factors³ which affect human cognitive recognition of visual signals, including the brightness of the source, size of the image, and the rate of change in the brightness. High contrast signs may increase driver distraction by elevating the prominence of these signs above traffic signals or other critical roadway information. Limiting sign luminance to result in medium contrast will increase the safety for drivers by ensuring the most critical traffic information will be the most prominent within the field of view.

Considering the range of aspects of visual perceptions and performance important to lighting, these fundamental quantities are: luminance, the amount of light entering the eye and falling on the retina, the size of a visual task, a visual task's luminance and chromatic contrast, spatial frequency, and flicker. Changes in these fundamental quantities affect threshold and suprathreshold performance.

1.1 West Hollywood Lighting Regulations

We recommend the City develop new lighting standards within the Sign District regulations to limit Light Trespass and Glare consistent with the current State and National standards. These State and National standards are designed to limit light pollution and off site lighting effects.

Reference standards include the California Energy Code (CalGreen), ASHRAE 90-75, the U.S. Green Building Council, and model lighting ordinances provided by the Illuminating Engineering Society of North America (IESNA) and the International Dark Sky Organization. Various aspects of these standards are included in local regulations to improve the outcomes of any approved project and avoid future disputes or legal challenges to proposed lighting plans. Standards suggested below will allow sufficient sign brightness and flexibility for the sign owners and advertisers, while minimizing the off-site negative effects of Light Trespass and Glare.

1.2 Lighting Zone Designation LZ 4

The Sunset Strip is an existing urban commercial zone with extensive nighttime use, including restaurants, entertainment, and outdoor advertising. Current best practices for

³ IESNA Handbook, 10th Edition, 4.2: Basic Parameters, page 4.4



lighting standards recognize the unique issues related to areas of high volume night time use versus areas where the primary use is residential. The California Energy Code (CEC) includes designations for Lighting Zones (LZ) 1 through 4, included below in Appendix A, which correspond to the Light Trespass recommendations within the IESNA 10th Edition Handbook, Table 26.4, included in Appendix B.

All urban areas within California are designated Lighting Zone 3 as default under the CEC, which limits the Light Trespass to 8 lux (0.74 footcandles). Per the CEC, California Building Energy Efficiency Standards, Section 10-114, page 40, 41., the designations for outdoor lighting zones in urban areas are as follows:

"The default for urban areas, as defined by the U.S. Census Bureau, is Lighting Zone 3. Local AHJs (Authorities Having Jurisdiction) may designate areas to Lighting Zone 4 for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels."

CEC Lighting Zone 4 allows higher illuminance for Light Trespass for building and illuminated signs in areas of High Ambient Lighting, defined by the IESNA as "areas of human activity where the vision of human residents and users is adapted to high light levels. Lighting is generally considered necessary for safety, security and/or convenience and it is mostly uniform or continuous." We recommend the City of West Hollywood designate the Sunset Strip District to be Lighting Zone 4 to allow higher illuminance values for Light Trespass under the CEC standards, which apply to all exterior lighting for building and illuminated signs.

Procedures for lighting zone designation changes are summarized in CEC Section 10-114 – DETERMINATION OF OUTDOOR LIGHTING ZONES AND ADMINISTRATIVE RULES FOR USE, which stipulates the local jurisdiction may implement changes to the Lighting Zone Designation as follows:

- "(c) Amending the Lighting Zone Designation. A local jurisdiction may officially adopt changes to the lighting zone designation of an area by following a public process that allows for formal public notification, review, and comment about the proposed change. The local jurisdiction may determine areas where Lighting Zone 4 is applicable and may increase or decrease the lighting zones for areas that are in State Default Lighting Zones 1, 2 and 3, as specified in TABLE 10-114-A.
- (d) Commission Notification, Amended Outdoor Lighting Zone Designation. Local jurisdictions who adopt changes to the State Default Lighting Zones shall notify the Commission by providing the following materials to the Executive Director:
 - 1. A detailed specification of the boundaries of the adopted Lighting Zones, consisting of the county name, the city name if any, the zip code(s) of the re designated areas, and a description of the physical boundaries within each zip code;



2. A description of the public process that was conducted in adopting the Lighting Zone changes; and
 3. An explanation of how the adopted Lighting Zone changes are consistent with the specifications of Section 10-114.
- (e) The Commission shall have the authority to not allow Lighting Zone changes which the Commission finds to be inconsistent with the specifications of Section 10-114."

By comparison, the Los Angeles Municipal Code (LAMC) defines a substantially higher Sign Illuminance Light Trespass maximum of 32.3 lux (3.0 footcandles) versus the CEC standards for Zone 3 or 4 (see section 2.2 below). The LAMC is 4 times higher than the CEC Zone 3 Light Trespass and 2.14 times higher than the Lighting Zone 4. While the LZ4 value is much less than the current LAMC maximum, the CEC standard is well defined and supported by the IESNA and ASHRAE, and other independent lighting organizations such as the International Dark Sky Organization and U.S. Green Building Council.

2. Analysis of Sunset Strip Lighting

The development of the lighting regulations noted above is recommended based upon an evaluation of the existing conditions along the Sunset Strip, the proposed conversion of a portion of the existing illuminated sign billboards to digital illuminated signs, and the proposed addition of new illuminated signs at selected sites along the Sunset Strip.

2.1 Existing Lighting Conditions

The existing lighting conditions along the Sunset Strip include a variety of light sources which contribute to a brightly illuminated outdoor urban environment. The streets and sidewalks along the Sunset Strip have a relatively high illumination consistent with the vehicular design standards for a high volume arterial street. The public right of way is surrounded on both north and south with commercial properties where parking lot lights and exterior building lighting is frequent. Within this well illuminated context, the lighted billboards and signs are prominent, but not excessively bright in comparison to their surroundings.

Residential properties to the north and south along the Sunset Strip are generally set back behind the commercial properties that front onto Sunset. The slope north and south of Sunset significantly affects the visibility of the signs from residential properties. To the north, the residential properties are usually well above the elevation of the Sunset Strip, and in most locations, above the top elevation of the illuminated signs. To the north of Sunset, the ambient light levels at residential streets and properties are very low, therefore the light incident at these residential properties from the signs may be substantial. However, most of the existing illuminated signs are located and directed such that there are few locations where signs project significant Light Trespass or Glare. The distances to adjacent residential properties varies considerably. The properties within close proximity are 250 feet to 300 feet away from the existing signs on the Sunset Strip.

To the south of the Sunset Strip, the residential properties are below the elevation of the Sunset Strip and well below the elevation of the illuminated signs. Signs located on the



south side of the Sunset Strip have the potential to create Light Trespass and or Glare due to the difference in elevation. Most of the existing illuminated signs are located and directed such that there are few locations where signs project significant Light Trespass or Glare to adjacent residential properties.

2.2 Future Lighting Conditions

Future proposed signs may cause Light Trespass or Glare with respect to the following variables:

- The sign light source (LED, metal halide lamps, or other technology) projects toward an adjacent property, and is close enough (immediately adjacent to or less than 250 feet away) to create substantial illuminance at a residential property line.
- The sign surface area is large enough to create substantial illuminance at an adjacent residential property line.
- The sign surface is bright enough to create Glare, or high contrast conditions, when the sign surface luminance is compared to the surrounding surface luminance.
- North facing (northeast to northwest) signs from the south side of Sunset Strip may be a source of Glare to residential properties to the north of The Sunset Strip.
- Signs along the south side of Sunset may create Light Trespass illuminance to residential zoned properties down the slope, south of the Sunset Strip, adjacent to or within 250 feet of the sign.

The following regulatory criteria will limit the Light Trespass and Glare impacts of the proposed illuminated signs:

Light Trespass sign illuminance must be less than the LZ4 value of 1.4 footcandles at adjacent residential zoned property lines.

Sign luminance maximum 300 candelas/m² will reduce Glare to below high contrast conditions.

The following formula describes the relationship between the Light Trespass illuminance measured in footcandles (fc) at any property line, the Sign Luminance (cd/m²), the Sign Area (ft²), and the distance (ft) from the sign to the property line.

$$\text{Light Trespass Illuminance} = \frac{\text{Sign Area} \times \text{Sign Luminance}}{10.76 \times \text{Distance}^2}$$

To comply with these regulations, signs will be either greater than 250 feet from a residential use, or reduced sign area, or reduced sign luminance.



3. Review of Lighting Regulations

Exterior lighting for signs is regulated throughout California by the local municipal code and the state energy, building, and vehicle codes. Pertinent lighting sections are summarized and discussed for the City of West Hollywood Municipal Code, the City of Los Angeles Municipal Code, City of Los Angeles Sign Use Districts, the State of California Green Building Code, and State of California Vehicle Code.

3.1 City of West Hollywood Municipal Code

The City of West Hollywood has established various codes and design guidelines that regulate the design of outdoor lighting and signs. Several code sections that regulate outdoor lighting are listed below:

West Hollywood Municipal Code contains guidelines for exterior building lighting and exterior sign illumination as follows:

Sections G-12.040 and G-34.250 define requirements for On Site Signage and Buildings. Because the proposed Sunset Strip Off-Site Signage Policy pertains to off-site signs and Sections G-12.040 and G-34.250 consist of design guidelines for on-site signs, these sections of the Municipal Code do not directly apply to the signs that would be regulated by the proposed project. However, the factors identified in the Municipal Code are pertinent to the evaluation of any potential lighting impact in that the Code stipulates Light Trespass and Glare restrictions.

City of West Hollywood Municipal Code, Section G-12.040 Building Design and Architecture.

- 6. Lighting.
- f. All lighting should be shielded to confine light spread within the site boundaries.
- j. Illuminate signs and billboards from above, not below.

City of West Hollywood Municipal Code, Section G-34.250 Sign Illumination.

Shield the light source. Whenever direct lighting fixtures are used (fluorescent or incandescent), care should be taken to properly shield the light source to prevent Glare from spilling over into residential areas and any public right-of-way. Signs should be lighted only to the minimum level required for nighttime readability.

3.2 Los Angeles Municipal Code

The City of Los Angeles regulates lighting with respect to building and safety, transportation, and Light Trespass (i.e., the spillover of light onto adjacent residential properties). Since the City of West Hollywood does not specify Light Trespass values at the property line of a residential zoned property, the LA Municipal Code is frequently used as the basis of developing a Significance Threshold for a lighting analysis. The following sections of the LA Municipal Code specify limits for exterior lighting:

Exterior lighting, such as streetlights and illuminated signs are regulated by the Los Angeles Municipal Code (LAMC). Applicable regulations include the following:

- LAMC Chapter 1, Article 4.4, Sec. 14.4.4 E. No sign shall be arranged and illuminated in such a manner as to produce a light intensity greater than 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

3.3 California Code of Regulations, Title 24

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following components of Title 24 include standards related to lighting:

California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3)

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for safety and security at pedestrian pathways, circulation ways, and paths of egress. All exterior lighting will comply with the requirements of the California Building Code and California Electrical Code.

California Energy Code (Title 24, Part 6)

The California Energy Code (CEC) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, including illuminated signs (see Appendix C and D herein), with the aim of reducing energy consumption through efficient and effective use of lighting equipment.

Section 130.3 – SIGN LIGHTING CONTROLS (herein as Appendix E) sets forth requirements for Sign Lighting Controls. All signs must comply with these requirements including a sign ON both and day and night must include a minimum 65 percent dimming at night.

Section 140.8 of the CEC (herein as Appendix F) sets forth lighting power density restrictions for signs.

California Green Building Standards Code (Title 24, Part 11)

The California Green Building Standards Code, which is Part 11 of Title 24, is commonly referred to as the CALGreen Code. Paragraph 5.1106.8, Light pollution reduction, requires that all non-residential outdoor lighting must comply with the following:

- The minimum requirements in the CEC for Lighting Zones 1–4 as defined in Chapter 10 of the California Administrative Code as noted above; and
- Backlight, Uplight and Glare (BUG) ratings as defined in the Illuminating Engineering Society of North America's Technical Memorandum on Luminaire Classification Systems for Outdoor Luminaires identified as IESNA TM-15-07 Addendum A; and



- Allowable BUG ratings not exceeding those shown in Table A5.106.8 in Section 5.106.8⁴ of the CALGreen Code (excerpt included in the Appendix H of this Study); or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

3.4 California Vehicle Code, Division 11. Rules of the Road

Chapter 2, Article 3 of the California Vehicle Code stipulates limits to the location of light sources that may cause glare and impair the vision of drivers.

- ARTICLE 3. Offenses Relating to Traffic Devices [21450 - 21468] [Article 3 enacted by Stats. 1959, Ch. 3.), Section 21466.5. No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 11/2-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

Utilizing the proposed limits to sign brightness outlined in Section 2.2 above will ensure the signs are well below the California Vehicle Code requirements. This analysis assumes the worst case, most conservative, condition where the Project signs would be within the centerline of the driver's field of view, and the angle noted above is 0. For this worst case condition the maximum allowable luminance is 500 fL. Therefore the threshold for night luminance is a maximum 500 fL for the California Vehicle code.

In Section 2.2 above, illuminated signs are recommended to not exceed a maximum surface brightness of 300 candelas/m². Calculating the equivalent sign luminance by converting to English units from metric units, 300 candelas/m² equals 87.6 fL. The illuminated sign brightness will not exceed 87.6 fL, which is far less than the 500 fL maximum. Therefore, at night the illuminated signs will not exceed the 500 fL threshold

⁴ Table 5.106.8, Footnote 2 defines the location of the Property Line for the purpose of evaluating compliance with the BUG ratings and provides that: "For property lines that abut public walkways, bikeways, plazas and parking lots, the property line may be considered to be 5 feet beyond the actual property line for purpose of determining compliance with this section. For property lines that abut public roadways and public transit corridors, the property line may be considered to be the centerline of the public roadway or public transit corridor for the purpose of determining compliance with this section." See Appendix H.



and will not introduce a new source of glare as defined by the California Vehicle Code, Article 3.

3.5 IESNA Recommended Practices

The Illuminating Engineering Society of North America (IESNA) recommends illumination standards for a wide range of building and development types. These recommendations are widely recognized and accepted as best practices and are therefore a consistent predictor of the type and direction of illumination for any given building type. For all areas not stipulated by the regulatory building code, municipal code or specifically defined requirements, the IESNA standards are used as the basis for establishing the amount and direction of light for the Project.

The IESNA 10th Edition Lighting Handbook defines Outdoor Lighting Zones relative to a range of human activity versus natural habitat. Table 26.4, Nighttime Outdoor Lighting Zone Definitions, included in Appendix C of this Study, establishes the Zone designation for a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. Table 26.4 is referenced by the CEC in sections 10-114 and 140.7 relative to allowable energy use for outdoor lighting. In addition, the IESNA 10th Edition Lighting Handbook defines Recommended Light Trespass Limits in Table 25.5, included in the Appendix C hereto, relative to the Outdoor Lighting Zones. The Recommended Light Trespass Illuminance Limits describe the maximum Light Trespass values in Lux at the location where trespass is under review. As noted above, the CEC stipulates that all urban areas in California are designated as Lighting Zone 3. IESNA Table 25.5, lists a Precurfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for Zone 3.

4. Significance Threshold

The recommended lighting regulations identified in Section 2.2 above will ensure that significant light or glare impacts will not occur as a result of the Sunset Strip Off-Site Signage Policy. Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations, Sections 15000–15387) provides a set of sample questions to evaluate impacts with regard to aesthetics, including light and glare. The question that pertains to light and glare is as follows:

Would the project:

- Create a new source of substantial light and glare which would adversely affect day or nighttime views in the area?

In the context of this question from Appendix G of the CEQA Guidelines, the determination of significance takes into account the following factors:

- The change in ambient nighttime levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent residential zoned properties.

Implementation of the lighting regulations in Section 2.2 will prevent a significant impacts with regard to artificial light or glare because:

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- The Project will not exceed 1.4 foot-candles at the property line of a residential zoned property and will therefore not adversely change the ambient light level at residential properties.
- The Project will not exceed 300 cd/m² and will therefore not create new high contrast conditions visible from a field of view from a residential zoned property or driver on Sunset Boulevard.

APPENDIX E. CEQA MEMO & FINAL INITIAL STUDY / NEGATIVE DECLARATION, page 252

SUNSET STRIP OFF-SITE SIGNAGE POLICY
INITIAL STUDY / NEGATIVE DECLARATION

Section 3.1(a). Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

- The streets and sidewalks along Sunset Boulevard have a relatively high illumination consistent with the vehicular design standards for a high volume arterial street. The public right of way is surrounded on both north and south with commercial properties where parking lot lights and exterior building lighting is frequent. Within this well-illuminated context, lighted billboards and signs are prominent but are not excessively bright in comparison to their surroundings.
- Along Sunset Boulevard, most residential properties are set back behind the commercial properties that front onto Sunset Boulevard. The slope to the north and south of Sunset Boulevard significantly affects the visibility of the signs from residential properties. ... The distance from Sunset Strip properties to adjacent residential properties varies considerably. The properties within close proximity are generally 250 feet to 300 feet away from the existing signs on Sunset Boulevard. To the south of Sunset Boulevard, the residential properties are below the elevation of Sunset Boulevard and well below the elevation of the illuminated signs. Signs located on the south side of Sunset Boulevard have the potential to create light trespass and or glare due to the difference in elevation. However, most of the existing illuminated signs are located and directed such that there are few locations where signs project significant light trespass or glare.
- North facing (northeast to northwest) signs from the south side of Sunset Boulevard may be a source of glare to residential properties to the north of Sunset Boulevard.
- Signs along the south side of Sunset Boulevard may create light trespass to residential properties down the slope, south of Sunset Boulevard.
- The purpose of the proposed regulations is to allow sufficient brightness and flexibility for billboard operators and advertisers, while limiting the off-site light trespass and glare.

Section 3.10(b). Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- Consistency with General Plan Policy LU-16.2: The proposed project updates existing regulations for off-site signage along the Sunset Strip. The regulations establish protections for nearby properties (particularly residential properties) from light trespass and other potential adverse effects.... Height limitations and requirements for sightline and viewshed studies would help prevent adverse visual affects at adjacent properties, including blockage of nearby outdoor advertisements and public viewsheds.

APPENDIX F. 2022 California Administrative Code, Section 10-114

ADMINISTRATIVE REGULATIONS FOR THE CALIFORNIA ENERGY COMMISSION (CEC)

certifying organizations that ensures uniform application of the CRRC testing and rating procedures, labeling and rating, and such other rating procedures for other factors that improves the accuracy of properties of roofing products affecting energy performance as the CRRC and the Commission may adopt.

4. The entity shall require manufacturers and independent certifying organizations within its program to use only laboratories accredited by the supervisory entity to perform tests in accordance with CRRC-1.

5. The entity shall maintain appropriate guidelines for testing laboratories and manufacturers, including requirements for adequate:

- A. Possession and calibration of equipment;
- B. Education, competence, and training of personnel;
- C. Quality control;
- D. Record keeping and reporting;
- E. Periodic review including, but not limited to, blind testing by laboratories; inspections of products; and inspections of laboratories, and manufacturing facilities;
- F. Challenges to ratings; and
- G. Guidelines to maintain the integrity of the program, including, but not limited to, provisions to avoid conflicts of interest within the rating process.

6. The entity shall be a nonprofit organization and shall maintain reasonable, nondiscriminatory fee schedules for the services it provides, and shall make its fee schedules, the financial information on which fees are based, and financial statements available to its members for inspection.

7. The entity shall provide hearing processes that give laboratories, manufacturers and certifying agencies a fair review of decisions that adversely affect them.

8. The entity shall maintain a policy committee or similar body whose procedures are designed to avoid conflicts of interest in deciding appeals, resolving disputes and setting policy for the certifying organizations in its program.

9. The entity shall publish at least annually a directory of rated products and products that are no longer rated by the CRRC.

10. The entity itself shall be free from conflict-of-interest ties or to undue influence from any particular roofing product manufacturing interest(s), testing or independent certifying organization(s).

11. The entity shall provide or authorize the use of labels that can be used to meet the requirements for showing compliance with the requirements of Sections 140.1, 140.2, 140.3(a)1, 141.0(b)2B, 150.1(c)11, 150.2(b)1H and 150.2(b)2, and this section.

12. The entity's rating program shall allow for multiple participants in each aspect of the program to provide

for competition between manufacturers and between testing labs.

Authority: Sections 25402 and 25402.1, Public Resources Code.

Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8 and 25943, Public Resources Code.

10-114. Determination of outdoor lighting zones and administrative rules for use. This section establishes rules for implementing outdoor lighting zones to show compliance with Section 140.7 of Title 24, California Code of Regulations, Part 6.

(a) **Lighting zones.** Exterior lighting allowances in California vary by Lighting Zones (LZ).

(b) **Lighting zone characteristics.** Table 10-114-A specifies the relative ambient illumination level and the statewide default location for each lighting zone.

(c) **Amending the lighting zone designation.** A local jurisdiction may officially adopt changes to the lighting zone designation of an area by following a public process that allows for formal public notification, review and comment about the proposed change. The local jurisdiction may determine areas where Lighting Zone 4 is applicable and may increase or decrease the lighting zones for areas that are in State Default Lighting Zones 1, 2 and 3, as specified in Table 10-114-A.

(d) **Commission notification, amended outdoor lighting zone designation.** Local jurisdictions who adopt changes to the State Default Lighting Zones shall notify the Commission by providing the following materials to the Executive Director:

1. A detailed specification of the boundaries of the adopted lighting zones, consisting of the county name, the city name if any, the zip code(s) of the redesignated areas, and a description of the physical boundaries within each zip code;
2. A description of the public process that was conducted in adopting the lighting zone changes; and
3. An explanation of how the adopted lighting zone changes are consistent with the specifications of Section 10-114.

(e) The Commission shall have the authority to not allow Lighting Zone changes which the Commission finds to be inconsistent with the specifications of Section 10-114.

Authority: Sections 25402 and 25402.1, Public Resources Code.

Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8 and 25943, Public Resources Code.

10-115 – Community shared solar electric generation system or community shared battery storage system compliance option for onsite solar electric generation or battery storage requirements.

(a) **Community shared solar electric generation system or battery storage system offset.** A community shared solar system, other community shared renewable system, community shared battery storage system, or combination of the aforementioned systems (hereinafter referred to as a community shared solar or battery stor-

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age system) may be approved by the Commission as a compliance option to partially or totally meet the on-site solar electric generation system and/or battery storage system that is otherwise required by Section 150.1(b) of Title 24, California Code of Regulations, Part 6. To be approved, the community shared solar electric generation or community shared battery storage system shall meet the following requirements.

1. **Enforcement agency.** The community shared solar electric generation system and/or community shared battery storage system shall be installed and available for enforcement agency site inspection, no later than the point in time the enforcement agency must physically verify compliance of the building, which would otherwise be required to have an on-site solar electric generation and/or battery storage system, and shall not cause delay in the process of enforcement agency review and approval of that building. The enforcement agency shall have jurisdiction and facilitated access to make site inspections. All documentation for the community solar electric generation system and/or community solar battery storage system that is required to demonstrate compliance for the

building shall be completed prior to building permit application.

2. **Energy performance.** The community shared solar electric generation system and/or community shared battery storage system shall be demonstrated to provide the same or better energy performance equal to the partial or total compliance with the energy performance of the on-site solar electric generation and/or battery storage system that would otherwise have been required for the building, computed by compliance software certified for use by the Commission.
3. **Dedicated building energy savings benefits.** The community shared solar electric generation system and/or community shared battery storage system shall provide energy saving benefits directly to the building that would otherwise have been required to have an on-site solar electric generation system and/or battery storage system. The energy savings benefits shall be allocated from the total resource of the community shared solar electric generation system and/or community shared battery storage system in a manner demonstrated to be equivalent to the reductions in

TABLE 10-114-A
LIGHTING ZONE CHARACTERISTICS AND RULES FOR AMENDMENTS BY LOCAL JURISDICTIONS

ZONE	AMBIENT ILLUMINATION	STATEWIDE DEFAULT LOCATION	MOVING UP TO HIGHER ZONES	MOVING DOWN TO LOWER ZONES
LZ0	Very Low	Undeveloped areas of government designated parks, recreation areas, and wildlife preserves.	Undeveloped areas of government designated parks, recreation areas, and wildlife preserves can be designated as LZ1 or LZ2 if they are contained within such a zone.	Not applicable.
LZ1	Low	Developed portion of government designated parks, recreation areas and wildlife preserves. Those that are wholly contained within a higher lighting zone may be considered by the local government as part of that lighting zone.	Developed portion of a government designated park, recreation area, or wildlife preserve, can be designated as LZ2 or LZ3 if they are contained within such a zone.	Not applicable.
LZ2	Moderate	Rural areas, as defined by the 2000 U.S. Census.	Special districts within a default LZ2 zone may be designated as LZ3 or LZ4 by a local jurisdiction. Examples include special commercial districts or areas with special security considerations located within a rural area.	Special districts and government designated parks within a default LZ2 zone may be designated as LZ1 by the local jurisdiction for lower illumination standards, without any size limits.
LZ3	Moderately High	Urban areas, as defined by the 2000 U.S. Census.	Special districts within a default LZ3 may be designated as LZ4 by local jurisdiction for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels.	Special districts and government designated parks within a default LZ3 zone may be designated as LZ1 or LZ2 by the local jurisdiction, without any size limits.
LZ4	High	None.	Not applicable.	Not applicable.

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energy consumption that would have resulted from the on-site solar electric generation system and/or battery storage system that is otherwise required by Section 150.1 of Title 24. The energy savings benefits allocated to the building shall be in the form of:

- A. actual reductions in the energy consumption of the dedicated building;
- B. utility energy reduction credits that will result in virtual reductions in the building's energy consumption that is subject to energy bill payments; or
- C. payments to the building that will have an equivalent effect as energy bill reductions.

The reduction in the building's energy bill resulting from A, B, or C above shall be greater than the added cost to the building resulting from the building's share in the community shared solar or battery system.

4. **Durability.** The community shared solar electric generation system and/or community shared battery storage system shall be designed and installed to provide the energy savings benefits to the dedicated building specified in Section 10-115(a)3 for a period of no less than twenty (20) years.
5. **Additionality.** The community shared solar electric generation system and/or community shared battery storage system shall provide the energy savings benefits specified in Section 10-115(a)3 exclusively to the dedicated building. Those energy savings benefits shall in no way be attributed to other purposes or transferred to other buildings or property.
6. **Accountability and recordkeeping.** Applicants for Commission approval of community shared solar electric generation systems and/or community shared battery storage systems shall be accountable to all parties who relied on these systems for partial or total compliance with the on-site solar electric generation and/or battery storage system that would otherwise be required, including but not limited to builders of the buildings, owners of the buildings, enforcement agencies, and the Commission. Recordkeeping regarding compliance with the requirements in Sections 10-115(a)1-6 shall be maintained over the period of time specified in Section 10-115(a)4 for each building for which the community shared solar electric generation or battery storage system is used to demonstrate partial or total compliance. Access to these records shall be provided to any entity approved by the Commission for auditing compliance with these requirements.

(b) **Application for commission approval.** Any entity may apply to the Commission for approval to administer a community shared solar electric generation or community shared battery storage system to provide partial or total compliance with the on-site solar electric generation system and/or battery storage system required by Section 150.1 of Title 24, California Code of Regulations, Part 6. The application shall demonstrate to the Commission's satisfaction that each of the requirements specified in Section 10-115(a)1-6 will be met and shall include detailed explanation of the actions that will be taken by the applicant to ensure that each requirement is met over the period of time specified in Section 10-115(a)4 for each building for which a partial or total offset is used to demonstrate compliance. All applicants have the burden of proof to establish that their application should be granted. The Commission shall have the authority to not approve any application that the Commission determines to be inconsistent with the requirements of Section 10-115.

(c) **Commission approval.** Community shared solar electric generation systems and/or community shared battery storage systems, which demonstrate to the Commission's satisfaction that all of the requirements specified in Section 10-115 will be met, shall be approved.

Authority: Sections 25402 and 25402.1, Public Resources Code.

Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8 and 25943, Public Resources Code.

APPENDIX G. 2022 California Energy Code, Section 140.7 Prescriptive Requirements for Outdoor Lighting

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NONRESIDENTIAL, HIGH-RISE RESIDENTIAL AND HOTEL/MOTEL OCCUPANCIES—COMPLIANCE APPROACHES FOR ACHIEVING ENERGY EFFICIENCY

**TABLE 140.6-G
TAILORED METHOD GENERAL LIGHTING POWER ALLOWED—BY ILLUMINANCE AND ROOM CAVITY RATIO**

GENERAL ILLUMINANCE LEVEL (LUX) ^a	GENERAL LIGHTING POWER DENSITY (W/FT ²) FOR THE FOLLOWING RCR VALUES ^b VALUES ^b			
	RCR ≤ 2.0	RCR > 2.0 AND ≤ 3.5	RCR > 3.5 AND ≤ 7.0	RCR > 7.0
150	0.40	0.45	0.60	0.75
200	0.45	0.55	0.75	1.00
300	0.65	0.80	1.00	1.40
400	0.75	0.95	1.25	1.50
500	0.90	1.05	1.45	1.85
600	1.08	1.24	1.64	2.38

a. Illuminance values from Column 2 of Table 140.6-D.

b. RCR values are calculated using applicable equations in Table 140.6-F.

Note: Authority: Sections 25213, 25218, 25218.5, 25402 and 25402.1, *Public Resources Code*. Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8, and 25943, *Public Resources Code*.

SECTION 140.7 PRESCRIPTIVE REQUIREMENTS FOR OUTDOOR LIGHTING

(a) An outdoor lighting installation complies with this section if it meets the requirements in Subsections (b) and (c), and the actual outdoor lighting power installed is no greater than the allowed outdoor lighting power calculated under Subsection (d). The allowed outdoor lighting shall be calculated according to outdoor lighting zone in Title 24, Part 1, Section 10-114.

Exceptions to Section 140.7(a): When more than 50 percent of the light from a luminaire falls within one or more of the following applications, the lighting power for that luminaire shall be exempt from Section 140.7:

1. Temporary outdoor lighting.
2. Lighting required and regulated by the Federal Aviation Administration, and the Coast Guard.
3. Lighting for public streets, roadways, highways and traffic signage lighting, including lighting for driveway entrances occurring in the public right-of-way.
4. Lighting for sports and athletic fields, and children's playgrounds.
5. Lighting for industrial sites, including but not limited to, rail yards, maritime shipyards and docks, piers and marinas, chemical and petroleum processing plants, and aviation facilities.
6. Lighting of public monuments.
7. Lighting of signs complying with the requirements of Sections 130.3 and 140.8.
8. Lighting of tunnels, bridges, stairs, wheelchair elevator lifts for American with Disabilities Act (ADA) compliance, and ramps that are other than parking garage ramps.

9. Landscape lighting.
10. In theme parks; outdoor lighting only for themes and special effects.
11. Lighting for outdoor theatrical and other outdoor live performances, provided that these lighting systems are additions to area lighting systems and are controlled by a multiscene or theatrical cross-fade control station accessible only to authorized operators.
12. Outdoor lighting systems for qualified historic buildings, as defined in the *California Historic Building Code* (Title 24, Part 8), if they consist solely of historic lighting components or replicas of historic lighting components. If lighting systems for qualified historic buildings contain some historic lighting components or replicas of historic components, combined with other lighting components, only those historic or historic replica components are exempt. All other outdoor lighting systems for qualified historic buildings shall comply with Section 140.7.

(b) **Outdoor lighting power trade-offs.** Outdoor lighting power trade-offs shall be determined as follows:

1. Allowed lighting power determined according to Section 140.7(d)1 for general hardscape lighting allowance may be traded to specific applications in Section 140.7(d)2, provided the hardscape area from which the lighting power is traded continues to be illuminated in accordance with Section 140.7(d)1A.
2. Allowed lighting power determined according to Section 140.7(d)2 for additional lighting power allowances for specific applications shall not be traded between specific applications, or to hardscape lighting in Section 140.7(d)1.
3. Trading of lighting power allowances between outdoor and indoor areas shall not be permitted.

(c) **Calculation of actual lighting power.** The wattage of outdoor luminaires shall be determined in accordance with Section 130.0(c).

(d) **Calculation of allowed lighting power.** The allowed lighting power shall be the combined total of the sum of the

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general hardscape lighting allowance determined in accordance with Section 140.7(d)1, and the sum of the additional lighting power allowance for specific applications determined in accordance with Section 140.7(d)2.

1. General hardscape lighting allowance. Determine the general hardscape lighting power allowances as follows:

A. The general hardscape area of a site shall include parking lot(s), roadway(s), driveway(s), sidewalk(s), walkway(s), bikeway(s), plaza(s), bridge(s), tunnel(s), and other improved area(s) that are illuminated. In plan view of the site, determine the illuminated hardscape area, which is defined as any hardscape area that is within a square pattern around each luminaire or pole that is ten times the luminaire mounting height with the luminaire in the middle of the pattern, less any areas that are within a building, beyond the hardscape area, beyond property lines or obstructed by a structure. The illuminated hardscape area shall include portions of planters and landscaped areas that are within the lighting application and are less than or equal to 10 feet wide in the short dimensions and are enclosed by hardscape or other improvement on at least three sides. Multiply the illuminated hardscape area by the area wattage allowance (AWA) from Table 140.7-A for the appropriate lighting zone.

B. Determine the perimeter length of the general hardscape area. The total perimeter shall not include portions of hardscape that are not illuminated according to Section 140.7(d)1A. Multiply the hardscape perimeter by the linear wattage allowance (LWA) for hardscape from Table 140.7-A for the appropriate lighting zone. The perimeter length for hard-

scape around landscaped areas and permanent planters shall be determined as follows:

- Landscaped areas completely enclosed within the hardscape area, and which have a width or length less than 10 feet wide, shall not be added to the hardscape perimeter length.
- Landscaped areas completely enclosed within the hardscape area, and which width or length is a minimum of 10 feet wide, the perimeter of the landscaped areas or permanent planter shall be added to the hardscape perimeter length.
- Landscaped edges that are not abutting the hardscape shall not be added to the hardscape perimeter length.

C. Determine the initial wattage allowance (IWA) for general hardscape lighting from Table 140.7-A for the appropriate lighting zone. The hardscape area shall be permitted one IWA per site.

D. The general hardscape lighting allowance shall be the sum of the allowed watts determined from (A), (B) and (C) above.

2. Additional lighting power allowance for specific applications. Additional lighting power for specific applications shall be the smaller of the additional lighting allowances for specific applications determined in accordance with Table 140.7-B for the appropriate lighting zone, or the actual installed lighting power meeting the requirements for the allowance.

Note: Authority: Sections 25213, 25218, 25218.5, 25402 and 25402.1, *Public Resources Code*. Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8, and 25943, *Public Resources Code*.

**TABLE 140.7-A
GENERAL HARDSCAPE LIGHTING POWER ALLOWANCE**

TYPE OF POWER ALLOWANCE	LIGHTING ZONE 0 ¹	LIGHTING ZONE 1	LIGHTING ZONE 2 ¹		LIGHTING ZONE 3 ¹		LIGHTING ZONE 4
	Asphalt/Concrete	Asphalt/Concrete	Asphalt	Concrete ²	Asphalt	Concrete ²	Asphalt/Concrete
Area wattage allowance (AWA)	No allowance ³	0.018 W/ft ²	0.023 W/ft ²	0.025 W/ft ²	0.025 W/ft ²	0.03 W/ft ²	0.03 W/ft ²
Linear wattage allowance (LWA)		0.15 W/ft	0.17 W/ft	0.4 W/ft	0.25 W/ft	0.4 W/ft	0.35 W/ft
Initial wattage allowance (IWA)		180 W	250 W	250 W	350 W	350 W	400 W

- Continuous lighting is explicitly prohibited in Lighting Zone 0. A single luminaire of 15 Watts or less may be installed at an entrance to a parking area, trail head, fee payment kiosk, outhouse, or toilet facility, as required to provide safe navigation of the site infrastructure. Luminaires installed shall meet the maximum zonal lumen limits as specified in Section 130.2(b).
- Where greater than 50% of the paved surface of a parking lot is finished with concrete. This does not extend beyond the parking lot, and does not include any other General Hardscape areas.
- Narrow band spectrum light sources with a dominant peak wavelength greater than 580 nm – as mandated by local, state, or federal agencies to minimize the impact on local, active professional astronomy or nocturnal habitat of specific local fauna – shall be allowed a 2.0 lighting power allowance multiplier.

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TABLE 140.7-B
ADDITIONAL LIGHTING POWER ALLOWANCE FOR SPECIFIC APPLICATIONS
All area and distance measurements in plan view unless otherwise noted.

LIGHTING APPLICATION	LIGHTING ZONE 0	LIGHTING ZONE 1	LIGHTING ZONE 2	LIGHTING ZONE 3	LIGHTING ZONE 4
WATTAGE ALLOWANCE PER APPLICATION. Use all that apply as appropriate.					
Building entrances or exits. Allowance per door. Luminaires qualifying for this allowance shall be within 20 feet of the door.	Not applicable	9 watts	15 watts	19 watts	21 watts
Primary entrances to senior care facilities, police stations, healthcare facilities, fire stations and emergency vehicle facilities. Allowance per primary entrance(s) only. Primary entrances shall provide access for the general public and shall not be used exclusively for staff or service personnel. This allowance shall be in addition to the building entrance or exit allowance above. Luminaires qualifying for this allowance shall be within 100 feet of the primary entrance.	Not applicable	20 watts	40 watts	57 watts	60 watts
Drive up windows. Allowance per customer service location. Luminaires qualifying for this allowance shall be within two mounting heights of the sill of the window.	Not applicable	16 watts	30 watts	50 watts	75 watts
Vehicle service station uncovered fuel dispenser. Allowance per fueling dispenser. Luminaires qualifying for this allowance shall be within two mounting heights of the dispenser.	Not applicable	55 watts	77 watts	81 watts	135 watts
ATM machine lighting. Allowance per ATM machine. Luminaires qualifying for this allowance shall be within 50 feet of the dispenser.	Not applicable	100 watts for first ATM machine; 35 watts for each additional ATM machine.			
WATTAGE ALLOWANCE PER UNIT LENGTH (W/linear ft). May be used for one or two frontage side(s) per site.					
Outdoor sales frontage. Allowance for frontage immediately adjacent to the principal viewing location(s) and unobstructed for its viewing length. A corner sales lot may include two adjacent sides, provided that a different principal viewing location exists for each side. Luminaires qualifying for this allowance shall be located between the principal viewing location and the frontage outdoor sales area.	Not applicable	No Allowance	11 W/linear ft	19 W/linear ft	25 W/linear ft
WATTAGE ALLOWANCE PER HARDSCAPE AREA (W/ft ²). May be used for any illuminated hardscape area on the site.					
Hardscape ornamental lighting. Allowance for the total site illuminated hardscape area. Luminaires qualifying for this allowance shall be rated for 100 watts or less as determined in accordance with Section 130.06(d), and shall be post-top luminaires, lanterns, pendant luminaires or chandeliers.	Not applicable	No Allowance	0.007 W/ft ²	0.013 W/ft ²	0.019 W/ft ²
WATTAGE ALLOWANCE PER SPECIFIC AREA (W/ft ²). Use as appropriate, provided that none of the following specific applications shall be used for the same area.					
Building facades. Only areas of building facade that are illuminated shall qualify for this allowance. Luminaires qualifying for this allowance shall be aimed at the facade and shall be capable of illuminating it without obstruction or interference by permanent building features or other objects.	Not applicable	No Allowance	0.100 W/ft ²	0.170 W/ft ²	0.225 W/ft ²
Outdoor sales lots. Allowance for uncovered sales lots used exclusively for the display of vehicles or other merchandise for sale. Driveways, parking lots or other nonsales areas shall be considered hardscape areas even if these areas are completely surrounded by sales lot on all sides. Luminaires qualifying for this allowance shall be within five mounting heights of the sales lot area.	Not applicable	0.060 W/ft ²	0.210 W/ft ²	0.280 W/ft ²	0.485 W/ft ²
Vehicle service station hardscape. Allowance for the total illuminated hardscape area less area of buildings, under canopies, off property, or obstructed by signs or structures. Luminaires qualifying for this allowance shall be illuminating the hardscape area and shall not be within a building, below a canopy, beyond property lines or obstructed by a sign or other structure.	Not applicable	0.006 W/ft ²	0.068 W/ft ²	0.138 W/ft ²	0.200 W/ft ²
Vehicle service station canopies. Allowance for the total area within the drip line of the canopy. Luminaires qualifying for this allowance shall be located under the canopy.	Not applicable	0.220 W/ft ²	0.430 W/ft ²	0.580 W/ft ²	1.010 W/ft ²
Sales canopies. Allowance for the total area within the drip line of the canopy. Luminaires qualifying for this allowance shall be located under the canopy.	Not applicable	No Allowance	0.470 W/ft ²	0.622 W/ft ²	0.740 W/ft ²
Nonsales canopies and tunnels. Allowance for the total area within the drip line of the canopy or inside the tunnel. Luminaires qualifying for this allowance shall be located under the canopy or tunnel.	Not applicable	0.057 W/ft ²	0.137 W/ft ²	0.270 W/ft ²	0.370 W/ft ²
Guard stations. Allowance up to 1,000 square feet per vehicle lane. Guard stations provide access to secure areas controlled by security personnel who stop and may inspect vehicles and vehicle occupants, including identification, documentation, vehicle license plates and vehicle contents. Qualifying luminaires shall be within two mounting heights of a vehicle lane or the guardhouse.	Not applicable	0.081 W/ft ²	0.176 W/ft ²	0.325 W/ft ²	0.425 W/ft ²
Student pick-up/drop-off zone. Allowance for the area of the student pick-up/drop-off zone, with or without canopy, for preschool through 12th grade school campuses. A student pick-up/drop-off zone is a curbside, controlled traffic area on a school campus where students are picked-up and dropped off from vehicles. The allowed area shall be the smaller of the actual width or 25 feet, times the smaller of the actual length or 250 feet. Qualifying luminaires shall be within two mounting heights of the student pick-up/drop-off zone.	Not applicable	No Allowance	0.056 W/ft ²	0.200 W/ft ²	No Allowance
Outdoor dining. Allowance for the total illuminated hardscape of outdoor dining. Outdoor dining areas are hardscape areas used to serve and consume food and beverages. Qualifying luminaires shall be within two mounting heights of the hardscape area of outdoor dining.	Not applicable	0.004 W/ft ²	0.030 W/ft ²	0.050 W/ft ²	0.075 W/ft ²
Special security lighting for retail parking and pedestrian hardscape. This additional allowance is for illuminated retail parking and pedestrian hardscape identified as having special security needs. This allowance shall be in addition to the building entrance or exit allowance.	Not applicable	0.004 W/ft ²	0.005 W/ft ²	0.010 W/ft ²	No Allowance

NONRESIDENTIAL, HIGH-RISE RESIDENTIAL AND HOTEL/MOTEL OCCUPANCIES—MANDATORY REQUIREMENTS FOR LIGHTING SYSTEMS AND EQUIPMENT, AND ELECTRICAL POWER DISTRIBUTION SYSTEMS

**SECTION 130.3
SIGN LIGHTING CONTROLS**

Nonresidential buildings other than healthcare facilities, high-rise residential buildings, and hotel/motel buildings shall comply with the applicable requirements of Sections 130.3(a)1 through 130.3(a)3.

(a) **Controls for sign lighting.** All sign lighting shall meet the requirements below as applicable:

1. **Indoor signs.** All indoor sign lighting other than exit sign lighting shall be controlled with an automatic time-switch control or astronomical time-switch control.

2. **Outdoor signs.** Outdoor sign lighting shall meet the following requirements as applicable:

A. All outdoor sign lighting shall be controlled with a photocontrol in addition to an automatic time-switch control, or an astronomical time-switch control.

Exception to Section 130.3(a)2A: Outdoor signs in tunnels, and signs in large permanently covered outdoor areas that are intended to be continuously lit, 24 hours per day and 365 days per year.

B. All outdoor sign lighting that is ON both day and night shall be controlled with a dimmer that provides the ability to automatically reduce sign lighting power by a minimum of 65 percent during nighttime hours. Signs that are illuminated at night and for more than 1 hour during daylight hours shall be considered ON both day and night.

Exception to Section 130.3(a)2B: Outdoor signs in tunnels and large covered areas that are intended to be illuminated both day and night.

3. **Demand responsive Electronic Message Center (EMC) control.** See Section 110.12 for requirements for demand responsive EMC controls.

Note: Authority: Sections 25213, 25218, 25218.5, 25402 and 25402.1, *Public Resources Code*. Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8, and 25943, *Public Resources Code*.

**SECTION 130.4
LIGHTING CONTROL ACCEPTANCE AND
INSTALLATION CERTIFICATE REQUIREMENTS**

Nonresidential buildings other than healthcare facilities, high-rise residential buildings and hotel/motel buildings shall comply with the applicable requirements of Sections 130.4(a) through 130.4(c). Healthcare facilities shall comply with the applicable acceptance and installation documentation requirements of OSHPD.

(a) **Lighting control acceptance requirements.** Before an occupancy permit is granted, indoor and outdoor lighting controls serving the building, area or site shall be certified as meeting the Acceptance Requirements for Code Compliance in accordance with Section 130.4(a). A Certificate of Acceptance shall be submitted to the enforcement agency under Section 10-103(a) of Part 1, that:

1. Certifies that all of the lighting acceptance testing necessary to meet the requirements of Part 6 is completed;

2. Certifies that the applicable procedures in Reference Nonresidential Appendix NA7.6 and NA7.8 have been followed;

3. Certifies that automatic daylight controls comply with Section 130.1(d) and Reference Nonresidential Appendix NA7.6.1;

4. Certifies that lighting shut-OFF controls comply with Section 130.1(e) and Reference Nonresidential Appendix NA7.6.2;

5. Certifies that demand responsive controls comply with Section 130.1(e) and Reference Nonresidential Appendix NA7.6.3; and

6. Certifies that outdoor lighting controls comply with the applicable requirements of Section 130.2(c) and Reference Nonresidential Appendix NA7.8; and

7. Certifies that lighting systems receiving the Institutional Tuning Power Adjustment Factor comply with Section 140.6(a)2J and Reference Nonresidential Appendix NA7.7.6.2.

(b) **Lighting control installation certificate requirements.** To be recognized for compliance with Part 6 an installation certificate shall be submitted in accordance with Section 10-103(a) for any lighting control system, energy management control system, track lighting integral current limiter, track lighting supplementary overcurrent protection panel, interlocked lighting system, lighting power adjustment factor, or additional wattage available for a videoconference studio, in accordance with the following requirements, as applicable:

1. Certification that when a lighting control system is installed to comply with lighting control requirements in Part 6 it complies with the applicable requirements of Section 110.9; and complies with Reference Nonresidential Appendix NA7.7.1.

2. Certifications that when an energy management control system is installed to function as a lighting control required by Part 6 it functionally meets all applicable requirements for each application for which it is installed, in accordance with Sections 110.9, 130.0 through 130.5, 140.6 through 150.0, and 150.2; and complies with Reference Nonresidential Appendix NA7.7.2.

3. **Reserved.**

4. **Reserved.**

5. Certification that interlocked lighting systems used to serve an approved area comply with Section 140.6(a)1; and comply with Reference Nonresidential Appendix NA7.7.5.

SECTION 140.8

PRESCRIPTIVE REQUIREMENTS FOR SIGNS

This section applies to all internally illuminated and externally illuminated signs, unfiltered light emitting diodes (LEDs) and unfiltered neon, both indoor and outdoor. Each sign shall comply with either subsection (a) or (b), as applicable.

(a) Maximum allowed lighting power.

1. For internally illuminated signs, the maximum allowed lighting power shall not exceed the product of the illuminated sign area and 12 watts per square foot. For double-faced signs, only the area of a single face shall be used to determine the allowed lighting power.
2. For externally illuminated signs, the maximum allowed lighting power shall not exceed the product of the illuminated sign area and 2.3 watts per square foot. Only areas of an externally lighted sign that are illuminated without obstruction or interference, by one or more luminaires, shall be used.
3. Lighting for unfiltered light emitting diodes (LEDs) and unfiltered neon shall comply with Section 140.8(b).

(b) **Alternate lighting sources.** The sign shall comply if it is equipped only with one or more of the following light sources:

1. High pressure sodium lamps; or
2. Metal halide lamps that are:
 - A. Pulse start or ceramic served by a ballast that has a minimum efficiency of 88 percent or greater; or
 - B. Pulse start that are 320 watts or smaller, are not 250 watt or 175 watt lamps, and are served by a ballast that has a minimum efficiency of 80 percent.

Ballast efficiency is the reference lamp power divided by the ballast input power when tested according to ANSI C82.6-2015.

3. Neon or cold cathode lamps with transformer or power supply efficiency greater than or equal to the following:
 - A. A minimum efficiency of 75 percent when the transformer or power supply rated output current is less than 50 mA; or
 - B. A minimum efficiency of 68 percent when the transformer or power supply rated output current is 50 mA or greater.

The ratio of the output wattage to the input wattage is at 100 percent tubing load.
4. Fluorescent lighting systems meeting one of the following requirements:
 - A. Use only lamps with a minimum color rendering index (CRI) of 80; or
 - B. Use only electronic ballasts with a fundamental output frequency not less than 20 kHz.
5. Light emitting diodes (LEDs) with a power supply having an efficiency of 80 percent or greater; or

Exception to Section 140.8(b)5: Single voltage external power supplies that are designed to convert 120 volt AC input into lower voltage DC or AC output, and have a nameplate output power less than or equal to 250 watts, shall comply with the applicable requirements of the appliance efficiency regulations (Title 20).

6. Compact fluorescent lamps that do not contain a medium screw base socket (E24/E26).

Exception 1 to Section 140.8: Unfiltered incandescent lamps that are not part of an electronic message center (EMC), an internally illuminated sign or an externally illuminated sign.

Exception 2 to Section 140.8: Exit signs. Exit signs shall meet the requirements of the appliance efficiency regulations.

Exception 3 to Section 140.8: Traffic Signs. Traffic signs shall meet the requirements of the appliance efficiency regulations.

Note: Authority: Sections 25213, 25218, 25218.5, 25402 and 25402.1, *Public Resources Code*. Reference: Sections 25007, 25008, 25218.5, 25310, 25402, 25402.1, 25402.4, 25402.5, 25402.8, and 25943, *Public Resources Code*.

SECTION 140.9

PRESCRIPTIVE REQUIREMENTS FOR COVERED PROCESSES

(a) **Prescriptive requirements for computer rooms.** Space conditioning systems serving a computer room with a power density greater than 20 W/ft² shall comply with this section by being designed with and having constructed and installed a cooling system that meets the requirements of Subsections 1 through 6.

1. **Economizers.** Each individual cooling system primarily serving computer room shall include either:
 - A. An integrated air economizer capable of providing 100 percent of the expected system cooling load as calculated in accordance with a method approved by the Commission, at outside air temperatures of 55°F dry-bulb/50°F wet-bulb and below, and be equipped with a fault detection and diagnostic system as specified by Section 120.2(i); or
 - B. An integrated water economizer capable of providing 100 percent of the expected system cooling load as calculated in accordance with a method approved by the Commission, at outside air temperatures of 40°F dry-bulb/35°F wet-bulb and below.

Exception 1 to Section 140.9(a)1: Individual computer rooms under 5 tons in a building that does not have any economizers.

Exception 2 to Section 140.9(a)1: New cooling systems serving an existing computer room in an existing building up to a total of 50 tons of new cooling equipment per building.

Lighting Practice: Environmental Considerations for Outdoor Lighting

LZ-2	Lighting Zone 2 pertains to areas with moderate ambient lighting levels. These typically include multifamily residential areas, institutional residential areas, schools, churches, hospitals, hotels/motels, commercial and/or business areas with evening activities, embedded in predominantly residential areas, neighborhood dining, recreational and playing fields and/or mixed use development with a predominance of residential areas. Can be used to accommodate a district of outdoor sales or industry in an area otherwise zoned LZ-1.	Recommended default zone for light commercial business districts and high density of mixed use residential districts. Includes neighborhood business districts, churches, schools and neighborhood recreational facilities, and light industrial zoning with modest nighttime user-lighting requirements.

Figure 4-4. LZ-2 description from the MLO.



Figure 4-5. A street located in an LZ-2 area: fully shielded lighting, uniform distribution. (Image courtesy of Bob Parks)

• LZ-3: Moderately high ambient light

LZ-3 (see Figure 4-6) includes areas of human activity (i.e., habitation, recreation, and/or work) where electric lighting may be continuous and is required for and convenience at night. The vision of human residents and users of these areas is adapted to moderately high light levels, and they have moderate to high expectations of electric lighting. Lighting is expected to be continuous (e.g. lighting delivered fairly evenly along the length of a path or street). After curfew, both light levels and uniformity may be reduced in some areas as activity levels decline. Figure 4-7 shows an example of building façade lighting in an LZ-3 area.

LZ-3	Lighting Zone 3 pertains to areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial areas and shopping and retail areas with high night time activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active outdoor retail areas.	Recommended default zone for large office/business districts. Includes business town centers, commercial mixed use, and heavy industrial and/or manufacturing zone districts.

Figure 4-6. LZ-3 description from the MLO.



Figure 4-7. A long-term care facility in an LZ-3 area: well-shielded lighting—no direct uplight. (Image courtesy of David Roederer)

• LZ-4: High ambient light

LZ-4 (see Figure 4-8) includes areas of high levels of human activity at night, including significant interaction among pedestrians and/or vehicles. The vision of humans when outside is typically adapted to moderate light levels. Lighting is continuous and is required for safety and convenience. Expectations for electric lighting are high, both in terms of light levels and uniformity along pathways or streets. However, both light levels and uniformity may be reduced after curfew hours in some areas as activity levels decline. Figure 4-9 shows an example of an urban entertainment area designated as LZ-4.

LZ-4	Lighting zone 4 pertains to areas of very high ambient lighting levels. LZ-4 should only be used for special cases and is not appropriate for most offices. LZ-4 may be used for extremely unusual installations such as high density entertainment districts, and heavy industrial areas.	Not a default zone. Includes high intensity business or industrial zone districts.

Figure 4-8. LZ-4 description from the MLO.



Figure 4-9. Example of an entertainment district in an LZ-4 urban area. (Image courtesy of Bob Parks)

APPENDIX K. IESNA Recommended Light Trespass Illuminance Limits

Table 26.5 | Recommended Light Trespass Illuminance Limits

Lighting Zone	Limit in lux ^a	
	Pre-curfew	Post-curfew
LZ4	15	6
LZ3	8	3
LZ2	3	1
LZ1	1	0
LZ0	0.1	0

- a. Maximum initial illuminance on a plane perpendicular to the line of sight to the luminaire(s). Plane located at observer position where light trespass is under review. [7]

APPENDIX L. Sign Lighting Illuminance Calculation (fc)

Sign Lighting illuminance data presented below is derived from the lighting illuminance calculations prepared as per the methods described in Section I.1 above. Illuminance data is presented in the following tables with location coordinates defined relative to the elevation and horizontal distance from lower left, viewing from the Property to the vertical plane where Light trespass illuminance is under review. Grid data is displayed at ten feet on center, vertical and horizontal.

VP-N1a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.70
	135	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	125	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.80
	115	0.70	0.80	0.80	0.80	0.80	0.70	0.70	0.80
	105	0.80	0.80	0.90	0.90	0.80	0.80	0.70	0.80
	95	0.80	0.80	0.90	0.90	0.90	0.80	0.70	0.80
	85	0.80	0.80	0.80	0.80	0.80	0.70	0.70	0.80
	75	0.70	0.70	0.70	0.70	0.60	0.60	0.50	0.60
	65	0.60	0.50	0.50	0.40	0.40	0.30	0.30	0.40
	55	0.50	0.30	0.30	0.20	0.10	0.00	0.00	0.00
	45	0.20	0.10	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N1a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.70	0.80	0.80	1.00	1.10	1.20	1.30	1.40
	135	0.80	0.80	0.90	1.00	1.10	1.30	1.50	1.60
	125	0.80	0.90	1.00	1.10	1.30	1.50	1.60	1.90
	115	0.80	0.90	1.00	1.20	1.50	1.70	1.90	2.00
	105	0.90	1.00	1.00	1.40	1.80	2.20	2.40	2.40
	95	0.90	1.00	1.10	1.50	2.20	2.60	2.70	2.90
	85	0.80	1.00	1.10	1.80	2.60	2.90	3.10	3.20
	75	0.80	0.90	1.10	1.90	3.00	3.20	3.40	3.30
	65	0.80	0.90	1.00	2.30	3.20	3.20	3.40	3.40
	55	0.00	0.00	0.00	1.70	2.20	2.60	2.90	3.00
	45	0.00	0.00	0.00	1.90	2.30	2.60	2.70	2.80
	35	0.00	0.00	0.00	1.50	2.10	2.30	2.60	2.50
	25	0.00	0.10	0.60	1.10	1.60	1.70	2.00	2.10
	15	0.00	0.00	0.00	0.60	1.00	1.60	1.40	1.40
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N1a

Horizontal (ft)		165	175	185	195	205	215	225	235
Vertical (ft)	145	1.50	1.50	1.40	1.40	1.30	1.20	1.20	1.10
	135	1.70	1.70	1.60	1.50	1.40	1.20	1.20	1.20
	125	1.90	1.90	1.90	1.60	1.50	1.20	1.20	1.20
	115	2.20	2.10	2.00	1.90	1.50	1.10	0.90	1.00
	105	2.50	2.40	2.30	2.10	1.60	1.00	0.80	0.80
	95	2.90	2.70	2.60	2.30	1.70	1.00	0.70	0.60
	85	3.20	3.00	2.80	2.50	1.90	1.10	0.80	0.70
	75	3.30	3.20	3.00	2.70	2.20	1.40	1.10	0.90
	65	3.30	3.10	3.00	2.70	2.20	1.80	1.70	1.50
	55	3.00	2.90	2.70	2.50	2.10	1.70	1.70	1.50
	45	2.80	2.70	2.60	2.30	2.00	1.70	1.70	1.50
	35	2.50	2.40	2.30	2.00	1.70	1.50	1.60	1.40
	25	2.00	2.00	1.80	1.70	1.50	1.40	1.40	1.40
	15	1.30	1.30	1.10	1.10	1.00	0.70	0.80	0.70
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N1a

Horizontal (ft)		245	255	265
Vertical (ft)	145	1.10	1.10	1.00
	135	1.20	1.10	1.10
	125	1.20	1.20	1.20
	115	1.10	1.20	1.20
	105	0.90	1.00	1.00
	95	0.80	0.80	0.70
	85	0.80	0.80	0.80
	75	0.90	0.90	1.00
	65	1.60	0.90	1.60
	55	1.60	0.80	1.50
	45	1.60	0.80	1.50
	35	1.50	0.80	1.50
	25	1.40	0.80	1.50
	15	0.70	0.70	0.80
	5	0.00	0.00	0.00

VP-N1b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20	0.10	0.10
	135	0.20	0.20	0.20	0.20	0.20	0.20	0.10	0.10
	125	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	105	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	95	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	85	0.20	0.20	0.20	0.20	0.20	0.20	0.10	0.10
	75	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	65	0.20	0.20	0.20	0.20	0.20	0.20	0.10	0.10
	55	0.20	0.20	0.20	0.20	0.20	0.10	0.10	0.10
	45	0.20	0.20	0.20	0.10	0.10	0.10	0.10	0.10
	35	0.20	0.20	0.20	0.10	0.10	0.10	0.10	0.10
	25	0.20	0.20	0.20	0.10	0.10	0.10	0.10	0.10
	15	0.20	0.20	0.20	0.10	0.10	0.10	0.10	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N1b

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.00
	35	0.10	0.10	0.10	0.10	0.10	0.00	0.00	0.00
	25	0.10	0.10	0.10	0.10	0.10	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.10	0.20	0.20	0.30	0.30	0.30	0.40
	135	0.20	0.20	0.20	0.30	0.30	0.30	0.40	0.40
	125	0.20	0.20	0.30	0.20	0.30	0.30	0.40	0.40
	115	0.20	0.20	0.20	0.20	0.20	0.30	0.40	0.40
	105	0.20	0.20	0.20	0.20	0.20	0.30	0.30	0.30
	95	0.20	0.20	0.20	0.20	0.30	0.30	0.30	0.30
	85	0.20	0.20	0.20	0.20	0.30	0.30	0.40	0.40
	75	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.50
	65	0.30	0.30	0.30	0.20	0.40	0.40	0.40	0.40
	55	0.30	0.30	0.20	0.30	0.30	0.30	0.30	0.40
	45	0.20	0.30	0.30	0.20	0.30	0.30	0.40	0.30
	35	0.30	0.20	0.30	0.30	0.40	0.30	0.50	0.40
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.50	0.50
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.40	0.40	0.40	0.50	0.50	0.50	0.60	0.60
	135	0.40	0.40	0.50	0.40	0.60	0.60	0.60	0.60
	125	0.40	0.40	0.50	0.50	0.50	0.60	0.60	0.70
	115	0.40	0.40	0.50	0.50	0.50	0.70	0.50	0.60
	105	0.30	0.40	0.40	0.40	0.50	0.50	0.50	0.60
	95	0.30	0.40	0.50	0.40	0.50	0.50	0.60	0.60
	85	0.40	0.60	0.40	0.50	0.50	0.60	0.70	0.70
	75	0.50	0.50	0.60	0.60	0.70	0.70	0.70	0.80
	65	0.70	0.50	0.60	0.80	0.60	0.70	0.70	0.80
	55	0.40	0.40	0.40	0.40	0.50	0.60	0.60	0.60
	45	0.30	0.40	0.40	0.50	0.60	0.50	0.60	0.60
	35	0.50	0.50	0.60	0.60	0.70	0.70	0.70	0.80
	25	0.50	0.50	0.60	0.50	0.60	0.70	0.60	0.80
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.60	0.60
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.90	0.80	0.80	0.80	0.80	0.70	0.70	0.70
	135	0.90	0.80	0.80	0.80	0.80	0.70	0.70	0.70
	125	0.90	0.90	0.80	0.80	0.80	0.80	0.70	0.70
	115	0.90	0.90	0.80	0.80	0.80	0.80	0.80	0.70
	105	1.00	0.90	0.80	0.80	0.80	0.80	0.80	0.70
	95	1.00	0.90	0.90	0.80	0.80	0.80	0.80	0.70
	85	1.00	0.90	0.90	0.80	0.80	0.80	0.80	0.70
	75	1.00	0.90	0.80	0.80	0.80	0.80	0.80	0.70
	65	1.00	0.90	0.80	0.80	0.80	0.70	0.70	0.70
	55	0.90	0.90	0.80	0.80	0.70	0.70	0.70	0.70
	45	0.90	0.80	0.70	0.70	0.70	0.70	0.70	0.60
	35	0.90	0.80	0.60	0.70	0.50	0.50	0.50	0.50
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2b

Horizontal (ft)		85	95	105	115	125	135
Vertical (ft)	145	0.60	0.60	0.60	0.60	0.50	0.50
	135	0.70	0.60	0.60	0.60	0.50	0.50
	125	0.70	0.70	0.60	0.60	0.60	0.50
	115	0.70	0.70	0.60	0.60	0.60	0.50
	105	0.70	0.70	0.60	0.60	0.60	0.60
	95	0.70	0.70	0.60	0.60	0.60	0.60
	85	0.70	0.70	0.60	0.60	0.60	0.60
	75	0.70	0.70	0.60	0.60	0.60	0.60
	65	0.70	0.60	0.60	0.60	0.60	0.60
	55	0.60	0.60	0.60	0.60	0.60	0.60
	45	0.60	0.60	0.60	0.50	0.50	0.50
	35	0.50	0.40	0.40	0.40	0.40	0.40
	25	0.00	0.00	0.00	0.00	0.00	0.30
	15	0.00	0.00	0.00	0.00	0.00	0.10
	5	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2c

Horizontal (ft)		5	15	25	35	45	55	65
Vertical (ft)	145	0.70	0.60	0.70	0.70	0.80	0.80	0.90
	135	0.60	0.60	0.70	0.70	0.80	0.90	0.90
	125	0.60	0.60	0.70	0.80	0.80	0.90	1.00
	115	0.60	0.70	0.70	0.80	0.90	0.90	1.00
	105	0.70	0.70	0.70	0.80	0.90	1.00	1.10
	95	0.60	0.70	0.80	0.80	1.00	1.10	1.30
	85	0.70	0.70	0.80	0.90	1.10	1.40	1.70
	75	0.70	0.80	0.90	1.00	1.40	2.00	2.80
	65	0.70	0.80	0.90	1.10	1.90	3.90	7.10
	55	0.80	0.80	0.90	1.20	2.70	10.50	23.90
	45	0.70	0.80	0.80	1.10	3.10	15.60	39.80
	35	0.60	0.70	0.70	1.00	2.50	10.40	26.60
	25	0.50	0.50	0.60	0.90	1.80	4.20	8.30
	15	0.00	0.10	0.10	0.20	0.60	1.30	2.30
	5	0.00	0.10	0.10	0.20	0.40	0.60	1.00

VP-N2d

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.40	0.40	0.40	0.40	0.30	0.30	0.30	0.30
	135	0.50	0.40	0.40	0.40	0.40	0.30	0.30	0.30
	125	0.50	0.50	0.40	0.40	0.40	0.40	0.30	0.30
	115	0.50	0.50	0.50	0.40	0.40	0.40	0.40	0.30
	105	0.60	0.50	0.50	0.50	0.40	0.40	0.40	0.40
	95	0.60	0.60	0.60	0.50	0.50	0.40	0.40	0.40
	85	0.70	0.70	0.60	0.60	0.50	0.50	0.40	0.40
	75	1.00	0.80	0.70	0.60	0.60	0.50	0.40	0.40
	65	1.50	1.10	0.90	0.70	0.60	0.50	0.50	0.40
	55	2.50	1.40	1.00	0.80	0.60	0.50	0.50	0.40
	45	3.20	1.70	1.10	0.80	0.70	0.60	0.50	0.40
	35	2.90	1.80	1.20	0.90	0.70	0.60	0.50	0.40
	25	2.60	1.90	1.30	0.90	0.70	0.60	0.50	0.40
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2d

Horizontal (ft)		85	95	105	115	125	135
Vertical (ft)	145	0.30	0.30	0.30	0.20	0.20	0.30
	135	0.30	0.30	0.30	0.30	0.30	0.30
	125	0.30	0.30	0.30	0.30	0.30	0.30
	115	0.30	0.30	0.30	0.30	0.30	0.30
	105	0.30	0.30	0.30	0.30	0.30	0.30
	95	0.30	0.30	0.30	0.30	0.30	0.30
	85	0.40	0.30	0.30	0.30	0.30	0.30
	75	0.40	0.40	0.30	0.30	0.30	0.30
	65	0.40	0.40	0.30	0.30	0.30	0.30
	55	0.40	0.40	0.30	0.30	0.30	0.30
	45	0.40	0.40	0.30	0.30	0.30	0.30
	35	0.40	0.40	0.30	0.30	0.30	0.30
	25	0.30	0.30	0.30	0.20	0.20	0.30
	15	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00

VP-N2e

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	135	0.40	0.40	0.30	0.30	0.30	0.30	0.30	0.30
	125	0.40	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	115	0.40	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	105	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	95	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	85	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.20
	75	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	15	0.20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	5	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10

VP-N2e

Horizontal (ft)		85	95
Vertical (ft)	145	0.30	0.30
	135	0.30	0.30
	125	0.30	0.30
	115	0.30	0.30
	105	0.30	0.30
	95	0.30	0.20
	85	0.20	0.20
	75	0.20	0.20
	65	0.20	0.20
	55	0.10	0.10
	45	0.10	0.10
	35	0.10	0.10
	25	0.10	0.10
	15	0.10	0.10
	5	0.10	0.10

VP-N3a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.40
	135	0.30	0.30	0.30	0.30	0.30	0.40	0.30	0.40
	125	0.30	0.30	0.30	0.30	0.30	0.40	0.40	0.40
	115	0.30	0.30	0.30	0.30	0.30	0.30	0.40	0.50
	105	0.30	0.30	0.30	0.40	0.30	0.30	0.40	0.40
	95	0.30	0.30	0.30	0.40	0.30	0.40	0.50	0.40
	85	0.40	0.40	0.30	0.30	0.40	0.40	0.50	0.60
	75	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.40
	65	0.30	0.20	0.20	0.30	0.30	0.40	0.50	0.50
	55	0.00	0.00	0.00	0.20	0.20	0.20	0.30	0.40
	45	0.00	0.00	0.00	0.20	0.20	0.20	0.30	0.30
	35	0.00	0.00	0.00	0.10	0.20	0.20	0.20	0.30
	25	0.00	0.00	0.00	0.10	0.10	0.10	0.10	0.20
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N3a

Horizontal (ft)		85	95
Vertical (ft)	145	0.40	0.40
	135	0.40	0.40
	125	0.40	0.40
	115	0.40	0.40
	105	0.40	0.50
	95	0.50	0.50
	85	0.40	0.60
	75	0.50	0.50
	65	0.50	0.50
	55	0.50	0.60
	45	0.50	0.50
	35	0.50	0.50
	25	0.20	0.20
	15	0.00	0.00
	5	0.00	0.00

VP-N3b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	135	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	125	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	115	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	105	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	95	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
	85	0.40	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	75	0.40	0.30	0.30	0.20	0.20	0.20	0.20	0.20
	65	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N3b

Horizontal (ft)		85	95	105	115	125	135
Vertical (ft)	145	0.40	0.40	0.40	0.40	0.40	0.40
	135	0.40	0.40	0.40	0.40	0.40	0.40
	125	0.40	0.40	0.40	0.40	0.40	0.40
	115	0.40	0.40	0.40	0.40	0.50	0.50
	105	0.40	0.40	0.40	0.40	0.40	0.50
	95	0.40	0.40	0.40	0.40	0.40	0.40
	85	0.30	0.30	0.30	0.40	0.40	0.40
	75	0.20	0.20	0.20	0.20	0.20	0.20
	65	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00

VP-N3c

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.40	0.40	0.30	0.30	0.30	0.30	0.30	0.20
	135	0.40	0.40	0.30	0.30	0.30	0.30	0.30	0.30
	125	0.40	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	115	0.40	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	105	0.50	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	95	0.50	0.40	0.40	0.30	0.30	0.30	0.30	0.30
	85	0.50	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	75	0.50	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	65	0.20	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	55	0.20	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	45	0.20	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	35	0.10	0.40	0.30	0.30	0.20	0.20	0.20	0.20
	25	0.10	0.30	0.20	0.20	0.20	0.20	0.10	0.10
	15	0.00	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N3c

Horizontal (ft)		85	95	105	115	125
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.20	0.20	0.20	0.20
	115	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.20
	85	0.20	0.20	0.20	0.20	0.20
	75	0.20	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20	0.20
	55	0.20	0.20	0.20	0.20	0.20
	45	0.20	0.20	0.20	0.20	0.20
	35	0.20	0.20	0.10	0.10	0.10
	25	0.10	0.10	0.10	0.10	0.10
	15	0.10	0.10	0.10	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00

VP-N3d

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.10	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.00	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.00	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N3d

Horizontal (ft)		85	95	105	115	125	135
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.20	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.10	0.10	0.00	0.00	0.00	0.10
	15	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.10	0.10	0.20	0.20	0.20	0.20	0.20
	95	0.10	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	85	0.10	0.10	0.10	0.10	0.20	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.00	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.00	0.00	0.00	0.10	0.10	0.00	0.10	0.10
	35	0.00	0.00	0.00	0.10	0.10	0.00	0.10	0.10
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4a

Horizontal (ft)		85	95	105	115	125	135	145
Vertical (ft)	145	0.20	0.20	0.20	0.30	0.30	0.30	0.30
	135	0.20	0.20	0.20	0.30	0.30	0.30	0.30
	125	0.20	0.30	0.20	0.30	0.30	0.30	0.40
	115	0.20	0.20	0.20	0.30	0.30	0.30	0.40
	105	0.20	0.20	0.20	0.20	0.30	0.30	0.40
	95	0.20	0.20	0.20	0.20	0.20	0.30	0.40
	85	0.10	0.20	0.20	0.20	0.20	0.30	0.40
	75	0.10	0.10	0.10	0.10	0.10	0.20	0.30
	65	0.10	0.10	0.10	0.10	0.10	0.20	0.30
	55	0.10	0.10	0.10	0.10	0.10	0.20	0.30
	45	0.10	0.10	0.10	0.10	0.10	0.20	0.30
	35	0.10	0.10	0.10	0.10	0.10	0.20	0.30
	25	0.00	0.00	0.10	0.10	0.10	0.20	0.30
	15	0.00	0.00	0.10	0.10	0.10	0.10	0.20
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4b

Horizontal (ft)		5	15	25	35	45	55
Vertical (ft)	145	0.20	0.20	0.30	0.30	0.20	0.20
	135	0.30	0.30	0.30	0.30	0.30	0.30
	125	0.30	0.30	0.30	0.30	0.30	0.30
	115	0.30	0.30	0.30	0.30	0.30	0.30
	105	0.30	0.40	0.40	0.30	0.30	0.30
	95	0.40	0.40	0.40	0.40	0.30	0.30
	85	0.40	0.40	0.40	0.40	0.40	0.30
	75	0.40	0.40	0.40	0.40	0.20	0.20
	65	0.40	0.40	0.40	0.40	0.10	0.10
	55	0.50	0.50	0.40	0.40	0.10	0.10
	45	0.50	0.50	0.40	0.40	0.10	0.10
	35	0.40	0.40	0.40	0.40	0.10	0.10
	25	0.40	0.40	0.40	0.40	0.10	0.10
	15	0.00	0.00	0.00	0.00	0.00	0.10
	5	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4c

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.30	0.30	0.30	0.30	0.30	0.40	0.40	0.40
	135	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.40
	125	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.50
	115	0.30	0.30	0.30	0.40	0.40	0.40	0.40	0.50
	105	0.30	0.30	0.30	0.40	0.40	0.40	0.50	0.50
	95	0.30	0.30	0.30	0.40	0.40	0.40	0.50	0.50
	85	0.30	0.30	0.30	0.30	0.40	0.40	0.50	0.50
	75	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.50
	65	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.50
	55	0.20	0.30	0.30	0.30	0.30	0.40	0.40	0.50
	45	0.20	0.20	0.30	0.30	0.30	0.40	0.40	0.50
	35	0.20	0.20	0.30	0.30	0.30	0.30	0.40	0.40
	25	0.20	0.20	0.20	0.30	0.30	0.30	0.40	0.40
	15	0.20	0.20	0.20	0.30	0.30	0.30	0.40	0.40
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4c

Horizontal (ft)		85	95
Vertical (ft)	145	0.40	0.50
	135	0.50	0.50
	125	0.50	0.50
	115	0.50	0.60
	105	0.50	0.60
	95	0.60	0.60
	85	0.60	0.60
	75	0.50	0.60
	65	0.50	0.60
	55	0.50	0.60
	45	0.50	0.60
	35	0.50	0.50
	25	0.50	0.50
	15	0.50	0.50
	5	0.00	0.00

VP-N4d

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.70
	135	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80
	125	0.90	0.90	0.90	0.90	0.90	0.80	0.80	0.80
	115	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.80
	105	1.00	1.00	1.00	0.90	0.90	0.90	0.90	0.90
	95	1.00	1.00	1.00	1.00	1.00	0.90	0.90	0.90
	85	1.00	1.00	1.00	1.00	1.00	1.00	0.90	0.90
	75	1.00	1.00	1.00	1.00	1.00	1.00	0.90	0.90
	65	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.90
	55	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.90
	45	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.90
	35	0.90	1.00	1.00	1.00	1.00	1.00	0.90	0.90
	25	0.90	1.00	1.00	1.00	1.00	1.00	0.90	0.90
	15	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4d

Horizontal (ft)		85	95	105	115	125	135	145
Vertical (ft)	145	0.70	0.70	0.70	0.70	0.60	0.60	0.60
	135	0.80	0.80	0.70	0.70	0.70	0.60	0.60
	125	0.80	0.80	0.80	0.70	0.70	0.70	0.60
	115	0.80	0.80	0.80	0.70	0.70	0.70	0.70
	105	0.90	0.80	0.80	0.80	0.70	0.70	0.70
	95	0.90	0.80	0.80	0.80	0.80	0.70	0.70
	85	0.90	0.90	0.80	0.80	0.80	0.70	0.70
	75	0.90	0.90	0.80	0.80	0.80	0.70	0.70
	65	0.90	0.90	0.80	0.80	0.80	0.70	0.70
	55	0.90	0.90	0.80	0.80	0.80	0.70	0.70
	45	0.90	0.90	0.80	0.80	0.80	0.70	0.70
	35	0.90	0.80	0.80	0.80	0.70	0.70	0.70
	25	0.90	0.80	0.80	0.80	0.70	0.70	0.70
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4e

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.50	0.50	0.50	0.50	0.50	0.60	0.60	0.60
	135	0.50	0.50	0.50	0.60	0.60	0.60	0.60	0.60
	125	0.50	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	115	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.70
	105	0.60	0.60	0.60	0.60	0.60	0.60	0.70	0.70
	95	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.70
	85	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.70
	75	0.60	0.60	0.60	0.60	0.70	0.70	0.70	0.70
	65	0.60	0.60	0.60	0.70	0.70	0.70	0.70	0.70
	55	0.60	0.60	0.60	0.60	0.70	0.70	0.70	0.70
	45	0.60	0.60	0.60	0.60	0.70	0.70	0.70	0.70
	35	0.60	0.60	0.60	0.60	0.70	0.70	0.70	0.70
	25	0.60	0.60	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4e

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	135	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	125	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.60
	115	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	105	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	95	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	85	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	75	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	65	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	55	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	45	0.70	0.70	0.70	0.70	0.70	0.70	0.60	0.60
	35	0.70	0.70	0.60	0.60	0.60	0.60	0.50	0.50
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N4e

Horizontal (ft)		165	175	185	195	205	215	225
Vertical (ft)	145	0.60	0.60	0.60	0.50	0.50	0.50	0.50
	135	0.60	0.60	0.60	0.60	0.50	0.50	0.50
	125	0.60	0.60	0.60	0.60	0.60	0.50	0.50
	115	0.70	0.60	0.60	0.60	0.60	0.50	0.50
	105	0.70	0.70	0.60	0.60	0.60	0.60	0.50
	95	0.70	0.70	0.60	0.60	0.60	0.60	0.50
	85	0.70	0.70	0.60	0.60	0.50	0.50	0.50
	75	0.70	0.70	0.60	0.50	0.50	0.50	0.50
	65	0.70	0.70	0.60	0.50	0.40	0.50	0.50
	55	0.60	0.60	0.60	0.50	0.40	0.50	0.40
	45	0.60	0.50	0.50	0.40	0.00	0.00	0.40
	35	0.50	0.40	0.40	0.30	0.00	0.00	0.30
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N5a

Horizontal (ft)		5	15	25	35	45	55	65
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.20	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N5b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.60	0.70	0.70	0.70	0.70	0.70	0.80	0.80
	135	0.70	0.70	0.70	0.70	0.80	0.80	0.80	0.80
	125	0.70	0.70	0.70	0.80	0.80	0.80	0.90	0.90
	115	0.70	0.80	0.80	0.80	0.90	0.90	0.90	0.90
	105	0.80	0.80	0.80	0.80	0.90	0.90	0.90	1.00
	95	0.80	0.80	0.90	0.90	0.90	1.00	1.00	1.00
	85	0.80	0.90	0.90	0.90	0.90	1.00	1.00	1.10
	75	0.80	0.90	0.90	0.90	1.00	1.00	1.00	1.00
	65	0.80	0.90	0.90	1.00	1.00	1.00	0.90	0.90
	55	0.80	0.90	0.90	0.90	1.00	1.00	0.90	0.90
	45	0.80	0.80	0.90	0.90	0.90	1.00	1.00	1.00
	35	0.50	0.50	0.50	0.60	0.70	0.70	0.70	0.70
	25	0.30	0.30	0.40	0.40	0.40	0.30	0.40	0.30
	15	0.20	0.20	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N5b

Horizontal (ft)		85	95
Vertical (ft)	145	0.80	0.80
	135	0.90	0.90
	125	0.90	1.00
	115	1.00	1.00
	105	1.00	1.10
	95	1.00	1.10
	85	1.10	1.10
	75	1.00	1.00
	65	0.90	1.00
	55	0.90	1.00
	45	1.00	1.10
	35	0.70	0.60
	25	0.10	0.10
	15	0.00	0.00
	5	0.00	0.00

VP-N5c

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.40	0.40	0.30	0.30	0.30	0.30	0.20	0.20
	135	0.40	0.40	0.40	0.30	0.30	0.30	0.30	0.20
	125	0.50	0.40	0.40	0.40	0.30	0.30	0.30	0.20
	115	0.50	0.40	0.40	0.40	0.30	0.30	0.30	0.20
	105	0.50	0.50	0.40	0.40	0.30	0.30	0.30	0.30
	95	0.50	0.50	0.40	0.40	0.40	0.30	0.30	0.30
	85	0.50	0.50	0.40	0.40	0.40	0.30	0.30	0.30
	75	0.60	0.50	0.50	0.40	0.40	0.30	0.30	0.30
	65	0.60	0.50	0.50	0.40	0.40	0.30	0.30	0.30
	55	0.60	0.50	0.50	0.40	0.40	0.30	0.30	0.30
	45	0.50	0.50	0.40	0.40	0.40	0.00	0.10	0.10
	35	0.40	0.40	0.30	0.30	0.30	0.00	0.10	0.00
	25	0.00	0.00	0.10	0.20	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N5d

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	135	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.60
	125	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	115	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	105	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	95	0.60	0.70	0.60	0.60	0.60	0.60	0.60	0.60
	85	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	75	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	65	0.60	0.60	0.60	0.70	0.70	0.70	0.70	0.70
	55	0.70	0.70	0.60	0.60	0.70	0.70	0.70	0.70
	45	0.00	0.00	0.00	0.50	0.50	0.60	0.60	0.50
	35	0.00	0.00	0.00	0.40	0.00	0.00	0.30	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N5d

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.60	0.60	0.60	0.60	0.60	0.50	0.50	0.50
	135	0.60	0.60	0.60	0.60	0.60	0.60	0.50	0.50
	125	0.70	0.60	0.60	0.60	0.60	0.60	0.60	0.50
	115	0.70	0.60	0.60	0.60	0.60	0.60	0.60	0.50
	105	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.50
	95	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	85	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	75	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
	65	0.70	0.70	0.70	0.60	0.60	0.60	0.60	0.60
	55	0.60	0.60	0.60	0.60	0.60	0.60	0.50	0.50
	45	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.40
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N6a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.03	0.04	0.04	0.04	0.05	0.04	0.04	0.05
	135	0.04	0.04	0.04	0.04	0.03	0.03	0.05	0.03
	125	0.04	0.02	0.04	0.03	0.03	0.03	0.04	0.04
	115	0.03	0.03	0.03	0.02	0.02	0.03	0.03	0.03
	105	0.03	0.03	0.04	0.03	0.02	0.03	0.03	0.03
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N6a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.04	0.06	0.04	0.04	0.05	0.04	0.04	0.05
	135	0.03	0.03	0.03	0.03	0.04	0.04	0.04	0.03
	125	0.03	0.03	0.03	0.03	0.04	0.03	0.03	0.04
	115	0.03	0.03	0.03	0.03	0.03	0.04	0.04	0.04
	105	0.03	0.03	0.03	0.04	0.04	0.03	0.04	0.04
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-N6a

Horizontal (ft)		165	175	185	195
Vertical (ft)	145	0.05	0.05	0.05	0.05
	135	0.04	0.04	0.04	0.04
	125	0.04	0.04	0.04	0.04
	115	0.04	0.04	0.05	0.04
	105	0.04	0.05	0.05	0.04
	95	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00

VP-S1a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	3.50	3.40	3.30	3.20	3.10	2.90	2.70	2.40
	135	4.20	4.10	4.00	3.90	3.70	3.30	3.00	2.60
	125	5.00	4.90	4.70	4.60	4.30	3.80	3.30	2.90
	115	5.90	5.80	5.60	5.40	5.00	4.40	3.80	3.30
	105	6.70	6.60	6.30	6.00	5.50	4.80	4.20	3.60
	95	7.10	7.00	6.60	6.30	5.80	5.10	4.40	3.80
	85	7.60	7.40	7.20	6.70	6.20	5.40	4.70	3.90
	75	7.70	7.50	7.30	6.80	6.20	5.40	4.70	3.90
	65	7.50	7.20	6.90	6.40	5.90	5.20	4.50	3.80
	55	6.80	6.60	6.30	5.90	5.50	4.90	4.20	3.60
	45	6.00	5.80	5.50	5.20	4.80	4.40	3.80	3.30
	35	5.20	5.00	4.70	4.50	4.10	3.80	3.50	3.10
	25	4.50	4.20	3.90	3.60	3.40	3.30	3.00	2.70
	15	3.90	3.50	3.20	1.90	1.30	1.20	1.10	1.00
	5	3.10	3.10	3.00	0.90	0.30	0.20	0.00	0.00

VP-S1a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	2.20	1.90	1.80	1.60	1.50	1.30	1.20	1.20
	135	2.30	2.10	1.80	1.70	1.60	1.40	1.30	1.20
	125	2.60	2.30	2.00	1.80	1.60	1.50	1.40	1.30
	115	2.80	2.50	2.10	1.90	1.70	1.60	1.40	1.30
	105	3.10	2.60	2.30	2.00	1.80	1.60	1.50	1.30
	95	3.20	2.70	2.40	2.10	1.80	1.70	1.50	1.40
	85	3.30	2.80	2.40	2.10	1.90	1.70	1.50	1.40
	75	3.30	2.80	2.40	2.10	1.90	1.70	1.50	1.40
	65	3.20	2.70	2.40	2.10	1.90	1.70	1.50	1.40
	55	3.10	2.70	2.30	2.00	1.80	1.60	1.50	1.30
	45	2.90	2.50	2.20	1.90	1.70	1.50	1.40	1.30
	35	2.70	2.30	2.10	1.80	1.60	1.50	1.30	1.20
	25	2.40	2.10	1.90	1.70	1.60	1.40	1.30	1.20
	15	1.20	1.50	1.40	1.30	1.30	1.20	1.10	1.10
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S1a

Horizontal (ft)		165	175	185	195	205	215	225	235
Vertical (ft)	145	1.10	1.00	1.00	0.90	0.80	0.80	0.80	0.70
	135	1.10	1.10	1.00	0.90	0.90	0.80	0.80	0.70
	125	1.20	1.10	1.00	1.00	0.90	0.90	0.80	0.80
	115	1.20	1.10	1.10	1.00	0.90	0.90	0.80	0.80
	105	1.20	1.10	1.10	1.00	1.00	0.90	0.80	0.80
	95	1.30	1.20	1.10	1.00	1.00	0.90	0.80	0.80
	85	1.30	1.20	1.10	1.00	1.00	0.90	0.80	0.80
	75	1.30	1.20	1.10	1.00	0.90	0.90	0.80	0.80
	65	1.30	1.20	1.10	1.00	0.90	0.90	0.80	0.80
	55	1.20	1.20	1.10	1.00	0.90	0.90	0.80	0.80
	45	1.20	1.10	1.00	1.00	0.90	0.80	0.80	0.80
	35	1.10	1.10	1.00	0.90	0.90	0.80	0.80	0.70
	25	1.10	1.00	1.00	0.90	0.80	0.80	0.70	0.70
	15	1.00	1.00	0.90	0.80	0.80	0.80	0.70	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S1a

Horizontal (ft)		245	255	265
Vertical (ft)	145	0.70	0.60	0.60
	135	0.70	0.70	0.60
	125	0.70	0.70	0.60
	115	0.70	0.70	0.60
	105	0.70	0.70	0.60
	95	0.70	0.70	0.60
	85	0.70	0.70	0.60
	75	0.70	0.70	0.60
	65	0.70	0.70	0.60
	55	0.70	0.70	0.60
	45	0.70	0.70	0.60
	35	0.70	0.60	0.60
	25	0.60	0.60	0.60
	15	0.00	0.00	0.00
	5	0.00	0.00	0.00

VP-S1b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.30	0.30	0.40	0.40	0.40	0.50	0.60	0.60
	135	0.30	0.30	0.40	0.40	0.40	0.60	0.60	0.70
	125	0.30	0.30	0.40	0.40	0.50	0.60	0.70	0.80
	115	0.30	0.40	0.40	0.40	0.50	0.60	0.70	0.80
	105	0.30	0.40	0.40	0.50	0.50	0.70	0.80	0.90
	95	0.30	0.40	0.40	0.50	0.60	0.70	0.80	1.00
	85	0.40	0.40	0.50	0.50	0.60	0.80	0.90	1.00
	75	0.40	0.40	0.50	0.50	0.60	0.80	1.00	1.10
	65	0.40	0.40	0.50	0.60	0.70	0.90	1.00	1.20
	55	0.40	0.40	0.50	0.60	0.70	0.90	1.00	1.20
	45	0.40	0.40	0.50	0.60	0.70	0.90	1.10	1.20
	35	0.40	0.40	0.50	0.60	0.70	0.90	1.10	1.20
	25	0.40	0.40	0.50	0.60	0.70	0.90	1.10	1.20
	15	0.40	0.40	0.50	0.60	0.70	0.90	1.10	1.20
	5	0.40	0.40	0.50	0.60	0.70	0.90	1.00	1.20

VP-S1b

Horizontal (ft)		85	95
Vertical (ft)	145	0.70	0.80
	135	0.80	0.90
	125	0.90	1.00
	115	0.90	1.00
	105	1.00	1.10
	95	1.10	1.30
	85	1.20	1.40
	75	1.30	1.50
	65	1.30	1.50
	55	1.40	1.60
	45	1.40	1.70
	35	1.40	1.70
	25	1.40	1.70
	15	1.40	1.60
	5	1.40	1.50

VP-S3a

Horizontal (ft)		5	15	25	35	45
Vertical (ft)	145	0.40	0.40	0.40	0.40	0.30
	135	0.40	0.40	0.30	0.30	0.30
	125	0.40	0.40	0.30	0.30	0.20
	115	0.40	0.30	0.20	0.20	0.20
	105	0.40	0.30	0.30	0.20	0.20
	95	0.40	0.30	0.30	0.20	0.20
	85	0.40	0.30	0.30	0.20	0.20
	75	0.40	0.30	0.30	0.20	0.20
	65	0.40	0.30	0.30	0.20	0.20
	55	0.40	0.30	0.30	0.20	0.20
	45	0.40	0.30	0.30	0.20	0.20
	35	0.40	0.30	0.30	0.20	0.20
	25	0.40	0.30	0.20	0.20	0.20
	15	0.30	0.30	0.20	0.20	0.20
	5	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.10	0.10	0.10	0.10	0.10	0.20	0.10	0.10
	105	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.20	0.30	0.20	0.30	0.30	0.40	0.20	0.30
	135	0.20	0.20	0.20	0.30	0.30	0.30	0.20	0.20
	125	0.20	0.20	0.20	0.30	0.30	0.30	0.20	0.20
	115	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	105	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	95	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	85	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	75	0.10	0.10	0.10	0.30	0.20	0.20	0.10	0.10
	65	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	55	0.10	0.10	0.10	0.30	0.20	0.20	0.10	0.10
	45	0.10	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	35	0.00	0.10	0.10	0.20	0.20	0.20	0.10	0.10
	25	0.00	0.00	0.00	0.10	0.10	0.10	0.10	0.10
	15	0.00	0.00	0.00	0.10	0.10	0.10	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		165	175	185	195	205	215	225	235
Vertical (ft)	145	0.30	0.40	0.40	0.50	0.40	0.50	0.50	0.50
	135	0.20	0.30	0.40	0.40	0.40	0.40	0.40	0.50
	125	0.20	0.30	0.40	0.40	0.40	0.40	0.40	0.40
	115	0.10	0.30	0.30	0.40	0.40	0.40	0.40	0.40
	105	0.10	0.30	0.30	0.40	0.40	0.40	0.40	0.40
	95	0.10	0.30	0.30	0.40	0.40	0.40	0.40	0.40
	85	0.10	0.30	0.30	0.40	0.40	0.40	0.40	0.40
	75	0.10	0.30	0.30	0.30	0.40	0.40	0.40	0.40
	65	0.10	0.30	0.30	0.30	0.40	0.40	0.40	0.40
	55	0.10	0.30	0.30	0.30	0.30	0.30	0.40	0.40
	45	0.10	0.20	0.30	0.30	0.30	0.30	0.30	0.30
	35	0.10	0.20	0.30	0.30	0.20	0.20	0.20	0.20
	25	0.10	0.20	0.30	0.30	0.10	0.10	0.10	0.10
	15	0.00	0.20	0.20	0.20	0.10	0.10	0.10	0.10
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		245	255	265	275	285	295	305	315
Vertical (ft)	145	0.50	0.50	0.30	0.30	0.30	0.60	0.60	0.70
	135	0.50	0.50	0.30	0.30	0.30	0.60	0.60	0.60
	125	0.50	0.50	0.30	0.30	0.30	0.60	0.60	0.60
	115	0.40	0.40	0.30	0.30	0.30	0.50	0.50	0.60
	105	0.40	0.40	0.30	0.30	0.30	0.50	0.50	0.60
	95	0.40	0.40	0.30	0.30	0.30	0.50	0.50	0.60
	85	0.40	0.40	0.20	0.30	0.30	0.50	0.50	0.60
	75	0.40	0.40	0.30	0.30	0.30	0.50	0.50	0.60
	65	0.40	0.40	0.20	0.30	0.30	0.50	0.50	0.50
	55	0.40	0.40	0.20	0.20	0.20	0.50	0.50	0.50
	45	0.30	0.30	0.10	0.10	0.10	0.30	0.40	0.00
	35	0.20	0.20	0.10	0.10	0.00	0.20	0.30	0.00
	25	0.10	0.10	0.00	0.00	0.00	0.10	0.20	0.00
	15	0.10	0.10	0.00	0.00	0.00	0.10	0.10	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		325	335	345	355	365	375	385	395
Vertical (ft)	145	0.70	0.70	0.70	0.70	0.70	0.70	0.80	0.80
	135	0.60	0.60	0.70	0.70	0.70	0.70	0.70	0.70
	125	0.60	0.60	0.70	0.70	0.70	0.70	0.70	0.80
	115	0.60	0.60	0.60	0.70	0.70	0.70	0.70	0.70
	105	0.60	0.60	0.60	0.70	0.70	0.70	0.70	0.80
	95	0.60	0.60	0.60	0.70	0.70	0.70	0.80	0.80
	85	0.60	0.60	0.70	0.70	0.70	0.70	0.80	0.80
	75	0.60	0.60	0.70	0.70	0.70	0.70	0.80	0.80
	65	0.60	0.60	0.60	0.70	0.70	0.70	0.80	0.80
	55	0.60	0.60	0.60	0.60	0.70	0.70	0.70	0.80
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S3b

Horizontal (ft)		405	415	425	435
Vertical (ft)	145	0.80	0.80	0.80	0.80
	135	0.80	0.80	0.80	0.80
	125	0.80	0.80	0.80	0.80
	115	0.80	0.80	0.80	0.90
	105	0.80	0.80	0.90	0.90
	95	0.80	0.90	0.90	0.90
	85	0.90	0.90	0.90	1.00
	75	0.90	0.90	0.90	1.00
	65	0.80	0.90	0.90	1.00
	55	0.80	0.90	0.90	1.00
	45	0.00	0.00	0.90	0.90
	35	0.00	0.00	0.80	0.80
	25	0.00	0.00	0.70	0.70
	15	0.00	0.00	0.60	0.60
	5	0.00	0.00	0.00	0.00

VP-S3c

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.10
	135	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.10
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.10
	115	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S4a

Horizontal (ft)		5	15	25	35	45
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10
	115	0.10	0.10	0.00	0.00	0.10
	105	0.10	0.10	0.00	0.00	0.00
	95	0.10	0.10	0.00	0.00	0.00
	85	0.10	0.10	0.00	0.00	0.00
	75	0.10	0.10	0.00	0.00	0.00
	65	0.10	0.10	0.00	0.00	0.00
	55	0.10	0.10	0.00	0.00	0.00
	45	0.10	0.10	0.00	0.00	0.00
	35	0.10	0.10	0.00	0.00	0.00
	25	0.10	0.10	0.00	0.00	0.00
	15	0.10	0.10	0.00	0.00	0.00
	5	0.10	0.00	0.00	0.00	0.00

VP-S4b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	85	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	75	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	55	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10
	45	0.20	0.20	0.20	0.20	0.20	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S4b

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.20	0.20	0.20	0.20	0.20	0.30	0.20	0.30
	135	0.20	0.20	0.20	0.30	0.20	0.30	0.30	0.30
	125	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.30
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	85	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	75	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	55	0.10	0.10	0.10	0.10	0.10	0.20	0.20	0.20
	45	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S4b

Horizontal (ft)		165	175	185	195	205	215	225	235
Vertical (ft)	145	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	135	0.30	0.20	0.30	0.30	0.30	0.30	0.30	0.30
	125	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	115	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	85	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	75	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	55	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	45	0.10	0.10	0.10	0.20	0.20	0.20	0.20	0.20
	35	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	25	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	15	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	5	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10

VP-S4b

Horizontal (ft)		245
Vertical (ft)	145	0.30
	135	0.30
	125	0.30
	115	0.30
	105	0.20
	95	0.20
	85	0.20
	75	0.20
	65	0.20
	55	0.20
	45	0.20
	35	0.10
	25	0.10
	15	0.10
	5	0.10

VP-S4c

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	85	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.20	0.20	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00
	25	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S4c

Horizontal (ft)		85	95
Vertical (ft)	145	0.10	0.10
	135	0.10	0.10
	125	0.10	0.10
	115	0.10	0.10
	105	0.10	0.10
	95	0.10	0.10
	85	0.10	0.10
	75	0.10	0.10
	65	0.10	0.10
	55	0.10	0.10
	45	0.10	0.10
	35	0.00	0.00
	25	0.00	0.00
	15	0.00	0.00
	5	0.00	0.00

VP-S4d

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.10	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	135	0.10	0.20	0.20	0.20	0.20	0.20	0.20	0.20
	125	0.10	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	115	0.10	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	105	0.10	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	95	0.10	0.10	0.20	0.20	0.20	0.20	0.20	0.20
	85	0.10	0.10	0.10	0.20	0.20	0.20	0.20	0.20
	75	0.10	0.10	0.10	0.20	0.20	0.20	0.20	0.20
	65	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	55	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	45	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	35	0.00	0.00	0.10	0.10	0.10	0.20	0.20	0.20
	25	0.00	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	15	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S4d

Horizontal (ft)		85	95	105	115
Vertical (ft)	145	0.20	0.20	0.20	0.20
	135	0.20	0.20	0.20	0.30
	125	0.20	0.20	0.20	0.30
	115	0.20	0.20	0.20	0.20
	105	0.20	0.20	0.20	0.20
	95	0.20	0.20	0.20	0.20
	85	0.20	0.20	0.20	0.20
	75	0.20	0.20	0.20	0.20
	65	0.20	0.20	0.20	0.20
	55	0.20	0.20	0.20	0.20
	45	0.20	0.20	0.20	0.20
	35	0.20	0.20	0.20	0.20
	25	0.10	0.20	0.10	0.10
	15	0.10	0.10	0.00	0.00
	5	0.00	0.00	0.00	0.00

VP-S5a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.40	0.50	0.50	0.50	0.50	0.50	0.50	0.50
	135	0.40	0.50	0.50	0.50	0.50	0.60	0.50	0.50
	125	0.50	0.50	0.50	0.60	0.60	0.60	0.60	0.60
	115	0.50	0.50	0.60	0.60	0.60	0.60	0.60	0.60
	105	0.60	0.60	0.60	0.60	0.60	0.70	0.60	0.60
	95	0.60	0.60	0.60	0.70	0.70	0.70	0.70	0.70
	85	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	75	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	65	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	55	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	45	0.60	0.70	0.70	0.70	0.70	0.70	0.70	0.70
	35	0.60	0.60	0.70	0.70	0.70	0.70	0.70	0.70
	25	0.60	0.60	0.60	0.70	0.70	0.70	0.60	0.60
	15	0.50	0.50	0.60	0.60	0.60	0.60	0.60	0.60
	5	0.50	0.50	0.50	0.60	0.60	0.60	0.60	0.50

VP-S5a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.60
	135	0.50	0.50	0.50	0.50	0.50	0.60	0.60	0.60
	125	0.60	0.60	0.50	0.50	0.60	0.60	0.60	0.60
	115	0.60	0.60	0.50	0.60	0.60	0.60	0.60	0.70
	105	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.70
	95	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.70
	85	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.70
	75	0.60	0.60	0.60	0.60	0.60	0.70	0.70	0.80
	65	0.60	0.60	0.50	0.60	0.60	0.70	0.70	0.80
	55	0.60	0.60	0.50	0.60	0.60	0.70	0.80	0.80
	45	0.60	0.60	0.50	0.60	0.60	0.70	0.70	0.80
	35	0.60	0.50	0.50	0.50	0.60	0.70	0.70	0.80
	25	0.60	0.50	0.50	0.50	0.60	0.60	0.70	0.70
	15	0.50	0.50	0.40	0.50	0.50	0.60	0.50	0.40
	5	0.50	0.40	0.40	0.40	0.50	0.50	0.40	0.00

VP-S5a

Horizontal (ft)		165	175	185	195	205	215
Vertical (ft)	145	0.60	0.60	0.50	0.60	0.60	0.60
	135	0.60	0.60	0.60	0.60	0.60	0.60
	125	0.60	0.60	0.60	0.60	0.60	0.60
	115	0.70	0.70	0.70	0.70	0.70	0.70
	105	0.70	0.70	0.70	0.70	0.80	0.80
	95	0.70	0.80	0.80	0.80	0.80	0.90
	85	0.80	0.80	0.80	0.80	0.90	0.90
	75	0.80	0.80	0.80	0.80	0.90	1.00
	65	0.80	0.80	0.80	0.80	0.90	1.00
	55	0.80	0.70	0.70	0.80	0.90	1.00
	45	0.70	0.60	0.60	0.70	0.90	1.00
	35	0.60	0.40	0.30	0.40	0.50	0.70
	25	0.60	0.40	0.30	0.30	0.50	0.60
	15	0.20	0.10	0.20	0.20	0.40	0.60
	5	0.20	0.00	0.10	0.10	0.20	0.30

VP-S6a

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	95	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	85	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	75	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	65	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	55	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	45	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	35	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6a

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	135	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	125	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	115	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	105	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	95	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	85	0.10	0.10	0.10	0.10	0.20	0.20	0.20	0.20
	75	0.10	0.10	0.10	0.10	0.20	0.20	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.20	0.20	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.20	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10	0.20	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	25	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	15	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	5	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10

VP-S6a

Horizontal (ft)		165	175	185	195
Vertical (ft)	145	0.20	0.10	0.10	0.10
	135	0.10	0.20	0.10	0.10
	125	0.20	0.10	0.10	0.10
	115	0.20	0.10	0.10	0.10
	105	0.20	0.10	0.10	0.10
	95	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10
	45	0.10	0.10	0.10	0.10
	35	0.10	0.10	0.10	0.10
	25	0.10	0.10	0.10	0.10
	15	0.10	0.10	0.10	0.10
	5	0.10	0.10	0.00	0.00

VP-S6b

Horizontal (ft)		5	15	25	35	45	55	65	75
Vertical (ft)	145	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	135	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	115	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		85	95	105	115	125	135	145	155
Vertical (ft)	145	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	135	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	115	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		165	175	185	195	205	215	225	235
Vertical (ft)	145	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	135	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	115	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		245	255	265	275	285	295	305	315
Vertical (ft)	145	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	135	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	115	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		325	335	345	355	365	375	385	395
Vertical (ft)	145	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	135	0.00	0.10	0.00	0.10	0.10	0.00	0.00	0.10
	125	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	115	0.10	0.10	0.00	0.00	0.00	0.10	0.10	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		405	415	425	435	445	455	465	475
Vertical (ft)	145	0.00	0.00	0.00	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.00	0.00	0.10	0.10	0.00
	125	0.00	0.00	0.10	0.00	0.10	0.10	0.10	0.10
	115	0.00	0.00	0.10	0.10	0.00	0.00	0.00	0.00
	105	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		485	495	505	515	525	535	545	555
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.00	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.00	0.00	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.00	0.00	0.00	0.10	0.10	0.10	0.10	0.10
	85	0.00	0.00	0.00	0.10	0.10	0.10	0.10	0.10
	75	0.00	0.00	0.00	0.00	0.10	0.10	0.10	0.10
	65	0.00	0.00	0.00	0.00	0.00	0.10	0.10	0.10
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		565	575	585	595	605	615	625	635
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	115	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	95	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	85	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	75	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	65	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	55	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	45	0.00	0.10	0.10	0.10	0.10	0.10	0.10	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

VP-S6b

Horizontal (ft)		645	655	665	675	685	695	705
Vertical (ft)	145	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	135	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	125	0.10	0.10	0.10	0.10	0.10	0.10	0.00
	115	0.10	0.10	0.10	0.10	0.10	0.10	0.10
	105	0.10	0.10	0.10	0.10	0.00	0.00	0.00
	95	0.10	0.10	0.10	0.10	0.00	0.00	0.00
	85	0.10	0.10	0.10	0.00	0.00	0.00	0.00
	75	0.10	0.10	0.10	0.00	0.00	0.00	0.00
	65	0.10	0.10	0.00	0.00	0.00	0.00	0.00
	55	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	45	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	35	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	25	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Appendix B

Air Quality and Greenhouse Gas Emissions Technical Memorandum

MEMORANDUM

To: Jennifer Davis, City of West Hollywood
From: Nicholas Lorenzen, Air Resource Specialist, Dudek
Collin Paludi, Air Resource Specialist, Dudek
Subject: Air Quality, Energy, and Greenhouse Gas Emissions Technical Memorandum – Addendum
to the Sunset Strip Off-Site Signage Policy IS/ND
Date: August 15, 2025
cc: Michele Finneyfrock, Project Manager, Dudek
Attachment A: Supporting Emission Calculations

1 Introduction and Purpose

The purpose of this memorandum is to evaluate the potential air quality, greenhouse gas (GHG) emissions, and energy impacts of billboard development on the Sunset Strip to support an Addendum to the Sunset Strip Off-Site Signage Policy Initial Study / Negative Declaration (IS/ND) in compliance with the California Environmental Quality Act (CEQA).

2 Summary of Previous CEQA Analysis

The City Council adopted a Negative Declaration (ND) for the Sunset Strip Off-Site Signage Policy (referred to as the “approved project” or the “policy”) in 2019. The ND was prepared pursuant to CEQA and is supported by an Initial Study (IS). Based on the analysis contained in the IS/ND and other considerations, the City Council approved the Sunset Strip Off-Site Signage Policy following adoption of the ND.

The 2019 IS/ND presents an environmental analysis for a signage development scenario, in order to analyze the environmental effects of policy implementation. The scenario is based on a number of factors, including the types of signage development, the number of signs, and the geographic intensity of signage development that are allowed under the Sunset Strip Off-Site Signage Policy, along with reasonable assumptions for the nature and pace of signage development on the Sunset Strip. Subsequent to adoption of the ND and approval of the Sunset Strip Off-Site Signage Policy in 2019, the City began policy implementation, which has consisted of a series of Design Excellence Screening processes to select applications for billboard projects that are then allowed to proceed through the entitlement process. The City has conducted three rounds of Design Excellence Screening, referred to as Round 1, Round 1.5, and Round 2. After selection of the Round 1 billboard projects, the City prepared an addendum in 2021 to analyze the differences between the signage development scenario assumed in the IS/ND and the actual scenario that would result from development of the Round 1 billboard projects. The 2021 Addendum

concluded that the Round 1 billboard projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the adopted IS/ND.¹

Subsequent to completion of the 2021 Addendum, the City began processing applications for the Round 1.5 billboard projects and began initiating the Design Excellence Screening process for Round 2. The purpose of this memorandum, in part, is to update the air quality, energy, and GHG analysis from the IS/ND and 2021 Addendum to reflect the addition of Round 1.5 and Round 2 billboard projects, as well as to wholistically address the signage development scenario that would result from development of all billboard projects associated with Rounds 1, 1.5, and 2. The signage development scenario that is currently being set forth will be referred to generally as the “modified signage development scenario.”

Additionally, in conjunction with the expansion of the signage development scenario, the City is proposing amendments to the policy that was adopted in 2019. These amendments are focused on clarifying and strengthening the policy’s light and glare requirements for billboards based on the proposed expansion of the signage development scenario. The proposed policy amendments together with the modified signage development scenario will be referred to herein as the “modified project.” However, it is noted that the proposed policy amendments do not pertain to air quality, GHG, or energy and thus would not alter the potential effects of off-site signage projects on air quality, GHG, or energy relative to the conclusions in the adopted IS/ND.

3 Project Description

This memorandum analyzes the modified signage development scenario, which consists of billboard projects selected to proceed through the entitlement process as part of Round 1, Round 1.5, and Round 2 of the City’s Design Excellence Screening process for billboard applications. As described above, the 2021 Addendum considers the impacts of the Round 1 billboard projects. This memorandum is thus focused on the details of the Round 1.5 and Round 2 billboard projects; however, Round 1 is still considered wholistically as part of the modified signage development scenario. Round 1.5 and 2 billboard projects are listed below:

- 8222 Sunset - The Chrysalis
- 8300 Sunset – The Standard Hotel
- 8371 Sunset – Saddle Ranch
- 8440 Sunset - Mondrian
- 9039 Sunset – The Stand
- 8250 Sunset - Between Dog and Wolf
- 8801 Sunset - Tower Theater
- 8873 Sunset – The Cape
- 8906 Sunset - Blossom
- 9121 Sunset - Sunset Cinema
- 9225-9229 Sunset - Wonderwall

¹ Both the IS/ND and the 2021 Addendum note that billboard projects integrated into larger projects (e.g., new development, building remodels) would undergo further CEQA review on a project-by-project basis, since the effects of the larger projects were unknown at the time of the IS/ND and 2021 Addendum.

Additionally, there would be 5 billboard projects as part of Rounds 1.5 and 2 that would be integrated into and constructed as part of new development projects, as listed below:

- 8410 Sunset – The Sunset Eclipse
- 8481-8495 Sunset – Sunset3
- 8850 Sunset – The Viper Room
- 8919 Sunset – The Fog and Clearing
- 9176 Sunset – Sunset Jewel

These billboards would be integrated into new development projects that are subject to individual review and analysis under CEQA. The air quality, GHG, and energy impacts associated with construction and operation of the new development projects, together with their billboard components, has been (or will be) addressed as required in CEQA documents for the new development projects. As such, the construction and operation of new development projects that include billboards are not considered as part of the analysis in this memorandum.

Round 1 projects are considered in this memorandum to the degree that they would overlap with, or otherwise create an additive effect with, Round 1.5 and 2 billboard projects. As with Rounds 1.5 and 2, new development projects from Round 1 are not considered as part of the analysis in this memorandum. Round 1 includes 15 billboard projects that are not part of new development. Round 1 projects are currently in various states of completion. Of the 15 projects not part of new development, 9 projects are constructed and operational at the time of this writing (August 2025), 2 projects have been approved and not yet constructed, and 4 projects are under review with the City. The construction of these 6 pending Round 1 projects may overlap with construction of the Round 1.5 and 2 projects, as further discussed in Section 5.1 below. Additionally, at full buildout, Rounds 1, 1.5, and 2 projects would be operating simultaneously. As such, this analysis considers operational impacts of the Round 1 billboard projects, together with the Rounds 1.5 and 2 projects. As such, the operational scenario considers the operations of 26 billboard projects.

Each billboard project would differ; however, the process of new billboard construction generally entails drilling a pole foundation, followed by placement of a billboard column into the footing. Next, the sign face (which is generally fabricated off site) is affixed to the billboard column. New foundations are typically 35 feet to 45 feet in depth and 5 feet in diameter, as described in the adopted IS/ND.

Maintenance activities for billboard projects are limited. Full motion billboards required periodic maintenance of the electrical components. Traditional and/or internally illuminated static billboards require advertising copy changes and occasional light bulb replacements. Copy changes are generally assumed to occur once per month and generally require one truck and work crew to perform. Some billboard projects would include new or additional landscaping that could result in additional maintenance activities. In balance, the analysis herein assumes that each billboard project is anticipated to involve approximately 2 maintenance events per month, with each maintenance event involving one crew visiting the site to perform maintenance on landscaping, pedestrian plazas, and/or billboards. Implementation of the modified signage development scenario would also result in an increase in electricity use along the Sunset Strip.

4 Changes in Circumstance/New Information

Several changes to the regulatory setting have occurred since adoption of the IS/ND in 2019; however, none of these changes have resulted in the identification of new significant impacts or significant impacts of increased severity. Of note, the City adopted an update to its Climate Action Plan (CAP) in December 2021, referred to as the Climate Action and Adaptation Plan (CAAP). The state has also adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). New versions of the California Emissions Estimator Model (CalEEMod) have been released, with the most recent being CalEEMod 2022. Additionally, the South Coast Air Quality Management District adopted an updated Air Quality Management Plan (AQMP) in 2022, which applies to the project area and its surroundings. These changes are discussed in greater detail below, as they relate to the modified project and any potential changes to impact determinations of the adopted IS/ND.

The analysis in the adopted IS/ND determined that the policy would not conflict with the CAP or with state plans and policies for the reduction of GHG emissions. The modified project would not remove any sustainability or GHG reduction requirements from the adopted policy. The CAAP identifies 20 GHG reduction and adaptation measures focused in five areas: City Leadership and Governance, Energy, Transportation and Mobility, Zero Waste, and Climate Resilience. Through these measures, the CAAP will assist the City in achieving its carbon neutrality goal by 2045. While the state has recently adopted the 2022 Scoping Plan, the CAAP is the most applicable plan for evaluating the modified project's consistency with plans established for GHG emission reductions, as this state-level plan is generally not intended to be used for project-level evaluations.

Regarding the CalEEMod update, the adopted IS/ND utilized CalEEMod 2016 to estimate air quality and GHG emissions. However, a new version of CalEEMod was released for public use in December 2022, referred to as CalEEMod 2022. CalEEMod 2022 includes updates to many of the CalEEMod modules with newer information used to create default data sets for projects including but not limited to energy demand, trip generation rates, and fleet mixes. Comparatively, emissions estimated for projects in CalEEMod 2022 are generally comparable to (and sometimes less than) those estimated using CalEEMod 2016.

Regarding the 2022 AQMP, the plan was developed to address the requirements for meeting the national ambient air quality standard for ground-level ozone (O_3) of 70 parts per billion by 2037. The 2022 AQMP builds on previous AQMPs by developing additional strategies and measures to reduce nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions, the primary precursor pollutants to O_3 . For CEQA purposes, the evaluation of consistency with the 2022 AQMP has not changed compared to previous AQMPs. The consistency analysis is still based on a project's consistency with existing land use development plans.

5 Approach and Methodology

The project area is located within the South Coast Air Basin (SCAB) and is within the jurisdictional boundaries of the SCAQMD. The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29 was used to estimate emissions from construction and operation of the modified project (CAPCOA 2025). CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and greenhouse gas emissions associated with construction activities and operation of a variety of land use projects, such as educational, residential, commercial, and industrial facilities. CalEEMod input parameters,

including the land use type used to represent the projects and their sizes, construction schedule, and anticipated use of construction equipment, were based on information provided by the applicant or default model assumptions if project specifics were unavailable.

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants that are evaluated include volatile organic compounds (also referred to as reactive organic gases [ROGs]), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides, particulate matter with an aerodynamic diameter less than or equal to 10 microns (coarse particulate matter, or PM_{10}), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (fine particulate matter, or $\text{PM}_{2.5}$). ROGs and NO_x are important because they are precursors to ozone (O_3). Criteria air pollutant emissions associated with construction of the modified project were estimated for the following emission sources: operation of off-road construction equipment, architectural coating, on-road vendor (material delivery) trucks, and worker vehicles. The operational criteria air pollutant emissions were estimated from area sources, energy sources, and mobile sources.

GHGs are gases that absorb infrared radiation in the atmosphere. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect. Principal GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), O_3 , and water vapor. If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. Globally, climate change has the potential to impact numerous environmental resources related to future air temperatures and precipitation patterns. Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. Climate change is already affecting California: average temperatures have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (Climate Action Team [CAT] 2010).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its global warming potential (GWP), which varies among GHGs. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of CO_2 . Thus, GHG emissions are typically measured in terms of pounds or tons of CO_2 equivalent (CO_2e). The CO_2e for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons (MT) of $\text{CO}_2\text{e} = (\text{MT of a GHG}) \times (\text{GWP of the GHG})$. The California Emissions Estimator Model (CalEEMod) assumes that the GWP for CH_4 is 25, which means that emissions of one MT of CH_4 are equivalent to emissions of 25 MT of CO_2 , and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report (IPCC 2007).

GHG emissions associated with construction of the modified project were estimated for the following emission sources: operation of off-road construction equipment, on-road vendor trucks, and worker vehicles. GHG emission sources associated with operation of the modified project include area, energy, mobile, and water and wastewater categories. The detailed project construction and operational assumptions are included in Attachment A.

5.1 Construction

It is anticipated that construction of Round 1.5 and 2 billboard projects could begin as early as June 2026.² Each project is assumed to take approximately 12 weeks to construct. It is noted that construction of Round 1 billboard projects is currently underway. At the time of this writing (August 2025), 9 of the Round 1 projects have been constructed. Based on the current status of the Round 1 projects, the City anticipates that construction of the 6 remaining Round 1 projects may overlap with construction of Rounds 1.5 and 2 (excluding billboard projects that are part of new development projects, whose construction schedules are currently unknown).

The City anticipates that buildout of all Round 1, 1.5, and 2 projects (sans billboard projects associated with new development) would be complete by December 2028. As such, a total of 17 standalone billboard projects may be constructed between June 2026–December 2028. The City estimates that up to 3 billboard projects could be undergoing construction along the Sunset Strip at any given time during this period. As such, this analysis reflects the potential construction impacts of up to 3 billboard projects occurring simultaneously.

The 12-week construction timeline provided below reflects the typical schedule for a single billboard project and has been used to estimate the overall duration and intensity of activity for the whole construction period. More construction details are included in Attachment A of this Memorandum:

- Site Preparation/Demolition/Excavation (22 days)
- New Billboard Installation (22 days)
- Building and Landscaping Improvements (22 days)

CalEEMod default values for worker trips were used. Vendor trips were added for each construction phase to reflect anticipated activity, including vendor trips for watering areas of exposed soils. For worker and vendor vehicle trip lengths, CalEEMod default values were used.

It was conservatively estimated that construction of each billboard project would involve demolition and removal of some existing on-site improvements, such as pavement, landscaping, building improvements, and/or signage. Each project is thus assumed to include export of approximately 250 square feet of debris off site, resulting in 6 daily one-way haul truck trips throughout the Site Preparation/Demolition/Excavation Phase. Additionally, each billboard project was modeled to include export of approximately 80 cubic yards of soil debris and would require a total of 10 one-way haul truck trips. As a conservative approach, all haul truck trips were modeled to occur within the same day to account for possible overlap. Additional haul truck trips were added to each phase to reflect anticipated activity. CalEEMod's default trip length of 20 miles was used for haul truck trips.

The construction equipment mix and vehicle trips used for estimating the project-generated construction emissions is shown in Table 1. Of note, the information within Table 1 is representative of one billboard project. To capture the maximum daily emissions from the construction of the billboards, the construction scenario in Table 1 was scaled for three simultaneous billboard projects to reflect the foreseeably most intensive scenario.

² The analysis assumes a construction start date of June 2026, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 1. Construction Scenario Details - Single Billboard Construction

Construction Phase	One-way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Average Daily Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation /Demolition/ Excavation ¹	12	6	12	Concrete/Industrial Saws	2	8
				Tractors/Loaders/Backhoes	1	8
				Generator Set	1	8
				Drill/Bore Rigs	1	8
New Billboard Installation ²	12	6	4	Cranes	1	4
Building and Landscaping Improvements ³	18	6	8	Cranes	1	8
				Tractors/Loaders/Backhoes	1	8
				Pavers	1	8
				Paving Equipment	1	8
				Rollers	1	8

Notes: See Attachment A for additional details.

¹ Not all projects would involve excavation activities. However, excavation activities are assumed for this phase to capture a worst-case scenario.

² Billboard faces are generally fabricated off site and then transported to the project area before being installed.

³ Not all projects would involve all three activities (i.e., building, landscaping, and paving); however, all three activities are assumed for this phase to capture a reasonable worst-case scenario.

It is noted that the construction scenario analyzed herein is more intensive than the scenarios analyzed in the IS/ND and 2021 Addendum. The billboard projects proposed as part of Rounds 1.5 and 2 are generally more intensive than the billboard projects proposed as part of Round 1. A majority of projects proposed for Rounds 1.5 and 2 are accompanied by more extensive improvements to existing landscaping, parking lots, and/or building facades relative to most Round 1 projects. The expanded scenario shown herein is intended to capture the potential impacts of these additional activities. Furthermore, the analysis in the IS/ND and 2021 Addendum did not numerically represent any potential overlap of billboard construction on the Sunset Strip. At the time of the IS/ND and 2021 Addendum, the number of billboard projects being contemplated was relatively limited, with the 2021 Addendum analyzing 10 billboard projects to be constructed over the course of a 15-year buildout horizon. At the time, it was thus reasonable to assume that construction would not generally overlap. However, with the potential construction of 17 billboard projects between June 2026–December 2028, some overlap is now anticipated to occur.

5.2 Operational

Operation of the modified project would generate emissions from area sources, energy use, mobile sources, water consumption, and solid waste generation, which are discussed below. Emissions from these sources were

estimated based on CalEEMod default values and preliminary project information provided by the City. The modified project would be operational following the completion of construction and was modeled to be in the year 2026.³

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from architectural coatings and landscaping.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of nonresidential surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The CalEEMod default VOC emission factors were used for billboard and parking area coatings. The model default reapplication rate of 10% of area per year was assumed. The contractor is required to procure architectural coatings from a supplier that complies with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with electricity and natural gas usage (non-hearth). Billboards do not generally require the use of natural gas. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

Based on previous billboard projects that have been reviewed by the City and information contained in the IS/ND and 2021 Addendum, electricity use for billboards can range widely. For example, a single traditional or internally illuminated billboard face has been estimated to require as little as 2,000 kilowatt hours (kWh) of electricity per year and as much as 25,000 kWh per year (City of West Hollywood, pers. comm. 2020, 2025a). A single full motion billboard face has been estimated to require between 29,000 and 94,000 kWh of electricity per year (City of West Hollywood 2019). Most billboard projects include multiple sign faces and/or architectural lighting elements as part of billboard structures and building/site improvements (e.g., building architectural lighting, landscape lighting). Electrical requirements for full motion billboard projects reviewed by the City to date range from approximately 110,000 kWh per year to 570,000 kWh per year (City of West Hollywood, pers. comm. 2025b, City of West Hollywood 2024). Billboard projects require varying amounts of electricity depending on their designs and square footage. Electrical draw may also vary based on ambient weather conditions. A reasonable scenario for estimating the electrical demand of the modified project has been formulated by averaging the maximum and minimum kWh per year from projects reviewed by the City to date. Each billboard project is thus assumed to demand approximately 340,000 kWh per year, with some billboard projects requiring

³ The year 2026 was selected for the CalEEMod analysis as the earliest year the Round 1.5 and Round 2 billboards could become operational. It is noted that some Round 1 billboard are already operational or are expected to become operational prior to 2026, while some Round 1.5 and 2 billboards are anticipated to become operational in 2028. As such, 2026 was selected as a reasonable, representative operational year. (Note: earlier operational dates generally result in more conservative analysis, because requirements for energy efficiency, vehicle efficiency, use of renewable energy, etc. become more stringent each year.)

less electricity and some requiring more. This estimated electrical demand was multiplied by 11 billboard projects to obtain an estimate for the electricity requirements of Round 1.5 and 2. As such, operations of the Round 1.5 and 2 billboard projects in total are estimated to require approximately 3,740,000 kWh per year of electricity. When added to Round 1 billboard projects (15 projects, sans new development projects), this total increases to 8,840,000 kWh per year of electricity.⁴ This estimate does not take credit for projects that consist solely of internally illuminated static billboards (which generally have reduced energy demands) or projects that include solar energy components (which may offset billboard-related electrical consumption). Additionally, this estimate does not take into account electricity demand reductions that would occur for billboard projects that involve removal of existing billboard faces.⁵

The GHG emissions from electricity use were estimated in CalEEMod using emissions factors from the 2023 Power Content Label reported by Clean Power Alliance (CPA) (CPA 2023) which provides electricity to the project area.

Mobile Sources

Following the completion of construction activities, the modified project would generate criteria pollutant and GHG emissions from the occasional maintenance trips required for operations. Each billboard project is anticipated to involve approximately 2 maintenance events per month, with each maintenance event involving one crew visiting the site to perform maintenance on landscaping, pedestrian plazas, and/or billboards. Therefore, an estimate of 104 trips per month was modeled for the operations of the Round 1, 1.5, and 2 billboards, assuming each event would require 4 vehicle trips per month (2 vehicle trips per maintenance event). CalEEMod was used to estimate emissions from proposed vehicular sources (refer to Attachment A). CalEEMod default data, including temperature, trip characteristics, variable start information, and emissions factors, were conservatively used for the model inputs. Project-related traffic was assumed to include a mixture of vehicles in accordance with the associated use, as modeled within CalEEMod, which is based on the California Air Resources Board (CARB) EMFAC2021 model. Emission factors representing the vehicle mix and emissions for 2026 were used to estimate emissions associated with vehicular sources.

Solid Waste

Operation of the modified project would not generate solid waste and would therefore not result in CO_{2e} emissions associated with landfill off-gassing.

Water

Supply, conveyance, treatment, and distribution of water for the modified project (outdoor water use for landscape and maintenance) would require the use of electricity, which would result in associated indirect GHG emissions. The electricity consumption from water use was estimated using CalEEMod default values for the modified project.

⁴ Total electrical demands for Rounds 1, 1.5, and 2 analyzed herein do not include billboard projects that are part of new development projects. New development projects with new billboards would be subject to project-specific CEQA review, during which time the new development project would be analyzed along with any associated billboards.

⁵ Upon buildout, the modified project as a whole would result in the removal of 23 existing billboard faces from the Sunset Strip.

6 Air Quality Assessment

6.1 Thresholds of Significance

The significance criteria used to evaluate impacts to air quality in the adopted IS/ND were based on the version of the CEQA Guidelines, Appendix G, that was in place at the time that analysis was prepared. These criteria are listed below.

A significant impact related to air quality would occur if the project would:

- A. *Conflict with or obstruct implementation or the applicable air quality plan.*
- B. *Violate any ambient air quality standards or contribute substantially to an existing air quality violation.*
- C. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).*
- D. *Expose sensitive receptors to substantial pollutants concentrations.*
- E. *Create objectionable odors affecting a substantial number of people.*

Since the time of the IS/ND, updates to the CEQA Guidelines have gone into effect. These updates included revisions to the air quality significance threshold questions in Appendix G of the CEQA Guidelines. The thresholds that are currently in place are listed below.

A significant impact related to air quality would occur if the project would:

- A. *Conflict with or obstruct implementation of the applicable air quality plan.*
- B. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.*
- C. *Expose sensitive receptors to substantial pollutant concentrations.*
- D. *Result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.*

The analysis in this memorandum relies on the most recent version of the Appendix G thresholds, since this memorandum 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. However, the revisions to the thresholds were minimal, as shown above, and do not have an appreciable effect on the analysis or the impact conclusions for this project. The revisions primarily involved combining the previous Thresholds B and C into a single threshold and expanding Threshold D to address “other emissions,” rather than just odors.

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the project would have a significant impact on air quality.

SCAQMD has adopted thresholds to address the significance of air quality impacts resulting from a project. A project would result in a substantial contribution to an existing air quality violation of the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) for O₃, which is a nonattainment pollutant, if the project's construction emissions would exceed SCAQMD's VOC or NO_x significance thresholds shown in Table 2. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (VOC and NO_x) on O₃ levels in ambient air cannot be determined through air quality models or other quantitative methods. The SCAB is also nonattainment for the state PM₁₀ and federal and state PM_{2.5} standards. While the SCAQMD does have a threshold for lead, the modified project would not be a source of lead during construction or operation. Therefore, lead was not evaluated herein.

Table 2. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (pounds per day)	Operation (pounds per day)
VOCs	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Odor Threshold		
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants ^c		
NO ₂ 1-hour average NO ₂ annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
PM ₁₀ 24-hour average PM ₁₀ annual average	10.4 µg/m ³ (construction) ^d 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^d 2.5 µg/m ³ (operation)	

Source: SCAQMD 2023.

Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; TAC = toxic air contaminant; NO₂ = nitrogen dioxide; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter.

^a The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

MEMORANDUM

SUBJECT: AIR QUALITY, ENERGY, AND GREENHOUSE GAS EMISSIONS TECHNICAL MEMORANDUM -- ADDENDUM TO THE SUNSET STRIP OFF-SITE SIGNAGE POLICY IS/ND

- b TACs include carcinogens and noncarcinogens.
- c Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
- d Ambient air quality threshold are based on SCAQMD Rule 403.

In addition to the emission-based thresholds listed in Table 2, SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the projects as a result of construction activities. Such an evaluation is referred to as a localized significance threshold (LST) analysis. The LST analysis focuses on construction equipment and does not include mobile sources. Therefore, the LST analysis only applies to the construction equipment on site, not the worker vehicles or vendor trucks. For project sites of 5 acres or less, the SCAQMD LST Methodology (2008) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO₂, CO, PM₁₀, and PM_{2.5}) without performing project-specific dispersion modeling. The modeled construction scenario of the modified project would disturb less than 5 acres per day, so it is appropriate to use the lookup tables for the LST evaluation.

The LST significance thresholds for NO₂ and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM₁₀ represents compliance with SCAQMD Rule 403 (Fugitive Dust). The LST significance threshold for PM_{2.5} is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the PM_{2.5} ambient air quality standards. The allowable emission rates depend on the following parameters:

- Source-receptor area (SRA) in which the project is located
- Size of the project Site
- Distance between the project site and the nearest receptor (any areas where persons can be situated for an hour or longer at a time)

The project area is located in SRA 2 (Northwest Coastal LA County). LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. In accordance with the SCAQMD *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, the modeled construction scenario would disturb a maximum of 1-acre per day during the grading phase. The nearest receptors are residences adjacent to the billboard sites. As such, the LST receptor distance was assumed to be 82 feet (25 meters) which is the closest value available. SCAQMD lists LST values for 1-acre sites, so the LST values within SRA 2 (Northwest Coastal LA County) for this 1-acre project site were used and are shown in Table 3.

Table 3. Localized Significance Thresholds for Source-Receptor Area 2 (Northwest Coastal LA County)

Pollutant	Threshold (pounds/day)
Construction	
NO ₂	103
CO	562
PM ₁₀	4
PM _{2.5}	3

Source: SCAQMD 2009.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter

Localized significance thresholds were based on the values for a 1-acre site at a distance of 25 meters (82 feet) from the nearest receptor.

6.2 Impact Analysis

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

The project area is located within the SCAB, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County, and is within the jurisdictional boundaries of SCAQMD.

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining all CAAQS and NAAQS. The most recent adopted AQMP for the SCAB is the 2022 AQMP, which was adopted by SCAQMD's Governing Board in December 2022 (SCAQMD 2022).

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

- **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 6.2.2. Detailed results of this analysis are included in Attachment A, CalEEMod Emissions Outputs. As presented in Section 6.2.2, construction and operation of the modified project would not generate criteria air pollutant emissions that would exceed SCAQMD's thresholds. Therefore, the modified project would not result in an increase in the frequency or severity of existing air quality violations. As such, the modified project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of the project's buildout and phases is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy

(RTP/SCS) (SCAG 2020a)⁶. This document, which is based on general plans for cities and counties in the SCAB, is used by SCAQMD to develop the AQMP emissions inventory (SCAQMD 2022).⁷ The SCAG RTP/SCS, Connect SoCal, and the associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

The City designates the project area as SSP (Sunset Specific Plan), which generally comprises the properties along the portion of Sunset Boulevard that extends through the City. The modified project would involve the development of signage, which would further develop the project area, as intended by City land use goals and policies, and would not induce growth in the City or region. Overall, the modified project is consistent with the existing land use designation and implementation of the modified project would not generate an increase in growth demographics that would conflict with existing projections within the region. Accordingly, the modified project would not conflict with the SCAG RTP/SCS forecasts. It is noted that the new development projects with billboard components could potentially be associated with growth in residential and/or commercial development. While such projects are not expected to exceed applicable growth forecasts, their potential to conflict with the AQMP has been (or will be) analyzed as required in project-specific, standalone CEQA documents, as described in Section 3 of this memorandum.

In summary, based on the considerations presented for the two criteria, impacts relating to the modified project's potential to conflict with or obstruct implementation of the applicable AQMP 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 consistency with an applicable air quality plan.

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

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and VOC off-gassing) and off-site sources (i.e., on-road vendor trucks, haul trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day,

⁶ While there is a newer version of the SCAG RTP/SCS, adopted in 2024, the demographics from the 2020 RTP/SCS are still applicable for the purposes of the air quality analysis, since those are included and used in the current AQMP.

⁷ Information necessary to produce the emissions inventory for the SCAB is obtained from SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), California Department of Transportation (Caltrans), and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2020 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

depending on the level of activity; the specific type of operation; and, for particulate matter, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated.

CalEEMod Version 2022.1.1.29 was used to estimate emissions from construction of the modified project. Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5} emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. The modified project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of exposed areas of soil disturbance two times per day, with additional watering depending on weather conditions. The CalEEMod default values were used for estimating fugitive dust emissions from grading activities. Billboard projects may involve application of architectural coating (e.g., paint and other finishes) for painting building facades, billboard structures, and/or parking lot striping. Construction contractors are required to procure architectural coatings from a supplier that complies with the requirements of SCAQMD's Rule 1113 (Architectural Coatings). Required compliance with Rule 1113 limits VOC emissions from architectural coatings.

Table 4 presents the estimated maximum daily construction emissions generated during simultaneous construction of up to 3 billboard projects. Table 4 also shows the maximum daily construction emissions estimated for the approved project as presented in the IS/ND and 2021 Addendum. Details of the emission calculations are provided in Attachment A.

Table 4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Year	Maximum Daily Emissions (Pounds per Day)					
2026	15.44	26.91	34.41	9.97	2.34	1.28
Maximum Daily Emissions	15.44	26.91	34.41	9.97	2.34	1.28
Maximum Daily Emissions (IS/ND and 2021 Addendum)	0.72	10.41	4.09	0.02	0.60	0.34
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; <0.01 = value is less than 0.01.

Emissions include compliance with SCAQMD Rule 403 and SCAQMD Rule 1113.
See Attachment A for complete results.

As shown in Table 4, emissions from construction would not exceed SCAQMD's daily thresholds. Therefore, construction impacts associated with criteria air pollutant emissions would be less than significant, and no mitigation measures are required.

The maximum daily construction emissions associated with the modified project would exceed the emissions estimated for the originally proposed project, as analyzed in the IS/ND and 2021 Addendum, but would remain below a level of significance. Furthermore, construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions.

Operational Emissions

Operation of the modified project considered in the operational scenario would generate criteria air pollutant (including ROG, NO_x, PM₁₀, and PM_{2.5}) emissions from mobile sources (maintenance trips) and area sources (consumer products, architectural coatings, and landscaping equipment). As stated previously, electricity use would only contribute indirectly to criteria air pollutant emissions. As discussed in Section 5.2, CalEEMod was used to estimate average daily and annual emissions from operation of the billboards. IS/ND did not include a quantitative analysis of operational criteria air pollutant emissions, as emissions were expected to be minimal. However, to provide a more comprehensive assessment of the modified project's potential impacts, operational emissions for the modified project have been quantified below.

Table 5 summarizes the maximum daily estimated operational criteria air pollutant emissions that would be generated from the modified project and compares estimated emissions to the respective SCAQMD operational thresholds.

Table 5. Project Estimated Maximum Daily Operation Criteria Air Pollutant Emissions

Emissions Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Maximum Daily Emissions (Pounds per Day)					
Area	1.23	0.01	1.73	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.01	0.01	0.12	<0.01	0.03	0.01
Modified Project Total Maximum Daily Emissions	1.24	0.02	1.84	<0.01	0.03	0.01
<i>SCAQMD Threshold</i>	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; <0.01 = reported value less than 0.005; N/A = not applicable; values in parentheses represent negative values.

See Attachment A for complete results.

As shown in Table 5, the modified project would not exceed SCAQMD's mass daily regional significance thresholds during operations. Therefore, operational impacts associated with criteria air pollutant emissions would be less than significant.

Cumulative Impacts

In considering cumulative impacts from the modified project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. The basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with SCAQMD's 2022 AQMP, which addresses cumulative emissions in the SCAB. As such, if a project's emissions would exceed SCAQMD's significance thresholds, it would be considered to have a cumulatively considerable contribution to

nonattainment status in the SCAB. If emissions would not exceed SCAQMD's significance thresholds, its contribution would not be considered cumulatively considerable.

The SCAB has been designated as a federal nonattainment area for O₃ and PM_{2.5} and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction of the modified project would generate VOC and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. As indicated in Tables 4 and 5, project-generated construction and operational emissions would be minimal and would not exceed SCAQMD's emission-based significance thresholds for VOC, NO_x, CO, SO₂, PM₁₀, or PM_{2.5}.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. As described under Section 5.1, this analysis assumes that 3 billboard projects may be constructed simultaneously. However, there are other types of development that may be occurring within and near the project area, including construction of billboard projects incorporated into new development. Other new development projects (without billboards) are also proposed, approved but not yet constructed, and/or reasonably foreseeable in the project area. Construction schedules for these new development projects are generally unknown and speculative at this time; therefore, potential construction impacts from the overlap of billboard projects with new development projects would be speculative.⁸ However, other projects occurring in the project area, including any such new development projects, are subject to CEQA and require an air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity for other projects in the area would be reduced through required implementation of control measures from SCAQMD. Cumulative PM₁₀ and PM_{2.5} emissions would be reduced because all projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Based on the previous considerations, the modified project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant. No new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

6.3.3 Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Significance Thresholds

Construction activities associated with the modified project would result in temporary sources of on-site fugitive dust and construction equipment emissions. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 2 are presented in Table 6 and compared to the maximum daily on-site construction and operational emissions.

⁸ The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). This discussion is nonetheless provided in an effort to show good-faith analysis and to comply with CEQA's information disclosure requirements.

Table 6. Localized Significance Thresholds Analysis

Pollutant	Project Construction Emissions (Pounds per Day)	LST Criteria (Pounds per Day)	Exceeds LST?
Construction – Modified Project			
NO ₂	24.69	103	No
CO	30.67	562	No
PM ₁₀	1.03	4	No
PM _{2.5}	0.93	3	No
Construction – Approved Project			
NO ₂	2.46	103	No
CO	1.07	562	No
PM ₁₀	0.07	4	No
PM _{2.5}	0.07	3	No

Source: SCAQMD 2009.

Notes: LST = localized significance threshold; NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

See Appendix A for detailed results.

Localized significance thresholds were determined based on the values for a 1-acre site at a distance of 25 meters (82 feet) from the nearest sensitive receptor.

These estimates reflect control of fugitive dust required by SCAQMD Rule 403.

The emissions represent worst-case operating scenario during construction.

Based on the results shown in Table 6, the modified project's emissions would exceed the emissions from the approved project but would still not exceed the SCAQMD's LSTs. Therefore, modified project would thus result in a less than significant impact with regard to localized impact to sensitive receptors during construction and no new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

At the time that the SCAQMD Handbook (1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD

conducted CO modeling for the 2003 AQMP⁹ (SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Each billboard would only generate an estimated 4 vehicle trips per month (100 total vehicle trips per month for the modified project) for maintenance and landscaping; therefore, the modified project would not raise the traffic volumes at local intersections to the 100,000 vehicles per day that could result in a CO hotspot.

Additionally, ambient CO levels are monitored at the 1630 N. Main St., Los Angeles air quality monitoring station, which is approximately 8.5 miles west of the project area (near downtown Los Angeles). The results at this station are considered to be generally representative of ambient air quality in the project region. Ambient CO levels monitored at this representative monitoring station indicate that the highest recorded 1-hour concentration of CO is 2.5 ppm (the State standard is 20 ppm) and highest 8-hour concentration is 1.6 ppm (the State standard is 9 ppm) during the past 3 years of available data (EPA 2025). As discussed above, the highest CO concentrations typically occur during peak traffic hours, so CO impacts calculated under peak traffic conditions represent a worst-case analysis. Given the considerably low level of CO concentrations in the project region, and the nominal increase in vehicle trips for maintenance, mobile emissions would not contribute to CO concentrations, and a CO hotspot is not anticipated to occur. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the modified project would result in no impact to air quality with regard to potential CO hotspots. No new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute (immediate) and/or chronic (cumulative) non-cancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics “Hot Spots” Information and Assessment Act,

⁹ SCAQMD’s CO hotspot modeling guidance has not changed since 2003.

Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere.

Examples of TACs include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Construction of the modified project would result in emissions of diesel particulate matter (DPM) from heavy construction equipment and trucks accessing construction sites. DPM is characterized as a TAC by the State of California. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and has adopted appropriate control measures for sources of these TACs. The following measures are required by state law to reduce DPM emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (13 CCR 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

Billboard construction would result in emissions of DPM from heavy construction equipment and trucks accessing construction sites. The Office of Environmental Health Hazard Assessment (OEHHA) has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure, but has not identified health effects due to short-term exposure to diesel exhaust. The duration of proposed construction activities (intermittently over the course of 2.5 years) would only constitute a small percentage of the total long-term exposure period, considered to be 30 years, and would not result in exposure of proximate sensitive receptors to substantial TACs. After proposed construction is completed, there would be no long-term source of TAC emissions during operation. In addition, the modified project would not require the extensive operation of heavy-duty diesel construction equipment, which is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce DPM emissions, and would not involve extensive use of diesel trucks, which are also subject to a CARB Airborne Toxics Control Measure. Furthermore, as shown in Table 4, maximum daily particulate matter (i.e., PM₁₀ or PM_{2.5}) emissions generated by construction equipment operation and haul-truck trips during construction (exhaust particulate matter or DPM), combined with fugitive dust generated by equipment operation and vehicle travel, is minimal.

The billboard projects are located on developed infill sites. Emissions during construction would not be concentrated in any one area of the sites but would be spread over the entirety of the sites. Emissions would not be continuous and would cease once construction is complete. Therefore, the modified project would not expose sensitive receptors to substantial quantities of TACs during construction. Impacts would be less than significant.

No residual TAC emissions and corresponding health risk are anticipated after construction, and no long-term sources of TAC emissions are anticipated during operation of the modified project. CARB has published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005), which identifies certain types of

facilities or sources that may emit substantial quantities of TACs and therefore could conflict with sensitive land uses, such as “schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.” The Air Quality and Land Use Handbook is a guide for siting of new sensitive land uses, and CARB recommends that sensitive receptors not be located downwind or in proximity to such sources to avoid potential health hazards. The enumerated facilities or sources include the following: high-traffic freeways and roads, distribution centers, railyards, ports, refineries, chrome plating facilities, dry cleaners, and large gas-dispensing facilities. The modified project would not include any of the above-listed land uses associated with generation of TAC emissions. The modified project may emit DPM emissions during operation from mobile sources (maintenance trips). However, as shown in Table 5, maximum daily particulate matter emissions are minimal. Potential impacts associated with exposure of sensitive receptors to TACs would be less than significant.

It is expected that operation of the modified project would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators) that could be a TAC source. Therefore, the modified project would not result in exposure of sensitive receptors in the vicinity of the project area to substantial TAC concentrations due to either construction or operation, and impacts would be less than significant. No new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

Health Impacts of Criteria Air Pollutants

Construction of the modified project would generate criteria air pollutant emissions; however, the modified project would not exceed the SCAQMD mass-emission thresholds.

The SCAB is designated as nonattainment for O₃ for the NAAQS and CAAQS. Thus, existing O₃ levels in the SCAB are at unhealthy levels during certain periods. The health effects associated with O₃ generally relate to reduced lung function. Because the modified project would not involve construction activities that would result in O₃ precursor emissions (VOC or NO_x) that would exceed the SCAQMD thresholds, construction of the modified project is not anticipated to substantially contribute to regional O₃ concentrations and associated health impacts. Similar to construction, no SCAQMD threshold would be exceeded during operation.

In addition to O₃, NO_x emissions contribute to potential exceedances of the NAAQS and CAAQS for NO₂ (since NO₂ is a constituent of NO_x). Exposure to NO₂ can cause lung irritation, bronchitis, and pneumonia, and lower resistance to respiratory infections. As depicted in Table 4 and Table 5, neither construction nor operation of modified project would exceed the SCAQMD thresholds for NO_x emissions. Thus, the modified project would not be expected to exceed the NO_x standards or contribute to associated health effects.

CO tends to be a localized impact associated with congested intersections. CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less than significant impact. Thus, the modified project' CO emissions would not contribute to the health effects associated with this pollutant.

The SCAB is designated as nonattainment for PM₁₀ under the CAAQS and nonattainment for PM_{2.5} under the NAAQS and CAAQS. Particulate matter contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of

problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. As with O₃ and NO_x, the modified project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed SCAQMD's thresholds. Accordingly, the modified project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, as shown in Table 5, the modified project would not result in any potentially significant contribution to local or regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts would be less than significant. No new significant impacts would occur, and no previously identified significant impacts would substantially increase in severity.

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

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

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the billboards. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and asphalt pavement application. Such odors would disperse rapidly from the project sites and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Furthermore, as stated above, the modified project would comply with SCAQMD Rule 402, Nuisance, which prohibits the release of odors which may cause annoyance to a considerable number of persons, as well as other SCAQMD rules related to odor generation. The modified project would not create any new sources of odor during operation. Therefore, operations would result in an odor impact that is less than significant.

The modified project would not involve other emissions that would affect a substantial number of people, aside from those discussed previously under the thresholds above. As such, impacts would remain less than significant for the modified project. The modified project would not lead to new impacts, and no previously identified significant impacts would substantially increase in severity.

7 Greenhouse Gas Emissions Assessment

7.1 Thresholds of Significance

The significance criteria used to evaluate the modified project's GHG emissions impacts is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this GHG emissions analysis, the modified project would have a significant environmental impact if they would (14 CCR 15000 et seq.):

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated on a project-level under CEQA.

Approaches to Determining Significance

Based on the GHG thresholds included in the current version of Appendix G of the CEQA Guidelines, implementation of the modified project would have a significant adverse impact related to GHG emissions if it would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions related to proposed projects and consider several other factors that could be used to determine whether GHG emissions from a project are significant, including: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as the threshold chosen by the lead agency is supported by substantial evidence. (See CEQA Guidelines Section 15064.7(c).) The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. (See CEQA Guidelines Section 15130(f).)

Pursuant to CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the

public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservations plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.” CEQA Guidelines Section 15064(h)(3) thus allows a lead agency to find that the GHG emissions resulting from a proposed project are less than significant if the project complies with adopted programs and/or other regulatory schemes to reduce GHG emissions. The City has adopted a Climate Action and Adaptation Plan (CAAP) to reduce GHG emissions. As such, the City can determine that the modified project’s GHG emissions would be less than significant if the modified project can be shown to comply with the CAAP.

Furthermore, in the absence of any adopted numeric threshold, the significance of a project’s GHG emissions can be evaluated by considering whether the project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. (See CEQA Guidelines Section 15064.4(b).) For land use development projects, such as the approved and modified project, the most directly applicable adopted regulatory plan to reduce GHG emissions would be the City’s CAAP, which is designed to achieve GHG reductions from land uses in the City as required by the state’s long-term climate goals. The City does not have an adopted numeric threshold for GHG impacts. As such, this analysis considers whether the modified project would be consistent with the CAAP. This analysis also considers the modified project’s consistency with regional and state GHG reduction goals as articulated in SB 32, the 2022 Scoping Plan, and the SCAG RTP/SCS. However, it is noted that the CAAP’s decarbonization target of 2035 is more aggressive than the statewide target of 2045, outpacing the statewide target by 10 years.

The IS/ND previously compared estimated GHG emissions to the SCAQMD’s threshold of 1,400 MT CO₂e, which can be used for commercial projects. While the CEQA guidelines state that consistency with a qualified CAAP is a sufficient demonstration of less-than-significant impacts related to the Appendix G GHG thresholds, this analysis also compares the emissions associated with the modified project to the previously used 1,400 MT CO₂e threshold, to align with the analysis of the adopted IS/ND. (It is noted that the City no longer uses the SCAQMD’s numerical thresholds for GHG analysis in CEQA documents.)

7.2 Impact Analysis

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

Project-Generated GHG Emissions

Construction Emissions

Construction of the modified project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. As stated above, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime; therefore, the total construction GHG emissions were calculated, amortized over 30 years, and then added to the operational emissions.

CalEEMod was used to estimate GHG emissions during construction of Round 1.5 and 2, which is anticipated to occur intermittently over the course of 2.5 years. On-site sources of GHG emissions include off-road equipment and off-site sources include on-road vehicles (vendor trucks and worker vehicles). GHG emissions generated by the construction of Round 1.5 and 2 are shown in Table 7. These emissions are then added to those estimated for Round 1.

Table 7. Estimated Annual Construction Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	Refrigerants	CO ₂ e
Year	Metric Tons				
Rounds 1.5 & 2 Billboard Projects (2026–2028)	646.49	0.03	0.03	0.27	656.88
Total (Rounds 1.5 & 2)					656.88
Round 1 Billboard Projects (~2021–2028)					78.63
Total					735.51
Annualized emissions over 30 years (metric tons per year)					24.52

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent. See Attachment A for complete results.

As shown in Table 7, construction GHG emissions associated with Rounds 1.5 and 2 would equate to approximately 657 MT CO₂e. When factoring in the previous estimates for Round 1 construction, the total modified project would result in approximately 736 MT CO₂e. Estimated construction emissions amortized over 30 years would be approximately 25 CO₂e per year. GHG emissions generated during construction would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Emissions

CalEEMod was used to estimate potential project-generated operational GHG emissions from area sources, energy sources (electricity use), mobile sources, and water and wastewater. For additional details, see Section 5.2 for a discussion of operational emission calculation methodology and assumptions. Operational year 2026 was assumed as the first year of potential operations. Table 8 shows the estimated operational emissions from the modified project.

Table 8. Estimated Annual Operation Greenhouse Gas Emissions

Project	CO ₂ e - Metric Tons per Year
Operation of Rounds 1, 1.5 and 2 Billboards	1,352.95
Amortized construction emissions	24.52
Total (Modified Project + amortized construction emissions + 2021 Addendum Total)	1,377.47
2021 Addendum Threshold	1,400
Threshold Exceeded?	No

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent. See Attachment A for complete results.

As shown in Table 8, the estimated total GHG emissions during operation of the modified project considered in the operational scenario would be approximately 1,377 MT CO₂e per year, including amortized construction emissions.

It is noted that the project-generated GHG emissions estimate does not take into account numerous factors that may reduce the GHG emissions estimates for the modified project. The primary driver of GHG emissions for billboard projects is electricity use. As also described in Section 5.2, the electricity estimates used in this analysis do not take into account projects that consist solely of internally illuminated static billboards (which generally have reduced energy demands) or projects that include solar energy components (which may offset billboard-related electrical consumption). Many billboard projects also entail the removal of existing billboard faces, and this analysis does not take credit for electricity demand reductions from billboard removals.¹⁰ The adopted policy also sets forth several requirements for energy efficiency and GHG reductions, which are not accounted for in this analysis. Billboard operators are required to use the highest available clean energy tier from the City's energy provider to the extent feasible. Additionally, billboard projects that are associated with building renovations must demonstrate improvement in the energy performance of the renovated building, such that the increase in energy usage resulting from the billboard is offset by increased building energy performance. All of these factors, either together or independently, would serve to reduce the GHG emissions estimates shown in Table 8.

As such, this analysis presents a conservative interpretation of the GHG emissions from the modified project. Because emissions would be less than the 1,400 MT CO₂e threshold, the modified project would not result in any new significant impacts or significant impacts of increased severity relative to what was disclosed for the approved project in the IS/ND. Impacts would be less than significant. No additional analysis is required.

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

The potential for the modified project to generate GHG emissions that may have a significant impact on the environment and the potential for the modified project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions is evaluated based on the modified project's consistency with the City's CAAP, as discussed above. The CAAP is a qualified plan under CEQA Guidelines Section 15183.5(b) meaning it meets the CEQA criteria for "a plan for the reduction of greenhouse gas emissions," such that it may be used for the specific purpose of streamlining the analysis of GHG emissions for subsequent projects.

Consistency with the City of West Hollywood Climate Action and Adaptation Plan

The City's CAAP includes strategies and measures to be implemented at the local level to meet the community-wide GHG reduction target. A project determined to be consistent with the strategies and measures of the CAAP would have a less than significant impact from GHGs. To evaluate the project's consistency with the CAAP, Table 9 below outlines the modified project's potential to conflict with the applicable measures therein. Other measures not

¹⁰ Upon buildout, the modified project as a whole would result in the removal of 23 existing billboard faces from the Sunset Strip.

identified in Table 9 are not directly applicable to the modified project; accordingly, the modified project would not conflict with those goals.

Table 9. Project Potential to Conflict with the City's CAAP

Topic	Measure	Potential to Conflict
Climate Leadership and Governance	CLG-3: Lead by example in addressing consumption-based emissions.	Consistent. The adopted Sunset Boulevard Off-Site Signage Policy encourages projects that use 100% clean energy and/or generate energy on-site, projects that incorporate innovative sustainability features, projects that address and further the City's intent for sustainable development, and projects that use durable, natural, and other sustainable materials. These principles were used during the selection of billboard projects as part of the City's Design Excellence Screening process.
Energy	EN-2: Promote, support, and expand the use of local solar power and battery energy storage	Consistent. The modified project would incorporate solar PV systems to the extent feasible. While individual billboard project specifics are still to be determined, at least two projects that are part of the modified signage development scenario (located at 8906 Sunset and 8222 Sunset) include solar panel installations or improvements.
	EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction.	Consistent. All projects that are part of the modified signage development scenario are required to be designed and constructed in compliance with applicable Title 24 standards, including the 2022 California Building Code and 2022 Energy Code. In addition, the projects would adhere to relevant requirements of the West Hollywood Municipal Code, including best practice provisions related to construction.
	EN-4: Enhance community energy resilience.	Consistent. At least two projects that are part of the modified signage development scenario (located at 8906 Sunset and 8222 Sunset) would include solar panel installations or improvements. Additionally, all new billboards are required by the policy to use the highest available clean energy tier from the City's energy provider to the extent feasible. For full motion billboards incorporated into new development or major renovations of existing buildings, the incremental energy usage attributable to the billboards is required to be fully offset to the extent feasible through demonstrated improvement in the energy performance of the new or renovated building.

Table 9. Project Potential to Conflict with the City's CAAP

Topic	Measure	Potential to Conflict
Natural Environment	NE-1: Protect and expand the urban tree canopy.	Consistent. Some billboard projects may involve removal of existing landscaping, including trees. However, in such instances, landscaping would be replaced and refurbished. Some billboard projects also involve installation of landscaping where there currently is little to none. As such, in its totality, the modified signage development scenario is expected to increase the amount of greenery along the Sunset Strip.
	NE-4: Encourage green infrastructure.	Consistent. As described above, the modified signage development scenario as a whole is expected to increase the amount of greenery along Sunset Strip. Several projects would include the addition of landscaping where none currently exists. These additional landscaped areas would serve to incrementally reduce the impervious surfaces in the project area. Some of the proposed landscaped areas have also been designed specifically for pollinators and/or native plant species, such as the butterfly garden proposed for 8222 Sunset and the native/drought-tolerant pollinator garden proposed for 8371 Sunset.

Source: City of West Hollywood 2021.

As shown in Table 9, the modified project would not conflict with the applicable measures within the City's CAAP. Therefore, the modified project would not result in any new significant impacts or significant impacts of increased severity relative to what was disclosed for the approved project in the IS/ND.

Consistency with the CARB 2022 Scoping Plan

The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. The relevant GHG emissions reduction targets for the modified project include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and was updated in 2014, 2017, and most recently in 2022. While the Scoping Plan is not directly applicable to specific projects and is not intended to be used as the sole basis for

project-level evaluations,¹¹ it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would not conflict with the state's GHG emission reduction targets established in SB 32 and AB 1279 if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Climate Change Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017). The more recent CARB 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022).

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), increase stringency of the Low Carbon Fuel Standard (LCFS), measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increase stringency of SB 375 targets. The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemicals and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022).

Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (LCFS), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the modified project would be located in a high-quality transit area and within a transit propriety area, the modified project would not conflict with the 2017 Scoping Plan's goal of reducing GHG emissions through reductions in VMT statewide.

The state's 2045 carbon neutrality goal requires CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce anthropogenic sources of GHG emissions. However, the 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the modified project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Nonetheless, the modified project would not interfere with the state's implementations of the strategies of the 2017 or 2022 Scoping Plans and would therefore be consistent with the state's long-term goals established by SB 32 and AB 1279. While the analysis of the approved project referenced earlier Scoping Plans, based on the considerations

¹¹ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009a).

above, the modified project would not result in any new significant impacts or significant impacts of increased severity relative to what was disclosed for the approved project in the IS/ND.

Consistency with the SCAG 2024 RTP/SCS

The SCAG RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light trucks in the southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission-reduction targets set forth by CARB, the RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

SCAG updates the RTP/SCS every 4 years. The currently adopted RTP/SCS is the 2024–2050 RTP/SCS, also known as Connect SoCal 2024. The 2024–2050 RTP/SCS identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience. An analysis of the modified project's compliance with the applicable strategies is presented below.

- **Sustainable Development.** The 2024–2050 RTP/SCS identifies sustainable development, including water and energy-efficient building practices and green infrastructure, as a strategy to reduce GHG emissions. Per the City's Sunset Boulevard Off-Site Advertising Policy, all new billboard operations are required to utilize the highest available clean energy tier from the City's energy provider to the extent feasible. Furthermore, for full motion billboards incorporated into new development or major renovations of existing buildings, the incremental energy usage attributable to the billboards is required to be fully offset to the extent feasible through demonstrated improvement in the energy performance of the new or renovated building. Many billboard projects would incorporate new or refurbished landscaping areas, adding greenery where there currently is none or enhancing existing green spaces. Additional landscaped areas on the Sunset Strip would serve to incrementally reduce the impervious surfaces in the project area.
- **Air Quality.** The 2024–2050 RTP/SCS identifies air quality and meeting federal and state ambient air quality standards as a co-benefit of reducing GHG emissions. The modified project would not exceed the SCAQMD's threshold of significance for any criteria air pollutant and would not result in any significant impacts related to air quality.
- **Natural and Agricultural Lands Preservation.** The 2024–2050 RTP/SCS promotes the conservation and restoration of natural and agricultural lands through several policies, such as quantifying the carbon sequestration potential of natural and agricultural lands and prioritization of sensitive habitat and wildlife corridors for permanent protection. The billboard projects developed under modified project would be located on already developed properties, and the modified project would not result in the removal of natural or agricultural lands.
- **Climate Resilience:** The 2024–2050 RTP/SCS promotes regional coordination and solutions for effective emergency response for climate-related hazards. Additionally, in the category of climate resilience, SCAG has established the following policies: prioritize the most vulnerable populations and communities subject to climate hazards; support local and regional climate and hazard planning; support nature-based solutions to increase regional resilience; promote sustainable water use planning; and, support an integrated

planning approach to help jurisdictions meet housing needs in a drier environment. While the modified project does not directly pertain to these climate resilience efforts, the modified project would not interfere with these policies, and certain components of the modified project may support several of these policies. Specifically, new landscaping incorporated into the billboard projects would be required to comply with the City's regulations for drought-resistant landscaping, thus promoting sustainable water use while still incorporating new green spaces into the project area. A number of billboard projects would be integrated into new development projects, some of which may include new housing and/or affordable housing units (e.g., 8850 Sunset, 8240 Sunset).

Based on the analysis above, the modified project would be consistent with the 2024–2050 RTP/SCS.

Summary

In summary, the modified project would not result in GHG emissions that would exceed the previously analyzed threshold. Furthermore, the modified project would be consistent with the City's CAAP, which is a qualified GHG reduction plan under CEQA, and would therefore result in a less than significant impact related to GHGs. The project would also not conflict with the GHG emissions reduction goals within the 2022 Scoping Plan and SCAG RTP/SCS. Therefore, the modified project would not result in any new or more severe significant impacts, nor would it create new conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions beyond that which was identified within the IS/ND or the 2021 Addendum. No further analysis would be required.

8 Energy Assessment

8.1 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment with respect to energy if the project would:

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

The above listed Appendix G energy thresholds are applied herein. It is noted that although the analysis for the previous IS/ND predated the addition of the Energy section to the CEQA guidelines, the analysis herein includes a discussion of the energy impacts associated with the modified project to ensure consistency with current CEQA requirements.

8.2 Impact Analysis

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

The modified project would result in an increase in demand for electricity in the project area, as well as gasoline and diesel consumption in the project area during construction and minimal gasoline consumption during operation.

Construction

Energy use during construction of the modified project would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities.

Electricity

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. The electricity used for construction activities would be temporary and minimal; it would be within the supply and infrastructure service capabilities of Southern California Edison (SCE), and it would not require additional local or regional capacity. The electricity demand during construction would be minimal and temporary.

Natural Gas

Natural gas is not anticipated to be required during construction. Any minor amounts of natural gas that may be consumed as a result of construction would be temporary and negligible and would not have an adverse effect.¹²

Petroleum

Off-road equipment used during construction of the billboards would primarily rely on diesel fuel, as would vendor trucks involved in delivery of materials to the project sites and haul trucks exporting demolition or excavated materials from the project sites. In addition, construction workers would travel to and from the project sites throughout construction.

Although these activities would result in the consumption of petroleum-based fuels, such use is consistent with the scale and duration of typical urban construction projects and would not constitute an unusual or excessive demand on local or regional fuel supplies.

Furthermore, the modified project would be subject to a range of regulatory measures specifically designed to reduce unnecessary fuel consumption and promote energy efficiency, particularly CARB's In-Use Off-Road Diesel

¹² While no natural gas is anticipated to be used during construction because construction equipment is typically diesel fueled, the possibility of natural gas use is acknowledged in the event a natural-gas-fueled piece of equipment is used. However, as noted previously, all equipment was assumed to be diesel fueled in CalEEMod.

Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Overall, the projects' demand would not be unusual compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy efficient than at comparable construction sites in the region or state.

Lastly, construction fuel consumption is inherently limited in duration and scope. Construction would be completed in discrete phases by December 2028, after which the modified project would no longer generate demand for off-road or haul-related petroleum use.

Given the temporary nature of construction, compliance with applicable energy efficiency regulations, and the use of standard construction practices, petroleum use would not be wasteful or inefficient.

Operation

Electricity

The operation of billboards would require electricity for the billboards' electrical components. Additionally, the supply, conveyance, treatment, and distribution of water for any landscaping components would indirectly result in electricity usage. As discussed in Section 5.2, electricity consumption was estimated based on similar project experience. According to these estimates, the 26 billboard projects together considered in the operational scenario would consume approximately 8,840,000 kWh per year of electricity.

While the total electricity demand may appear high when presented as a standalone figure, it reflects the continuous operation of multiple billboards, each equipped with high-efficiency LED technology operating up to 24 hours per day. The estimated usage is consistent with similar full motion signage projects of this scale and type. Furthermore, at a regional scale, the demand for electricity within the SCE service area was over 85,870 million kWh in 2022. The anticipated electrical demand of the billboards would comprise a nominal 0.01% of the total demand for the service area. Within SCE's service area, total energy consumption is anticipated to grow an average of 1.53% per year from 2022 to 2030 (CEC 2022). The billboard projects considered in this operational scenario that are not yet constructed would ultimately come online over a period of several years, and each applicant would be required to secure service from SCE. Given the incremental increases in electrical demand of a period of several years and the fact that assumptions for the modified project's electricity demands are conservative (see Within SCE's service area, total energy consumption is anticipated to grow an average of 1.53% per year from 2022 to 2030 (CEC 2022). The billboard projects considered in this operational scenario that are not yet constructed would ultimately come online over a period of several years, and each applicant would be required to secure service from SCE. Given the incremental increases in electrical demand of a period of several years and the fact that assumptions for the modified project are considered conservative (see Section 5.2), the modified project's electricity demand is anticipated to be well accommodated within the anticipated growth in energy consumption for SCE's service area.

Furthermore, billboards would be required to meet the Title 24 of the California Code of Regulations standards, including the 2022 California Building Energy Efficiency Standards, which serve to enhance and regulate California's building standards, at a minimum.

In summary, although electricity consumption would increase in the project area due to the demand of the billboards, implementation of the Sunset Boulevard Off-Site Signage Policy supports the City's goals and vision for the SSP, and the increased electrical demand is anticipated to be reasonably served by SCE. For these reasons, electricity consumption would not be considered inefficient, wasteful, or unnecessary.

Natural Gas

As previously discussed in Section 5.2, the billboards would not require the use of natural gas during operations..

Petroleum

During operations, fuel consumption resulting from the modified project would involve the use of motor vehicles traveling to and from the project sites for maintenance events. As discussed in Section 5.2, an estimate of 104 vehicle trips per month was modeled for the total project operations, assuming each billboard would require 2 maintenance events per month (4 vehicle trips per maintenance event). Based on this estimate, the annual VMT attributable to the modified project would be 14,976 VMT and would result in the consumption of an estimated 583 gallons of petroleum per year.

Additionally, over the lifetime of the modified project, the fuel efficiency of the vehicles being used by the maintenance crew is expected to increase. As such, the amount of gasoline consumed as a result of vehicular trips to and from the project sites during operation would decrease over time as regulations become more stringent.

Given the low number of VMT generated by project operations, the petroleum consumption associated with the modified project would not be considered inefficient or wasteful.

Summary

Although energy impacts were not previously analyzed in the IS/ND, the modified signage development scenario would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum, during construction or operation. As such, energy impacts would be less than significant.

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

The modified project would be subject to and would comply with, at a minimum, the 2022 California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for residential and non-residential building, including signs such as billboards, constructed in California to reduce energy demand and consumption. Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under CALGreen.

Additionally, the modified project would support the City's goals by supporting the strategies included in the City's CAAP for reducing energy demand, such as Measures EN-2, EN-3, and EN-4, as discussed in Section 7.2.2, Greenhouse Gas Emissions – Impact Analysis.

Although energy impacts were not previously analyzed in the IS/ND, because the modified project would comply with and exceed the existing energy standards and regulations, as well as support the goals of the local CAAP, the modified project would result in a less than significant impact associated with the potential to conflict with energy-related plans.

9 Conclusions

Criteria air pollutant emissions generated during construction and operation of the modified project would not exceed SCAQMD's significance thresholds or result in a cumulatively considerable net increase in emissions. Similarly, the emissions would also neither exceed the LST significance thresholds for sensitive receptors during construction, nor create a CO hotspot. The modified project would not be a long-term source of odors or other emissions during construction or operation. Therefore, the modified project would not result in any new significant impacts or significant impacts of increased severity relative to what was disclosed for the approved project in the IS/ND. No new significant impacts would occur in the category of air quality, and no previously identified significant impacts would substantially increase in severity.

Regarding the modified project's GHG emissions, the modified project would not result in GHG emissions that would exceed the previously analyzed threshold. Additionally, the modified project would not conflict with the City's CAAP, the applicable plan to reduce GHGs in the region. Moreover, the modified project would not conflict with 2022 CARB Scoping Plan or the SCAG 2024-2050 RTP/SCS; therefore, the modified project would not result in any new significant impacts or significant impacts of increased severity relative to what was disclosed for the approved project in the IS/ND. No new significant impacts would occur in the category of GHG emissions, and no previously identified significant impacts would substantially increase in severity.

Lastly, because the modified project would not result in a wasteful or inefficient use of resources, would comply with and exceed the existing energy standards and regulations, and would support the goals of the local CAAP, the modified project would result in a less than significant energy impact.

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MEMORANDUM

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Attachment A

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WeHo Sunset Billboards Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	WeHo Sunset Billboards
Construction Start Date	6/1/2026
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	19.6
Location	34.097980728718014, -118.36826056992118
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4337
EDFZ	16
Electric Utility	Clean Power Alliance
Gas Utility	Southern California Gas
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Office Building	39.7	1000sqft	0.91	39,676	13,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.1	15.4	26.9	34.4	0.07	1.04	1.32	2.34	0.95	0.34	1.28	—	9,033	9,033	0.39	0.52	8.66	9,174
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.18	1.10	3.23	4.19	0.01	0.11	0.17	0.28	0.10	0.04	0.14	—	1,065	1,065	0.05	0.05	0.44	1,082
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21	0.20	0.59	0.76	< 0.005	0.02	0.03	0.05	0.02	0.01	0.03	—	176	176	0.01	0.01	0.07	179

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	16.1	15.4	26.9	34.4	0.07	1.04	1.32	2.34	0.95	0.34	1.28	—	9,033	9,033	0.39	0.52	8.66	9,174
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	1.18	1.10	3.23	4.19	0.01	0.11	0.17	0.28	0.10	0.04	0.14	—	1,065	1,065	0.05	0.05	0.44	1,082
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.21	0.20	0.59	0.76	< 0.005	0.02	0.03	0.05	0.02	0.01	0.03	—	176	176	0.01	0.01	0.07	179

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.27	1.24	0.02	1.84	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,102	8,122	1.99	< 0.005	0.10	8,172
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.96	0.96	0.01	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,094	8,114	1.99	< 0.005	< 0.005	8,164
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.17	1.16	0.02	1.30	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,102	8,122	1.99	< 0.005	0.05	8,172
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21	0.21	< 0.005	0.24	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	3.29	1,341	1,345	0.33	< 0.005	0.01	1,353

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.01	0.12	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	29.4	29.4	< 0.005	< 0.005	0.10	29.9
Area	1.26	1.23	0.01	1.73	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.10	7.10	< 0.005	< 0.005	—	7.12

Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	8,065	8,065	0.00	0.00	—	8,065
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Total	1.27	1.24	0.02	1.84	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,102	8,122	1.99	< 0.005	0.10	8,172
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.01	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	< 0.005	28.5
Area	0.95	0.95	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	8,065	8,065	0.00	0.00	—	8,065
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Total	0.96	0.96	0.01	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,094	8,114	1.99	< 0.005	< 0.005	8,164
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.01	0.12	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	31.1	31.1	< 0.005	< 0.005	0.05	31.6
Area	1.16	1.14	0.01	1.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.86	4.86	< 0.005	< 0.005	—	4.88
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	8,065	8,065	0.00	0.00	—	8,065
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Total	1.17	1.16	0.02	1.30	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	19.9	8,102	8,122	1.99	< 0.005	0.05	8,172
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	5.15	5.15	< 0.005	< 0.005	0.01	5.22
Area	0.21	0.21	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.80	0.80	< 0.005	< 0.005	—	0.81
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	1,335	1,335	0.00	0.00	—	1,335
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.15	0.15	0.00	0.00	—	0.15
Waste	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5
Total	0.21	0.21	< 0.005	0.24	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	3.29	1,341	1,345	0.33	< 0.005	0.01	1,353

3. Construction Emissions Details

3.1. Site Preparation/Demolition/Excavation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.33	1.93	18.1	25.4	0.04	0.50	—	0.50	0.46	—	0.46	—	3,800	3,800	0.15	0.03	—	3,813
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.09	1.53	< 0.005	0.03	—	0.03	0.03	—	0.03	—	229	229	0.01	< 0.005	—	230
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.20	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.9	37.9	< 0.005	< 0.005	—	38.0
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.14	2.33	0.00	0.00	0.47	0.47	0.00	0.11	0.11	—	488	488	0.02	0.02	1.65	495
Vendor	0.04	0.02	0.62	0.30	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	561	561	0.02	0.08	1.52	587
Hauling	0.03	0.01	0.49	0.19	< 0.005	0.01	0.11	0.12	0.01	0.03	0.04	—	408	408	0.02	0.07	0.92	429
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.3	28.3	< 0.005	< 0.005	0.04	28.7
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.8	33.8	< 0.005	< 0.005	0.04	35.3
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	24.6	24.6	< 0.005	< 0.005	0.02	25.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.68	4.68	< 0.005	< 0.005	0.01	4.75

Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.60	5.60	< 0.005	< 0.005	0.01	5.85
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.07	4.07	< 0.005	< 0.005	< 0.005	4.28

3.3. Excavation Trucks (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.15	0.03	2.45	0.97	0.01	0.03	0.56	0.58	0.03	0.15	0.18	—	2,041	2,041	0.11	0.33	4.58	2,145
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.59	5.59	< 0.005	< 0.005	0.01	5.87
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.93	0.93	< 0.005	< 0.005	< 0.005	0.97

3.5. New Billboard Installation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.66	0.56	5.17	4.61	0.01	0.21	—	0.21	0.19	—	0.19	—	1,485	1,485	0.06	0.01	—	1,490

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.04	0.03	0.31	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89.5	89.5	< 0.005	< 0.005	—	89.8
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.01	0.01	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.14	2.33	0.00	0.00	0.47	0.47	0.00	0.11	0.11	—	488	488	0.02	0.02	1.65	495
Vendor	0.04	0.02	0.62	0.30	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	561	561	0.02	0.08	1.52	587
Hauling	0.06	0.01	0.98	0.39	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	816	816	0.05	0.13	1.83	858
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.3	28.3	< 0.005	< 0.005	0.04	28.7
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.8	33.8	< 0.005	< 0.005	0.04	35.3
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	49.2	49.2	< 0.005	0.01	0.05	51.7

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.68	4.68	< 0.005	< 0.005	0.01	4.75
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.60	5.60	< 0.005	< 0.005	0.01	5.85
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.15	8.15	< 0.005	< 0.005	0.01	8.55

3.7. Building and Landscaping Improvements (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.04	2.56	24.1	29.9	0.06	1.01	—	1.01	0.93	—	0.93	—	6,107	6,107	0.25	0.05	—	6,128
Architectural Coatings	12.6	12.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.45	1.80	< 0.005	0.06	—	0.06	0.06	—	0.06	—	368	368	0.01	< 0.005	—	369

Architect ural Coating	0.76	0.76	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.03	0.03	0.27	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01	—	60.9	60.9	< 0.005	< 0.005	—	61.2
Architect ural Coating s	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.20	0.21	3.49	0.00	0.00	0.71	0.71	0.00	0.17	0.17	—	732	732	0.03	0.03	2.48	742
Vendor	0.04	0.02	0.62	0.30	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	561	561	0.02	0.08	1.52	587
Hauling	0.12	0.03	1.96	0.77	0.01	0.02	0.44	0.47	0.02	0.12	0.14	—	1,633	1,633	0.09	0.26	3.66	1,716
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.19	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	42.4	42.4	< 0.005	< 0.005	0.06	43.0
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.8	33.8	< 0.005	< 0.005	0.04	35.3
Hauling	0.01	< 0.005	0.12	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	98.4	98.4	0.01	0.02	0.09	103
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.02	7.02	< 0.005	< 0.005	0.01	7.12
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.60	5.60	< 0.005	< 0.005	0.01	5.85
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.3	16.3	< 0.005	< 0.005	0.02	17.1

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	8,065	8,065	0.00	0.00	—	8,065
Total	—	—	—	—	—	—	—	—	—	—	—	—	8,065	8,065	0.00	0.00	—	8,065
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	8,065	8,065	0.00	0.00	—	8,065
Total	—	—	—	—	—	—	—	—	—	—	—	—	8,065	8,065	0.00	0.00	—	8,065
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,335	1,335	0.00	0.00	—	1,335
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,335	1,335	0.00	0.00	—	1,335

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.85	0.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.31	0.28	0.01	1.73	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.10	7.10	< 0.005	< 0.005	—	7.12
Total	1.26	1.23	0.01	1.73	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.10	7.10	< 0.005	< 0.005	—	7.12
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.85	0.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.95	0.95	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landsca Equipment	0.04	0.04	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.80	0.80	< 0.005	< 0.005	—	0.81
Total	0.21	0.21	< 0.005	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.80	0.80	< 0.005	< 0.005	—	0.81

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.88	0.88	0.00	0.00	—	0.88
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.00	0.15	0.15	0.00	0.00	—	0.15
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.15	0.15	0.00	0.00	—	0.15

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Total	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Total	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.99	0.00	—	69.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5
Total	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation/Demolition/Excavation	Site Preparation	6/1/2026	6/30/2026	5.00	22.0	—
Excavation Trucks	Grading	6/1/2026	6/1/2026	5.00	1.00	—
New Billboard Installation	Building Construction	7/1/2026	7/30/2026	5.00	22.0	—
Building and Landscaping Improvements	Paving	7/31/2026	8/31/2026	5.00	22.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation/Demolition/Excavation	Concrete/Industrial Pavers	Diesel	Average	6.00	8.00	33.0	0.73
Site Preparation/Demolition/Excavation	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation/Demolition/Excavation	Generator Sets	Diesel	Average	3.00	8.00	14.0	0.74
Site Preparation/Demolition/Excavation	Bore/Drill Rigs	Diesel	Average	3.00	8.00	83.0	0.50
New Billboard Installation	Cranes	Diesel	Average	3.00	4.00	367	0.29
Building and Landscaping Improvements	Cranes	Diesel	Average	3.00	8.00	367	0.29

Building and Landscaping Improvements	Tractors/Loaders/Back	Diesel	Average	3.00	8.00	84.0	0.37
Building and Landscaping Improvements	Pavers	Diesel	Average	3.00	8.00	81.0	0.42
Building and Landscaping Improvements	Paving Equipment	Diesel	Average	3.00	8.00	89.0	0.36
Building and Landscaping Improvements	Rollers	Diesel	Average	3.00	8.00	36.0	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation/Demolition/Excavation	—	—	—	—
Site Preparation/Demolition/Excavation	Worker	36.0	18.5	LDA,LDT1,LDT2
Site Preparation/Demolition/Excavation	Vendor	18.0	10.2	HHDT,MHDT
Site Preparation/Demolition/Excavation	Hauling	6.00	20.0	HHDT
Site Preparation/Demolition/Excavation	Onsite truck	—	—	HHDT
Excavation Trucks	—	—	—	—
Excavation Trucks	Worker	0.00	18.5	LDA,LDT1,LDT2
Excavation Trucks	Vendor	—	10.2	HHDT,MHDT
Excavation Trucks	Hauling	30.0	20.0	HHDT
Excavation Trucks	Onsite truck	—	—	HHDT
New Billboard Installation	—	—	—	—

New Billboard Installation	Worker	36.0	18.5	LDA,LDT1,LDT2
New Billboard Installation	Vendor	18.0	10.2	HHDT,MHDT
New Billboard Installation	Hauling	12.0	20.0	HHDT
New Billboard Installation	Onsite truck	—	—	HHDT
Building and Landscaping Improvements	—	—	—	—
Building and Landscaping Improvements	Worker	54.0	18.5	LDA,LDT1,LDT2
Building and Landscaping Improvements	Vendor	18.0	10.2	HHDT,MHDT
Building and Landscaping Improvements	Hauling	24.0	20.0	HHDT
Building and Landscaping Improvements	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Building and Landscaping Improvements	0.00	0.00	0.00	0.00	60,000

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Site Preparation/Demolition/Excavation	—	—	0.00	750	—
Excavation Trucks	—	240	0.00	0.00	—
Building and Landscaping Improvements	0.00	0.00	0.00	0.00	0.01

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Office Building	0.01	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	414	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VT/Weekday	VT/Saturday	VT/Sunday	VT/Year

Total all Land Uses	3.13	3.13	3.13	1,248	37.6	37.6	37.6	14,976

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	59,514	19,838	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
General Office Building	8,840,000	333	0.0000	0.0000	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)

General Office Building	0.00	182,320

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Office Building	36.9	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.38	annual days of extreme heat
Extreme Precipitation	6.85	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	65.7
AQ-PM	63.0
AQ-DPM	27.2
Drinking Water	78.9
Lead Risk Housing	52.9
Pesticides	0.00
Toxic Releases	70.9
Traffic	85.8
Effect Indicators	—
CleanUp Sites	54.3
Groundwater	43.8

Haz Waste Facilities/Generators	35.6
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	4.90
Cardio-vascular	10.8
Low Birth Weights	34.4
Socioeconomic Factor Indicators	—
Education	6.52
Housing	23.4
Linguistic	4.59
Poverty	5.92
Unemployment	74.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	89.47773643
Employed	90.05517772
Median HI	88.54099833
Education	—
Bachelor's or higher	92.69857564
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	91.71050943
Active commuting	37.86731682

Social	—
2-parent households	77.41562941
Voting	11.27935327
Neighborhood	—
Alcohol availability	69.19029899
Park access	46.6059284
Retail density	25.42024894
Supermarket access	44.32182728
Tree canopy	91.23572437
Housing	—
Homeownership	66.77787758
Housing habitability	92.76273579
Low-inc homeowner severe housing cost burden	45.7590145
Low-inc renter severe housing cost burden	97.52341845
Uncrowded housing	77.4541255
Health Outcomes	—
Insured adults	89.88836135
Arthritis	68.4
Asthma ER Admissions	95.6
High Blood Pressure	54.9
Cancer (excluding skin)	19.8
Asthma	94.4
Coronary Heart Disease	63.8
Chronic Obstructive Pulmonary Disease	88.0
Diagnosed Diabetes	91.2
Life Expectancy at Birth	55.5
Cognitively Disabled	93.6
Physically Disabled	93.4

Heart Attack ER Admissions	95.0
Mental Health Not Good	92.6
Chronic Kidney Disease	85.5
Obesity	74.1
Pedestrian Injuries	82.9
Physical Health Not Good	91.4
Stroke	84.7
Health Risk Behaviors	—
Binge Drinking	5.9
Current Smoker	88.4
No Leisure Time for Physical Activity	98.7
Climate Change Exposures	—
Wildfire Risk	99.1
SLR Inundation Area	0.0
Children	71.1
Elderly	32.8
English Speaking	83.9
Foreign-born	50.5
Outdoor Workers	93.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	90.9
Traffic Density	76.8
Traffic Access	60.4
Other Indices	—
Hardship	0.5
Other Decision Support	—
2016 Voting	45.3

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	17.0
Healthy Places Index Score for Project Location (b)	91.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Energy Use	Electricity consumption is reflective of 26 total billboard projects from Rounds 1, 1.5 and 2. Projects would not require natural gas consumption.
Construction: Construction Phases	Based on applicant-provided information.
Construction: Off-Road Equipment	Based on applicant-provided information. Equipment list reflects three simultaneously constructed billboard projects, in accordance with the construction plans.
Construction: Trips and VMT	Trip numbers are reflective of 3 simultaneous billboard projects.
Operations: Water and Waste Water	No indoor water use would be included the in the project.
Construction: Paving	Paved area was calculated based on previous similar project experience. Each billboard project was assumed to include 120 square feet of area to be paved.
Operations: Vehicle Data	Trips based on traffic study performed for the project.

Operations: Refrigerants	Refrigerants are not required by digital billboards.
Construction: Demolition	Conservative estimate of 250 BSF per billboard project to account for facade renovation was included.
Characteristics: Utility Information	City of West Hollywood purchases from CPA. Intensity factors provided by 2023 CPA Power Content Label.
Land Use	Assumed billboard area as building square feet. Assumed 11 billboards from Rounds 1, 1.5, and 2, with each billboard at 5,000 BSF and 500 SF of landscaping.

WeHo Sunset Billboards LST Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	WeHo Sunset Billboards LST
Construction Start Date	6/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	19.6
Location	34.097980728718014, -118.36826056992118
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4337
EDFZ	16
Electric Utility	Clean Power Alliance
Gas Utility	Southern California Gas
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Office Building	39.7	1000sqft	0.91	39,676	13,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.9	15.4	24.7	30.7	0.06	1.01	0.05	1.03	0.93	0.01	0.93	—	6,218	6,218	0.28	0.07	0.13	6,246
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.15	1.09	2.93	3.73	0.01	0.10	< 0.005	0.11	0.10	< 0.005	0.10	—	702	702	0.03	0.01	0.01	705
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21	0.20	0.54	0.68	< 0.005	0.02	< 0.005	0.02	0.02	< 0.005	0.02	—	116	116	0.01	< 0.005	< 0.005	117

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	15.9	15.4	24.7	30.7	0.06	1.01	0.05	1.03	0.93	0.01	0.93	—	6,218	6,218	0.28	0.07	0.13	6,246
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	1.15	1.09	2.93	3.73	0.01	0.10	< 0.005	0.11	0.10	< 0.005	0.10	—	702	702	0.03	0.01	0.01	705
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.21	0.20	0.54	0.68	< 0.005	0.02	< 0.005	0.02	0.02	< 0.005	0.02	—	116	116	0.01	< 0.005	< 0.005	117

3. Construction Emissions Details

3.1. Site Preparation/Demolition/Excavation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.33	1.93	18.1	25.4	0.04	0.50	—	0.50	0.46	—	0.46	—	3,800	3,800	0.15	0.03	—	3,813
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.09	1.53	< 0.005	0.03	—	0.03	0.03	—	0.03	—	229	229	0.01	< 0.005	—	230

Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.20	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.9	37.9	< 0.005	< 0.005	—	38.0
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.02	0.28	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.6	12.6	0.01	< 0.005	0.02	13.5
Vendor	0.02	0.01	0.18	0.14	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	32.1	32.1	0.01	0.01	0.04	33.8
Hauling	0.01	< 0.005	0.09	0.07	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.0	15.0	< 0.005	< 0.005	0.01	15.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.75	0.75	< 0.005	< 0.005	< 0.005	0.81
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.94	1.94	< 0.005	< 0.005	< 0.005	2.04

Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.91	0.91	< 0.005	< 0.005	< 0.005	0.96
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.32	0.32	< 0.005	< 0.005	< 0.005	0.34
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.16

3.3. Excavation Trucks (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.02	0.44	0.33	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	75.1	75.1	0.02	0.01	0.06	79.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.21	0.21	< 0.005	< 0.005	< 0.005	0.22
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.04

3.5. New Billboard Installation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.66	0.56	5.17	4.61	0.01	0.21	—	0.21	0.19	—	0.19	—	1,485	1,485	0.06	0.01	—	1,490
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.31	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	89.5	89.5	< 0.005	< 0.005	—	89.8
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.02	0.28	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.6	12.6	0.01	< 0.005	0.02	13.5
Vendor	0.02	0.01	0.18	0.14	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	32.1	32.1	0.01	0.01	0.04	33.8
Hauling	0.02	0.01	0.18	0.13	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	30.0	30.0	0.01	0.01	0.02	31.8

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.75	0.75	< 0.005	< 0.005	< 0.005	0.81
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.94	1.94	< 0.005	< 0.005	< 0.005	2.04
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.82	1.82	< 0.005	< 0.005	< 0.005	1.92
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.32	0.32	< 0.005	< 0.005	< 0.005	0.34
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.30	0.30	< 0.005	< 0.005	< 0.005	0.32

3.7. Building and Landscaping Improvements (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.04	2.56	24.1	29.9	0.06	1.01	—	1.01	0.93	—	0.93	—	6,107	6,107	0.25	0.05	—	6,128
Architectural Coatings	12.6	12.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.45	1.80	< 0.005	0.06	—	0.06	0.06	—	0.06	—	368	368	0.01	< 0.005	—	369
Architectural Coatings	0.76	0.76	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.27	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01	—	60.9	60.9	< 0.005	< 0.005	—	61.2
Architectural Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.16	0.04	0.42	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	18.9	18.9	0.01	< 0.005	0.03	20.3
Vendor	0.02	0.01	0.18	0.14	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	32.1	32.1	0.01	0.01	0.04	33.8
Hauling	0.03	0.02	0.35	0.26	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	60.1	60.1	0.02	0.01	0.05	63.5

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.21
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.94	1.94	< 0.005	< 0.005	< 0.005	2.04
Hauling	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.64	3.64	< 0.005	< 0.005	< 0.005	3.85
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.32	0.32	< 0.005	< 0.005	< 0.005	0.34
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.64

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation/Demolition/Excavation	Site Preparation	6/1/2026	6/30/2026	5.00	22.0	—
Excavation Trucks	Grading	6/1/2026	6/1/2026	5.00	1.00	—

New Billboard Installation	Building Construction	7/1/2026	7/30/2026	5.00	22.0	—
Building and Landscaping Improvements	Paving	7/31/2026	8/31/2026	5.00	22.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation/Demolition/Excavation	Concrete/Industrial Soils	Diesel	Average	6.00	8.00	33.0	0.73
Site Preparation/Demolition/Excavation	Tractors/Loaders/Back Hoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation/Demolition/Excavation	Generator Sets	Diesel	Average	3.00	8.00	14.0	0.74
Site Preparation/Demolition/Excavation	Bore/Drill Rigs	Diesel	Average	3.00	8.00	83.0	0.50
New Billboard Installation	Cranes	Diesel	Average	3.00	4.00	367	0.29
Building and Landscaping Improvements	Cranes	Diesel	Average	3.00	8.00	367	0.29
Building and Landscaping Improvements	Tractors/Loaders/Back hoes	Diesel	Average	3.00	8.00	84.0	0.37
Building and Landscaping Improvements	Pavers	Diesel	Average	3.00	8.00	81.0	0.42
Building and Landscaping Improvements	Paving Equipment	Diesel	Average	3.00	8.00	89.0	0.36
Building and Landscaping Improvements	Rollers	Diesel	Average	3.00	8.00	36.0	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation/Demolition/Excavation	—	—	—	—
Site Preparation/Demolition/Excavation	Worker	36.0	0.25	LDA,LDT1,LDT2
Site Preparation/Demolition/Excavation	Vendor	18.0	0.25	HHDT,MHDT
Site Preparation/Demolition/Excavation	Hauling	6.00	0.25	HHDT
Site Preparation/Demolition/Excavation	Onsite truck	—	—	HHDT
Excavation Trucks	—	—	—	—
Excavation Trucks	Worker	0.00	0.25	LDA,LDT1,LDT2
Excavation Trucks	Vendor	—	0.25	HHDT,MHDT
Excavation Trucks	Hauling	30.0	0.25	HHDT
Excavation Trucks	Onsite truck	—	—	HHDT
New Billboard Installation	—	—	—	—
New Billboard Installation	Worker	36.0	0.25	LDA,LDT1,LDT2
New Billboard Installation	Vendor	18.0	0.25	HHDT,MHDT
New Billboard Installation	Hauling	12.0	0.25	HHDT
New Billboard Installation	Onsite truck	—	—	HHDT
Building and Landscaping Improvements	—	—	—	—
Building and Landscaping Improvements	Worker	54.0	0.25	LDA,LDT1,LDT2
Building and Landscaping Improvements	Vendor	18.0	0.25	HHDT,MHDT

Building and Landscaping Improvements	Hauling	24.0	0.25	HHDT
Building and Landscaping Improvements	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Building and Landscaping Improvements	0.00	0.00	0.00	0.00	60,000

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Site Preparation/Demolition/Excavation	—	—	0.00	750	—
Excavation Trucks	—	240	0.00	0.00	—
Building and Landscaping Improvements	0.00	0.00	0.00	0.00	0.01

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Office Building	0.01	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	414	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.38	annual days of extreme heat
Extreme Precipitation	6.85	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	65.7
AQ-PM	63.0
AQ-DPM	27.2
Drinking Water	78.9
Lead Risk Housing	52.9
Pesticides	0.00
Toxic Releases	70.9
Traffic	85.8
Effect Indicators	—
CleanUp Sites	54.3
Groundwater	43.8
Haz Waste Facilities/Generators	35.6
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	4.90
Cardio-vascular	10.8
Low Birth Weights	34.4
Socioeconomic Factor Indicators	—
Education	6.52
Housing	23.4
Linguistic	4.59
Poverty	5.92
Unemployment	74.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	89.47773643
Employed	90.05517772
Median HI	88.54099833
Education	—
Bachelor's or higher	92.69857564
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	91.71050943
Active commuting	37.86731682
Social	—
2-parent households	77.41562941
Voting	11.27935327
Neighborhood	—
Alcohol availability	69.19029899
Park access	46.6059284
Retail density	25.42024894
Supermarket access	44.32182728
Tree canopy	91.23572437
Housing	—
Homeownership	66.77787758
Housing habitability	92.76273579
Low-inc homeowner severe housing cost burden	45.7590145
Low-inc renter severe housing cost burden	97.52341845
Uncrowded housing	77.4541255
Health Outcomes	—

Insured adults	89.88836135
Arthritis	68.4
Asthma ER Admissions	95.6
High Blood Pressure	54.9
Cancer (excluding skin)	19.8
Asthma	94.4
Coronary Heart Disease	63.8
Chronic Obstructive Pulmonary Disease	88.0
Diagnosed Diabetes	91.2
Life Expectancy at Birth	55.5
Cognitively Disabled	93.6
Physically Disabled	93.4
Heart Attack ER Admissions	95.0
Mental Health Not Good	92.6
Chronic Kidney Disease	85.5
Obesity	74.1
Pedestrian Injuries	82.9
Physical Health Not Good	91.4
Stroke	84.7
Health Risk Behaviors	—
Binge Drinking	5.9
Current Smoker	88.4
No Leisure Time for Physical Activity	98.7
Climate Change Exposures	—
Wildfire Risk	99.1
SLR Inundation Area	0.0
Children	71.1
Elderly	32.8

English Speaking	83.9
Foreign-born	50.5
Outdoor Workers	93.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	90.9
Traffic Density	76.8
Traffic Access	60.4
Other Indices	—
Hardship	0.5
Other Decision Support	—
2016 Voting	45.3

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	17.0
Healthy Places Index Score for Project Location (b)	91.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Energy Use	Electricity consumption is reflective of 26 total billboard projects from Rounds 1, 1.5 and 2. Projects would not require natural gas consumption.
Construction: Construction Phases	Based on applicant-provided information.
Construction: Off-Road Equipment	Based on applicant-provided information. Equipment list reflects three simultaneously constructed billboard projects, in accordance with the construction plans.
Construction: Trips and VMT	Trip numbers are reflective of 3 simultaneous billboard projects. Trip length changed to account for localized emissions for LST analysis.
Operations: Water and Waste Water	No indoor water use would be included the in the project.
Construction: Paving	Paved area was calculated based on previous similar project experience. Each billboard project was assumed to include 120 square feet of area to be paved.
Operations: Vehicle Data	Trips based on traffic study performed for the project.
Operations: Refrigerants	Refrigerants are not required by digital billboards.
Construction: Demolition	Conservative estimate of 250 BSF per billboard project to account for facade renovation was included.
Characteristics: Utility Information	City of West Hollywood purchases from CPA. Intensity factors provided by 2023 CPA Power Content Label.
Land Use	Assumed billboard area as building square feet. Assumed 11 billboards from Rounds 1, 1.5, and 2, with each billboard at 5,000 BSF and 500 SF of landscaping.

Appendix C

Cultural Resources Reports

Appendix C1

Archeological Resources Inventory Report

August 13, 2025

15194

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

Subject: Archaeological Resources Inventory Report – Addendum to the Sunset Strip Off-Site Signage Policy IS/ND, City of West Hollywood, California

Dear Ms. Davis:

The letter documents the archaeological resources inventory conducted in support of the Addendum to the Sunset Strip Off-Site Signage Policy Final Initial Study/Negative Declaration (IS/ND) (“addendum”). The addendum analyzes amendments to the adopted Sunset Boulevard Off-Site Signage Policy, which is a component of the Sunset Specific Plan (“proposed policy amendments”) together with a series of billboard projects that are being proposed in addition to the signage development scenario that was analyzed in the adopted IS/ND. These additional billboard projects were selected as part of Rounds 1.5 and 2 of the City’s Design Excellence Screening Process and will be referred to herein as the “Round 1.5 and 2 billboard projects.” The Round 1.5 and 2 billboard projects consist of 16 billboard development applications along Sunset Boulevard in the City of West Hollywood (City).¹

For the purposes of this report, the “Project” refers to the proposed policy amendments and the Round 1.5 and 2 billboard projects. The Project area consists of the Sunset Specific Plan area (Figure 1).

This archaeological resources inventory was conducted in accordance with the California Environmental Quality Act (CEQA). The City is the lead agency for compliance with CEQA. In accordance with CEQA, Dudek performed a cultural resources inventory for the entire Project area. The properties on which the Round 1.5 and 2 billboard projects are proposed encompass 10.5 acres and are outlined in Figure 2.

Dudek conducted a records search for the Project area including a surrounding 0.25-mile buffer at the South Central Coastal Information Center (SCCIC). No archaeological resources were identified within the Project area or 0.25-miles of the Project area. A Native American Heritage Commission (NAHC) Sacred Lands File search was requested, and results were negative. A pedestrian survey was not conducted due to the existing development and landscaping within the Project area, creating a lack of observable exposed soils.

Dudek’s archaeological resources inventory of the Project indicates that there is a low sensitivity for identifying subsurface cultural resources deposits during Project implementation. In consideration of the negative results of the SCCIC records search and archival research, no further archaeological efforts or mitigation are recommended to be necessary in support of implementation of the Project. The Project is unlikely to impact undiscovered

¹ 5 of the 16 billboard projects are components of new development projects, which are subject to individual review and analysis under CEQA. Nevertheless, the properties of such projects are included in this inventory in order to provide as much information as possible about the environmental consequences of the Round 1.5 and 2 billboard projects. As appropriate, the information in this report may be incorporated by reference into future CEQA documents for the new development projects.

archaeological resources. In the unlikely event that cultural resources are encountered during exposure of subsurface soils, procedures outlined in the Sunset Boulevard Off-Site Signage Policy for the protection of such resources would continue to be followed.

1 Project Description and Location

The Round 1.5 and 2 billboard projects are located along Sunset Boulevard on the following properties: Accessor's Parcel Numbers 5554-018-021, 5554-018-022, 5554-018-006, 5554-018-007, 5554-024-017, 5555-021-005, 5555-021-006, 5555-021-004, 5555-021-003, 5555-002-147, 5560-029-037, 5554-024-006, 5554-019-023, 5555-010-026; 5555-010-025, 5560-022-035, 4339-017-001, 4339-017-006, 4339-017-007, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-008, 5560-023-022, 4340-001-001, 4340-001-021, 5560-024-004, 5560-034-019, 4340-028-002, 4340-028-010, 4340-028-001, 4350-001-036, and 4350-001-033, within the City of West Hollywood. The current addresses for these sites are 8222, 8300, 8371, 8440, 9039, 8410, 8250, 8481-95, 8801, 8850, 8873, 8906, 8919, 9121, 9176, and 9225-9229 Sunset Boulevard. The Project falls within Sections 7, 8, and 18 of Township 1 South and Range 14 West of the Beverly Hills and Hollywood, California, U.S. Geological Survey 7.5-minute Quadrangle map (Figure 1). Adjacent land uses include the continuation of Sunset Boulevard and residential development to the west, the Santa Monica Mountain foothills and residential development to the north, Sunset Boulevard and residential and commercial development to the east, and Santa Monica Boulevard and residential and commercial development to the south (Figure 2). Existing conditions at the properties of the proposed Round 1.5 and 2 billboard projects include structures, landscaped areas, paved parking lots, paved sidewalks, and paths.

Development of the Round 1.5 and 2 billboard projects would generally entail some ground disturbance on the properties, including excavation for establishing billboard pole foundations. Such excavations generally range from 22 feet to 45 feet in depth but can extend as deep as 75 feet below grade, depending on the billboard's design and the site's soil conditions.

2 Regulatory Framework

2.1 The California Register of Historic Resources (Public Resources Code section 5020 et seq.)

Under CEQA, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code section 5020.1(j)). In 1992, the California legislature established CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code section 5024.1(a)). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria:

- Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

(California Public Resources Code section 5024.1(c).) Resources less than 50 years old are not considered for listing in the CRHR, but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, section 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

2.2 Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

2.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

2.4 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological and historic resources:

1. California Public Resources Code section 21083.2(g): Defines "unique archaeological resource."

2. California Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5(a): Define historical resources. In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code section 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines section 15064.5(b)(1); California Public Resources Code section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

2.5 California Health and Safety Code section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

2.6 Senate Bill 18

California Senate Bill 18, which took effect on March 1, 2005, requires local (city and county) governments to consult with California Native American tribes identified by the NAHC for the purpose of protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans (Government Code Section 65352.3).

2.7 City of West Hollywood: Municipal Code Chapter 19.58

Chapter 19.58 of the City of West Hollywood's Municipal Code contains the City's Cultural Heritage Preservation Ordinance, which was adopted based on the following findings of the Council:

- A. Threatened Structures and Sites.** The Council has determined that the character, history, and spirit of the City, State, and nation are reflected in the historic structures, improvements, natural features, objects, sites, and areas of significance located within the City and that in the face of ever increasing pressures of modernization and urbanization, cultural resources, cultural resource sites, and historic districts located within the City are threatened with alteration, demolition, or removal.
- B. Preservation of Structures and Sites.** The Council has further determined that these threatened structures, representing the City's unique cultural, historical, and social foundations, should be preserved as a living part of community life and development in order to build a greater understanding of the city's past and to give future generations the opportunity to appreciate, enjoy, and understand the city's rich heritage.
- C. Methods of Preservation.** Recognizing that the use of historic preservation measures has become increasingly prevalent as a method for identifying and preserving cultural resources, the city joins with private concerns, the state, and the United States Congress to develop methods of preserving the city's unique aesthetic, architectural, cultural, and historical heritage, in compliance with the provisions of the

National Historic Preservation Act of 1966, as amended, and state law (Government Code Section 37361).
(Ord. 01-594 § 2 (Exh. A), 2001)

19.58.050 Criteria for Designation of Cultural Resources

The Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.060 (Designation of Historic Districts) and 19.58.070 (Review and Approval of Designations) below if it finds that the cultural resource meets one or more of the following criteria.

- A. Exemplifies Special Elements of the City. It exemplifies or reflects special elements of the city's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses an integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
 - 1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
 - 2. It contributes to the significance of an historic area by being:
 - a. A geographically definable area possessing a concentration of historic or scenic properties; or
 - b. A thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
 - 3. It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning; or
 - 4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation; or
 - 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city; or
- B. Example of Distinguishing Characteristics. It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- C. Identified with Persons or Events. It is identified with persons or events significant in local, state, or national history; or
- D. Notable Work. It is representative of the work of a notable architect, builder, or designer. (Ord. 03-663 § 4, 2003; Ord. 02-643 § 48, 2003; Ord. 01-594 § 2 (Exh. A), 2001)

19.58.060 Designation of Historic Districts

Except as outlined below, the criteria and procedure for designating an historic district shall be the same as for designating individual cultural resources as in Section 19.58.070 (Review and Approval of Designations).

- A. Historic Resources Survey. As part of the nomination for designating an historic district, an historic resources survey shall be prepared identifying all contributing resources and non-contributing resources. If not otherwise designated, all cultural resources listed in a designated historical district will be considered "contributing." The survey may also identify contributing landscaping, natural features or sites. The survey shall be reviewed in accordance with the designation procedures listed below. The survey shall identify the

manner in which the proposed district possesses a significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically by plan or physical development within the period of significance and within the context of the district.

- B. Finding of Contribution. Each cultural resource within a proposed historic district must be identified as a contributing resource. If a resource is individually designated, it is then automatically considered a contributing resource within the district that includes it. (Ord. 02-643 § 49, 2003; Ord. 01-594 § 2 (Exh. A), 2001)

2.8 City of West Hollywood General Plan

Chapter 4, Historic Preservation, of the 2035 General Plan provides the following goals and policies potentially relevant to the proposed project:

HP-1: Expand the base of information on the City's history.

Intent: The City has planned for and made provisions to recognize its history in a West Hollywood Room in the West Hollywood Library. To expand the City's effort in the creation of this special room, the City will develop policies for and obtain documents, maps, photographs, and other materials that are relevant to the City's past. To maintain relevant historical documents on-hand at City Hall and the West Hollywood Room that will serve as reference materials to assist the City in making decisions regarding historic preservation.

- HP-1.1 Work with partners to program, curate, and support the West Hollywood Room in the West Hollywood Library and to support the mission to protect and preserve its heritage.
- HP-1.2 Develop an archival policy and archive of historic documents associated with West Hollywood to share with the community, educators, and researchers.
- HP-1.3 As feasible, maintain an internal resource center containing a collection of relevant historic documents.

HP-2: Continue to identify and evaluate cultural resources.

Intent: To ensure that historically significant properties are identified and evaluated for preservation as cultural resources.

- HP-2.1 Continue to revise and update the West Hollywood Historic Resources Survey as needed.
- HP-2.2 Continue to seek designation of eligible properties as West Hollywood Cultural Resources and/or Historic Districts.
- HP-2.3 As feasible, provide assistance in applications for designated West Hollywood Cultural Resources to be nominated as properties in the California and National Registers.

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

Intent: To recognize the importance of historic properties as valuable cultural resources and to maintain and preserve these properties for future generations.

- HP-3.1 Revise and update the Historic Preservation Element of the West Hollywood General Plan on a regular basis.

- HP-3.2 Ensure the protection of cultural resources through enforcement of existing codes.
- HP-3.3 Continue to coordinate Section 106 (National Historic Preservation Act) procedures with other environmental review procedures.
- HP-3.4 Continue to allow for the adaptive reuse of cultural resources.
- HP-3.5 Develop post-disaster policies and plans for designated cultural resources to encourage preservation of damaged cultural resources.
- HP-3.6 Suspend development activity when archaeological resources are discovered during construction. The project sponsor will be required to retain a qualified archaeologist to oversee the handling of resources in coordination with appropriate local and State agencies and organizations and local Native American representatives, as appropriate.
- HP-3.7 Continue to coordinate with City staff from various fields so that historic preservation goals are recognized, taking into consideration the implications historic preservation can have on other established City goals.

HP-4: Increase the public's awareness of the City's history and cultural resources.

Intent: To provide the public with an understanding of the City's past and to create a sense of pride in the City's cultural resources.

- HP-4.1 Continue to educate the public about the history of West Hollywood.
- HP-4.2 Continue to memorialize significant people, places, and events in the history of West Hollywood through plaques and public art.
- HP-4.3 As feasible, maintain information on cultural resources on the City website.

HP-5: Promote the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance.

Intent: To create incentives to encourage and assist property owners and developers in preserving historically significant cultural resources.

- HP-5.1 As feasible, maintain a resource library that includes technical information on the treatment of historic properties.
- HP-5.2 Consider providing relief from some taxes and fees for preservation projects.
- HP-5.3 Explore new sources of revenue such as grants and loans that can be used for the maintenance, rehabilitation, or restoration of cultural resources, or operating the City's preservation program.
- HP-5.4 As feasible, evaluate City programs for opportunities to underwrite the maintenance, rehabilitation or restoration of cultural resources.
- HP-5.5 Consider reevaluating the usefulness of the Transfer of Development Rights Program.
- HP-5.6 Consider directing capital improvement funds towards the preservation and enhancement of cultural resources and historic districts.

HP-6: Use historic preservation concepts as tools for economic development.

Intent: To utilize the City's cultural resources in a manner that assists the overall economic development of the City.

- HP-6.1 Seek opportunities to work with business and professional groups to incorporate cultural resources into their promotions of business and tourism.

HP-6.2 As feasible, incorporate goals and objectives related to cultural resources into public and private plans for economic development.

2.9 Sunset Boulevard Off-Site Signage Policy

The Sunset Boulevard Off-Site Signage Policy was adopted in 2019 to guide and regulate development of off-site signage along the 1.6-mile corridor of Sunset Boulevard known as the Sunset Strip. The policy includes the below-listed protections for archaeological resources:

Modifications to existing signage that requires ground-disturbing activities must adhere to the following standards:

1. Projects proposing new ground disturbance (e.g., excavation of new post holes) should be reviewed by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards prior to any ground disturbance taking place. The archaeologist shall provide an assessment of archaeological sensitivity and the potential to impact subsurface deposits and may provide recommendations for archaeological and/or Native American monitoring, additional study, or testing, if warranted.

2. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities, 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 upon the significance of the find under 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, additional testing, or data recovery may be warranted. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the archeologist.

2.10 City of West Hollywood Billboard Conditions of Approval

The City has adapted the above-listed requirement from the Sunset Boulevard Off-Site Signage Policy as a condition that is applied to all new and/or modified billboard projects. This condition is shown below:

Because the proposed billboard requires ground disturbance or excavation for the new support pole, the project shall be reviewed by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards prior to any ground-disturbance taking place. Because relevant archaeological records searches are covered in the Sunset Strip Off-Site Signage Policy IS/ND, there is no need to do new records searches. However, the archaeologist shall review their site plans (including depth and width of excavation). Based on their review, the archaeologist will then make a recommendation relative to

construction archaeological monitoring (e.g., whether monitoring is necessary, and if so, the extent of the monitoring effort). If archaeological or paleontological resources are found during excavation, the following apply:

1. If archaeological resources (sites, features, or artifacts) are exposed during construction activities, 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 additional study is warranted. Depending upon the significance of the find under 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, additional testing, or data recovery may be warranted. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the archeologist.

In addition to the above-listed condition pertaining to archaeological resources, the City also imposes the below-listed condition pertaining to tribal cultural resources. The language of this condition was developed as a result of tribal consultation for previous billboard development on the Sunset Strip. No known tribal cultural resources have been identified in the Project area as a result of tribal outreach or consultation. As such, no mitigation for tribal cultural resources is required under CEQA. However, in a good faith effort to address tribal concerns, the City agreed to this condition and has been applying it to billboard project approvals. This requirement will continue to apply for future billboard development on the Sunset Strip to ensure responsiveness to interested tribes.

2. Prior to commencement of ground disturbing activities for the Project, tribes who engaged in consultation regarding the project will be contacted and informed of the start date of ground disturbing activities. If a consulting tribe chooses to exercise the option to observe ground disturbing activities, access to the Project site will be provided upon 24-hour notification; full PPE (personal protective equipment) will be required for access to the Project site. If archaeological cultural resources (sites, features, or artifacts) are exposed during construction activities, 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 additional study is warranted. Depending upon the significance of the find under 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 a Construction Monitoring Treatment Plan (CMTP), additional testing, or data recovery may be warranted. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the archeologist. Additionally, if the encountered cultural resources are Native American in nature, the tribes who have requested consultation for the project will be contacted and consulted with regarding appropriate treatment. Consultation with tribes regarding the inadvertent discovery of a TCR (tribal cultural resource) will include soliciting the Tribe's concerns and preferred approach to the development of a CMTP; dispensation, storage and curation (repository or ground placement) of artifacts; whether Native American monitoring

(part or fulltime) should be instituted, etc. If human remains are encountered, all procedures and protocols will be followed in accordance with state and local regulations with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Actions upon the discovery of human remains would at a minimum include temporarily halting all ground disturbing activities until the required evaluation of potential remains is complete, contacting the coroner and reporting the inadvertent discovery of human remains. If the coroner determines the human remains are Native American, the coroner will contact the Native American Heritage Commission who will determine the Most Likely Descendent (MLD) with whom further consultation regarding treatment of the human remains will be made.

3 Results

3.1 Records Search

Previous Studies

Dudek conducted a California Historical Resources Information System (CHRIS) records search of the Project area and a 0.25-mile radius of the Project area at the South Central Coastal Information Center (SCCIC) on March 11, 2025. The records search results indicate that 28 previous cultural resources studies have been conducted within the Project area and the 0.25-mile radius (Table 1). Nine of the cultural resource studies intersect the Project area. The records search results are included in Confidential Appendix A.

Table 1. Cultural Resources Studies within 0.25-Miles of Project Area

Report Number	Authors	Date	Title
Intersects Project Area			
LA-04402	Duke, Curt	1999	Cultural Resource Assessment for the AT&T Wireless Services Facility Number R242.1, Located at 9145 Sunset Boulevard, in the City and County of Los Angeles, California
LA-05355	Maki, Mary K.	2001	Negative Phase I Archaeological Survey of .35 Acres for Havenhurst Drive Senior Housing Project City of West Hollywood, Los Angeles County, California
LA-08244	McKenna, Jeanette A.	1999	A Phase I Cultural and Paleontological Resources Investigations for the Proposed Sunset Millennium Project Area in West Hollywood, Los Angeles County, California
LA-09801	Candace Ehringer and Angel Tomes	2008	Cultural Resources Assessment for the Proposed Sunset Time Specific Plan at Sunset Boulevard, West Hollywood, Los Angeles County, CA

LA-10568	Unknown	1987	City of West Hollywood Historic Resources Survey 1986-1987 Final Report
LA-10604	Ehringer, Candace	2009	Cultural Resources Assessment for the Proposed 8801 Sunset Boulevard Specific Plan, West Hollywood, Los Angeles County, California
LA-10677	Bonner, Wayne H. and Kathleen A. Crawford	2010	Direct APE Historic Architectural Assessment for T-Mobile USA Candidate SV00096A (SM096 Standard Hotel), 8300 West Sunset Boulevard, West Hollywood, Los Angeles County, California
LA-10681	Bonner, Wayne H.	2010	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate SV00096A (SM096 Standard Hotel), 8300 West Sunset Boulevard, West Hollywood, Los Angeles County, California
LA-10963	Bonner, Wayne H.	2011	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33682-D (Urban Center), 10821 Long Beach Boulevard, Lynwood, Los Angeles County, California
Outside Project Area			
LA-03765	Casen, George	1983	Historic Property Survey 07 LA 02 P.M. 3.65/9.57 Route 405 to Fairfax Avenue Los Angeles County California 07204-051280
LA-04401	Duke, Curt	1999	Cultural Resource Assessment for the AT&T Wireless Services Facility Number R224.1, Located at 8721 Sunset Boulevard, City and County of Los Angeles, California
LA-04411	Duke, Curt	1999	Cultural Resource Assessment for the AT&T Wireless Services Facility Number R225.1, Located at 8300 West Sunset Boulevard, City of West Hollywood, County of Los Angeles, California
LA-05343	Duke, Curt	2001	Cultural Resource Assessment Cingular Wireless Facility No. Sm 096-01 Los Angeles County, California
LA-06123	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. SM 015-02 Los Angeles County, California
LA-07375	Wlodarski, Robert J.	2004	A Phase I Archaeological Study for 1343-1345 North Laurel Avenue the Linick-Weisman House West Hollywood, Los Angeles County, California
LA-09555	Bonner, Wayne H. and Kathleen A. Crawford	2009	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate SV11745B (8375 Fountain Avenue RT), 8375 Fountain Ave., West Hollywood, Los Angeles County, California
LA-09556	Bonner, Wayne and Kathleen Crawford	2009	Direct APE Historic Architectural Assessment for T-Mobile USA Candidate SV11745B (8375 Fountain Ave. RT), 8375 Fountain Ave., West Hollywood, Los Angeles County, California.
LA-10296	Bonner, Wayne H. and Kathleen A. Crawford	2009	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate SV12153A (Sunset Towers), 8730 Sunset Blvd., West Hollywood, Los Angeles County, CA.

LA-10601	Lapin, Philippe	2000	Cultural Resource Assessment for AT&T Wireless Services Facility Number R300.2, County of Los Angeles, California
LA-11481	Lofts, Shannon L.	2011	Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0416-8, 402 Doheny Road Beverly Hills, Los Angeles County, California 90210. CASPR#3551016878
LA-12115	Bonner, Wayne H. and Kathleen A. Crawford	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV12153A (Sunset Tower) 8730 West Sunset Boulevard, West Hollywood, Los Angeles County, California
LA-12150	Bonner, Wayne H. and Kathleen A. Crawford	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00096A (SM096 Standard Hotel) 8300 West Sunset Boulevard, West Hollywood, Los Angeles County, California
LA-12152	Bonner, Wayne H. and Kathleen A. Crawford	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11745B (8375 Fountain Avenue RT), 8375 Fountain Avenue, Los Angeles, Los Angeles County, California
LA-12406	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAR225 (Sunset Standard Hotel) 8300 West Sunset Boulevard, West Hollywood, Los Angeles County, California, CASPR No. 3551017575
LA-12720	Bonner, Diane F., Carrie D. Wills, and Kathleen A. Crawford	2014	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11150B (Mani Bros. Building) 9000 West Sunset Boulevard, West Hollywood, Los Angeles County, California
LA-12755	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAR224 (Sunset/Scotts Building) 8721 Sunset Boulevard, Los Angeles, Los Angeles County, California CASPR No. 3551017571
LA-13168	Anonymous	1999	West Hollywood Villas de San Vicente Courtyard Housing Project
LA-13247	Hill, Allison and Marc A. Beherec	2016	PHASE I CULTURAL RESOURCES INVESTIGATION FOR THE LOWER FRANKLIN RESERVOIR NO. 2 FLOATING COVER REPLACEMENT PROJECT, LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA, SCH# 2015118109

Previously Recorded Resources

The SCCIC records search results did not identify any archaeological resources within the Project area or within the 0.25-mile buffer. Forty-four previously recorded historic-age built environment resources were identified, four of which are located within the Project area. Further discussion of built environment resources is included in addendum.

3.2 Archival Research

Dudek conducted an online review of historic aerial photographs and historical topographic maps to understand the development of the Project area and surrounding landscape through time. Historic aerial photographs for the Project area were available for the years of 1947 to 2022 (NETR 2025). On the 1947 aerial, the Project area is already developed into residential and commercial structures and there are few substantial changes that are observed on subsequent aerials.

Historical topographic (topo) maps of the Project area were available from 1894 to 2022 (NETR 2025). The earliest available topo map from 1894 shows the presence of Sunset Boulevard with several adjacent structures. There is little observable change in the land use of the Project area between 1894 and 1915. The 1921 map depicts the construction of numerous roads and structures within the Project area. Most of the connecting arterial streets were constructed by this time. The 1952 map depicts the Project area in its current state and the entire surrounding area has been developed. There is no observable change in the maps between 1952 and 2022.

3.3 NAHC and Tribal Correspondence

A search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was requested on March 24, 2025, for the Project area. The SLF consists of a database of known Native American resources. These resources may not be included in SCCIC database. The NAHC responded on April 7, 2025, with negative results (Appendix B).

In compliance with Senate Bill 18, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities.

3.4 Review of Geomorphological Context and Geotechnical Reports

The U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey indicates that one soil type is located in the Project area: Urban land-Xerorthents, landscaped complex, 0 to 5% slopes. The Urban land-Xerorthents, landscaped complex occurs on hillslopes at elevations of 10 to 1,810 feet and are comprised of human-transported material consisting mostly of colluvium and/or residuum weathered from sedimentary rock. The depth to paralithic bedrock is 10 to 60 inches below ground surface (bgs). These soils are used for urban residential development and commercial areas as the result of cut and fill techniques or tailings being transported to the location to act as fill. Vegetation consists of primarily maintained lawns, and ornamental trees and scrubs (USDA 2025).

Previously conducted geotechnical studies within the Project area show that fill is found on average between 3 feet to 6 feet below ground surface (bgs), and then Pleistocene sediments below 6 to 7 feet bgs (PGI 2003; Geotechnologies Inc, 2020; Geocon 2021). PGI (2003) reported 4 to 6 feet of fill, and 2 feet of Holocene colluvium below fill at 8497 Sunset Boulevard. Geotechnologies reported artificial fill from 3 to 7 feet bgs, and older (Pleistocene) alluvial fan deposits below fill to a depth of 80 feet at 9160 Sunset Boulevard. Geocon (2021) reported artificial fill from 2 to 3 feet bgs, and alluvium to depths between 60 and 80 feet, however they did not differentiate between Holocene and Pleistocene alluvial units at 8850 Sunset Boulevard. Pleistocene alluvial deposits have a moderate potential for supporting the presence of subsurface archaeological deposits.

4 Summary and Management Considerations

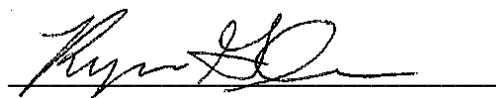
4.1 Archaeological Recommendations

As mentioned in Section 2.9 and Section 2.10, the Sunset Boulevard Off-Site Signage Policy and associated project conditions require assessment of archaeological sensitivity for billboard projects. This report may be used as this required assessment of archaeological sensitivity for billboard projects within Rounds 1.5 and 2.² Dudek's archaeological resources inventory of the Project area indicates that there is a low sensitivity for identifying subsurface archaeological deposits during Project implementation. The SCCIC records search did not identify any archaeological resources within the Project area or 0.25-mile buffer. The NAHC SLF search was also returned with negative results. The Project area has also been disturbed since 1894 by urban development and utility infrastructure installation. The geomorphic analysis determined that the Project area is underlain by mostly fill sediments that have a low sensitivity for buried archaeological deposits. Excavations for some billboard projects are expected to exceed the depth of the fill layers into alluvial sediments, which have a moderate level of sensitivity. If resources are encountered in this geologic formation, the resources would be preserved by halting work in the area and evaluating the resource for significance, pursuant to the protections for archaeological resources established in the Sunset Boulevard Off-Site Signage Policy. In consideration of the negative results of the SCCIC records search, archival research, and NAHC SLF, no further archaeological efforts or mitigation are recommended to be necessary in support of implementation of the Project. Monitoring is not required for billboard development in Rounds 1.5 and 2. Billboards that are components of new development projects would need to adhere to the project-specific recommendations for those new development projects.

The Project is unlikely to impact undiscovered archaeological resources. In the unlikely event that archaeological resources are encountered during exposure of subsurface soils, ground-disturbing work would be immediately halted in the area and a qualified archaeologist would be retained to evaluate the resources pursuant to the protections for archaeological resources established in the Sunset Boulevard Off-Site Signage Policy and the City of West Hollywood Billboard Conditions of Approval 1 and 2 in Section 2.10 of this report.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me at 626.204.9840 or rglenn@dudek.com.

Sincerely,



Ryan J. Glenn, M.A., RPA
Archaeologist

² Projects that are part of new development projects may still require further evaluation, as determined during the individual CEQA review processes that are required for those projects.

Att.: *Figure 1, Project Location*
Figure 2, Project Site
National Archaeological Database Information Sheet
Confidential Appendix A, SCCIC Records Search Results
Appendix B, Tribal Correspondence

cc: Ryan Glenn, Michele Finneyfrock, Dudek

6 References

City of West Hollywood 2011. West Hollywood General Plan 2035. Accessed April 11, 2025.

<https://www.weho.org/city-government/download-documents/-folder-155>.

Dibblee, T.W. and H.E. Ehrenspeck, ed. 1991a. Geologic map of the Beverly Hills and Van Nuys (south 1/2) quadrangles, Los Angeles, California [map]. Dibblee Geological Foundation, Dibblee Foundation Map DF-31. Scale 1:24,000.

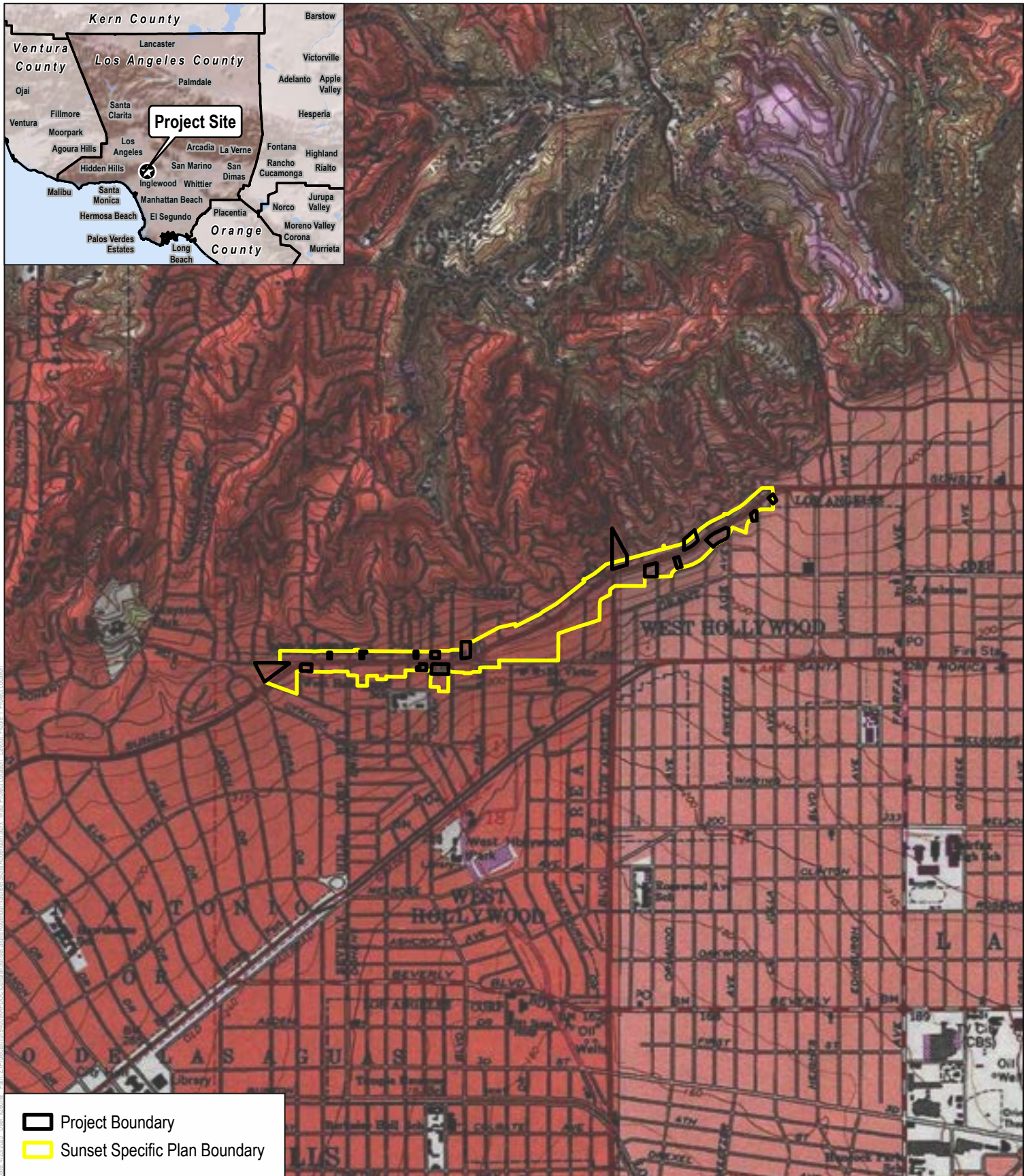
GEOCON. 2021. Proposed Hotel and Condominium Development 8850 Sunset Boulevard West Hollywood, California APNS 4339-017- 001 Through -008. Updated Geotechnical Investigation. February 17, 2021

Geotechnologies, Inc. 2020. Geotechnical Engineering Investigation Proposed Office Development 9160-9174 West Sunset Boulevard, West Hollywood, California. December 14, 2020.

NETR (National Environmental Title Research, LLC) 2025. Area search for: Alhambra, CA. Accessed May 6, 2025. <http://www.historicaerials.com/>.

PGI (Pacific Geosoils, Inc.). 2004. Soil and Geology Investigation Proposed Mixed-Use Building (Sunset-Futura) 8497 Sunset Blvd. West Hollywood, California. October 2, 2004.

USDA (U.S. Department of Agriculture). 2025. Web Soil Survey. USDA, Natural Resources Conservation Service, Soil Survey Staff. Accessed May 7, 2025. <http://websoilsurvey.nrcs.usda.gov>



SOURCE: USGS 7.5-Minute Series 1:24,000
 Beverly Hills and Hollywood Quadrangles - Township 1S Range 14W Sections 07, 08, 18

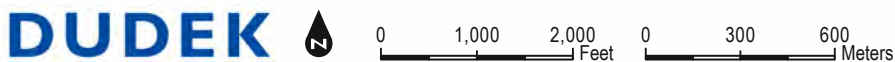


FIGURE 1
Project Location
 Sunset Specific Plan



FIGURE 2A

Project Site

Sunset Signs Addendum



FIGURE 2B

Project Site

Sunset Signs Addendum



FIGURE 2C

Project Site

Sunset Signs Addendum



FIGURE 2D

Project Site

Sunset Signs Addendum

National Archaeological Database (NADB) Information

Authors:	Ryan J. Glenn, M.A., RPA
Firm:	Dudek
Project Proponent:	City of West Hollywood
Report Date:	August 2025
Report Title:	Archaeological Resources Inventory Report for the Addendum to the Sunset Strip Off-Site Signage Policy IS/ND, City of West Hollywood, California
Type of Study:	Phase I Inventory
Resources:	None
USGS Quads:	Beverly Hills and Hollywood, California, Township 1 South, Range 14 West, Sections 7, 8, 18
Acreage:	10.5
Permit Numbers:	N/A
Keywords:	Inventory, City of West Hollywood, Addendum to the Sunset Strip Off-Site Signage Policy IS/ND, Conditions of Approval, Assessment of Archaeological Sensitivity

Confidential Appendix A

SCCIC Records Search Results

Appendix B

Tribal Correspondence

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100

West Sacramento, CA 95691

916-373-3710

916-373-5471 – Fax

nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Sunset Signs Addendum Project

County: Los Angeles

USGS Quadrangle Name: Beverly Hills and Hollywood

Township: 1S **Range:** 14W **Section(s):** 07, 08, 18

Company/Firm/Agency: Dudek

Street Address: 225 South Lake Avenue, Suite M210

City: Pasadena **Zip:** 91101

Phone: (626) 204-9840

Fax: _____

Email: rglenn@dudek.com

Project Description:

The proposed project involves amendments to the adopted Sunset Boulevard Off-Site Signage Policy (which is a component of the Sunset Specific Plan). The City is also proposing to expand the off-site signage development scenario on the Sunset Strip. Specifically, 16 additional off-site sign applications have been selected through the City's Design Excellence Screening process. The development of these projects would generally entail ground disturbance, including excavation for establishing billboard pole foundations. Such excavations range from 35-45 feet in depth but can reach 75'.



NATIVE AMERICAN HERITAGE COMMISSION

April 7, 2025

Ryan Glenn
Dudek

Via Email to: rglenn@dudek.com

Re: Sunset Signs Addendum Project, Los Angeles County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
*Yokayo Pomo, Yuki,
Nomlaki*

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
*Pauma-Yuima Band of
Luiseño Indians*

COMMISSIONER
Vacant

ACTING EXECUTIVE
SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Native American Heritage Commission
Native American Contact List
Los Angeles County
4/7/2025

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	(951) 763-2808	chair@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	2/1/2024
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		anthonymad2002@gmail.com	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	6/28/2023
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		besparza@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	6/28/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/18/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/18/2023
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	(626) 286-1262	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	12/4/2023
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761		christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/28/2023
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		Chavez1956metro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	5/30/2023
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351		tongvatcr@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	5/30/2023
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	vminott@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	4/8/2024

Native American Heritage Commission
Native American Contact List
Los Angeles County
4/7/2025

Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	sestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	4/8/2024
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Sunset Signs Addendum Project, Los Angeles County.

Record: PROJ-2025-001803
Report Type: List of Tribes
Counties: Los Angeles
NAHC Group: All

Appendix C2

Historic Built Environment Resources Analysis

8222 Sunset Boulevard Historical Resources Significance Evaluation

MEMORANDUM

To: Jennifer Davis, Community Development Department
From: Andrea Dumovich Heywood, MHC
Danielle Baza, BA (MA Candidate)
Patricia Ambacher, MA
Subject: 8222 W. Sunset Boulevard
Date: July 10, 2025
cc: Michele Finneyfrock, Project Manager, Dudek
Attachment(s): California Department of Parks and Recreation 523 Form Set

1 Introduction

This technical memorandum documents the identification and evaluation of built environment cultural resources within or adjacent to the proposed 8222 W. Sunset Boulevard Project (Project). This technical memorandum includes the following components: (1) an introduction including project location, description, and the regulatory context; (2) background research, which includes a focused review of the Built Environment Resource Directory (BERD), and archival research; (3) an evaluation of significance for the built environment cultural resource within the Project area; (4) management recommendations; and (5) references cited in this memorandum.

This technical memorandum, associated fieldwork, and property significance evaluation were completed by Architectural Historians Katie Ahmanson, MHC, Danielle Baza, BA, and Andrea Dumovich Heywood, MHC, who meet the Secretary of the Interior's (SOI) Professional Qualification Standards in architectural history. The memorandum and significance evaluation was reviewed by Senior Architectural Historian Patricia Ambacher, MA, who also meets the SOI's Professional Qualification Standards in architectural history and history.

1.1 Project Location

The proposed Project is located on the south side of W. Sunset Boulevard, between Roxbury Road to the west and Marmont Lane to the east, in the City of West Hollywood (West Hollywood). The subject property at 8222 W. Sunset Boulevard is situated within two city boundaries, with West Hollywood at the north end of the subject property and the City of Los Angeles at the south end. The city boundaries cut through the subject property diagonally from the northeast to southwest. The newsstand building is located in West Hollywood and the rear parking lot is located in the City of Los Angeles.

1.2 Project Description

The proposed Project is located at 8222 W. Sunset Boulevard. This property is currently developed with a former newsstand (built in circa 1998), which would be demolished during project implementation, and rear parking lot. The proposed Project involves the installation of a billboard structure and pedestrian improvements on the northwest corner of the property. The billboard structure would consist of two new full motion billboard faces, with dimensions ranging from 25 feet wide by 40 feet high facing east and 16 feet wide by 30 feet high facing west. The pedestrian improvements include a landscaped area, mini plaza, pedestrian exhibit, security lights, new striping for an on-site parking lot, new trash enclosure, and the addition of electrical transformer and panels.

2 Regulatory Setting

The following sections provide a brief overview of the federal, state, and local regulatory framework that historic properties and historical resources are identified and evaluated.

2.1 Federal

While the Project as currently planned is subject only to state and local regulatory conditions, federal regulations are provided here for reference should they be relevant in the future. Properties listed in the National Register of Historic Places (NRHP) or determined eligible for listing in the NRHP are historical resources under the California Environmental Quality Act (CEQA).

2.1.1 National Register of Historic Places

The National Historic Preservation Act established the NRHP. The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. The NRHP criteria for evaluation (Title 36 Code of Federal Regulations Section 60.4) considers the quality of significance in American history, architecture, archaeology, engineering, and culture. For a property to be listed in or determined eligible for listing, it must meet at least one of the following criteria:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded or may be likely to yield, information important in prehistory or history.

The NRHP outlines further criteria considerations for significance. Moved properties; birthplaces; cemeteries; reconstructed buildings, structures, or objects; commemorative properties; and properties that have achieved significance within the past 50 years are generally not eligible for the NRHP.

In addition to meeting one of the NRHP criteria, the property also must have integrity. Integrity is the ability of a property to convey its significance. Because the concept of integrity is based on significance, the assessment of a

property's integrity can only proceed after its significance has been fully established. The assessment of integrity requires consideration under the following seven aspects or qualities: location, design, materials, workmanship, setting, feeling, and association. To retain integrity, a property will always possess several, and generally most, of these aspects (NPS 1997: 44).

2.2 State

2.2.1 California Register of Historical Resources

California Public Resources Code (PRC) Section 5024.1 establishes the CRHR, which lists all significant resources in California that are considered to be historical resources. In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. As such, a resource is considered historically significant if it meets at least one of the following criteria outlined under PRC Section 5024.1(c):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the significance criteria described in PRC Section 5024.1(c), a resource must also possess sufficient integrity to qualify for listing in the CRHR. Integrity as defined in 14 California Code of Regulations (CCR) Section 4852(c) as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" as evaluated with regard to the resource's retention of location, design, setting, materials, workmanship, feeling, and association. Historical resources that lack sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR if they have the potential to yield significant scientific, historical information, specific data. The CRHR has three special considerations for resources described under 14 CCR Section 4852(d).

2.2.2 California Environmental Quality Act

CEQA requires that the lead agency consider the impacts of a project on historical resources. PRC Section 21084.1 defines historical resources as those listed, or eligible for listing, in the CRHR, or those officially designated or recognized as historically significant by a local government pursuant to a local county or city ordinance or jurisdiction, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. Historical resources also include "historic properties" in California that are listed, or

determined eligible for listing, in the NRHP and CRHR. The CEQA Guidelines provide specific guidance for determining the significance of impacts on historical resources. As described in in Section 15064.5(b) of the CEQA Guidelines, a “project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.”

- A “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (Section 15064.5[b][1]).
- The significance of an historical resource is materially impaired when a project:
 - Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources (Section 15064.5[b][2][A]); or
 - Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1[k] of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1[g] of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant (Section 15064.5[b][2][B]); or
 - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historic significance and that justify its inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (Section 15064.5[b][2][B]).

The CEQA Guidelines also provide guidance on minimizing or avoiding significant adverse impacts on historical resources as outlined in the following provisions of Section 15064.5(b)(3)-(5).

- Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource (Section 15064.5[b][3]).
- A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures (Section 15064.5[b][4]).
- When a project will affect state-owned historical resources, as described in PRC Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of the environmental documents (Section 15064.5[b][5]).

2.3 Local

2.3.1 City of West Hollywood

The West Hollywood's municipal code section *19.58.050 Criteria for Designation of Cultural Resources* states the applicable criteria as follows:

The Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.060 (Designation of Historic Districts) and 19.58.070 (Review and Approval of Designations) below if it finds that the cultural resource meets one or more of the following criteria.

- A. *Exemplifies Special Elements of the City.* It exemplifies or reflects special elements of the city's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses an integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
 - 1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
 - 2. It contributes to the significance of a historic area by being:
 - a. A geographically definable area possessing a concentration of historic or scenic properties; or
 - b. A thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
 - 3. It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning; or
 - 4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation; or
 - 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city; or
- B. *Example of Distinguishing Characteristics.* It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- C. *Identified with Persons or Events.* It is identified with persons or events significant in local, state, or national history; or
- D. *Notable Work.* It is representative of the work of a notable architect, builder, or designer.

3 Methodology

Research through various sources and built environment field survey were conducted to determine the full extent of the potential built environment resources located within the Project area.

3.1 Background and Archival Research

The following sources provide additional information regarding the potential of built environment resources located within the Project area. This information was used to understand the history of the area and how the landscape has changed and developed over time.

3.1.1 Built Environment Resource Directory

The California Office of Historic Preservation (OHP) maintains the BERD, an inventory of built environment cultural resources that are processed through OHP's office. A June 16, 2025, search of the BERD for Los Angeles County showed that the subject property was not listed.

3.1.2 Calisphere

Calisphere provides access to 2,000 collections contributed by more than 300 cultural heritage organizations in California, including universities, libraries, archives, museums, and historical societies. Dudek searched for subject properties' addresses and other keywords on Calisphere on June 26, 2025. This search did not identify any historic photographs of the project area showing the subject property.

3.1.3 Online Archive of California

The Online Archive of California (OAC) provides free public access to detailed descriptions of primary resource collections maintained by more than 300 contributing institutions including libraries, special collections, archives, historical societies, and museums throughout California and collections maintained by the 10 University of California campuses. Dudek searched for historical tenants and addresses associated with the subject properties on OAC on June 26, 2025, and did not identify any relevant materials.

3.1.4 Los Angeles County Assessor

Dudek obtained assessor data from the Los Angeles County Office of the Assessor's Property Assessment Information System for the subject property on June 27, 2025. This assessor data provided information about construction date, square footage, and tract number.

3.1.5 City of West Hollywood Historic Preservation

West Hollywood adopted its Historic Preservation Ordinance in 1989. The City currently has over 80 historic and cultural resources along with six historic districts that include Harper Avenue National Register District (designated in 1992), Courtyard Historic District (designated in 1993), Lingenbrink Commercial Grouping (designated in 1995), and Old Sherman District. The City of West Hollywood also has an active Mills Act program (City of West Hollywood

2025; City of West Hollywood 2011). The subject property at 8222 West Sunset Boulevard is not listed as a contributor to these districts.

In 1987, West Hollywood conducted a windshield survey of approximately 1,750 properties constructed before 1942. Of those properties 118 were compiled into West Hollywood's official historic resources inventory. In 2008, a reconnaissance level historic resource survey documenting multi-family properties was completed in West Hollywood (West Hollywood 2025). The subject property was not identified in either of these surveys. A third reconnaissance level survey was undertaken by West Hollywood in 2018. That survey focused on commercial, institutional, and industrial structures built before 1975. The property at 8222 W. Sunset Boulevard was included in the 2018 survey and was assigned the California Historical Status Code 6Z (Found ineligible for NRHP, CRHR or local designation through survey evaluation) (GPA 2016: 121). California Department of Parks and Recreation (DPR) 523 Forms were not prepared for the property.

Based on building permits on file with West Hollywood, Development Permit 98-07 was filed in 1998 by Jason Swing on behalf of property owner David Kermani for a new newsstand building at 8224 W. Sunset Boulevard. The subject newsstand was constructed shortly thereafter, in circa 1998 (West Hollywood 1998).

3.1.6 Historical Aerials

A review of historical aerial photographs was conducted as part of the archival research effort for the proposed project. The aerial photographs provided a general idea of changes to the subject property over time. Aerial photographs were reviewed for the years 1947, 1948, 1952, 1964, 1972, 1977, 1978, 1980, 1985, 1989, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2003, 2004, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022 (NETR 2025a).

3.1.7 Historical Maps

A review of historic aerial topographic maps was conducted as part of the archival research effort for the proposed project. The aerial topographies provided a general idea of growth in the immediate vicinity and changes to the subject property over time. Aerial topographies were reviewed for the years 1894, 1896, 1898, 1900, 1902, 1904, 1906, 1908, 1910, 1913, 1915, 1921, 1924, 1926, 1932, 1955, 1963, 1968, 1975, 1982, 1995, 2012, 2015, 2018, and 2022 (NETR 2025b).

3.1.8 Historical Newspapers

Dudek reviewed historical newspapers from Newspapers.com covering West Hollywood, Los Angeles, and Los Angeles County to understand the development of the subject property. These documents were used in the preparation of the property evaluation and Section 4, Results.

3.2 Field Survey

Dudek Architectural Historian Katie Ahmanson, MHC, conducted an intensive level survey of the study area on May 22, 2025. The survey entailed documenting the exterior of the property with notes and photographs, specifically noting spatial relationships and observed alterations. The rear of the property was not accessible.

4 Results

One resource, 8222 W. Sunset Boulevard was identified in the field survey. In the 2016 survey, the subject property was noted as having a build date of 1956 (GPA 2016: 121). Background and archival research and City planning permits indicate that the newsstand building was approved in 1998 and soon thereafter constructed (NETR 2025a; Ruscha 1998; West Hollywood 1998). According to available historic aerials, the subject parcel appears to have been mostly built up with one large building or multiple buildings from 1964 through 1992. By 1993, it appears that the existing building(s) on site were demolished and the subject property transitioned into a vacant lot (NETR 2025a). From 1994 to circa 1998, the parcel served as an open-air parking lot with no buildings on site. Newspaper research indicates that beginning in 1998, the subject newsstand building operated as the Swing Brothers Newsstand. Historic aerials in 1999 confirm that the newsstand was constructed by that time. One year later, a 24-hour coffee shop, known as Coffee House, opened on the adjacent parcel in the building immediately west of the newsstand, at 8226 W. Sunset Boulevard (LAT 1999: 380; Yelp Inc. 2025). Per historic newspapers, it is likely that the newsstand parking lot served both Swing Brothers Newsstand and Coffee House patrons.

Although the property is less than 45 years of age, an evaluation of significance was prepared using the criteria of the NRHP, CRHR, and West Hollywood. The property is recommended not eligible for the three programs because of a lack of significance. The DPR 523 Forms are attached to this memorandum and contain a detailed description and a complete evaluation of the property.

5 Conclusions and Management Recommendations

No historical resources were identified within the Project area as a result of archival research, BERD review, field survey, and a significance evaluation. The subject property is not currently listed in any national, state, or local registers. It was previously identified in the 2016 local survey and was recommended as not eligible (GPA 2016: 121). The subject property was evaluated in consideration of NRHP, CRHR, and West Hollywood criteria and integrity requirements, and 8222 W. Sunset Boulevard is recommended ineligible for inclusion in the NRHP, CRHR, and as a cultural resource in West Hollywood.

Dudek evaluated the resource in the project area in accordance with Section 15064.5 (a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California PRC and found that the property is not considered a historical resource for the purposes of CEQA. The recommended California Historical Resources Status Code for 8222 W. Sunset Boulevard remains 6Z.

6 References

- GPA (GPA Consulting, Inc.). 2016. *City of West Hollywood Commercial Historic Resources Survey Prepared for the City of West Hollywood*. Accessed July 9, 2025. https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_Document.pdf.
- LAT (Los Angeles Times). 1999. "Spilling the Beans." Los Angeles Times (Los Angeles, CA). June 3, 1999. Page 380. Newspapers.com.

- NETR (Nationwide Environmental Title Research, LLC). 2025a. Historic Aerial Photographs of West Hollywood, CA, dating from 1947, 1948, 1952, 1964, 1972, 1977, 1978, 1980, 1985, 1989, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2003, 2004, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022. Accessed June 2025. <https://www.historicaerials.com/viewer>.
- NETR. 2025b. Historic Topographic Maps of West Hollywood, CA, dating from 1894, 1896, 1898, 1900, 1902, 1904, 1906, 1908, 1910, 1913, 1915, 1921, 1924, 1926, 1932, 1955, 1963, 1968, 1975, 1982, 1995, 2012, 2015, 2018, and 2022. Accessed June 2025. <https://www.historicaerials.com/viewer>.
- NPS (National Park Service). 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. U.S. Department of the Interior: Washington, D.C.
- ParcelQuest. 2025. Property information for 8222 W. Sunset Boulevard, West Hollywood, Los Angeles County, California. ParcelQuest. Accessed June 2, 2025. <https://pqweb.parcelquest.com/#home>.
- Ruscha, Edward. 1998. *Sunset Boulevard, 1998 : Roll 1 : Crescent Hgts headed west : Image 0021*. Getty Research Collections. Accessed July 14, 2025. <https://www.getty.edu/research/collections/object/10209M>
- West Hollywood. 1998. Building Permits on File for 8224 W. Sunset Boulevard. Accessed July 22, 2025.
- West Hollywood. 2025. "Historic Resource Surveys." Accessed July 9, 2025. <https://www.wehopreservation.org/historic-resource-surveys/>.
- Yelp Inc. 2025. "Swing Brothers Newsstand: 8224 W Sunset Boulevard." Uploaded photo by user Jason S., stating "Sunset Strip – Swing Newsstand since 1998." https://www.yelp.com/biz_photos/swing-brothers-newsstand-west-hollywood?select=FDH58-RRuQq2zpSGMao4vQ.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 16

*Resource Name or #: (Assigned by recorder) 8222 W. Sunset Boulevard

P1. Other Identifier: 8224-8226 W. Sunset Boulevard; Swing Brothers Newsstand; The Stand on Sunset; Kiosk-o-Theque

***P2. Location:** ☐ Not for Publication ☒ Unrestricted ***a. County** Los Angeles

and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad** Hollywood, Calif. **Date** 1966 **T 1S; R 14W; of Sec 8;** San Bernardino **B.M.**

c. Address 8222 W. Sunset Boulevard City West Hollywood Zip 90046

d. UTM: (Give more than one for large and/or linear resources) Zone 11S, 373785.06 mE/ 3773831.77 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

Assessor Parcel Number (APN) 5554-018-022

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The subject property at 8222 W. Sunset Boulevard is located on the south side of W. Sunset Boulevard, between Roxbury Road to the west and Marmont Lane to the east. Two city boundaries cut through the subject property diagonally from the northeast to southwest, with the City of West Hollywood at the north end and the City of Los Angeles at the south end. A single-story utilitarian newsstand building is to the north in the City of West Hollywood and a rear paved parking lot is to the south in the City of Los Angeles (Photo 1). The subject property is immediately south and facing Chateau Marmont—Los Angeles Historic Cultural Monument #151 (Los Angeles City Planning 2025). (See Continuation Sheet.)

***P3b. Resource Attributes:** (List attributes and codes) HP6. 1-3 Story Commercial Building

***P4. Resources Present:** ☒ Building ☐ Structure ☒ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph



P5b. Description of Photo: Photo 1, primary (north) façade, looking south, May 22, 2025, Dudek

***P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both
Circa 1998/NETR 2025; Ruscha 1998; West Hollywood 1998

***P7. Owner and Address:**

David M Kermani Co. Trust
1154 N. Doheny Drive
Los Angeles, CA 90069

***P8. Recorded by:**

Katie Ahmanson, MHC, Dudek
225 S Lake Ave, Suite 225-M210
Pasadena, CA 91101

***P9. Date Recorded:**

May 22, 2025

***P10. Survey Type:** (Describe)

Intensive

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") Dudek. 2025. 8222 W. Sunset Boulevard Memorandum. Prepared for City of West Hollywood.

***Attachments:** ☐ NONE ☒ Location Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record

☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record

☐ Artifact Record ☐ Photograph Record ☐ Sketch Map ☐ Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

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*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 8222 W. Sunset Boulevard

B1. Historic Name: Unknown

B2. Common Name: Unknown

B3. Original Use: Unknown

B4. Present Use: Combination newsstand, bookstore, record store, art gallery, podcast recording studio

*B5. **Architectural Style:** Utilitarian vernacular

*B6. **Construction History:** (Construction date, alterations, and date of alterations) The subject newsstand building was constructed in circa 1998 (NETR 2025; Ruscha 1998; West Hollywood 1998).

*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** **Original Location:**

*B8. **Related Features:** None

B9a. Architect: Unknown

b. Builder: Unknown

*B10. **Significance: Theme** N/A

Area: N/A

Period of Significance N/A **Property Type** N/A **Applicable Criteria** N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The building at 8222 W. Sunset Boulevard does not meet the criteria for the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or the City of West Hollywood's local criteria as outlined in section 19.58.050 *Criteria for Designation of Cultural Resources*. The property was evaluated in accordance with Section 15064.5 (a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code. The property is not considered a historical resource under CEQA. As such, this evaluation assigns a 6Z California Historical Resources Status Code to 8222 W. Sunset Boulevard. See Continuation Sheet.

B11. Additional Resource Attributes: (List attributes and codes) None

*B12. **References:** See Continuation Sheet

B13. Remarks: None

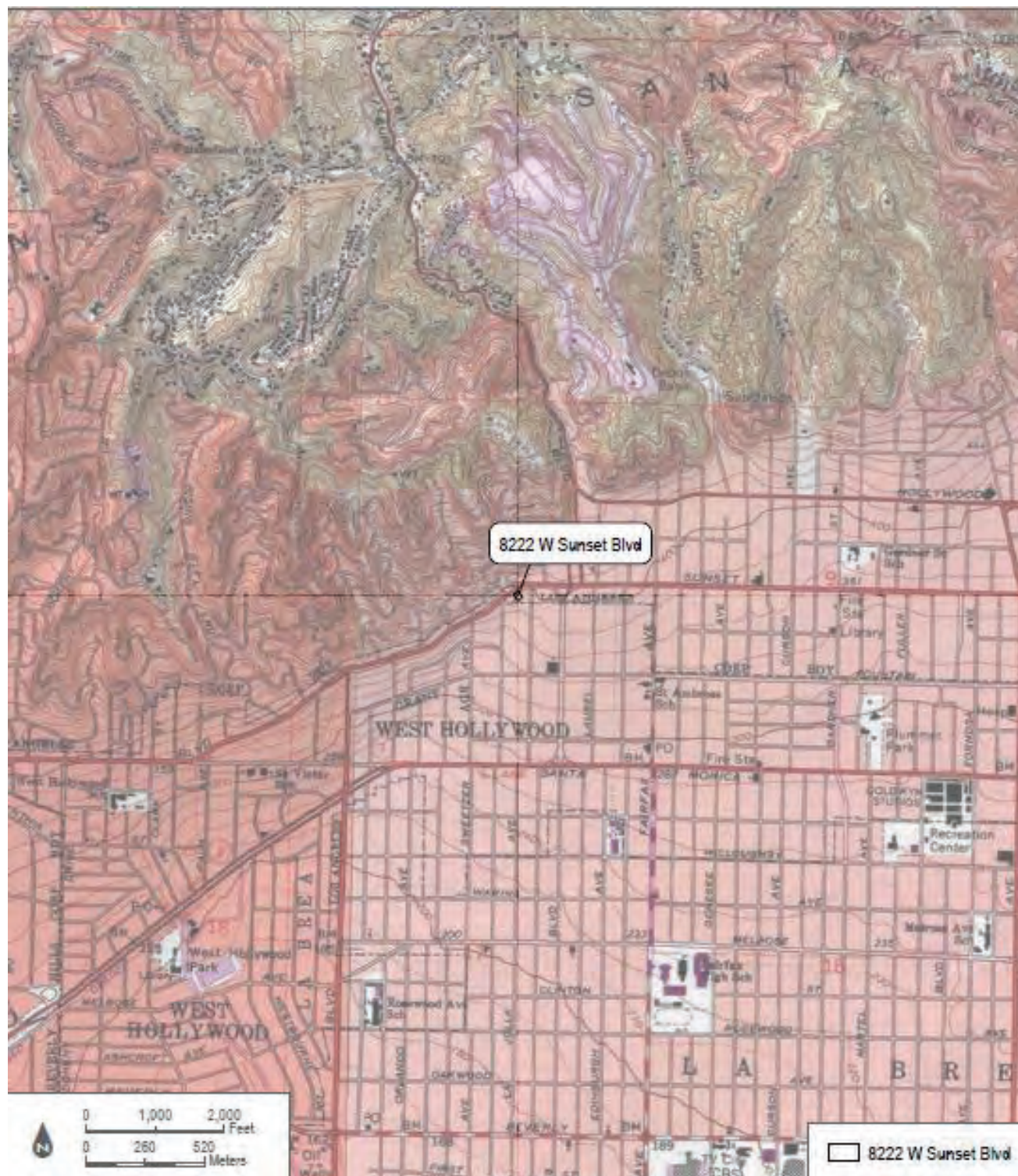
*B14. **Evaluator:** Andrea Dumovich Heywood, MHC

***Date of Evaluation:** July 7, 2025

(This space reserved for official comments.)

(Sketch Map with north arrow required.)





CONTINUATION SHEET

Page 4 of 16

*Resource Name or # (Assigned by recorder) 8222 W. Sunset Boulevard

*Recorded by: Katie Ahmanson, MHC, Dudek *Date: May 22, 2025 ☒ Continuation ☐ Update

Description (cont.)

The newsstand building, which is primarily clad in stucco and corrugated metal, has a long, rectangular-shaped footprint. It is approximately 38 feet in length and 5-to-6 feet wide. A shed style roof clad in cotton canopy material with extended eaves is at the primary (north) façade. The primary façade consists of three architectural bays, each with metal corrugated roll-down doors. Between the bays are narrow strips of what appear to be plywood applied over stucco cladding. Mirrors with several carnival-style lights are applied to the soffit.

The east side façade immediately abuts the neighboring property to the east and is not visible from the public right of way. The west side facade lacks fenestration and the rear (south) façade contains three utilitarian doors and no ornamentation.

Based on recent photographs, the roof appears to likely consist of synthetic slate tile, which may remain under the existing canopy cover. The roof's canopy design has yellow and white stripes with large red text that reads "Are We On Air?" and smaller red text that repeats the same words above each of the three bays along the fascia. The outer two metal roll-down doors each read "Music & Stories," and the central door reads "Kiosk-o-Theque"—all in cursive font. At the west façade, a neon sign states, "Are we on air?." Just west of the newsstand building on the subject parcel is a metal chain-linked access gate to the rear parking lot.

Significance (cont.)

City of West Hollywood Commercial Development

In 2016, the City of West Hollywood published a citywide commercial development historic context statement, written by GPA Consulting, Inc. (GPA 2016). The following is an abbreviated version of the historic context statement:

The City of West Hollywood began as a small community associated with the railroad. Largely agricultural at first, the town of Sherman began to take shape. Sherman's growth accelerated after the arrival of the motion picture industry in the late 1910s. Much of the town's development in the first decades of the twentieth century was driven by its location between Hollywood and Beverly Hills.

By 1919, the area sometimes referred to as West Hollywood was generally considered to be bounded by Sunset Boulevard on the north, Doheny Drive on the west, La Brea Avenue on the east, and Beverly Boulevard on the south. This encompassed the town site of Sherman. The street grid that runs through Hollywood dominated the eastern portion of the area, while the angled route of Santa Monica Boulevard, following the railroad tracks, determined the grid to the west.

Until the first decade of the twentieth century, Sunset Boulevard's terminus was located just west of Laurel Canyon Boulevard/Crescent Heights Boulevard. By the early 1920s, most of the available land in Sherman had been subdivided, and the community was being hemmed in by the neighboring communities of Beverly Hills and Hollywood. Restaurants and taverns were established, and the 1.7-mile long strip of Sunset Boulevard through Sherman (at this time referred to as "the county strip") would contribute significantly to the town's prosperity in the ensuing decades. Between 1922 and 1923 alone, the population grew by more than 4,000 people. Sherman

CONTINUATION SHEET

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*Resource Name or # (Assigned by recorder) 8222 W. Sunset Boulevard

*Recorded by: Katie Ahmanson, MHC, Dudek *Date: May 22, 2025 ☒ Continuation ☐ Update

residents voted against consolidation with Los Angeles and remained unincorporated. The earliest commercial development of Sunset Boulevard began with the construction of four Georgian Revival style buildings by Francis Montgomery, son-in-law of Victor Ponet. The small commercial area, united by style and massing, was expanded in the 1930s and was later known as Sunset Plaza.

From the time Sherman adopted the name West Hollywood in 1925 until the end of World War II, the up-and-coming town transformed into the home of some of Hollywood's most famous gathering spots. The western portion of Sunset Boulevard was developed with low-rise commercial buildings in the late 1920s and 1930s. Dubbed the Sunset Strip, this stretch of unincorporated county road became synonymous with Hollywood glamour. By the eve of World War II, the city was largely built out. The development that would take place in the postwar period largely consisted of infill or the reuse or replacement of buildings constructed during earlier decades. Despite the onset of the Great Depression, the entertainment industry helped sustain the economy of both Hollywood and West Hollywood.

The construction of the buildings at what is now Sunset Plaza attracted further investment; the nearby Chateau Marmont, located over the border in Los Angeles, was constructed in 1929, and the Sunset Tower was built in 1930 (both were constructed as apartments but are now hotels). The same year, property owners lobbied the County Board of Supervisors for zone changes and improvements that could pave the way for Sunset Boulevard's development. Much of the western portion of Sunset Boulevard (today known as the Sunset Strip) was developed during the ensuing decade. During the 1930s, Sunset Boulevard became the after-dark playground for the Hollywood elite. It was the perfect location between their studios in Hollywood and homes in Beverly Hills. It also became a haven for members of the mob, who were attracted by the area's lack of police oversight.

In the post-World War II period, the West Hollywood area became the center of region's creative communities. A burgeoning gallery scene along La Cienega Boulevard in Los Angeles became a nationally recognized destination for modern art. The interior design industry began a gradual ascendancy in the southeast corner of the area as well; by the end of the twentieth century, it would be one of the largest concentrations of interior design businesses in the Pacific Rim. As the creative environment thrived, the Sunset Strip began an era of transition. By the early 1960s, construction was underway on several high-rise hotel and office buildings with sleek Modern designs along Sunset Boulevard. The older commercial buildings became the home of a new youth culture where teenagers clashed with authorities.

The Sunset Strip in the postwar period saw the decline of traditional nightclubs and the rise of the rock music scene. Though turnover was common throughout the Sunset Strip's history, the newer businesses were truly of a different nature by 1965. The first heyday of the Sunset Strip as the destination for restaurants and supper clubs extended over 20 years from 1934 to 1954. Culturally and politically, the area became more conservative during this period. By the 1940s, upscale lesbian bars like the Gypsy Room were replaced with more conventional and traditional restaurants. By the mid-1950s, the Sunset Strip declined as an entertainment destination as televisions became widely owned and variety shows featured many of the former club acts. Long dominated by organized crime, the Sunset Strip declined as Las Vegas drew away business. The second heyday of the Sunset Strip, ushered in by the opening of the Whiskey a Go-Go in 1964, witnessed the rise of a different type of club scene dominated by 1960s and 1970s rock music and youth culture.

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From 1966 to 1984, West Hollywood was a destination for several diverse groups of people. The interior design industry continued to be an important force in the area through the 1970s and 1980s. Numerous European firms, including Ligne Rosset, opened their only stores in the United States in West Hollywood, demonstrating the supremacy of the area to the design industry in the country. Spearheaded by developers Friedman and Kates, the construction of the Pacific Design Center in 1975 further affirmed the growth and permanence of the design industry in West Hollywood's economy. In addition, West Hollywood became one of the centers of the music and art scenes for the youth and counter-culture movements of the 1960s and 1970s. The Sunset Strip became synonymous with youth culture as it evolved from the swinging 1960s to the harder rock scenes of the late 1970s and early 1980s. At the same time, Santa Monica Boulevard became a business district catering to the gay and lesbian population as they increasingly asserted their rights to identify publicly as homosexuals. At the end of the period another group, Russian Jewish immigrants, also found a refuge in West Hollywood. When the City of West Hollywood incorporated in 1984, it was the first city in the United States to have an elected governing body whose majority comprised openly gay officials (GPA 2016).

Today, at 1.9 square miles, the City of West Hollywood is home to approximately 35,000 residents, of which over 40 percent identify as lesbian, gay, bisexual, or transgender, and approximately 11 percent are representative of regions from the former Soviet Union (City of West Hollywood 2025).

Development of 8222 W. Sunset Boulevard

The subject newsstand building was constructed in circa 1998 (NETR 2025; Ruscha 1998; West Hollywood 1998).

According to available historic aerials, the subject parcel appears to have been mostly built up with one large building or multiple buildings from 1964 through 1992. By 1993, it appears that the existing building(s) on site were demolished and the subject property transitioned into a vacant lot (Exhibit 1) (NETR 2025).

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Exhibit 1. 1964 aerial photograph (L) showing the subject property at 8222 W. Sunset Blvd with one or more buildings; 1993 aerial photograph (R) showing the subject property as a vacant lot (outlined in red).



Source: NETR 2025

From 1994 to circa 1998, the parcel served as an open-air parking lot with no buildings on site (NETR 2025; Ruscha 1998). Based on building permits on file with West Hollywood, Development Permit 98-07 was filed in 1998 by Jason Swing on behalf of property owner David Kermani for a new newsstand building at 8224 W. Sunset Boulevard. The subject newsstand was constructed shortly thereafter, in circa 1998 (West Hollywood 1998). Newspaper research also affirms that beginning in 1998, the subject newsstand building operated as the Swing Brothers Newsstand. Historic aerials in 1999 confirm that the newsstand was constructed by that time (Exhibit 2). One year later, a 24-hour coffee shop, known as Coffee House, opened on the adjacent parcel in the building immediately west of the newsstand, at 8226 W. Sunset Boulevard (LAT 1999: 380; Yelp Inc. 2025). Per historic newspapers, it is likely that the newsstand parking lot served both Swing Brothers Newsstand and Coffee House patrons.

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Exhibit 2. 1999 aerial photograph (L) first showing the subject newsstand building at the north property line and parking to the rear; 2020 aerial photograph (R) showing the subject property remained consistent with only a single building on site (outlined in red).



Source: NETR 2025

The subject building remained a newsstand through the early 2000s, however by 2011 it was known as “The Stand on Sunset,” which also sold snacks and drinks (Google 2025c). During the COVID-19 pandemic in 2020, the newsstand closed and was used for storage for the neighboring restaurant known as The Den (Chikhouné 2024). In 2021, a rear structure of approximately 1,400 square feet was added to the immediate south of the newsstand building, likely for storage for The Den, which was removed in 2023 (Exhibit 3) (Google 2025a; Google 2025b). Around this time, Arman Naféei opened Kiosk-o-thèque—a combination newsstand, bookstore, record shop, art gallery, and podcast recording studio—which continues to operate in the building today (Chikhouné 2024; Are We On Air? 2025). Alterations observed during the survey include canopy roof cover or full roof replacement; narrow strips of plywood applied over the stucco siding between architectural bays; addition of mirrors with several carnival-style lights at the soffit; and the addition of a neon sign reading “Are we on air?” at the west façade.

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Exhibit 3. 2021 aerial photograph (L) first showing the subject newsstand building at the north property line with a new rear addition and parking to the rear; 2023 aerial photograph (R) showing the rear addition removed and the subject property remains consistent with how it appears today (outlined in red).



Source: Google 2025a; Google 2025b

Evaluation

In 2016, the City of West Hollywood conducted a reconnaissance-level survey as part of its citywide commercial and non-residential survey effort. The subject property was noted as having a build date of 1956. It was assigned a “6Z” status code, meaning it was found ineligible for listing in the NRHP, CRHR, and local designation through survey evaluation. DPR forms were only prepared for properties designated as potentially eligible and therefore no DPR was completed for the subject property (GPA 2016).

Although the newsstand is less than 45 years of age, it was evaluated for its potential significance based on NRHP, CRHR, and local City of West Hollywood designation criteria.

Under NRHP and CRHR Criteria A/1, and the City of West Hollywood’s local criteria, the property at 8222 W. Sunset Boulevard lacks a direct and important association with any event significant in local, state, or national history. The commercial property was constructed in circa 1998 as the Swing Brothers Newsstand, decades after World War II when most of West Hollywood was already built out, and long after Sunset Boulevard was established as a commercial corridor. While post-war commercial development along Sunset Boulevard is an important local trend, it primarily consisted of high-rise hotel and office buildings built in the 1960s. As such, the subject property post-dates the significant period of post-World War II commercial development in West Hollywood and instead represents the general, more sporadic extension of commercial development along Sunset Boulevard that has continued to the present day. Although West Hollywood became the center for Los Angeles’ creative communities in the post-World War II era, including that of design and music, Kiosk-o-thèque was not part of the original creative establishment as it opened in the subject building in circa 2023. It is also not known to be directly associated with any events that have made a significant contribution to the history of West Hollywood, Los Angeles County,

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California, or the nation. Research also did not identify a significant historical event that occurred on the property. Additionally, 8222 W. Sunset Boulevard does not exemplify special elements of the City including cultural, economic, engineering, political, natural, or social history and does not possess integrity. Therefore, the subject property does not meet NRHP Criterion A, CRHR Criterion 1, or the City of West Hollywood's local criteria.

Under NRHP and CRHR Criteria B/2, and the City of West Hollywood's local criteria, the property at 8222 W. Sunset Boulevard lacks a significant association with the productive life of any person important in local, state, or national history. Research identified The Swing Brothers, The Stand on Sunset, and Kiosk-o-thèque as newsstand occupants. However, no information was uncovered regarding Jason Swing of The Swing Brothers, The Stand on Sunset company, or any affiliated employees of either company. Additionally, no information was uncovered regarding original property owner David Kermani. Arman Naféi established Kiosk-o-thèque at the subject property in circa 2023. Although Naféi interviewed celebrities such as Jane Birkin and Patti Smith for his podcast Are We On Air?, he is not the first or only person to have done so, and no additional information was uncovered regarding his association with the subject property (Chikhoun 2024). Research did not identify any other individuals who made a singular and significant contribution to the development of the newsstand industry or West Hollywood commercial development along Sunset Boulevard. The subject property is also not identified with any persons significant in local history or associated with the work of a notable architect, builder, or designer. Due to a lack of identified significant associations with any persons important in our past, the property is recommended not eligible under NRHP Criterion B, CRHR Criterion 2, or the City of West Hollywood's local criteria.

Under NRHP and CRHR Criterion C/3, and the City of West Hollywood's local criteria, the commercial building at 8222 W. Sunset Boulevard does not fully embody the distinctive characteristics of any particular architectural style, nor is it known to represent the work of a master, possess high artistic value, or be a component of a potential or existing historic district. Research did not identify an architect or builder for the property, and it appears unlikely to be the work of a notable architect, builder, or designer. The subject property contains a single-story commercial newsstand building constructed in circa 1998. Although newsstand commercial typology consisting of a long, narrow building selling print is less common today, the building itself is utilitarian and is not an example of distinguishing characteristics of an architectural or historical type or specimen known to the City of West Hollywood. It also does not exemplify special elements of the City's aesthetic or architectural history and does not possess integrity. Overall, the property lacks sufficient design and construction value to meet NRHP Criterion C, CRHR Criterion 3, or the City of West Hollywood's local criteria.

Under NRHP and CRHR Criteria D/4, and the City of West Hollywood's local criteria, the subject property is not significant as a source, or likely source, of important historical information, nor does it appear likely to yield important information about historic construction methods, materials, or technologies. This technology is well understood through contemporary trade journals and scientific monographs. As such, the property lacks significance under NRHP Criterion D, CRHR Criterion 4, or the City of West Hollywood's local criteria.

Under NRHP Criteria Consideration G: Properties that Have Achieved Significance Within the Past Fifty Years, and the CRHR Special Criteria Consideration, the subject property lacks exceptional importance. The newsstand at 8222 W. Sunset Boulevard is not considered a resource so fragile that it will not survive the next 50 years nor is it an outstanding example of a newsstand building that it meets the Criteria Consideration G threshold. NRHP Criteria

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Consideration G requires that the property must also be found significant under A/1, B/2, C/3, and/or D/4, which the property does not meet. It also has not demonstrated that sufficient time has passed to understand its historical importance to meet CRHR Special Criteria Consideration. Therefore, the property is recommended not eligible under NRHP Criteria Consideration G.

To be eligible for listing at the national, state, or local level, a property must first meet one or more of the significance criteria as discussed above before a determination can be made as to whether the property retains its historic character and possesses sufficient physical integrity to convey its significance. In the specific case of 8222 W. Sunset Boulevard, an integrity analysis was considered immaterial because the evaluation found that the resource lacks the necessary significance to warrant further analysis of its physical and historic integrity.

In conclusion, 8222 W. Sunset Boulevard lacks sufficient significance to meet any of the criteria for inclusion in the NRHP as outlined under 36 CFR § 60.4, or the CRHR as described under PRC § 5024.1(c), or the local City of West Hollywood criteria as outlined in municipal code section 19.58.050 *Criteria for Designation of Cultural Resources*, either individually or as a contributing element to an existing or potential historic district. As such, the subject property at 8222 W. Sunset Boulevard is not considered a historical resource for the purposes of CEQA pursuant to Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

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Photographs (cont.)

Photo 2. Subject property's primary (north) façade, view southwest.



Source: Dudek. 2025.

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Photo 3. Subject property's primary (north) and west side facades, view northeast.



Source: Dudek. 2025.

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Photo 4. Subject property's rear (south) façade and rear vacant lot, view northwest.



Source: Google. November 2023.

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Photo 5. Subject property's primary (north) façade, view east.



Source: L'Observatoire International. 2024.

8222 Sunset Boulevard Historical Resources Indirect Impacts Analysis

MEMORANDUM FOR THE RECORD

To: Jennifer Davis, Community Development Department, City of West Hollywood

From: Debi Howell-Ardila, MHP, Senior Architectural Historian and Preservation Planner, Dudek

Subject: Historical Resources Impacts Screening Memorandum (Indirect Impacts), 8222 Sunset Boulevard Billboard Project, West Hollywood, California

Date: August 5, 2025

Project Objective and Overview

This Memorandum for the Record (MFR) transmits the results of a Historical Resources Impacts Screening (Impacts Screening) for the 8222 Sunset Blvd. billboard project, West Hollywood (City). This MFR analyzes any indirect impacts to historic resources adjacent to the 8222 Sunset site. The proposed project involves construction of a billboard on a site occupied by a small newsstand structure. (The project's potential impacts on the newsstand as a potential historical resource have been evaluated in a separate study.)

This MFR addresses potential indirect/visual impacts to historical resources adjacent to the project site. The *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* serve as the point of departure for this analysis. Specifically, this study utilizes the *Secretary's Standards for Rehabilitation*, which include guidelines for adjacent new and related construction to historic properties. According to CEQA Guidelines Section 15064.5(b)(3), projects that comply with the *Secretary's Standards* are generally considered mitigated to a level of less than significant. This memo describes the project methodology, the relevant regulatory framework, and findings, presented in Table 1 (Secretary's Standards Project Review) and Table 2 (Impacts Screening). Figure 1 provides an overview of the properties within the CEQA Area Potential Impacts (API). A matrix format has been utilized for this study for ease of review and use by the City. This document has been prepared to facilitate agency compliance with CEQA.

Methodology

This analysis focuses on of-age properties within the CEQA API, which extends roughly one parcel out in each direction; additional parcels have been included in areas with higher sensitivity and/or designated landmarks. In support of this MFR, Dudek conducted research and a site visit to photograph and document the project site, its setting, and subject properties within the CEQA API. The boundaries of the CEQA API were determined in coordination with the City. For the property directly adjacent to the site (8218 W. Sunset Blvd.), which is an eligible historical resource in Los Angeles, the City consulted with the City of Los Angeles Office of Historical Resources staff and reported back to Dudek on the results of that consultation.

Of-age properties within the CEQA API that have not yet been assessed for significance have been carried forward as assumed resources and included in this analysis. In addition, for purposes of this study, Dudek has applied its professional judgment to determine the potential character-defining features of subject properties within the CEQA API. These assumed character-defining features are based on the overall scale, mass, character, and general planning features (such as sidewalk setbacks and spatial relationships between the subject property and neighboring properties).

Figure 1. Subject Properties in CEQA API, 8222 Sunset Blvd. Billboard Project



Research conducted in support of this MFR included review of Los Angeles County Tax Assessor records, previous City historic resources surveys, SurveyLA findings (for adjacent properties in the City of Los Angeles), and the California Office of Historic Preservation Built Environment Resources Directory, among other sources. Through this research phase, Dudek identified “historical resources” in the CEQA API (under CEQA Guidelines, historical resources include properties that are either designated or eligible for federal, state, or local listing.)

This MFR was prepared by Dudek Senior Architectural Historian and Preservation Planner Debi Howell-Ardila, MHP, who has 20 years of experience in historical resource analysis under the California Environmental Quality Act (CEQA) and exceeds the Secretary of the Interior’s Professional Qualification Standards in both history and architectural history. Dudek Architectural Historian Katie Ahmanson completed literature review, research, site visits, and contributed to this analysis.

Regulatory Setting

This regulatory framework section identifies the federal, state, and local laws, statutes, guidelines, and regulations that govern the identification and treatment of cultural resources as well as the analysis of potential impacts to cultural resources. The lead agency must consider the provisions and requirements of this regulatory framework when rendering decisions on projects that have the potential to affect cultural resources.

Federal Regulations

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) instituted a multifaceted program, administered by the Secretary of the Interior, to encourage sound preservation policies of the nation’s cultural resources at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the goals of the NHPA, assisted Native American tribes to preserve their cultural heritage, and created the Advisory Council on Historic Preservation.

National Register of Historic Places

The NRHP was established by the NHPA of 1966 as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 Code of Federal Regulations [CFR] 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons who are significant in our past;

- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historic figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, and properties that are primarily commemorative in nature, are not considered eligible for the NRHP, unless they satisfy certain conditions. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance. In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the “ability of a property to convey its significance.”¹ To retain integrity, a property must possess several, if not all, of these seven qualities, which are defined in the following manner in National Register Bulletin 15:

1. Location – the place where the historic property was constructed or the place where the historic event occurred;
2. Design – the combination of elements that create the form, plan, space, structure, and style of a property;
3. Setting – the physical environment of a historic property;
4. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. Feeling – a property’s expression of the aesthetic or historic sense of a particular period of time;
7. Association – the direct link between an important historic event or person and a historic property.

For the purposes of this study’s indirect impact analysis, the aspects of setting and feeling are of particular relevant for this discussion; areas of particular relevance are highlighted below. The National Park Service defines the quality of setting in the following way:

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer’s concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as: Topographic features (a gorge or the crest of a hill);

¹ National Park Service (NPS). 1990. *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, p. 44. Washington, D.C.: U.S. Department of the Interior, National Park Service.

vegetation; simple manmade features (paths or fences); and relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its surroundings. This is particularly important for districts.²

The National Park Service defines the quality of feeling in the following way:

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.³

State Regulations

The policies of the NHPA are implemented at the state level by the California Office of Historic Preservation, a division of the California Department of Parks and Recreation. The Office of Historic Preservation is also tasked with carrying out the duties described in the PRC and maintaining the California Historic Resources Inventory and California Register of Historical Resources (CRHR). The state-level regulatory framework also includes CEQA, which requires the identification and mitigation of substantial adverse impacts that may affect the significance of eligible historical resources.

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is, according to PRC Sections 21083.2 and 21084.1, "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the CRHR.

According to PRC Section 5024.1(c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Criterion 2: It is associated with the lives of persons important in our past;
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values;
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

² NPS, 1990, p. 45.

³ NPS, 1990, p. 45.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether historical resources may be adversely impacted by a proposed project. Under CEQA, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Answering this question is a two-part process: first, the determination must be made as to whether the proposed project involves historical resources. Second, if historical resources are present, the proposed project must be analyzed for a potential substantial adverse change in the significance of the resource.

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historical resources are:

- A resource listed in, or formally determined eligible for listing in, the California Register of Historical Resources (PRC 5024.1, Title 14 CCR, Section 4850 et seq);
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC;
- Any building, structure, object, site, or district that the lead agency determines eligible for national, state, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historical resource under CEQA) if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852).

According to CEQA Guidelines Section 15064.5 and PRC Section 5024.1, the fact that a resource is not listed or determined eligible for listing in the California Register or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be an historical resource. According to CEQA Guidelines Section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment.

Specifically, CEQA Guidelines Section 15064.5 specifies that “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Material impairment occurs when a project alters in an adverse manner or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” or eligibility for inclusion in the NRHP, CRHR, or local register. In addition, pursuant to CEQA Guidelines Section 15126.2, the “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

CEQA Guidelines Section 15064(d) further defines direct and indirect impacts in the following manner:

- A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.

- An indirect physical change in the environment is a physical change in the environment, which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
- An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

Secretary of the Interior's Standards for the Treatment of Historic Properties

In accordance with CEQA Guidelines and 14 CCR Section 15126.4(b)(1), a project that has been determined to conform with the *Secretary's Standards* is generally considered a project that will not cause a significant adverse impact to historical resources. However, a CEQA finding of no significant impact may still be made if the project does not fully meet all of the *Secretary's Standards*. The *Secretary's Standards* and associated Guidelines are not "prescriptive but are intended to promote responsible preservation practices."⁴ The standards offer recommendations for maintaining, repairing, and replacing historic features, as well as for designing additions.

As developed by the National Park Service, the *Secretary's Standards* consist of four related treatment approaches: preservation, rehabilitation, restoration, and reconstruction. It is anticipated that rehabilitation would be the appropriate approach for the proposed project. Rehabilitation, which is the most flexible treatment approach of the four, is defined as the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. The 10 Secretary's Standards for Rehabilitation are:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

⁴ Weeks, K.D., and A.E. Grimmer. 2001. *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Washington, D.C.: U.S. Department of the Interior. Available at: <http://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>. Accessed July 11, 2022.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Secretary's Standards compliance begins with the identification and documentation of the "character-defining," or historically significant, features of the historical resource. For purposes of this project, which assesses the potential for the proposed project to result in indirect significant adverse impacts through visual impacts or a change to setting/feeling, the presumed character-defining features are based on the overall scale, mass, character, and planning features (such as sidewalk setbacks and spatial relationships between the subject property and neighboring properties). The intent is to take a conservative approach, should any of the of-age properties subsequently be found to qualify as historical resources pursuant to CEQA.

Local Regulations

City of West Hollywood Cultural Heritage Preservation Ordinance

As codified in the City's Municipal Code Title 19 Chapter 19.58 Article 19-4, the West Hollywood Cultural Heritage Preservation Ordinance defines the criteria and process for the designation of cultural resources (or any portion thereof, both interior and exterior) and historic districts. Cultural resources may be designated if they meet one or more of the following criteria:

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

4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation.
 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city.
- Example of Distinguishing Characteristics. It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen.
 - Identified with Persons or Events. It is identified with persons or events significant in local, state, or national history.
 - Notable Work. It is representative of the work of a notable architect, builder, or designer.

Analysis Findings

The findings of this analysis are presented in Appendix A (Table 1, Secretary's Standards for Rehabilitation Project Review, 8222 Sunset Boulevard Billboard Project) Appendix B (Table 2, CEQA Impacts Screening, 8222 Sunset Blvd. Billboard Project).

In summary, the proposed project was analyzed according to the distance/proximity of the project from the subject property within the CEQA API; those properties are roughly divided in three categories: properties on the same side of Sunset Blvd., to the east and west; properties across the street on Sunset Blvd., and properties off Sunset Blvd., in the neighboring residential area to the south.

The project was found to be in partial non-compliance with Standard No. 9 for properties adjacent to and within the same city block as the project site, due to the scale (in footprint and height) of the proposed billboard and the comparatively modest scale of these nearby properties. As noted above, a CEQA finding of no significant impact may still be made if a project does not fully meet all of the *Secretary's Standards*. In this case, the proposed project would not destroy historic materials or features of these nearby properties and, if removed in the future, the essential form and integrity of the subject properties would remain unchanged. On balance, therefore, the proposed project complies with the Secretary's Standards.

As a result of this analysis, the proposed project is found to comply with the *Secretary's Standards*. Therefore, no potential significant adverse indirect impacts, through visual impacts or changes to setting/feeling, would be expected to result from project implementation. No further CEQA study for historical resources is required.

Appendix A

Table 1, Secretary's Standards for Rehabilitation Project Review, 8222 Sunset Blvd. Billboard Project

Table 1. Secretary’s Standards for Rehabilitation Project Review, 8222 Sunset Boulevard Billboard Project

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
1.	8222 W. Sunset Blvd., Los Angeles APN 5554-018-022												This property is located in the project site and is slated for demolition. An historical resource assessment of the property has been completed in a separate document.
2.	8218 W. Sunset Blvd., Los Angeles APN 5554-018-004 Jay Ward Building (1923/1931)	Historical Resource 3S; 3CS; 5S3 (eligible at the federal, state, and local levels) Source = SurveyLA	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	The subject property is directly adjacent to the proposed project. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the comparatively modest scale of the one-story subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged. On balance, therefore, the proposed project complies with the Secretary’s Standards.
3.	1471 Havenhurst Dr., Los Angeles APN 5554-018-042 Andalusia Apartments (1926)	1S (NRHP designated) 5S (Locally designated; Los Angeles HCM #435)	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
4.	8221 W. Sunset Blvd., Los Angeles APN 5555-030-008 and 5555-030-010 Chateau Marmont (1923 and 1928)	3S (NRHP Eligible) 5S (Locally designated; Los Angeles HCM #151)	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	Although the proposed project would alter the setting of the vicinity, its distance from the subject property (which is sited atop a hill, north of the project site across Sunset Boulevard) is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
5.	8226 W Sunset Blvd., West Hollywood APN 5554-018-021 The Den on Sunset (1923)	6Z (Ineligible for federal, state, or local designation) Source = West Hollywood Historic Preservation Database	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
6.	8228 W Sunset Blvd., West Hollywood APN 5554-018-020 Office building (1927)	6Z (Ineligible for federal, state, or local landmark designation) Source = West Hollywood Historic Preservation Database	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
7.	1481 Havenhurst Dr., Los Angeles APN 5554-018-005 1923	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
8.	1477 Havenhurst Dr., Los Angeles APN 5554-018-008 1953	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
9.	8225 W Sunset Blvd., West Hollywood APN 5555-025-009 1926	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
10.	8210 W. Sunset Blvd., Los Angeles APN 5554-018-003 1925	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
11.	8200 W Sunset Blvd. Los Angeles APN 5554-018-001 Pink Taco Restaurant (between 1952 and 1964)	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.

MAP ID#	SUBJECT PROPERTY APN NAME DATE OF CONSTRUCTION	CURRENT HISTORIC RESOURCE STATUS and/or CHR STATUS CODE	No. 1: A property will be used as it was historically or given a new use that requires minimal change	No. 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features/spaces/spatial relationships will be avoided.	No. 3: Each property will be recognized as a physical record of its time, place, and use. Avoid changes that create a false sense of historical development.	No. 4: Changes that have acquired historic significance in their own right will be retained and preserved.	No. 5: Distinctive materials, features, finishes, and construction techniques... will be preserved.	No. 6: Deteriorated historic features will be repaired rather than replaced. Where severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and, where possible, materials.	No. 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible.	No. 8: Significant archeological resources affected by a project shall be protected and preserved	No. 9: New additions, ext. alterations, or related new construction will not destroy historic materials, features/spatial relationships that characterize the property. New work shall be differentiated from the old and will be compatible with the historic materials.	No. 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	SOIS ANALYSIS
12.	8200 W Sunset Blvd. / 1483 Havenhurst Dr. Los Angeles APN 5554-018-001 1960/1970	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Partial	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
13.	8215 W. Sunset Blvd., Los Angeles APN 5555-030-009 1930	Has not been evaluated; treated as presumed historical resource	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	Yes	Yes	This of-age property is treated as a presumed historical resource for purposes of this Secretary’s Standards project review and impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards.
KEY N/A = nonapplicable CHR = California Historical Resource 1S—Designated on NRHP 3S—Appears NRHP eligible, individually, through survey evaluation 3CS—Appears CRHR eligible, individually, through survey evaluation 5S—Designated individually as local landmark 5S3—Appears eligible under local criteria as an individual property through survey evaluation 6Z—More than 50 years old but not eligible for historic designation, either individually or as a district contributor													

Appendix B
Table 2, CEQA Impacts Screening,
8222 Sunset Blvd. Billboard Project

Table 2. Impacts Screening, 8222 Sunset Blvd. Billboard Project

Map ID #	Address Name (if applicable)	City	APN	Construction Date	Known Historical Resource?	CHR Status Code and Source	Adjacency to project site	Impacts Screening
1.	8222 W. Sunset Blvd.	West Hollywood	5554-018-022				Project Site	The historic resource status of the property slated for demolition is being assessed in a separate study. The only structure being considered for demolition is the newsstand. Otherwise the site is vacant (no other structures).
2.	8218 W. Sunset Blvd. Jay Ward Building	Los Angeles	5554-018-004	1923/1931	Yes	3S; 3CS; 5S3 (NRHP, CRHR, and local eligibility) SurveyLA	Same side of Sunset Blvd., directly adjacent to the east of project site	The subject property is directly adjacent to the proposed project, to the west. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the comparatively modest scale of the one-story subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.
3.	1471 Havenhurst Dr. Andalusia Apartments	Los Angeles	5554-018-042	1926	Yes	1S (NRHP designated) BERD, #19-0420 5S (Locally designated) Los Angeles HCM #435	South of Sunset Blvd., south of project site, in adjacent residential area	Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no further study of historical resources is needed for the subject property.
4.	8221 W. Sunset Blvd. Chateau Marmont	Los Angeles	5555-030-008 and 5555-030-010	1923 and 1928	Yes	3S (NRHP Eligible) BERD, #19-166985 5S (Locally designated) Los Angeles HCM #151	Across the street on Sunset Blvd., to the north/northeast	Although the proposed project would alter the setting of the vicinity, its distance from the subject property (which is sited atop a hill, north of the project site across Sunset Blvd.) is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. No significant indirect adverse impacts to historical resources would be expected to result from project implementation, and no further study of historical resources is needed for the subject property.
5.	8226 W Sunset Blvd. The Den on Sunset	West Hollywood	5554-018-021	1923	No	6Z (Ineligible for federal, state, or local designation) West Hollywood Historic Preservation Database)	Same side of Sunset Blvd., west of project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.

Map ID #	Address Name (if applicable)	City	APN	Construction Date	Known Historical Resource?	CHR Status Code and Source	Adjacency to project site	Impacts Screening
6.	8228 W Sunset Blvd. Office building	West Hollywood	5554-018-020	1927	No	6Z (Ineligible for federal, state, or local landmark designation) West Hollywood Historic Preservation Database)	Same side of Sunset Blvd., west of project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. While the project complies with most of the Secretary's Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary's Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.
7.	1481 Havenhurst Dr.	Los Angeles	5554-018-005	1923	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Not on Sunset Blvd.; south of project site, in adjacent residential area	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the project would not be expected to result in visual impacts or a loss of integrity of "setting" or "feeling" leading to material impairment, should the subject property be found to qualify as a historical resource. Therefore, no significant adverse impacts to historical resources would be expected from project implementation, and no further study of historical resources is needed for the subject property.
8.	1477 Havenhurst Dr.	Los Angeles	5554-018-008	1953	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Not on Sunset Blvd.; south of project site, in adjacent residential area	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the project would not be expected to result in visual impacts or a loss of integrity of "setting" or "feeling" leading to material impairment, should the subject property be found to qualify as a historical resource. Therefore, no significant adverse impacts to historical resources would be expected from project implementation, and no further study of historical resources is needed for the subject property.
9.	8225 W Sunset Blvd.	West Hollywood	5555-025-009	1926	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Across the street on Sunset Blvd., north/northeast of the project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the project would not be expected to result in visual impacts or a loss of integrity of "setting" or "feeling" leading to material impairment, should the subject property be found to qualify as a historical resource. Therefore, no significant adverse impacts to historical resources would be expected from project implementation, and no further study of historical resources is needed for the subject property.
10.	8210 W. Sunset Blvd.	Los Angeles	5554-018-003	1925	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes	Same side of Sunset Blvd., east of project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. While the project complies with most of the Secretary's Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and

Map ID #	Address Name (if applicable)	City	APN	Construction Date	Known Historical Resource?	CHR Status Code and Source	Adjacency to project site	Impacts Screening
						of SOIS analysis and impacts screening.		integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.
11.	8200 W Sunset Blvd. Pink Taco (restaurant)	Los Angeles	5554-018-001	Between 1952 and 1964 (NETR)	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Same side of Sunset Blvd., east of project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.
12.	1483 Havenhurst Dr.	Los Angeles	5554-018-001	1960/1970	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Same side of Sunset Blvd., east of project site	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. While the project complies with most of the Secretary’s Standards, it is in partial non-compliance with Standard No. 9, due to the scale (in footprint and height) of the proposed billboard and the proximity to the subject property. However, the proposed project does not destroy historic materials or features of the subject property and, if removed in the future, the essential form and integrity of the historical resource would remain unchanged, should the subject property be found to qualify as a historical resource. On balance, therefore, the proposed project complies with the Secretary’s Standards, and no indirect impact would be expected due to project implementation. No further study of historical resources is needed for the subject property.
13.	8215 W. Sunset Blvd.	Los Angeles	5555-030-009	1930	Unknown	CHR code has not been assigned; subject property treated as presumed historical resource for purposes of SOIS analysis and impacts screening.	Across the street on Sunset Blvd., to the north/northeast	This of-age property is treated as a presumed historical resource for purposes of this impacts screening. Although the proposed project would alter the setting of the vicinity, its distance from the subject property is such that the proposed project would not be expected to result in visual impacts or a loss of integrity of “setting” or “feeling” to the designated historical resource. No significant indirect adverse impacts to historical resources would be expected to result from project implementation, and no further study of historical resources or potential significant indirect impacts is needed for the subject property.

KEY
CHR = California Historical Resource
BERD—California Office of Historic Preservation Built Environment Resources Directory
1S—Designated on NRHP
3S—Appears NRHP eligible, individually, through survey evaluation
3CS—Appears CRHR eligible, individually, through survey evaluation
5S—Designated individually as local landmark
5S3—Appears eligible under local criteria as an individual property through survey evaluation
6Z—More than 50 years old but not eligible for historic designation, either individually or as a district contributor

9229 Sunset Boulevard Historical Resources Significance Evaluation



Historical Resource Evaluation Memorandum

Date: July 8, 2025

To: Jeremy Kolieb, Consumer Experience Group, LLC; City of West Hollywood Community Development Department

Cc: Marcelo Spina, Patterns

Subject: Historical Resource Evaluation of 9229 W. Sunset Boulevard

From: Amanda Duane, Senior Architectural Historian, and Phoebe Rayburn, Architectural Historian I, GPA Consulting

1. INTRODUCTION

1.1 Purpose

The purpose of this memorandum (memo) is to present the results of a streamlined historical resource evaluation for the property at 9229 W Sunset Boulevard, Assessor Parcel Number (APN) 4350-001-033 (subject property) in West Hollywood in anticipation of a proposed project (project). GPA Consulting (GPA) was retained to complete this assessment of the subject property to support the City of West Hollywood's (City) environmental review of the project in compliance with the California Environmental Quality Act (CEQA). The subject property is located on the west corner of the Sunset Boulevard and Doheny Road intersection. It is improved with commercial building constructed in 1961 (see **Figure 1**).



Figure 1: Subject property location.



1.2 Methodology

In preparing this memo, GPA performed the following tasks:

1. Consulted the Office of Historic Preservation's Built-Environment Resource Directory (BERD), the West Hollywood Register of Cultural Resources (local register), 1987 Citywide Historic Resources Survey, and 2016 City of West Hollywood Commercial Historic Resources Survey Citywide Historic Resources Survey (2016 Commercial Survey) to determine whether the subject property is designated at the national, state, or local level, or previously identified in a survey as a potential historical resource. This review revealed that the subject property has not been designated or previously identified in a survey.
2. Conducted a field inspection of the subject property. During the field inspection, GPA assessed the general condition and physical integrity of the buildings on the subject property. Digital photographs were taken during the field inspection.
3. Conducted research into the history of the property to identify the appropriate historic contexts for the evaluation. Sources referenced include the Los Angeles County Office of the Assessor records, newspaper archives, historic aerial photographs, and building permit records on file at the City of West Hollywood .
4. Reviewed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the property.

1.3 Qualifications of Preparers

Amanda Duane and Phoebe Rayburn were responsible for the preparation of this memo. Ms. Duane fulfills the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. Their résumés are included in **Attachment A: Résumés**.

2. REGULATORY FRAMEWORK

2.1 National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."¹

Criteria

To be eligible for listing in the National Register, a property must be at least fifty years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:²

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or

¹ Title 36 Code of Federal Regulations Part 60.2.

² Title 36 Code of Federal Regulations Part 60.4.



- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”⁴ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁵

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.⁶ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and

³ Patrick Andrus and Rebecca Shrimpton, eds., (National Register Bulletin 15) *How to Apply the National Register Criteria for Evaluation* (US Department of the Interior, National Park Service, Cultural Resources: 1997), 7, accessed June 2024, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁴ National Register Bulletin 15, 44.

⁵ National Register Bulletin 15, 44.

⁶ Title 36 Code of Federal Regulations Part 60.3(d).



- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁷

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.⁸

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁹

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission (SHRC) for inclusion on the California Register.¹⁰

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least fifty years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or

⁷ Donna J. Seifert, Barbara J. Little, Beth L. Savage, and John H. Sprinkle, Jr., (National Register Bulletin 21) *Defining Boundaries for National Register Properties* (US Department of the Interior, National Park Service, Cultural Resources: 1997), 12, accessed June 2025, <https://www.nps.gov/subjects/nationalregister/upload/Boundaries-Completed.pdf>.

⁸ Linda F. McClelland, Carol D. Shull, and James Charleton, (National Register Bulletin 16A) *How to Complete the National Register Registration Form*, eds. Maureen P. Danaher and Rebecca Shrimpton (US Department of the Interior, National Park Service, Cultural Resources: 1999), 16, accessed June 2025, <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>.

⁹ Public Resources Code §5024.1 (a).

¹⁰ Public Resources Code §5024.1 (d).



3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than fifty years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹¹

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹²

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates additional details about the evaluation. For eligible properties, these letters indicate whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

¹¹ Public Resources Code §4852.

¹² Public Resources Code §5024.1.



The specific Status Code referred to in this report is:

6Z: “Appears ineligible for designation at the national, state, and local levels through survey evaluation.”¹³

2.3 City of West Hollywood Historic Preservation Ordinance

Chapter 19.58 of the West Hollywood Municipal Code, commonly known as the City’s Cultural Heritage Preservation Ordinance, identifies the criteria under which a property or collection of properties may be added to the West Hollywood Register of Cultural Resources. Properties may be designated a cultural resource or historic district by the City Council following the recommendation of the Historic Preservation Commission (HPC). HPC recommends the designation of cultural resources and historic districts if they possess significance and retain integrity. To be significant, properties must meet one of the following designation criteria:

- A) *Exemplifies Special Elements of the City* – It exemplifies or reflects special elements of the city’s aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses an integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
 - 1) It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
 - 2) It contributes to the significance of a historic area by being:
 - (a) A geographically definable area possessing a concentration of historic or scenic properties; or
 - (b) A thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
 - 3) It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning; or
 - 4) It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation; or
 - 5) It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city; or
- B) *Example of Distinguishing Characteristics* – It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- C) *Identified with Persons or Events* – It is identified with persons or events significant in local, state, or national history; or
- D) *Notable Work* – It is representative of the work of a notable architect, builder, or designer.

¹³ “Technical Assistance Series #8: Technical Assistance Series #8: Users Guide to the California Historical Resources Status Codes and Historic Resources Inventory Directory,” California Department of Parks and Recreation, Office of Historic Preservation, accessed June 2025, <https://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.



3. ENVIRONMENTAL SETTING

3.1 Property Description

The subject property is improved with a nine-story commercial building constructed in 1961, consisting of a two-story base, seven-story office tower, one-story pavilion, and partially subterranean parking.

The commercial building is rectangular in plan and the connected pavilion is roughly triangular in plan. The primary elevation of the main building faces south towards West Sunset Boulevard and it has a flat roof with raised parapet and a mechanical and/or elevator penthouse at the center. The exterior includes concrete foundation walls, marble panels, narrow frosted glass panels, and textured stucco. Along the ground level of the south (side) elevation moving west to east, there is: an open garage entrance, a pair of frameless glass doors, a group of fixed butted glass windows, and a recessed main entrance with floor-to-ceiling butted glass windows and a pair of frameless glass doors. Above the ground level, there is a decorative frieze consisting of narrow frosted glass panels that wraps around the south elevation and cantilevers off the west elevation over the neighboring driveway. Above the frieze is a ribbon of fixed reflective glass windows. The upper eight stories on the south elevation are set back from the first two stories. They are ten bays wide; each bay has a group of three single-light reflective glass windows in a row above a painted stucco spandrel panel (see **Figure 2** through **Figure 4**).

The east elevation of the office tower is set back behind the pavilion and faces the intersection of West Sunset Boulevard and Doheny Road. The exterior wall is stucco with a painted advertisement and has a narrow ribbon of butted glass windows on all seven floors. A sign along the roofline reads “City National Bank.” The pavilion extending from the east end of the commercial building has a flat roof, concrete foundation walls, steel-framed window walls on its north, east, and south elevations, and paired frameless glass doors. Vertical metal fins extend past the roofline and there is signage reading “City National Bank” above the pavilion entrance on the east elevation. The entrance is accessed by a set of concrete stairs with metal railing (see **Figure 3**, **Figure 5**, and **Figure 6**).

At the east end of the north elevation there is a curved wall connecting the pavilion to the ground level of the office tower. The curved wall has a concrete foundation with decorative scoring, narrow frosted glass panels, and a single metal door. The first two stories of the north elevation of the office tower are recessed and the overhang is supported by square concrete pillars. Moving east to west, there is: a metal entrance door, an open garage entrance, a second metal door, and a second open garage entrance. Above the second garage entrance on the second story there are six sash windows. There is a small surface parking lot between the street and the building. The east elevation of the office tower has a narrow ribbon of butted glass windows punctuated by a balcony opening on all seven floors (see **Figure 6** through **Figure 9**).

The west (side) elevation faces the neighboring building’s driveway. The office tower is recessed above the concrete foundation walls and marble panels. The elevation has a narrow ribbon of butted glass windows on all seven floors (see **Figure 10** through **Figure 12**).

The pavilion extending from the east end of the commercial building has a flat roof, concrete foundation walls, steel-framed window walls on its north, east, and south elevations, and paired frameless glass doors. Vertical metal fins extend past the roofline and there is signage reading “City National Bank” above the pavilion entrance on the east elevation. The entrance is accessed by a set of concrete stairs with metal railing (see **Figure 3** and **Figure 5**).



Figure 2: South (primary) elevation of commercial building, view looking north. GPA, May 2025.



Figure 3: South (primary, at left) and east (side, at right) elevations of commercial building, view looking northwest. GPA, May 2025.

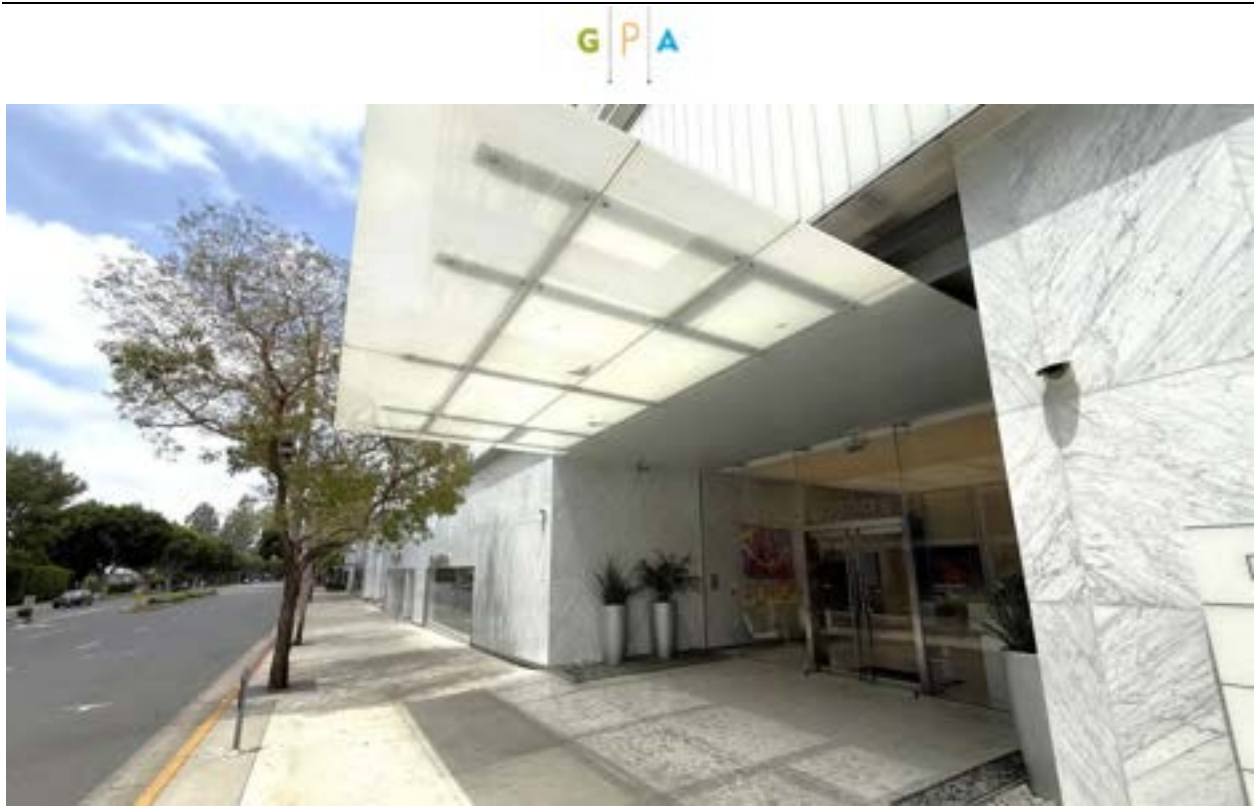


Figure 4: South entrance, view looking northwest. GPA, May 2025.



Figure 5: East (side) elevation of commercial building, view looking southwest. GPA, May 2025.



Figure 6: East (side, at left) and north (rear, at right) elevations of commercial building, view looking southwest. GPA, May 2025.



Figure 7: North (rear) elevation of commercial building, view looking south. GPA, May 2025.



Figure 8: North (rear) elevation of commercial building, view looking southeast. GPA, May 2025.



Figure 9: North (rear) elevation of commercial building, view looking south. GPA, May 2025.



Figure 10: West (side, at left) and south (primary, at right) elevation of commercial building, view looking northeast. GPA, May 2025.

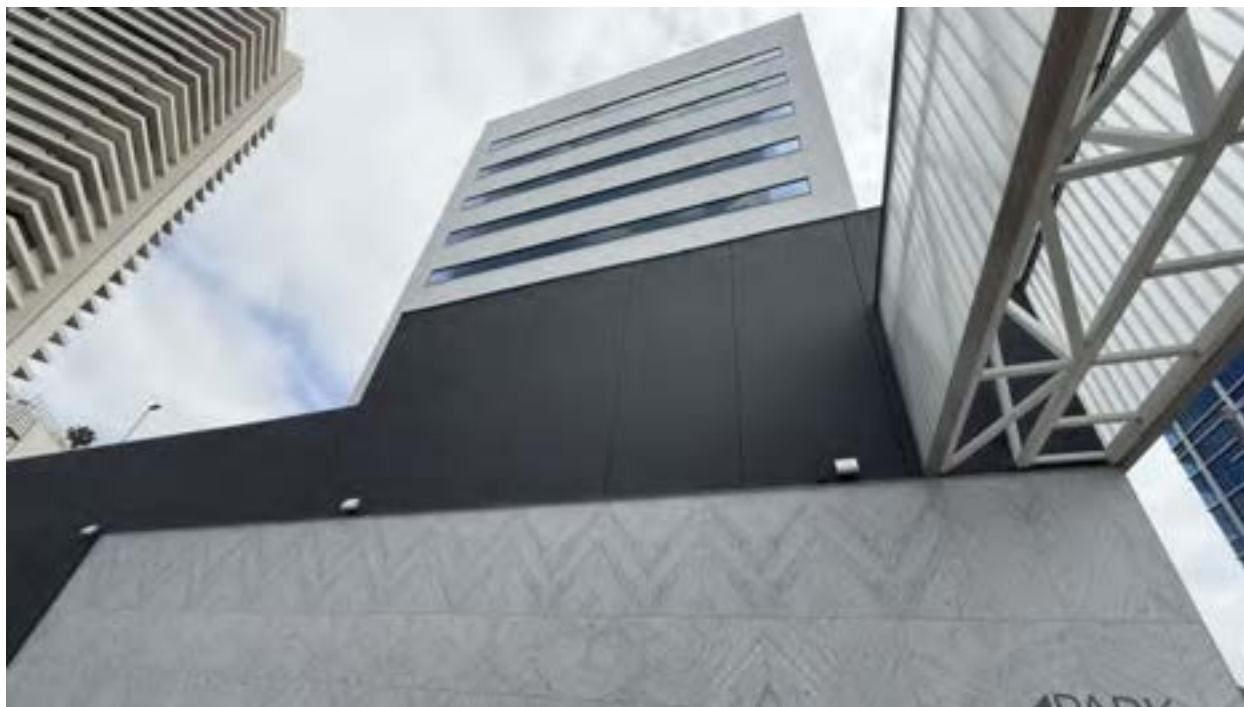


Figure 11: West (side) elevation of commercial building, view looking east. GPA, May 2025.



Figure 12: West (side) elevation of commercial building, view looking north. GPA, May 2025.

3.2 Construction History



Figure 13: Subject building, c. 1961, view looking northwest. Historic photo courtesy of Adsasusage Los Angeles Photo Archive, www.adsasusage.com

The subject property is improved with a nine-story commercial building with one-story pavilion. The building was designed by Victor Gruen Associates and constructed by the Buckeye Construction Co., Inc.¹⁴ Comparing the appearance of the building from the May 2025 field survey to a detailed historic photo (see **Figure 13**), a number of exterior alterations are evident:

- Modification/replacement of one-story pavilion walls and roof;
- Removal of the geometric screen on the east and west elevations of the office tower;
- Removal/replacement of the faced granite cladding along the ground level;
- Replacement of original windows on the office tower;
- Modification of windows along the second-story;

¹⁴ Victor Gruen Associates, *City National Bank Building, Sunset Boulevard/Doheny Road, Los Angeles, Calif.*, April 1960, Site Plan.



- Modification of entrances/openings along ground level of south elevation, including addition of new canopy over main entrance;
- Installation of frosted glass paneling along two-story base and north elevation ground level.

Building permit records for West Hollywood are not complete before the City's incorporation in 1984. The earliest records date to 1939, but most of these consist of scanned copies that are not always fully legible. More recent permit information is available on the City's website but details such as architect or contractor are not included. Available information from building permits for exterior alterations is summarized in **Table 1** below; the table does not list the numerous permits for interior tenant improvements (e.g., partitions, remodeling) or mechanical, electrical, and plumbing work. All building permits reviewed are publicly available in the City's files.

Table 1: Construction History

Date	Permit #	Description of Work	Architect	Contractor
9/11/1959	2351	Preliminary grading + excavation for structure	Victor Gruen Assoc.	[illegible]
12/17/1959	2901	Foundation walls and shoring retaining walls	Victor Gruen	Buckeye Const. Co.
1959	[illegible]	Offices and Stores - Buckeye Const Co. [9 stories]	Victor Gruen Assoc.	Buckeye Const. Co.
1960	[illegible]	Change of footing	Victor Gruen	—
9/22/1960	[illegible]	Office bldg. revision to conc. frame 3 rd floor	Victor Gruen	Buckeye Const. Co
4/18/1961	8588	4-single face wall signs – incl. letters	—	Brite Lite Neon
7/18/1961	9245	Decorative aluminum screen	Victor Gruen Assoc.	Buckeye Const. Co.
[Illegible]	[Illegible]	Decorative screen ¹⁵	Victor Gruen Assoc.	Buckeye Const. Co.
1/29/1962	652	Wall sign 1'-10" x 4'2"	—	QRS Neon
7/23/1962	1966	Erect 7 sq. ft. wall sign over rear door	—	QRS Neon
9/21/1964	2531	(1) single face [incl] illum. sign on lower south wall-sign "C"	—	Federal Sign & Signal
9/21/1964	2533	Single face illum. Letters on east canopy – sign "B"	—	Federal Sign & Signal
9/21/1964	2535	One single face illum letter sign on east elevation – sign "A"	—	Federal Sign & Signal
[Illegible]	9792	Install fish and letters on wall	—	Superior Elect.
[illegible]	1610	Install wall sign	—	QRS Neon
12/22/1965	5797	Install (1) single face illuminated wall sign 24' x 2'6"	—	Federal Sign & Signal
9/15/1965	5227	Install illuminated letters	—	20 th Century Lites
[Illegible]	9792	Install fish and letters on wall	—	Superior Elect.
[illegible]	1610	Install wall sign	—	QRS Neon

¹⁵ Note on scanned permit says, "Abandoned 7-26-1961." This scope of work appears to have been completed with Permit No. 9245.



Date	Permit #	Description of Work	Architect	Contractor
1992	B91-000-958	Exterior renovation	—	—
1992	B92-001-172	Install rooftop window washing system.	—	—
2003	B03-003-602	Commercial tenant – façade remodel of existing restraint.	—	—
2008	B08-000-235	Re-roof of commercial building – built-up.	—	—
2010	B09-000-755	Commercial tenant – façade remodel only.	—	—
2016	B16-0989	Facade change and renovate lobby (expired)		
2017	B17-0496	Facade change and renovate lobby (expired)	—	—

3.2.1 Victor Gruen Associates

Victor Gruen was born in Austria in 1903. He studied architecture at the Academy of Fine Arts in Vienna where he opened his first practice in 1933. After emigrating to New York in 1938, he and his future wife, Elsie Krummeck, established the firm of Gruen and Krummeck and designed upscale retail stores. Victor Gruen and Elsie Krummeck married and moved to Los Angeles in 1941, relocating their firm as well; however, the couple would divorce in 1951.¹⁶

Sources vary, but Gruen went on to establish Victor Gruen Associates (later Gruen Associates) in 1946 or 1951.¹⁷ The firm would gain international recognition by the 1960s for innovative commercial and residential projects, but were best known for their revolutionary design for postwar shopping malls and master plans. Some notable examples of their work in the Los Angeles area include:

- Wilshire Terrace Co-Op (1958), 10375 Wilshire Boulevard, Los Angeles, the first residential tower on Wilshire in Westwood
- Wilshire Beverly Center (1962), 9461 Wilshire Boulevard, Beverly Hills, a high-rise adapted to an unusual triangular lot
- Marina del Rey Master Plan (1965)
- Pacific Design Center (1975), 8687 Melrose Ave, West Hollywood (with architects Cesar Pelli and Norma Merrick Sklarek)¹⁸

Victor Gruen retired from Victor Gruen Associates in 1968 to pursue environmental planning. Now Gruen Associates, the firm is still active and influential, particularly in the areas of planning and urban design.¹⁹

¹⁶ "Finding Aid: Victor Gruen papers, 1886-1991," Library of Congress, accessed June 2025, <https://hdl.loc.gov/loc.mss/eadmss.ms001017>.

¹⁷ "Victor Gruen Associates," Los Angeles Conservancy, accessed June 2025, <https://www.laconservancy.org/learn/architect-biographies/victor-gruen-associates/>; "Gruen Vault," Gruen Associates, accessed June 2025, <https://www.gruenassociates.com/about-us/gruen-vault/>; George S. Koyle, ed., *American Architects Directory*, sponsored by the American Institute of Architects (R.R. Bowker Company, 1955), 214, accessed June 2025, <https://aiahistoricaldirectory.atlassian.net/wiki/spaces/AHDAA/pages/20644319/1956+American+Architects+Directory>.

¹⁸ "Victor Gruen Associates."

¹⁹ "Finding Aid: Victor Gruen Papers."



3.2.2 Buckeye Construction Company

Buckeye Construction Company was founded in 1947 by George Konheim. Konheim was born in Ohio in 1917. As a young man he worked several odd jobs. He went on to study engineering and during World War II, he worked at Pratt & Whitney helping to manufacture airplane engines for the military.

In 1943, he moved to Los Angeles and shortly thereafter established the Buckeye Construction Company. Early projects included building residences in the Beverlywood and Cheviot Hills areas of Los Angeles. In 1950, Konheim formed a partnership with banker and entrepreneur Bram Goldsmith, after which Buckeye focused on commercial construction.

An affiliate company, Buckeye Realty & Management Corporation, was established in the 1950s to oversee leasing and management for Buckeye's buildings, including the subject property. During this era, a large proportion of development activity was focused on single- and multi-family residential development in suburban areas. Buckeye Construction Company saw an overlooked opportunity to develop and construct commercial buildings in major city centers like Beverly Hills, Los Angeles, Santa Monica, and Phoenix Arizona, which became their business model. Between 1953 and 1958, the company constructed nearly 600,000 square feet of commercial real estate in the Los Angeles area.

Major projects included:

- City National Bank Building (1967), 606 S. Olive Street, Los Angeles
- Bank of America (1962), 9461 Wilshire Boulevard, Beverly Hills
- Academy of Motion Picture Arts and Sciences Headquarters (1975), 8949 Wilshire Boulevard, Beverly Hills²⁰

3.3 Ownership/Occupant History

GPA conducted research into the owners and occupants of the subject property over time to identify any possible persons or businesses of local historical importance or prominence.

Because the City of West Hollywood was part of unincorporated Los Angeles County until 1984, research sources like city directories do not always include listings for addresses in present-day West Hollywood. Additionally, as a large-scale commercial building with numerous offices and tenant turnover, 9229 W. Sunset Boulevard has had numerous occupants over the years. As such, the following ownership/occupant history is representative but may not be exhaustive. This information is summarized below in **Table 2**.

Table 2: Ownership/Occupant History

Year(s) Listed	Owner	Owner/Tenant	Source
1961-	Buckeye Realty & Management Corp.	Owner	West Hollywood Building Permit Records
1961-2025	City National Bank	Tenant	West Hollywood Building Permit Records

²⁰ "Buckeye Builders Active," *Westwood Hills Press*, May 22, 1958, 17, accessed June 2025, Newspapers.com; Victoria Talbot, "City of Beverly Hills Dedicates Bram Goldsmith Way," *Beverly Hills Courier*, November 9, 2018, 1, accessed June 2025, <https://www.cnb.com/content/dam/cnb/library/publishers/beverly-hills-courier/media/Bram-Goldsmith-Way-Media-Beverly-Hills-Courier-Full-Text.pdf>; Dennis McLellan, "George Konheim, 84; Leading Developer, Philanthropist," *Los Angeles Times*, December 9, 2001, accessed June 2025, <https://www.latimes.com/archives/la-xpm-2001-dec-09-me-13165-story.html>.



Year(s) Listed	Owner	Owner/Tenant	Source
1961	Spraylon Sales Corporation	Tenant	"Classified Ad," <i>Long Beach Independent-Press-Telegram</i> , August 20, 1961, D8.
1962	Warner Ranch Co., Inc.	Tenant	"Warner Ranch Co., Inc. [display ad]," <i>Valley Times</i> , November 6, 1962, 3-D.
1963	The Grenadier [Restaurant]	Tenant	"The Grenadier [display ad]," <i>Los Angeles Evening Citizen News</i> , March 8, 1963, A-9.
1963	H. A. Rappaport, Plaintiff's Attorney	Tenant	"Notice of Marshal's Sale No. 621 478," <i>Van Nuys News and Valley Green Sheet</i> , May 21, 1963, 28.
1963	George Murphy Associates	Tenant	"Ground Plans Completed," <i>Whittier Star Review</i> , August 18, 1963, 6.
1963	Demica Enterprises--R. D. Collins and W.H. Iungerich	Tenant	"Certificate for Transaction of Business Under Fictitious Name," <i>Valley Times</i> , October 26, 1963, 19.
1965	Scientific Optical Corp	Tenant	"Notice of Intended Transfer and Leaseback," <i>Arcadia Tribune</i> , August 26, 1965, 26.
1965-	Whittaker Corporation	Tenant	"Whittaker Acquires New York Company," <i>Valley Times</i> , October 13, 1965, 6. "Notice to Creditors Transfer in Bulk," <i>Daily Breeze</i> , July 14, 1967, 25.
1966-1972	Stefanino's Trattoria-- Connie Kaye	Tenant	"We Are Now Officially Open: Stefanino's Trattoria [ad]," <i>Los Angeles Times</i> , March 9, 1966, V2.
1975-1980	Nick's Fish Market	Tenant	Lois Dwan, "Roundabout," <i>Los Angeles Times</i> , July 6, 1975, 62. "Dancing in L.A.," <i>L.A. Weekly</i> , June 11, 1980, 13.
1987-1989	Coldwell Baker	Tenant	"It's a Good Sign and it's Coming Soon [ad]," <i>Los Angeles Times</i> , August 22, 1987, 16. "Move Your Career to a Prestigious Address [ad]," <i>Los Angeles Times</i> , February 4, 1989, 16.
1987-1992	Career Counseling and Assessment Associates	Tenant	"Career Counseling is Specialty of Sundby," <i>Los Angeles Times</i> , August 25, 1987, V-A. "Career Counselling and Assessment Associates [ad]," <i>L.A. Weekly</i> , April 2, 1992, 9.
2012-2025	Bootsy Bellows	Tenant	"Bar Opening: Bootsy Bellows," <i>Los Angeles Times</i> , Friday June 22, 2012, D14. Caroline Dalal, "Lights, Luxe, and Late Nights: The Best New Year's Eve Parties in Los Angeles," <i>Resident</i> , December 27, 2024, accessed June 2025, https://resident.com/sports-and-entertainment/2024/12/27/lights-luxe-and-late-nights-the-best-new-years-eve-parties-in-los-angeles .



3.4 Summary of Previous Evaluations

9229 W. Sunset Boulevard was identified in the 2016 Commercial Survey. Following the reconnaissance survey, the building was assigned a status code of 6Z, “appears ineligible for designation at the national, state, and local levels through survey evaluation.” A DPR Form was not prepared.

4. EVALUATION OF ELIGIBILITY

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. Because the subject property is a 1961 commercial building in West Hollywood, the architectural trends, associated property types, eligibility standards, and integrity considerations for the Postwar West Hollywood, 1946-1965 theme from the 2016 Commercial Survey Historic Context was used as a framework for evaluation. Relevant excerpts are included below.

4.1 Theme: Postwar West Hollywood, 1946-1965

4.1.1 Historic Overview

In the post-World War II period, the West Hollywood area became the center of region's creative communities. A burgeoning gallery scene along La Cienega Boulevard in Los Angeles became a nationally recognized destination for modern art. The interior design industry began a gradual ascendancy in the southeast corner of the area as well; by the end of the twentieth century, it would be one of the largest concentrations of interior design businesses in the Pacific Rim. As the creative environment thrived, the Sunset Strip began an era of transition. The time of supper clubs came to a close. By the early 1960s, construction was underway on several high-rise hotel and office buildings with sleek Modern designs along Sunset Boulevard. The older commercial buildings became the home of a new youth culture where teenagers clashed with authorities.²¹

4.1.2 Architectural Trends

The prevalent architectural style for commercial buildings constructed between 1946 and 1965 across the United States was Mid-Century Modern. Emerging from earlier idioms of the Modern movement, Mid-Century Modern was more fully embraced by the public following World War II. The style utilized the industrial materials and streamlined construction techniques developed during the war years. Designs relied on light metal or concrete frames sheathed in thin glass skins over boxy, geometric forms. The unadorned simplicity and technological sophistication of the style demonstrated a “faith in the future and progress.” Mid-Century Modern designs were used for every type of commercial, residential, and institutional building in America.

The style is generally characterized by:

- Flat roofs
- Geometric roof forms, such as folded plates, dramatic gables, and A-frames
- Canted walls
- Wood or stucco siding, often used in combination

²¹ Excerpted from GPA Consulting, *City of West Hollywood Commercial Historic Resources Survey* (West Hollywood Community Development Department, September 2016), 54, accessed June 2024, <https://www.wehopreservation.org/historic-resource-surveys/>.



- Brick or stone veneer often used as primary or accent material
- Flush-mounted-steel framed windows or large single-paned wood-framed windows
- Large, single pane windows
- Clerestory windows²²

4.1.3 Associated Property Types

During the postwar period, the West Hollywood area became nationally recognized as the center of many creative industries. The interior design industry thrived. The gallery scene on La Cienega was known nationwide for its innovative, period-defining artists. Skyscrapers and high-rise Mid-Century Modern towers replaced low-rise commercial buildings along Sunset Boulevard as Santa Monica Boulevard fell into a period of stagnation. At the same time, youth culture dominated the Sunset Strip. New music clubs opened and patrons clashed with law enforcement officials.

Property types associated with this period are scattered throughout the city and include low-rise commercial buildings and high-rise hotel and office buildings. The construction of new commercial buildings; however, was eventually constrained by the lack of undeveloped land along the major transportation corridors of Santa Monica and Sunset Boulevards. As the commercial streets were hemmed in by residential neighborhoods on the north and south, the relatively small parcels restricted opportunity for new development. The subdivision patterns created during the prewar era remained, and favored the construction of relatively small commercial buildings or the alteration of older buildings from the 1920s through 1940s. Consequently, many resources are located in buildings constructed during earlier periods.²³

4.1.4 Eligibility Standards

Eligible resources dating to the period of development between 1946 and 1965 reflect a period of transition. The early 1960s were a time of architectural transformation for West Hollywood, with new construction emerging in the Mid-Century Modern style. Buildings dating to earlier periods of development became the center of the new live music and art scenes. An eligible resource or district must have been important in the commercial, institutional, and architectural development of the city during this period. Examples may include resources related to retail commercial development, office buildings, hotels, early live music venues, galleries, and restaurants. Resources may also be buildings constructed in earlier periods associated with businesses, events, and important individuals who achieved significance in the postwar period.

To be eligible under the Postwar West Hollywood 1946 - 1965 theme, an individual property or district should:

- Be associated with a business, organization, or industry that made important contributions to commercial or institutional growth and development of West Hollywood; or
- Be emblematic of or constructed directly in response to cultural developments that occurred in West Hollywood during the period of significance; or

²² Excerpted from GPA Consulting, *Commercial Historic Resources Survey*, 65-66.

²³ Excerpted from GPA Consulting, *Commercial Historic Resources Survey*, 67.



- Be fully realized example of the style or property type, displaying the significant character-defining features of a style or property type in multiple aspects of design; and
- Date from the period of significance; and
- Retain the essential aspects of integrity [see **Integrity Considerations**, below].²⁴

4.1.5 Integrity Considerations

- Should retain integrity of Location, Design, Feeling, Materials, and Association from the period of significance
- Integrity is based on the period during which the significant business, industry, or events took place at the property or the period of initial construction reflecting the original design and architectural character of the resource
- Setting may be compromised by nearby construction that post-dates the period.
- The majority of the resource's materials and design features from the period of significance must remain intact and visible, including wall cladding, windows, fenestration pattern, roof features, and details related to its architectural style²⁵

²⁴ Excerpted from GPA Consulting, *Commercial Historic Resources Survey*, 67.

²⁵ Excerpted from GPA Consulting, *Commercial Historic Resources Survey*, 68.



5. EVALUATION OF ELIGIBILITY

5.1 National Register and California Register

Because the National Register and California Register criteria are closely mirrored (see **Section 2**), the evaluation below addresses eligibility for national and state listing simultaneously.

Criterion A/1

To be eligible under Criterion A/1, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The property was evaluated within the context of Commercial Development and theme of Postwar West Hollywood, 1945-1965. The following Eligibility Standards for this context and theme in the 2016 Commercial Survey Historic Context Statement are relevant to Criterion A/1 (see **Section 4.1**):

- *Be associated with a business, organization, or industry that made important contributions to commercial or institutional growth and development of West Hollywood.*
 - Research revealed that the original owner was the Buckeye Construction Company, and that there were a number of business occupants associated with commercial development during the 1960s; however, *National Register Bulletin 15* states that “mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: a property’s specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.”²⁶ No evidence was found to suggest that any of the businesses or organizations made an *important* contribution to the commercial development of West Hollywood.
- *Be emblematic of or constructed directly in response to cultural developments that occurred in West Hollywood during the period of significance.*

The building was developed by Buckeye Construction Company as part of a business model that they established as early as 1953, wherein they constructed commercial office buildings in major cities while other developers typically focused on suburban residential development. By 1958, Buckeye Construction Company had constructed thousands of square feet of leasable commercial space in the Los Angeles area and was expanding into other service areas in the Southwest region.²⁷ This suggests that the construction of the subject building is more directly associated with the expansion and business strategy of the Buckeye Construction Company rather than any specific cultural developments in West Hollywood. Therefore, for the reasons discussed above, the subject property does not meet the Eligibility Standards for properties evaluated within the theme of Postwar West Hollywood, 1946-1965 and does not appear to be eligible under Criterion A/1.

Criterion B/2

To be eligible under Criterion B/2, a property must be associated with the lives of persons significant in our past.

The research summarized in **Section 3.3** identified numerous businesses associated with the property over time but did not reveal any evidence to suggest that any of the businesses made demonstrably significant contributions to history. Many people have worked at the various businesses that have occupied the subject

²⁶ National Register Bulletin 15, 12.

²⁷ “Buckeye Builders Active.”



property since its construction; however, collaborative efforts like these are generally evaluated under Criterion A.²⁸

Therefore, the subject property does not appear to be eligible under Criterion B/2.

Criterion C/3

To be eligible under Criterion C/3, a property must embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or lastly, represent a significant and distinguishable entity whose components may lack individual distinction. The property was evaluated within the context of Commercial Development and theme of Postwar West Hollywood, 1945-1965 as an example of a high-rise office tower in the Mid-Century Modern style. The following Eligibility Standards for this context and theme in the 2016 Commercial Survey Historic Context Statement are relevant to Criterion C/3 (see **Section 4.1**):

- *Be fully realized example of the style or property type, displaying the significant character-defining features of a style or property type in multiple aspects of design.*
 - o While the subject property was an example of Mid-Century Modern style as applied to a high-rise office building at the time of construction (see **Figure 13**), it has undergone numerous exterior alterations. As a result, it no longer embodies the distinctive characteristics of a type, method, or period of construction, nor meets the Integrity Considerations for properties evaluated under the theme of Postwar West Hollywood, 1946-1965.

According to National Register Bulletin 15, to be eligible as the work of a master, or a “figure of generally recognized greatness in a field,” a property must “express a particular phase in the development of the master’s career, an aspect of [their] work, or a particular idea or theme in [their] craft. A property is not eligible as the work of a master, for example, just because it was designed by a master architect.”²⁹ The subject property was designed by Victor Gruen Associates (now Gruen Associates), a firm that is widely considered to be innovative and influential, particularly within the realms of postwar commercial shopping center design and urban planning; however, as an individual commercial office tower, the subject property is not closely associated with these key themes within their body of work. Furthermore, due to the extent of the alterations, the building no longer reflects the original design intent. While Buckeye Construction Company was a prolific and successful contractor and development firm, research did not reveal any evidence to suggest that they would be considered a master within the field of construction.

The possession of high artistic values refers to the articulation of a particular concept of design so fully that it expresses an aesthetic ideal, which is not the case for the subject property.

The last component of Criterion C/3 generally refers to historic districts. *National Register Bulletin 15* states that “a district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”³⁰ Although the properties surrounding the subject property are commercial in use, they represent a range of commercial building types, sizes, construction dates, and levels of integrity such that a potential historic district does not appear to exist. Furthermore, a potential historic district was not identified in this area during the 2016 Commercial Survey.

²⁸ National Register Bulletin 15, 15.

²⁹ National Register Bulletin 15, 20.

³⁰ National Register Bulletin 15, 5.



Therefore, for the reasons discussed above, the subject property does not meet the Eligibility Standards or for properties evaluated within the theme of Postwar West Hollywood, 1946-1965 and does not appear to be eligible under Criterion C/3.

Criterion D/4

To be eligible under Criterion D/4, a property must have yielded, or have potential to yield, information important in prehistory or history.

Criterion D/4 generally applies to archaeological resources, but may apply to a built resource in instances where the resource may contain important information about such topics as construction techniques or human activity. In any case, the resource must be the principal source of information, which does not appear to be true for the subject property.

Therefore, the property does not appear to be eligible under Criterion D/4.

5.2 West Hollywood Register of Cultural Resources

Criterion A.1

To be eligible under local Criterion A.1, a property must embody distinctive characteristics of a period, method, style, or type of construction, or be a valuable example of the use of indigenous materials or craftsmanship.

Due to numerous exterior alterations since 1961, the subject property no longer embodies the distinctive characteristics of that period, method, style, and type of construction. As a Mid-Century Modern building constructed with widely available materials such as glass, granite, and stucco and since altered with contemporary materials and techniques, the subject property would not represent a valuable example of the use of indigenous materials or craftsmanship.

The remainder of this criterion mirrors the first portion of National and California Register Criteria C/3; therefore, the subject property does not appear to be eligible under local Criterion A.1 for the reasons discussed above and on page 23.

Criterion A.2

To be eligible under local Criterion A.2, a property must contribute to the significance of a geographically definable area that possesses a concentration of historic or scenic properties; or contribute to a thematically related grouping of properties aesthetically unified by plan or physical development.

This criterion mirrors the last portion of National and California Register Criterion C/3; therefore, the subject property does not appear to be eligible under local Criterion A.2 as a contributing element to a larger concentration of resources for the reasons discussed beginning on page 23.

Criterion A.3

To be eligible under local Criterion A.3, a property must reflect significant geographical patterns, such as those associated with eras of growth or settlement, modes of transportation, or distinctive examples of community or park planning.

This criterion mirrors National and California Register Criteria A/1; therefore, the subject property does not appear to be eligible under local Criterion A.3 for the reasons discussed beginning on page 22.

Criterion A.4

To be eligible under local Criterion A.4, a property must embody elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation.



As previously discussed, the subject property has been altered such that it no longer embodies the original architectural design, craftsmanship, detail, or materials that may have represented a significant architectural achievement.

Therefore, the subject property does not appear to be eligible under local Criterion A.4.

Criterion A.5

To be eligible under local Criterion A.5, a property must have a unique location or singular physical characteristic, or be a view or vista that represents an established and familiar visual feature of a neighborhood, community or the city.

Although the subject property is located at the prominent intersection of Sunset Boulevard and Doheny Road, the subject property does not appear to possess any singular visual characteristic that would distinguish it from other commercial office towers throughout the City. Lastly, there is no reason to believe that it would constitute a familiar view or vista that is widely associated with West Hollywood, or a neighborhood or community within West Hollywood.

Therefore, the subject property does not appear to be eligible under local Criterion A.5.

Criterion B

To be eligible under local Criterion B, a property must be one of few remaining examples in the city, region, state, or nation that possesses the distinguishing characteristics of an architectural or historical type or specimen.

As one of several commercial towers built in the 1960s at the intersection of Sunset Boulevard and Doheny Road alone, there is no reason to believe that the subject property is one of few remaining examples of the type in the City. As previously discussed, alterations have diminished the subject property's ability to embody the Mid-Century Modern style.

Therefore, the subject property does not appear to be eligible under local Criterion B.

Criterion C

To be eligible under local Criterion C, a property must be identified with persons or events significant in local, state, or national history.

This criterion mirrors National and California Register Criteria A/1 and B/2; therefore, the subject property does not appear to be eligible under local Criterion C for the reasons discussed on page 22.

Criterion D

To be eligible under local Criterion D, a property must be representative of the work of a notable architect, builder, or designer.

This criterion mirrors a portion of National and California Register Criteria C/3; therefore, the subject property does not appear to be eligible under local Criterion D for the reasons discussed on page 24.

5.3 Integrity

It is standard practice to assess a property's integrity as part of a historic evaluation. Integrity is a property's ability to convey its historic significance through its physical features. *National Register Bulletin 15* defines seven aspects of integrity: Location, design, setting, materials, workmanship, feeling, and association. To convey significance, a property must retain some combination of these aspects of integrity from its period of significance. The aspects of integrity that are essential vary depending on the potential significance of the



resource. For a property to meet eligibility criteria, a property must have both significance and exhibit sufficient integrity to convey that significance.

The Integrity Considerations for properties evaluated within the Postwar West Hollywood, 1946-1965 theme (see **Section 4.1.5**) indicate that the resource should retain integrity of location, design, feeling, materials, and association from the period of significance. The Integrity Considerations also indicate that the majority of the resource's materials and design features from the period of significance must remain intact and visible, including wall cladding, windows, fenestration pattern, roof features, and details related to its architectural style. As outlined in **Section 3.2**, the building has undergone a number of changes to all of these features, including alterations to the wall cladding, windows and fenestration pattern, roof features on the pavilion, and removal of original decorative features.

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

The subject property has not been moved since its construction and therefore retains integrity of location.

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

While the original function of the subject property is evident, the integrity of design has been diminished over time by changes that obscure the original design intent and make it less readily identifiable as a Mid-Century Modern building (see **Section 3.2**).

Setting: The physical environment of the historic property.

The immediate setting of the property appears to be intact, including the siting of the building on its lot. The surrounding setting has changed over time due to ongoing development and new construction, but the overall physical environment of the subject property is evident as commercial development along a major corridor.

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

The subject property no longer retains integrity of materials following the application of contemporary cladding materials, removal of original decorative features, windows, and doors, and installation of contemporary replacements (see **Section 3.2**).

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

Similarly, the integrity of workmanship has been diminished by alterations including changes to the cladding, windows, entrances, and pavilion that have obscured or removed physical evidence of early 1960s construction techniques (see **Section 3.2**).

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

With integrity of design, materials, and workmanship no longer intact, the subject property no longer fully evokes the feeling of a commercial office tower from the 1960s.

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

The loss of physical integrity has diminished the subject property's ability to convey any potentially significant associations.

Therefore, for the reasons discussed above, the subject property does not meet the Integrity Considerations for properties evaluated within the theme of Postwar West Hollywood, 1946-1965.



6. CONCLUSIONS

The subject property is not currently listed under any national, state, or local landmark or historic district program. It was identified in the 2016 Commercial Survey and assigned a status code of 6Z, indicating that it was found ineligible for designation at the national, state, and local levels through survey evaluation.

Through research, fieldwork, and an evaluation under national, state, and local criteria, GPA concludes that the 2016 finding is still valid. The property does not appear to be eligible for listing in the National Register or California Register, or for local designation on the City's Register of Cultural Resources due to a lack of significance and diminished integrity following numerous exterior alterations. The property does not meet the Eligibility Standards or Integrity Considerations for properties evaluated within the Postwar West Hollywood, 1946-1965 theme of the 2016 Commercial Survey Historic Context Statement. Lastly, the subject property does not appear to contribute to a potential historic district.

Therefore, the subject property does not appear to be a historical resource as defined by CEQA. The recommended Status Code for the subject property is 6Z: ineligible for designation at the national, state, and local levels through survey evaluation.

Thank you for your consideration of this memo. I am available to answer any questions you might have via email at amanda@gpaconsulting-us.com.

Sincerely,



Amanda Duane, Senior Architectural Historian

Attachments:

Attachment A: Résumés

Attachment B: DPR Form

7. SOURCES

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Attachment A: Résumés



AMANDA DUANE



Amanda Duane is a Senior Architectural Historian at GPA. She has been involved in the field of historic preservation since 2011. Amanda graduated from Savannah College of Art and Design with a Bachelor of Fine Art degree in Historic Preservation. She has since worked in local government and private historic preservation consulting in California. Amanda joined GPA in 2012 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record recordation; large-scale historic resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; National Register Place nominations; local landmark applications; historic context statements; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is experienced in expertly guiding property owners through the process of securing local and federal historic tax credits and working with local governments to develop design guidelines for administering local design reviews. Amanda is also highly skilled in graphic design as well as interpretation and exhibition design.

Educational Background:

- B.F.A, Historic Preservation, Savannah College of Art and Design, 2011

Professional Experience:

- GPA Consulting, Senior Architectural Historian, 2021-Present
 - Associate Architectural Historian, 2017-2021
 - Architectural Historian II, 2014-2017
 - Architectural Historian I, 2012-2014
- Architectural Resources Group, Intern, 2012
- City of Los Angeles, Office of Historic Resources, Intern, 2011-2012

Qualifications:

- Meets the Secretary of the Interior's Professional Qualification Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- National Preservation Institute, Section 106: An Introduction

Professional Activities:

- California Preservation Foundation Conference Programs Committee, 2017

Selected Projects:

- 10510-10536 Culver Boulevard, CEQA Historical Resource Evaluation Report, Culver City, 2023
- 122 Hart Avenue, CEQA Historical Resource Evaluation Report, Santa Monica, 2023
- 1500 W. Adams Boulevard, CEQA Historical Resource Technical Report, Los Angeles, 2022-2024
- 2501 Curtis Avenue, CEQA Historical Resource Evaluation Report, Redondo Beach, 2021-2022
- 38258, 38270, 38324-25 Fremont Boulevard, CEQA Historical Resource Evaluation Report, 2024
- 400-432 S. San Vicente Boulevard, CEQA Historical Resource Evaluation Report, Los Angeles, 2023
- 434 Aster Street, CEQA Historical Resource Evaluation Report, Laguna Beach, 2023
- 519 Westmount Drive, CEQA Historical Resource Assessment Memo, West Hollywood, 2024
- 5679 Corso di Napoli, CEQA Historical Resource Evaluation Report, Long Beach, 2025
- 612 N. Beverly Drive, Due Diligence Memorandum, Beverly Hills, 2024
- 9247 Alden Drive, CEQA Historical Resource Assessment Report, Beverly Hills, 2024
- 936-962 Seward Street, 949-959 Hudson Avenue, CEQA Historical Resource Evaluation Report, Los Angeles, 2023
- Las Palmas Senior Center, CEQA Historical Resource Evaluation Report, Los Angeles, 2023-2024
- Commercial Historic Resources Survey, West Hollywood, 2016
- Historic Context Statement and Historic Resources Survey Update of Residential Properties in the R2, R3, & R4 Zones, West Hollywood, 2020-2025



PHOEBE RAYBURN



Phoebe Rayburn is an Architectural Historian I at GPA. She has been involved with the field of historic preservation since 2024. Phoebe graduated from the College of Charleston with a bachelor's degree in historic preservation and community planning and a minor in art history. At GPA, she assists the architectural historian team with the preparation of environmental compliance documents in accordance with the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA), and the Secretary of the Interior's Standards (SOIS). Prior to GPA, Ms. Rayburn was a preservation intern at the Historic Charleston Foundation, where she performed historic property inspections, coordinated inspection schedules, prepared and mailed inspection reports, and performed archival research on endangered historic properties for presentation. She is proficient in a number of software programs, including AutoCAD, Adobe InDesign, SketchUp, Adobe Photoshop and Lightroom, and Microsoft Office. She uses these skills to add depth to her analyses and reports in the form of maps, illustrations, and graphics.

Educational Background:

- B.A., Historic Preservation and Community Planning, Minor in Art History, College of Charleston, 2024

Professional Experience:

- GPA Consulting, Architectural Historian I, February 2025 – Present
- Historic Charleston Foundation, Preservation Intern, January 2024 – May 2024

Selected Projects:

- 12482 Putnam Street, CEQA Historical Resource Evaluation Report, Whittier, 2025
- 1323 South Pacific Street, CEQA Historical Resources Evaluation Report, Oceanside, 2025
- 145 S. Earlham Street, Design Standards Memo, Orange, 2025
- 405 E. Toluca Street, Design Standards Memo, Orange, 2025
- 442 S. Shaffer Street, Design Standards Memo, Orange, 2025
- 5679 Corso di Napoli, CEQA Historical Resource Evaluation Report, Long Beach, 2025
- 8910-8924 Ardendale Avenue, CEQA Historical Resource Evaluation Report, San Gabriel, 2025
- El Nido Fire Station Replacement, Section 106 Historic Property Survey Report, Merced County, 2025
- Henningsen-Lotus Road Multi-Use Trail, Section 106 Historic Property Survey Report, El Dorado County, 2025
- I-405 Auxiliary Lanes from I-110 to Wilmington, Section 106 Historic Property Survey Report, Los Angeles County, 2025
- Kensington Historic District, National Register of Historic Places Nomination Form, San Diego, 2025
- Lodi Downtown Specific Plan, Historic Resources Inventory, Lodi, 2025
- Telegraph Road over San Gabriel River Bridge, Section 106 Historic Property Survey Report, Pico Rivera, 2025
- Washington Boulevard Bridge over Rio Hondo Channel, Section 106 Historic Property Survey Report, Pico Rivera, 2025



Attachment B: DPR Form

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomia _____
NRHP Status Code 6Z

Other Listings _____
Review Code _____ Reviewer _____ Date _____

Page 1 of 10 *Resource Name or #: (Assigned by recorder) 9229 W. Sunset Boulevard

P1. Other Identifier: _____

*P2. Location: ☐ Not for Publication ☒ Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Beverly Hills Date 1966 T 1S ; R 14W ; Unsectioned Rancho Land ; Mt. Diablo **B.M**

c. Address 9229 W. Sunset Boulevard City West Hollywood Zip 90069

d. UTM: (Give more than one for large and/or linear resources) Zone 11S , 371479.91 mE 3773049.41 mN

e. Other Locational Data: APN 4350-001-033

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and The subject property is improved with a nine-story commercial building constructed in 1961, consisting of a two-story base, seven-story office tower, one-story pavilion, and partially subterranean parking.

The commercial building is rectangular in plan and the connected pavilion is roughly triangular in plan. The primary elevation of the main building faces south towards West Sunset Boulevard and it has a flat roof with raised parapet and a mechanical and/or elevator penthouse at the center. The exterior includes concrete foundation walls, marble panels, narrow frosted glass panels, and textured stucco. Along the ground level of the south (side) elevation moving west to east, there is: an open garage entrance, a pair of frameless glass doors, a group of fixed butted glass windows, and a recessed main entrance with floor-to-ceiling butted glass windows and a pair of frameless glass doors. Above the ground level, there is a decorative frieze consisting of narrow frosted glass panels that wraps around the south elevation and cantilevers off the west elevation over the neighboring driveway. Above the frieze is a ribbon of fixed reflective glass windows. The upper eight stories on the south elevation are set back from the first two stories. They are ten bays wide; each bay has a group of three single-light reflective glass windows in a row above a painted stucco spandrel panel.

(See Continuation Sheet).

*P3b. Resource Attributes: (List attributes and codes) HP7. 3+ story commercial building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present:

☒ Building ☐ Structure ☐ Object ☐ Site
☐ District ☐ Element of District ☐ Other
(Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) looking NW, 5/29/25

*P6. Date Constructed/Age and

Source: ☒ Historic ☐ Prehistoric

☐ Both

1961 LA County Tax Assessor

*P7. Owner and Address:

SUNSET SIERRA PROPERTIES INC

9255 W SUNSET BLVD #330

WEST HOLLYWOOD CA 90069

*P8. Recorded by:

Amanda Duane , GPA Consulting

840 Apollo Street, Suite 312

El Segundo, CA 90245

*P9. Date 6/24/2025

*P10. Survey Type: (Describe)

Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting, Historical Resource Evaluation Memorandum: 9229 W. Sunset Boulevard, June 20, 2025

*Attachments: ☐ NONE ☐ Location Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record

☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record

☐ Rock Art Record ☐ Artifact Record ☐ Photograph Record

☐ Other _____

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code 6Z

Page 2 of 10

*Resource Name or #: (Assigned by recorder) 9229 W. Sunset Boulevard

B1. Historic Name: City National Bank

B2. Common Name: None

B3. Original Use: Commercial

B4. Present Use: Commercial

*B5. Architectural Style: Mid-Century Modern

*B6. Construction History: (Construction date, alterations, and date of alterations)

See Continuation Sheet.

*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date _____ Original Location _____

*B8. Related Features:

None.

B9a. Architect: Victor Gruen Associates b. Builder: Buckeye Construction Company

*B10. Significance: Theme Commercial Development, Postwar West Hollywood Area West Hollywood

Period of Significance 1945-1965 Property Type Commercial Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

National Register and California Register

Criterion A/1

To be eligible under Criterion A/1, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The property was evaluated within the context of Commercial Development and theme of Postwar West Hollywood, 1945-1965. The following Eligibility Standards for this context and theme in the 2016 Commercial Survey Historic Context Statement are relevant to Criterion A/1:

- Be associated with a business, organization, or industry that made important contributions to commercial or institutional growth and development of West Hollywood.
 - o Research revealed that the original owner was the Buckeye Construction Company, and that there were a number of business occupants associated with commercial development during the 1960s; however, *National Register Bulletin 15* states that "mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: a property's specific association must be considered important as well.

(See Continuation Sheet.)

B11. Additional Resource Attributes: (List attributes and codes) _____

*B12. References:

See Continuation Sheet.

B13. Remarks:

None

*B14. Evaluator: Amanda Duane, GPA Consulting

*Date of Evaluation 6/24/2025

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



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*Date: 6/24/2025

☒ Continuation ☐ Update

***P3a. Description (continued from page 1):**

The east elevation of the office tower is set back behind the pavilion and faces the intersection of West Sunset Boulevard and Doheny Road. The exterior wall is stucco with a painted advertisement and has a narrow ribbon of butted glass windows on all seven floors. A sign along the roofline reads "City National Bank." The pavilion extending from the east end of the commercial building has a flat roof, concrete foundation walls, steel-framed window walls on its north, east, and south elevations, and paired frameless glass doors. Vertical metal fins extend past the roofline and there is signage reading "City National Bank" above the pavilion entrance on the east elevation. The entrance is accessed by a set of concrete stairs with metal railing.

At the east end of the north elevation there is a curved wall connecting the pavilion to the ground level of the office tower. The curved wall has a concrete foundation with decorative scoring, narrow frosted glass panels, and a single metal door. The first two stories of the north elevation of the office tower are recessed and the overhang is supported by square concrete pillars. Moving east to west, there is: a metal entrance door, an open garage entrance, a second metal door, and a second open garage entrance. Above the second garage entrance on the second story there are six sash windows. There is a small surface parking lot between the street and the building. The east elevation of the office tower has a narrow ribbon of butted glass windows punctuated by a balcony opening on all seven floors.

The west (side) elevation faces the neighboring building's driveway. The office tower is recessed above the concrete foundation walls and marble panels. The elevation has a narrow ribbon of butted glass windows on all seven floors.

The pavilion extending from the east end of the commercial building has a flat roof, concrete foundation walls, steel-framed window walls on its north, east, and south elevations, and paired frameless glass doors. Vertical metal fins extend past the roofline and there is signage reading "City National Bank" above the pavilion entrance on the east elevation. The entrance is accessed by a set of concrete stairs with metal railing.

***B6. Construction History (continued from Page 2):**



Figure 1: 9229 W, Sunset Boulevard, c. 1961, view looking northwest. Historic photo courtesy of Adsauseage Los Angeles Photo Archive, www.adsauseage.com

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☒ Continuation ☐ Update

Comparing the appearance of the building from the May 2025 field survey to a detailed historic photo, a number of exterior alterations are evident:

- Modification/replacement of one-story pavilion walls and roof;
- Removal of the geometric screen on the east and west elevations of the office tower;
- Removal/replacement of the faced granite cladding along the ground level;
- Replacement of original windows on the office tower;
- Modification of windows along the second-story;
- Modification of entrances/openings along ground level of south elevation, including addition of new canopy over main entrance;
- Installation of frosted glass paneling along two-story base and north elevation ground level.

Building permit records for West Hollywood are not complete before the City's incorporation in 1984. The earliest records date to 1939, but most of these consist of scanned copies that are not always fully legible. More recent permit information is available on the City's website but details such as architect or contractor are not included. Available information from building permits for exterior alterations is summarized in **Table 1** below; the table does not list the numerous permits for interior tenant improvements (e.g., partitions, remodeling) or mechanical, electrical, and plumbing work.

Date	Permit #	Description of Work	Architect	Contractor
9/11/1959	2351	Preliminary grading + excavation for structure	Victor Gruen Assoc.	[illegible]
12/17/1959	2901	Foundation walls and shoring retaining walls	Victor Gruen	Buckeye Const. Co.
1959	[illegible]	Offices and Stores - Buckeye Const Co. [9 stories]	Victor Gruen Assoc.	Buckeye Const. Co.
1960	[illegible]	Change of footing	Victor Gruen	—
9/22/1960	[illegible]	Office bldg. revision to conc. frame 3 rd floor	Victor Gruen	Buckeye Const. Co
4/18/1961	8588	4-single face wall signs – incl. letters	—	Brite Lite Neon
7/18/1961	9245	Decorative aluminum screen	Victor Gruen Assoc.	Buckeye Const. Co.
[Illegible]	[Illegible]	Decorative screen ¹	Victor Gruen Assoc.	Buckeye Const. Co.
1/29/1962	652	Wall sign 1'-10" x 4'2"	—	QRS Neon
7/23/1962	1966	Erect 7 sq. ft. wall sign over rear door	—	QRS Neon
9/21/1964	2531	(1) single face [incl] illum. sign on lower south wall-sign "C"	—	Federal Sign & Signal
9/21/1964	2533	Single face illum. Letters on east canopy – sign "B"	—	Federal Sign & Signal
9/21/1964	2535	One single face illum letter sign on east elevation – sign "A"	—	Federal Sign & Signal
[Illegible]	9792	Install fish and letters on wall	—	Superior Elect.
[illegible]	1610	Install wall sign	—	QRS Neon
12/22/1965	5797	Install (1) single face illuminated wall sign 24' x 2'6"	—	Federal Sign & Signal
9/15/1965	5227	Install illuminated letters	—	20 th Century Lites
[Illegible]	9792	Install fish and letters on wall	—	Superior Elect.
[illegible]	1610	Install wall sign	—	QRS Neon
1992	B91-000-958	Exterior renovation	—	—

¹ Note on scanned permit says, "Abandoned 7-26-1961." This scope of work appears to have been completed with Permit No. 9245.

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Date	Permit #	Description of Work	Architect	Contractor
1992	B92-001-172	Install rooftop window washing system.	—	—
2003	B03-003-602	Commercial tenant – façade remodel of existing restraint.	—	—
2008	B08-000-235	Re-roof of commercial building – built-up.	—	—
2010	B09-000-755	Commercial tenant – façade remodel only.	—	—
2016	B16-0989	Facade change and renovate lobby (expired)		
2017	B17-0496	Facade change and renovate lobby (expired)	—	—

***B10. Significance (continued from Page 2):**

For example, a building historically in commercial use must be shown to have been significant in commercial history.”² No evidence was found to suggest that any of the businesses or organizations made an *important* contribution to the commercial development of West Hollywood.

- *Be emblematic of or constructed directly in response to cultural developments that occurred in West Hollywood during the period of significance.*
 - o The building was developed by Buckeye Construction Company as part of a business model that they established as early as 1953, wherein they constructed commercial office buildings in major cities while other developers typically focused on suburban residential development. By 1958, Buckeye Construction Company had constructed thousands of square feet of leasable commercial space in the Los Angeles area and was expanding into other service areas in the Southwest region.³ This suggests that the construction of the subject building is more directly associated with the expansion and business strategy of the Buckeye Construction Company rather than any specific cultural developments in West Hollywood.

Therefore, for the reasons discussed above, the subject property does not meet the Eligibility Standards for properties evaluated within the theme of Postwar West Hollywood, 1946-1965 and does not appear to be eligible under Criterion A/1.

Criterion B/2

To be eligible under Criterion B/2, a property must be associated with the lives of persons significant in our past.

The research conducted for this evaluation identified numerous businesses associated with the property over time but did not reveal any evidence to suggest that any of the businesses made demonstrably significant contributions to history. Many people have worked at the various businesses that have occupied the subject property since its construction; however, collaborative efforts like these are generally evaluated under Criterion A.⁴

Therefore, the subject property does not appear to be eligible under Criterion B/2.

Criterion C/3

To be eligible under Criterion C/3, a property must embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or lastly, represent a significant and distinguishable entity whose components may lack individual distinction. The property was evaluated within the context of Commercial Development and theme of Postwar West Hollywood, 1945-1965 as an example of a high-rise office tower in the Mid-Century Modern style. The following Eligibility Standards for this context and theme in the 2016 Commercial Survey Historic Context Statement are relevant to Criterion C/3:

² National Register Bulletin 15, 12.

³ “Buckeye Builders Active,” *Westwood Hills Press*, May 22, 1958, 17, accessed June 2025, Newspapers.com.

⁴ National Register Bulletin 15, 15.

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- *Be fully realized example of the style or property type, displaying the significant character-defining features of a style or property type in multiple aspects of design.*
 - o While the subject property was an example of Mid-Century Modern style as applied to a high-rise office building at the time of construction, it has undergone numerous exterior alterations. As a result, it no longer embodies the distinctive characteristics of a type, method, or period of construction, nor meets the Integrity Considerations for properties evaluated under the theme of Postwar West Hollywood, 1946-1965.

According to National Register Bulletin 15, to be eligible as the work of a master, or a "figure of generally recognized greatness in a field," a property must "express a particular phase in the development of the master's career, an aspect of [their] work, or a particular idea or theme in [their] craft. A property is not eligible as the work of a master, for example, just because it was designed by a master architect."⁵ The subject property was designed by Victor Gruen Associates (now Gruen Associates), a firm that is widely considered to be innovative and influential, particularly within the realms of postwar commercial shopping center design and urban planning; however, as an individual commercial office tower, the subject property is not closely associated with these key themes within their body of work. Furthermore, due to the extent of the alterations, the building no longer reflects the original design intent. While Buckeye Construction Company was a prolific and successful contractor and development firm, research did not reveal any evidence to suggest that they would be considered a master within the field of construction.

The possession of high artistic values refers to the articulation of a particular concept of design so fully that it expresses an aesthetic ideal, which is not the case for the subject property.

The last component of Criterion C/3 generally refers to historic districts. *National Register Bulletin 15* states that "a district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development."⁶ Although the properties surrounding the subject property are commercial in use, they represent a range of commercial building types, sizes, construction dates, and levels of integrity such that a potential historic district does not appear to exist. Furthermore, a potential historic district was not identified in this area during the 2016 Commercial Survey.

Therefore, for the reasons discussed above, the subject property does not meet the Eligibility Standards or for properties evaluated within the theme of Postwar West Hollywood, 1946-1965 and does not appear to be eligible under Criterion C/3.

Criterion D/4

To be eligible under Criterion D/4, a property must have yielded, or have potential to yield, information important in prehistory or history.

Criterion D/4 generally applies to archaeological resources, but may apply to a built resource in instances where the resource may contain important information about such topics as construction techniques or human activity. In any case, the resource must be the principal source of information, which does not appear to be true for the subject property.

Therefore, the property does not appear to be eligible under Criterion D/4.

West Hollywood Register of Cultural Resources

Criterion A.1

To be eligible under local Criterion A.1, a property must embody distinctive characteristics of a period, method, style, or type of construction, or be a valuable example of the use of indigenous materials or craftsmanship.

Due to numerous exterior alterations since 1961, the subject property no longer embodies the distinctive characteristics of that period, method, style, and type of construction. As a Mid-Century Modern building constructed with widely available materials such as glass, granite, and stucco and since altered with contemporary materials and techniques, the subject property would not represent a valuable example of the use of indigenous materials or craftsmanship.

⁵ National Register Bulletin 15, 20.

⁶ National Register Bulletin 15, 5.

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The remainder of this criterion mirrors the first portion of National and California Register Criteria C/3; therefore, the subject property does not appear to be eligible under local Criterion A.1 for the reasons discussed above and on page 5.

Criterion A.2

To be eligible under local Criterion A.2, a property must contribute to the significance of a geographically definable area that possesses a concentration of historic or scenic properties; or contribute to a thematically related grouping of properties aesthetically unified by plan or physical development.

This criterion mirrors the last portion of National and California Register Criterion C/3; therefore, the subject property does not appear to be eligible under local Criterion A.2 as a contributing element to a larger concentration of resources for the reasons discussed beginning on page 5.

Criterion A.3

To be eligible under local Criterion A.3, a property must reflect significant geographical patterns, such as those associated with eras of growth or settlement, modes of transportation, or distinctive examples of community or park planning.

This criterion mirrors National and California Register Criteria A/1; therefore, the subject property does not appear to be eligible under local Criterion A.3 for the reasons discussed beginning on page 2.

Criterion A.4

To be eligible under local Criterion A.4, a property must embody elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation.

As previously discussed, the subject property has been altered such that it no longer embodies the original architectural design, craftsmanship, detail, or materials that may have represented a significant architectural achievement.

Therefore, the subject property does not appear to be eligible under local Criterion A.4.

Criterion A.5

To be eligible under local Criterion A.5, a property must have a unique location or singular physical characteristic, or be a view or vista that represents an established and familiar visual feature of a neighborhood, community or the city.

Although the subject property is located at the prominent intersection of Sunset Boulevard and Doheny Road, the subject property does not appear to possess any singular visual characteristic that would distinguish it from other commercial office towers throughout the City. Lastly, there is no reason to believe that it would constitute a familiar view or vista that is widely associated with West Hollywood, or a neighborhood or community within West Hollywood.

Therefore, the subject property does not appear to be eligible under local Criterion A.5.

Criterion B

To be eligible under local Criterion B, a property must be one of few remaining examples in the city, region, state, or nation that possesses the distinguishing characteristics of an architectural or historical type or specimen.

As one of several commercial towers built in the 1960s at the intersection of Sunset Boulevard and Doheny Road alone, there is no reason to believe that the subject property is one of few remaining examples of the type in the City. As previously discussed, alterations have diminished the subject property's ability to embody the Mid-Century Modern style.

Therefore, the subject property does not appear to be eligible under local Criterion B.

Criterion C

To be eligible under local Criterion C, a property must be identified with persons or events significant in local, state, or national history.

This criterion mirrors National and California Register Criteria A/1 and B/2; therefore, the subject property does not appear to be eligible under local Criterion C for the reasons discussed on page 2 and 4-5.

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*Date: 6/24/2025

☒ Continuation ☐ Update

Criterion D

To be eligible under local Criterion D, a property must be representative of the work of a notable architect, builder, or designer.

This criterion mirrors a portion of National and California Register Criteria C/3; therefore, the subject property does not appear to be eligible under local Criterion D for the reasons discussed beginning on page 5.

Integrity

It is standard practice to assess a property's integrity as part of a historic evaluation. Integrity is a property's ability to convey its historic significance through its physical features. *National Register Bulletin 15* defines seven aspects of integrity: Location, design, setting, materials, workmanship, feeling, and association. To convey significance, a property must retain some combination of these aspects of integrity from its period of significance. The aspects of integrity that are essential vary depending on the potential significance of the resource. For a property to meet eligibility criteria, a property must have both significance and exhibit sufficient integrity to convey that significance.

The Integrity Considerations for properties evaluated within the Postwar West Hollywood, 1946-1965 theme indicate that the resource should retain integrity of location, design, feeling, materials, and association from the period of significance. The Integrity Considerations also indicate that the majority of the resource's materials and design features from the period of significance must remain intact and visible, including wall cladding, windows, fenestration pattern, roof features, and details related to its architectural style. As outlined above, the building has undergone a number of changes to all of these features, including alterations to the wall cladding, windows and fenestration pattern, roof features on the pavilion, and removal of original decorative features.

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

The subject property has not been moved since its construction and therefore retains integrity of location.

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

While the original function of the subject property is evident, the integrity of design has been diminished over time by changes that obscure the original design intent and make it less readily identifiable as a Mid-Century Modern building.

Setting: The physical environment of the historic property.

The immediate setting of the property appears to be intact, including the siting of the building on its lot. The surrounding setting has changed over time due to ongoing development and new construction, but the overall physical environment of the subject property is evident as commercial development along a major corridor.

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

The subject property no longer retains integrity of materials following the application of contemporary cladding materials, removal of original decorative features, windows, and doors, and installation of contemporary replacements.

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

Similarly, the integrity of workmanship has been diminished by alterations including changes to the cladding, windows, entrances, and pavilion that have obscured or removed physical evidence of early 1960s construction techniques.

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

With integrity of design, materials, and workmanship no longer intact, the subject property no longer fully evokes the feeling of a commercial office tower from the 1960s.

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

The loss of physical integrity has diminished the subject property's ability to convey any potentially significant associations.

Therefore, for the reasons discussed above, the subject property does not meet the Integrity Considerations for properties evaluated within the theme of Postwar West Hollywood, 1946-1965.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary # _____
HRI # _____
Trinomial _____

Page 9 of 10 *Resource Name or #: (Assigned by recorder) 9229 W, Sunset Boulevard

*Recorded By: Amanda Duane, GPA Consulting

*Date: 6/24/2025

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Conclusion

The subject property is not currently listed under any national, state, or local landmark or historic district program. It was identified in the 2016 Commercial Survey and assigned a status code of 6Z, indicating that it was found ineligible for designation at the national, state, and local levels through survey evaluation.

Through research, fieldwork, and an evaluation under national, state, and local criteria, GPA concludes that the 2016 finding is still valid. The property does not appear to be eligible for listing in the National Register or California Register, or for local designation on the City's Register of Cultural Resources due to a lack of significance and diminished integrity following numerous exterior alterations. The property does not meet the Eligibility Standards or Integrity Considerations for properties evaluated within the Postwar West Hollywood, 1946-1965 theme of the 2016 Commercial Survey Historic Context Statement. Lastly, the subject property does not appear to contribute to a potential historic district.

Therefore, the subject property does not appear to be a historical resource as defined by CEQA. The recommended Status Code for the subject property is 6Z: ineligible for designation at the national, state, and local levels through survey evaluation.

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State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
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Primary # _____
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Page 10 of 10 *Resource Name or #: (Assigned by recorder) 9229 W, Sunset Boulevard
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8250 Sunset Boulevard Historical Resources Significance Evaluation

HISTORIC RESOURCES GROUP

HISTORICAL RESOURCE EVALUATION REPORT 8250-8254 W SUNSET BOULEVARD, WEST HOLLYWOOD JULY 2025



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1.0 EXECUTIVE SUMMARY

This report evaluates the commercial property located at 8250-8254 West Sunset Boulevard in the City of West Hollywood (AIN 5554-019-023) for potential historic significance and eligibility for designation as a historical resource. The property is currently occupied by a one- and two-story commercial building originally constructed in 1955 as Ben Pollack's Restaurant. Since 1961 the building has been occupied by The Body Shop strip club. A pylon sign was constructed on the property in the early 1960s.

8250-8254 W Sunset Boulevard was previously evaluated in the 2016 City of West Hollywood Commercial Historic Resources Survey and was assigned the California historical resource status code 6Z, which means that it was found ineligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or as a local Cultural Resource. Since that survey finding is now almost ten years old, the City of West Hollywood has requested a new evaluation of the property to confirm the previous finding. Therefore, this report evaluates the building and pylon sign for potential historic significance under the relevant eligibility criteria and integrity thresholds for listing in the National Register, the California Register, and as a City of West Hollywood Cultural Resource. This assessment will be used in the current California Environmental Quality Act (CEQA) review for analyzing the proposed billboards in Rounds 1.5 and 2 of the Sunset Arts & Advertising Program.

This report has determined that the building and pylon sign located at 8250-8254 West Sunset Boulevard are not associated with important historic events or persons; do not embody the distinctive characteristics of an architectural style or building type; are not the notable work of a master; and do not exemplify special elements of West Hollywood. Therefore, neither the building nor the sign is eligible for listing in the National Register or the California Register, or for designation as a City of West Hollywood Cultural Resource.

2.0 METHODOLOGY

This report evaluates the property at 8250-8254 West Sunset Boulevard using integrity thresholds and eligibility criteria for listing in the National Register, the California Register, and as a West Hollywood Cultural Resource. The field methods and analysis are based on guidance from the National Park Service, the California Office of Historic Preservation, and the City of West Hollywood for evaluating potential historical resources. Identification of physical features was ascertained through building records and a site visit conducted on June 12, 2025, to observe existing conditions on the property.

The following sources were consulted:

- Building permits
- Historic photographs
- Historic newspaper articles
- Historic aerial photography
- Sanborn Fire insurance maps
- Field observation of the property
- Other primary and secondary sources relevant to the history and development of the property.

Research, evaluation, field observation, and analysis were performed by John LoCascio, AIA, Principal Architect, a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) in Architecture and Historic Architecture. A resume is included in Appendix E.

3.0 LOCATION

8250-8254 West Sunset Boulevard is an irregularly shaped parcel of approximately 12,490 square feet (0.28 acre). It is located at the southwest corner of the intersection of West Sunset Boulevard and North Harper Avenue in the City of West Hollywood. The parcel is flanked on the west, north, and northeast by one- and two-story commercial (retail and office) properties, and on the southeast and south by two- and three-story multi-family residential properties.

A location map is included in Figure 1, below.

FIGURE 1: LOCATION MAP



8250-8254 W Sunset Boulevard outlined in red

4.0 PHYSICAL DESCRIPTION

8250-8254 West Sunset Boulevard is an irregularly shaped parcel that slopes down rather steeply from the street. A commercial building occupies the north portion of the parcel. The building is set back slightly from the sidewalk on Sunset Boulevard by narrow raised planters veneered in stone tiles, and is set flush to the west property line. The planter extends to the northeast corner of the site and wraps a marble-clad fountain with a curvilinear basin and a cast plaster statue. There is a small surface parking area paved in asphaltic concrete on the northeast portion of the site, and a larger surface parking lot that occupies the rear of the parcel. A pylon sign rises at the corner of Sunset Boulevard and Harper Avenue. It has a tapered support and three stacked boxes with channel letters outlined in neon tubing that spell, from top to bottom, "BODY SHOP," "18 & OVER," and "LIVE NUDE Girls Girls Girls." The top and bottom boxes are framed in chase lights.

The commercial building is one story in height at the front (north), facing the street, and two stories at the rear (south). It has a parallelogram plan, simple massing, and asymmetrical composition. It has a side gable roof with shallow eaves. A false mansard with wood shingles extends the width of the north (front) portion of the roof and a shed extends across the south (rear) portion. Two illuminated box signs are mounted on the front portion of the mansard. The exterior walls are veneered in textured cement plaster. The primary entrance is located on the north façade and consists of a recessed door with applied moldings and rosettes. The entrance is flanked with wall-mounted light boxes with cutout silhouettes of female nudes. A mural of silhouetted female nudes decorates the blank west façade. There is a secondary entrance on the east façade, consisting of a flush door accessed by concrete steps. There is minimal fenestration which is located only on the south façade.

FIGURE 2



8250-8254 West Sunset Boulevard, view southeast from Sunset Boulevard. Historic Resources Group, 2025

Additional current photographs of the property are included in Appendix A.

Alterations

No photographic documentation has been found of the building's exterior appearance as Ben Pollack's restaurant in the late 1950s. The earliest photographic documentation dates to the 1966 photos of Sunset Boulevard by artist Ed Ruscha, now housed in the Getty Research Institute. At that time The Body Shop Burlesque had exterior walls clad in vertical plank or grooved panel siding; a side gable roof with composition shingle roofing and a small, secondary gable over the recessed entrance; a large rooftop billboard sign displaying the club's name, illuminated by a row of large roof-mounted lights; and what appear to be windows covered with plywood panels. The entrance consisted of a pair of recessed plank doors with a fabric awning extending over the sidewalk, flanked by large wall signs with scalloped frames. Brick raised planters extended across the front of the building. The pylon sign at the northeast corner of the site had the same general form as it does today, but the center box was fitted with neon letters spelling BURLESQUE and the bottom box was a letterboard sign. All three boxes were wrapped with a continuous frame of chase lights.

Subsequent exterior alterations, as documented in the Ruscha photos, include the following:

- By 1973 the rooftop billboard had been removed.
- By 1974 the pylon sign had been modified to display the club's new name, The Sunset Cabaret.
- By 1976 the club's name had reverted to The Body Shop Burlesque and the sign was restored accordingly. A plaster parapet had been added atop the side gable roof, possibly part of a second-floor addition. The east part of the building had been clad in wood shingle siding and a Pepsi sign had been mounted on the roof.
- By 1985 the exterior walls had been plastered, large murals flanked the entrance, an additional awning had been added, a false mansard had been constructed atop the original roof, and three billboard signs had been added to the roof, one of which promoted BURGERS HOT DOGS.
- By 1990 a screen wall had been added around the northeast corner of the site to create an outdoor dining area for the Greek Corner Taverna which then occupied the east portion of the building, the largest roof sign had been removed, the smallest had been replaced, the plank entrance doors had been replaced with a pair of flush doors, and a wider entrance awning had been installed.
- By 1995 the front murals had been replaced with light boxes displaying silhouettes of female nudes, a roof sign displaying a female nude had been added to the roof, and additional boxes had been added to the pylon sign.
- By 1997 the screen wall had been expanded and plastered, the entrance canopy had been removed, and the two lower boxes of the pylon sign had been replaced with a

single large box sign with channel letters spelling LIVE NUDE GIRLS GIRLS GIRLS.

- By 1998 the screen wall and outdoor dining area had been removed, the brick planters had been clad in stone tiles and extended to the northeast corner of the site, a large fountain with cast plaster statues had been added, the entrance doors had been replaced, and the pylon sign had been returned to a three-box configuration similar but not identical to its original configuration. The continuous frame of chase lights had been removed and channel letters spelled “BODY SHOP,” “18 Years OK,” and “LIVE NUDE Girls Girls Girls.”
- The top and bottom boxes of the pylon sign were individually outlined with chase lights sometime after 2007.

Archival images of 8250-8254 West Sunset Boulevard from the Getty Research Institute are included in Appendix B of this report.

5.0 DEVELOPMENT HISTORY

Note: Building permit records were obtained from the City of West Hollywood to document the development history of 8250-8254 West Sunset Boulevard. However, they are of poor quality and are mostly illegible except as specifically cited below. This development history therefore relies primarily on other documentation including Sanborn Fire Insurance maps, archival photographs, historic aerial photographs, and newspaper articles and advertisements to chronicle the development and occupancy of the site.

What is now 8250-8254 West Sunset Boulevard was originally part of a larger parcel that included 8260-8268 West Sunset Boulevard to the west. The entire parcel was undeveloped as of 1919.¹ By 1928 the west portion of the parcel had been developed with a one-story, four-unit commercial building (8260-8268 West Sunset) and there appears to have been a separate structure on the eastern portion, near the intersection of Sunset Boulevard and Harper Avenue.² In 1941 a gasoline service station was constructed at 8254 West Sunset Boulevard.³ This was demolished by 1955.⁴

In November 1954 jazz drummer and band leader Ben Pollack was issued a building permit to construct a new restaurant at 8250 West Sunset Boulevard.⁵ Pollack had been known as “the father of swing” and was credited with the discovery of several well-known musicians who played in his bands before moving on and achieving stardom, including Glenn Miller, Benny Goodman, Harry James, Charlie and Jack Teagarden, and Muggsy Spanier.⁶ But Pollack failed to live up to his early potential as a musician and band leader, in part by attempting a career as a singer (he had a weak voice) and by focusing on promoting the career of his girlfriend and future wife, Doris Robbins, as a singer and actress. Neither pursuit was successful, and by 1943 Pollack was working as a music manager and promoter but was no longer performing.⁷

Pollack’s eponymous restaurant was open by the summer of 1955, serving cocktails, ribs, steaks, chicken, and pizza to the sound of New Orleans jazz.⁸ Ben Pollack’s operated at 8250 West Sunset Boulevard until at least November of 1959.⁹ By June of 1961 the property was occupied by Al Deitch’s Body Shop Burlesque,¹⁰ which later became known simply as The Body Shop and still occupies the property. The pylon sign at the corner of Sunset Boulevard and Harper Avenue was installed by The Body Shop sometime between 1961 and 1966, apparently to replace an earlier pole sign installed by Ben Pollack.¹¹

In 1974 the property was briefly called The Sunset Cabaret but by 1976 had reverted to the name The Body Shop. The east portion of the building was shared by a burger and hot dog stand in 1985, and in 1990 by the Greek Corner Taverna. The false mansard roof was added

¹ Sanborn Fire Insurance map, 1919.

² Fairchild Aerial Surveys, Frame A-12, 1:10,000, Flight C_235X, June 28, 1928. University of California Santa Barbara Aerial Photography Collection.

³ County of Los Angeles, Permit No. 23633, July 31, 1941.

⁴ Sanborn Fire Insurance map, 1955.

⁵ County of Los Angeles, Permit No. B72181, November 5, 1954.

⁶ “Ben Pollack Dies; Musician Was 67,” *New York Times*, June 9, 1971, 46.

⁷ Scott Yanow, “Ben Pollack: Profiles in Jazz,” *The Syncopated Times*, April 30, 2020, <https://syncopatedtimes.com/ben-pollack/>, accessed June 2025.

⁸ Display ad, *Los Angeles Mirror*, August 22, 1955, 6.

⁹ “Ben Pollack Serves Fine Food ‘n Fun,” *California Eagle*, November 19, 1959, 10.

¹⁰ Display ad, *Los Angeles Mirror*, June 6, 1961, 42.

¹¹ County of Los Angeles, building permits, permit numbers and dates illegible.

between 1976 and 1985.¹² The Body Shop gained notoriety in 1987 when its name was included in the litany of strip clubs that makes up the chorus of Motley Crue's hit single "Girls, Girls, Girls," though the song's popular music video was shot at another Sunset Boulevard strip club mentioned in the song, the Seventh Veil.¹³ The words "Girls Girls Girls" were not added to The Body Shop's pylon sign until sometime between 1995 and 1997, nearly a decade after the song's release.¹⁴

FIGURE 3



The Body Shop Burlesque, Edward Ruscha, 1966. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.

Additional archival images of The Body Shop are included in Appendix B. Historic aerial photographs are included in Appendix C, and Sanborn Fire Insurance maps are included in Appendix D.

¹² Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.

¹³ Matt Wake, "Nikki Sixx and Director Wayne Isham Look Back on 'Girls, Girls, Girls' 30 Years Later," *LA Weekly*, August 22, 2017, [https://www.laweekly.com/nikki-sixx-and-director-](https://www.laweekly.com/nikki-sixx-and-director-wayne-isham-look-back-on-girls-girls-girls-30-years-later/)

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¹⁴ Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.

6.0 HISTORIC DESIGNATIONS

Historical and cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of historical resources of national, State, regional, and local significance include:

- The National Historic Preservation Act of 1966, as amended;
- The Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards);
- The California Environmental Quality Act (CEQA);
- The California Register of Historical Resources (California Register);
- The California Public Resources Code;
- The City of West Hollywood Cultural Heritage Preservation Ordinance (West Hollywood Municipal Code, Title 19, Chapter 19.58)

National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment.”¹⁵

The National Register recognizes a broad range of historical and cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes.¹⁶ Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.¹⁷

A resource that is listed in or eligible for listing in the National Register is considered a “historic property” under Section 106 of the National Historic Preservation Act.

CRITERIA

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the

¹⁵ 36 Code of Federal Regulations (CFR) 60.
https://www.ecfr.gov/cgi-bin/text-idx?SID=b36f494ab8c19284178b4c593eda2a8f&tpl=/ecfrbrowse/Title36/36cfr60_main_02.tpl (accessed September 2021).

¹⁶ The identification of archaeological sites and traditional cultural properties is outside the scope of this report.

¹⁷ United States Department of the Interior, National Park Service, “National Historic Landmarks: Frequently Asked Questions,” <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>. (accessed September 2021).

significance of a resource:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.¹⁸

CONTEXT

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear.”¹⁹ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

INTEGRITY

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”²⁰ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property’s expression of the aesthetic or historic sense of a particular period

¹⁸ *National Register Bulletin 15*, 8. Criterion D typically applies to potential archaeological resources, which is outside the scope of this report.

¹⁹ *National Register Bulletin 15*, 7-8.

²⁰ *National Register Bulletin 15*, 44.

of time.

- *Association* is the direct link between an important historic event or person and a historic property.²¹

California Register of Historical Resources

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”²² The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.²³ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

- A.** It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
- B.** It is associated with the lives of persons important to local, California or national history; or
- C.** It embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- D.** It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.²⁴

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State

²¹ *National Register Bulletin 15*, 44-45.

²² California Public Resources Code, Section 5024.1[a].
http://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1 (accessed September 2021).

²³ California Public Resources Code, Section 5024.1[b]
http://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1 (accessed September 2021).

²⁴ Criterion 4 addresses potential archaeological resources, which is outside the scope of this assessment.

Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

City of West Hollywood Cultural Resources

The West Hollywood Cultural Heritage Preservation Ordinance includes criteria and procedures for designating City of West Hollywood Cultural Resources and Historic Districts. Cultural resources may include any building, structure, portion of a structure, improvement, natural area feature, object, or site, district, or any grouping of structures or improvements which may be of aesthetic, archaeological, architectural, cultural, educational, historic, landscape architectural, or scientific significance to the citizens of the city, state or nation which is, or may be, eligible for designation or which has been designated and determined to be subject to historic preservation in compliance with the provisions of Chapter 19.58 of the Zoning Ordinance. Cultural resources include all potential and designated resources and contributing resources in historic districts.

The Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.060 and 19.58.070 if it finds that the cultural resource meets one or more of the following criteria:

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

- 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city; or
- B. *Example of Distinguishing Characteristics*. It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- C. *Identified with Persons or Events*. It is identified with persons or events significant in local, state, or national history; or
- D. *Notable Work*. It is representative of the work of a notable architect, builder, or designer.

7.0 PREVIOUS EVALUATIONS

Historical Resources Surveys

The property at 8250-8254 West Sunset Boulevard was previously evaluated in the 2016 City of West Hollywood Commercial Historic Resources Survey prepared by GPA Consulting, Inc. It was assigned the California historical resource status code 6Z, which means that it was found ineligible for listing in the National Register, the California Register, and as a local Cultural Resource. The property has not been evaluated in any other historical resources survey undertaken in the City of West Hollywood.

Built Environment Resources Directory (BERD)

The California Office of Historic Preservation (OHP) maintains the Built Environment Resource Directory (BERD), a database of previously evaluated resources throughout the state. The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. 8250-8254 West Sunset Boulevard is not listed in the BERD.²⁵

²⁵ Built Environment Resource Directory (BERD). California Office of Historic Preservation.

https://ohp.parks.ca.gov/?page_id=30338 (accessed September 2020).

8.0 HISTORIC CONTEXT

The following historic contexts, themes, and eligibility standards are excerpted from the “City of West Hollywood Commercial Historic Resources Survey,” prepared for the City of West Hollywood Community Development Department by GPA Consulting, Inc., September 2016.

Context: Postwar West Hollywood 1946-1965

In the post-World War II period, the West Hollywood area became the center of region's creative communities. A burgeoning gallery scene along La Cienega Boulevard in Los Angeles became a nationally recognized destination for modern art. The interior design industry began a gradual ascendancy in the southeast corner of the area as well; by the end of the twentieth century, it would be one of the largest concentrations of interior design businesses in the Pacific Rim. As the creative environment thrived, the Sunset Strip began an era of transition. The time of supper clubs came to a close. By the early 1960s, construction was underway on several high-rise hotel and office buildings with sleek Modern designs along Sunset Boulevard. The older commercial buildings became the home of a new youth culture where teenagers clashed with authorities.

THE DECLINE OF THE SUNSET STRIP

The Sunset Strip in the postwar period saw the decline of traditional nightclubs and the rise of the rock music scene. Though turnover was common throughout the Sunset Strip's history, the newer businesses were truly of a different nature by 1965. The first heyday of the Sunset Strip as the destination for restaurants and supper clubs extended over twenty years from 1934 to 1954. Culturally and politically, the area became more conservative during this period. By the 1940s, upscale lesbian bars like the Gypsy Room were replaced with more conventional and traditional restaurants. By the mid-1950s, the Strip declined as an entertainment destination as televisions became widely owned and variety shows featured many of the former club acts. Long dominated by organized crime, the Strip declined as Las Vegas, another mafia stronghold, drew away business. The second heyday of the Sunset Strip, ushered in by the opening of the Whiskey a Go-Go in 1964, witnessed the rise of a different type of club scene dominated by 1960s and 1970s rock music and youth culture.

In the immediate postwar period, the Strip embodied the glamour of Hollywood as the capital of the entertainment industry and many of the area's popular nightclubs were mentioned in celebrity news stories and known nationwide through Hollywood gossip magazines. Along the Strip were some of the Los Angeles area's most upscale bars and restaurants. Average citizens could mingle with the rich and famous for the price of dinner. Turnover was high and few nightclubs had the longevity to remain popular for long. The restaurant scene varied. Some specialized in steaks served in intimate booths. Others were see-and-be-seen destinations with open floor plans. Movie clientele favored the Mocambo (8590 Sunset Boulevard, demolished) and Ciro's (8433 Sunset Boulevard, now The Comedy Store). The press was theoretically barred from The Villa Nova (9015 Sunset Boulevard, now Rainbow Bar and Grill) an intimate Italian restaurant. Despite the ban, the restaurant appeared in many gossip columns. Several nightclubs had themes before such concepts were kitsch. Bublichki was a Russian restaurant serving dinner accompanied by Gypsy music from a Tudor Revival style building at 8846 Sunset

Boulevard (demolished). Emerging musicians played at Café Gala and the jazz-focused Crescendo (8572 Sunset Boulevard, demolished). Interlude, which shared a building with Crescendo, featured stand-up comics. Many of these restaurants listed their Sunset Boulevard addresses as part of “Hollywood,” capitalizing on the association with the entertainment industry.

Though the Sunset Strip had always been a center of vice, the flashy nightclub scene of the 1940s and 1950s became the center of escalating violence between organized crime rackets. Dueling organized crime bosses Mickey Cohen and Jack Dragna fought over control of Los Angeles from the sidewalks of Sunset Boulevard in a feud known as the Sunset Wars. The crime bosses were opposites: “...Dragna preferred to remain inconspicuous – somewhat the opposite of his contemporary Mickey Cohen.” Cohen frequented nightclubs along the Sunset Strip and restaurants on Santa Monica Boulevard to the south. Cohen’s operation used his clothing shop, Michael’s Exclusive Haberdashery (8804 Sunset Boulevard, demolished) as a headquarters. Gunman attacked the store on August 18, 1948, missing Cohen who was using a restroom at the rear of the building.

By the late 1940s, several murders had taken place in front of popular nightclubs. After a shootout at Sherry’s Restaurant (9039 Sunset Boulevard, now 1Oak) in 1949, a new sheriff’s captain was given charge of “cleaning up the county strip and giving police service which will maintain law and order and rid the community of hoodlums and undesirable characters.” The Strip cleanup was part of a wide-scale crackdown on organized crime underway nationwide by the early 1950s. Cohen and Dragna were singled out as mafia controllers of bookmaking, narcotics, and other rackets in Los Angeles by the federal government during the Kefauver hearings and by California Governor Warren’s statewide Commission on Organized Crime. While illegal gambling, drugs, and after hours alcohol service remained part of the Sunset Strip for decades, by the mid-1950s organized crime, movie stars, and tourists were increasingly traveling to Las Vegas for entertainment and legalized vices like gambling. Las Vegas was heavily promoted on billboards along the Strip billboards, helping to signal the Strip’s demise as an entertainment destination and eventually siphoning off most of the upscale nightclub business.

The resurgence of the Sunset Strip began in the early 1960s as high-rise office and hotel building construction slowly replaced one and two-story buildings. In contrast, Santa Monica Boulevard retained a consistently low-rise and less refined character. The Pacific Electric Santa Monica Boulevard Line, that connected downtown Los Angeles to Santa Monica, stopped running in 1954. The tracks were used by the Southern Pacific freight and passenger line and remained in the center of the street until 1972 (the tracks were covered with asphalt, but not completely removed until a street improvement project in the early 2000s). Along Santa Monica Boulevard, the lowrise buildings from pre-World War II periods remained, attracting little attention from developers. Although its reputation may have been tarnished, the name Sunset Boulevard still had prestige and developers seized the opportunity to acquire and demolish the one and two-story buildings of the Sunset Strip at a relatively low cost “to make way for the structures of the sixties.”

By 1962, more than a dozen new buildings between four and sixteen stories were planned for

the Sunset Strip. The first new buildings were hotels and apartments. The Thunderbird Inn (8300 Sunset Boulevard, now the Standard Hotel) opened in 1961 as motor lodge with abundant parking. The Playboy Club-Hotel and Offices, adjacent towers, were designed by Richard Dorman and Curtis & Davis, and planned for sites on the south side of Sunset, west of La Cienega. While Las Vegas may have been a threat to business only a few years before, according to Playboy publisher Hugh Hefner, the Sunset Strip was “one of the most famous, glamorous streets in the world. It is enjoying a resurgence and growth that will bring new life, color and excitement to the entire scene.” In 1963, the 300-room Hotel Continental, a Gene Autry hotel group property, opened at 8401 Sunset. Eight new office buildings were planned for the Strip in 1962, including the 11-story City National Bank. While some high-end restaurants, notably Scandia (9040 Sunset Boulevard, demolished) and Cyrano’s (8711 Sunset Boulevard), remained open through the 1960s, tastes were changing and diners such as Ben Frank’s (8585 Sunset Boulevard, now Mel’s Diner) catered to a more casual, car-oriented crowd, and less glamorous. Mimetic and exuberant roadside architecture also triumphed as car culture dominated the area, with wildly decorated storefronts like Wil Wright’s ice cream parlor and the hot-dog shaped Tail o’ the Pup food stand.

A new era of entertainment on the Sunset Strip began when the Whiskey a Go-Go (8901 Sunset Boulevard) opened on January 15, 1964 in a former bank building. Elmer Valentine, an ex-cop from Chicago with mob ties, created what became “one of the most celebrated clubs in the history of rock music.” The club was the source of the iconic Go-Go Girl of the 1960s and became an internationally known destination. Valentine named the club after a discothèque in Paris that featured live dancers. To accommodate the tight floor space, Valentine suspended a disc jockey booth from the ceiling. After a female DJ began dancing as she played records between live acts, Valentine added two more suspended cages for dancers. One of the dancers, Joanie Labine, designed what became the official go-go girl costume: fringed dress and white boots. The Whiskey a Go-Go became the first of many trendsetting clubs in the second heyday of the Strip. In the following years, the Sunset Strip was revived as a center of the live music scene, with many existing buildings adapted for a new era of entertainment.

Eligibility Standards

Eligible resources dating to the period of development between 1946 and 1965 reflect a period of transition. The early 1960s were a time of architectural transformation for West Hollywood, with new construction emerging in the Mid-Century Modern style. Buildings dating to earlier periods of development became the center of the new live music and art scenes. An eligible resource or district must have been important in the commercial, institutional, and architectural development of the city during this period. Examples may include resources related to retail commercial development, office buildings, hotels, early live music venues, galleries, and restaurants. Resources may also be buildings constructed in earlier periods associated with businesses, events, and important individuals who achieved significance in the postwar period.

To be eligible under the Postwar West Hollywood 1946 - 1965 theme, an individual property or district should:

- Be associated with a business, organization, or industry that made important contributions to commercial or institutional growth and development of West

Hollywood; or

- Be emblematic of or constructed directly in response to cultural developments that occurred in West Hollywood during the period of significance; or
- Be fully realized example of the style or property type, displaying the significant character defining features of a style or property type in multiple aspects of design; and
- Date from the period of significance; and
- Retain the essential aspects of integrity.

Context: Modern West Hollywood 1966-1984

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

THE SUNSET STRIP- THE MECCA FOR MUSIC

Between 1964 and 1966, the Sunset Strip quickly changed from "the star-struck haunt of the rich, renowned and ribald grown-ups..." to the "...in place' for the plus-15 teen-ager and the just-turned-21 young adult." After the Whiskey a Go-Go opened in January 1964, the Sunset Strip was on the verge of transforming from "Hollywood's last, sacred sanctuary of chichi for the middle-aged" into a center of 1960s youth culture. By August 1965, Sheriff Vice Captain Walter R. Howell reported that, "The economic character on the Strip has changed significantly from the sophisticated, expensive supper clubs to the gaudy, postered bistros catering to the younger set." The transition reflected the rise of youth culture, which was characterized by a resistance to authority that contrasted with the conservative atmosphere of the preceding postwar period. Music was a central focus and mode of expression for this culture. The Doors, the house band at the Whiskey a Go-Go in 1966, were just one of the many rock bands that defined the era and established the reputation of the Sunset Strip as the center of the contemporary music scene. The Strip and nearby areas of West Hollywood became the center of West Coast rock music as it progressed from the 1960s through 1990s, spanning the eras of

rock, folk, punk, glam, new wave, heavy metal, and grunge music.

Several nightclubs featuring rock music, dancing, and stand-up comedy aimed at people under-21 years old opened in the West Hollywood area between 1964 and 1966. Most clubs were along the Sunset Strip, though a few were located on Santa Monica and La Cienega Boulevards. Teenage-centric It's Boss opened in the former location of Ciro's in 1965. Bill Gazzarri first opened his club at 319 N. La Cienega, but moved to 9039 Sunset by the mid-1960s. Acts at Gazzarri's included The Doors, The Byrds, and Buffalo Springfield. Pandora's Box was located in a triangular traffic strip just across the county line on Crescent Heights in Los Angeles. The counter-culture scene transcended music. At the intersection of Sunset and La Cienega Boulevards, sculptor Mark Di Suvero led multiple artists in an anti-Vietnam War art installation called the Tower of Art (removed). Diners and coffee shops, like Ben Frank's, and vacant lots along the Strip and Santa Monica Boulevard were crowded with people, particularly teenagers, at all hours of the night.

In 1966, several clashes between the Sheriff's Department and teenage curfew violators led to a series of demonstrations known as the Sunset Strip Curfew Riots. After complaints from business owners, deputies began enforcing a ten o'clock curfew for minors in the summer of 1966. Deputies patrolled the West Hollywood area through the night, picking up underage curfew violators. Mass curfew arrests took place by the busload in the parking lot adjacent Ben Frank's, which had become "...a sort of headquarters for teen-agers on the Strip." The Sunset Strip Curfew Riots began on November 13, 1966 when a crowd of demonstrators gathered in front of Pandora's Box in the City of Los Angeles to hold a vigil the night before the club was scheduled to be torn down to reconfigure the intersection at Sunset and Crescent Heights. Los Angeles city police officers and county sheriff's deputies reacted violently when the large crowd blocked traffic on Sunset Boulevard. On subsequent nights, nearly one thousand "...young persons protesting alleged 'police brutality' gathered outside Pandora's Box, where they rioted and invaded two Rapid Transit District buses."

Small demonstrations occurred on succeeding nights in front of Pandora's Box and another club, the 5th Estate (8200 Sunset Boulevard). The curfew riots on Sunset Boulevard continued for several days and were seen as a harbinger of future conflicts between young people and law enforcement that characterized the anti-Vietnam War protests of following years. The events inspired Stephen Stills of Buffalo Springfield to write the song "For What It's Worth (Stop, children, what's that sound?)," which became one of the defining songs of the era's anti-war protests. After the riots, numerous clubs were forced to shut down when Sheriff Peter J. Pitchess successfully lobbied to have the county revoke or change dancing permits.

In the decades following the riots, music and comedy became the primary focus of the West Hollywood nightlife scene. An era of iconic Sunset Strip billboards for rock music began with Elektra Records' billboard for The Doors' first album. The California Sound of the 1970s, a singer-songwriter and folk music style of rock, found a home at Doug Weston's club, The Troubadour (9081 Santa Monica Boulevard). The Troubadour, which began as a coffee house on La Cienega, moved to Santa Monica Boulevard in 1957. From there, the club helped launch the careers of rock and folk singers such as Elton John, Linda Ronstadt, and Joan Baez and comedians from the Smothers Brothers to Cheech and Chong. "In the late 1960s and early

1970s, the Troubadour was considered the most consistently important showcase of contemporary folk and folk-rock talent in the country” and one of the country’s foremost rock clubs. David Geffen and Elliot Roberts capitalized on the sound in 1971 when they formed their label Asylum Records (offices at 9130 Sunset Boulevard). The artistic communities of West Hollywood were fluid. Janis Joplin, Jim Morrison, and other musicians regularly mingled with Ed Kienholz and the artists of the La Cienega gallery scene at Barney’s Beanery (8447 Santa Monica Boulevard) and Duke’s Coffee Shop (demolished) on Santa Monica Boulevard. Even The Troubadour’s Monday open mic night (the Hootenanny) aligned with La Cienega’s Monday night gallery open houses.

The mellow, marijuana-laced scene at The Troubadour was juxtaposed by a scene of rowdiness at the Continental Hyatt House (formerly the Gene Autry Hotel). Dubbed both “Riot House” and “Riot Hyatt,” the hotel became the “unofficial innkeeper” for touring musicians through the 1980s. Notorious incidents of rock and roll debauchery took place at the hotel, with legendary rock bands The Who and Led Zeppelin renting entire floors, allegedly riding motorcycles through the hallways, and flinging televisions out the windows onto Sunset Boulevard. Tower Records, a Sacramento-based chain store, opened a shop on the Strip at Horn Avenue in 1971. Soon it became the company’s flagship store on the West Coast and a hub for music lovers who searched for records and experienced in-store performances by their favorite bands. During this period, nightclubs became more specialized by focusing on music or comedy instead of both. The Comedy Store opened at the former Ciro’s and It’s Boss building in 1972. Sunset Strip venues like Gazzarri’s had declined in popularity during the early 1970s, but rose again as the music got louder. Bands such as Frank Zappa & The Mothers of Invention, The Crusaders, and Bruce Springsteen & the E Street Band recorded live concert albums at the Roxy. The “Second British Invasion,” began in the 1970s and included musicians David Bowie and Queen. They played at the E Club on the Strip, just outside West Hollywood (8171 Sunset Boulevard). The Rainbow Bar & Grill became a popular hangout for rock musicians and their groupies. Regulars included Keith Moon, Alice Cooper, Micky Dolenz, Harry Nilsson, John Lennon, and Ringo Starr. Other genres of rock, many originating with local bands, emerged in the late 1970s, including punk, new-wave, hard rock, and heavy metal. Reflecting on new bands like Van Halen, The Knack, and The Runaways, who all played at the Whiskey a- Go-Go and other Sunset Strip clubs as The Doors had done in the previous decade, local rock critic Richard Cromelin observed, “The explosions of local talent in 1978 marked a flourishing of native bands unmatched since the go-go days of the mid-‘60s.”

Vince Neil of the band Mötley Crüe described the Sunset Strip scene of the 1980s as a “cesspool of depravity.” As the 1980s progressed, drugs and loud music seemed to further separate the Strip from its onetime reputation as a destination for sophisticated adults. At the same time, innovative haute cuisine restaurants like Wolfgang Puck’s Spago paradoxically brought these types of adults back to the area. As West Hollywood and its performance venues constantly adapted to fit each generation’s definition of nightlife, the area remained center of music, comedy, and dining for decades. Performers and their art were always pushing the limits of acceptability, but welcome in the entertainment centers of West Hollywood.

Eligibility Standards

Eligible resources dating to the period of development between 1966 and 1984 reflect a period

when West Hollywood was associated with creative and diverse lifestyles. Commercial corridors became associated with cultural movements, from the music scene on the Sunset Strip to the Boystown district on Santa Monica Boulevard. The period culminated with the founding of the City of West Hollywood in 1984. An eligible resource or district must have been important in the commercial, institutional, and architectural development of the city during this period. Examples may include buildings constructed in earlier periods associated with businesses, events, and important individuals who achieved significance in the period between 1966 and 1984.

To be eligible under the Modern West Hollywood 1966 - 1984 theme, an individual property or district should:

- Be associated with a business, organization, or industry that made important contributions to commercial or institutional growth and development of West Hollywood; or
- Be the primary location of an important business and/or was the primary place of work of an individual important within the theme of commercial development in West Hollywood during the period of significance; or
- Be emblematic of or constructed directly in response to cultural developments that occurred in West Hollywood during the period of significance; or
- Be fully realized example of the style or property type, displaying the significant character defining features of a style or property type in multiple aspects of design; and
- Date from the period of significance; and
- Retain the essential aspects of integrity.

9.0 EVALUATION OF SIGNIFICANCE

National Register/California Register

The building and pylon sign at 8250-8254 West Sunset Boulevard are evaluated below within the applicable historic contexts and themes and against the established eligibility criteria and integrity thresholds for listing in the National Register of Historic Places and the California Register of Historical Resources.

CRITERION A/1: EVENT

According to guidance from the National Park Service, to be considered significant under Criterion A/1 a property must have an important association with a single event, or with a pattern of events, repeated activities, or historic trends that are important within an identified context. No evidence has been found to suggest that the property at 8250-8254 West Sunset Boulevard has an important association with any events, pattern of events, or historic trends that have made a significant contribution to the broad patterns of national, state, or local history.

Ben Pollock's restaurant opened in 1955; no documentation of the restaurant could be found after 1959, and by 1961 it was closed. This timeframe coincides with the general decline of the Sunset Strip as an entertainment destination from the mid-1950s to the mid-1960s. The restaurant was open for only a few years and never achieved the popularity and fame of earlier local establishments such as *Ciro's* or the *Mocambo*; Ben Pollock's was not mentioned in celebrity news stories or known nationwide through Hollywood gossip magazines. And, as documented in the Ed Ruscha photo series of Sunset Boulevard, the building has been substantially altered since it housed Ben Pollock's so would no longer retain historic integrity if the restaurant had been historically significant.

The Body Shop opened in the former Ben Pollock's building in 1961, before the rebirth of the Sunset Strip as a destination for live entertainment which began with the opening of the *Whisky à Go Go* in 1964. Indeed, the opening of a strip club along the formerly glamorous thoroughfare can be seen as symptomatic of just how far the area had declined in the post-war years. As author and popular music historian William McKeen said: "By the sixties, *Ciro's* and a lot of other clubs on the Strip had degenerated into sleazy dives. No one in his right mind would go into them without a hazmat suit."²⁶

The Body Shop operated concurrently with the second heyday of the Sunset Strip but did not contribute to the Strip's rebirth in the 1960s and was not part of the cultural movement that made the Strip a world-renowned center of the live music scene into the 1990s. Venues like the *Whisky à Go Go*, *The Roxy Theatre*, the *Rainbow Bar & Grill*, *Gazzari's*, and *Doug Weston's Troubadour* (which was located on Santa Monica Boulevard, but had always been considered something of an honorary member of the Strip club)²⁷ provided intimate club settings that showcased new talent and helped launch the careers of the biggest and most influential acts in

²⁶ William McKeen, *Everybody Had an Ocean: Music and Mayhem in 1960s Los Angeles* (Chicago: Chicago Review Press, 2017), Kindle edition, 242.

²⁷ "In Search of the Hottest Music in Town," *Los Angeles Times*, March 13, 1994.

the rock, folk, punk, glam, new wave, heavy metal, and grunge genres. They were the most celebrated clubs in the history of rock music and made the Sunset Strip the epicenter of the contemporary music scene for three decades. While the Strip's offerings would expand throughout the 1960s to include not only nightclubs and discotheques but bars, coffee houses, and diners as well, these were ancillary businesses that supplemented the Strip's primary venues but did not contribute to its importance. The origins of the area's renaissance remained rooted in music and its role as the voice of a new generation. The Body Shop was not associated with the music scene, was not an internationally known or even locally famous venue, did not foster the careers of universally celebrated artists, and did not contribute to the cultural zeitgeist of the Sunset Strip in the 1960s, 1970s and 1980s. The Body Shop's association with the Sunset Strip is purely geographic.

Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under National Register Criterion A or California Register Criterion 1.

CRITERION B/2: PERSON

According to guidance from the National Park Service, to be considered significant under Criterion B/2 a property must have an important association with individuals whose specific contributions to history can be identified and documented; whose activities are demonstrably important within a local, state, or national historic context; and whose association with the property reflects the time period during which he or she achieved significance.

Ben Pollock, who constructed the existing building at 8250-8254 West Sunset Boulevard in 1955 as his eponymous restaurant, was a noted jazz drummer and band leader in his youth. However, he made poor career choices and failed to live up to his early potential. His ownership of the restaurant in the mid- to late-1950s occurred decades after his musical prime. And, as documented in the Ed Ruscha photo series of Sunset Boulevard, the building has been substantially altered since it housed Ben Pollock's so would no longer retain historic integrity if Pollock had been a historically significant person. No information could be found about Al Deitch, the original owner of The Body Shop. No evidence has been found to suggest that he or any other owner, performer, or occupant of 8250-8254 West Sunset Boulevard made specific contributions to history that can be identified and documented, or engaged in activities that are demonstrably important within a local, state, or national historic context. Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under National Register Criterion B or California Register Criterion 2.

CRITERION C/3: DESIGN/CONSTRUCTION

According to guidance from the National Park Service, to be considered significant under Criterion C/3 a property must embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value. The building at 8250-8254 West Sunset Boulevard does not embody the distinctive characteristics of any identifiable architectural style, type, period, or method of construction. The names of the building's architect and builder are not legible on the original building permit; but the building has never been associated with any figure of recognized greatness in the fields of architecture or design and does not express aesthetic ideals or design concepts.

The freestanding pylon sign at 8250-8254 West Sunset Boulevard is not an excellent or distinctive example of an architectural style or promotional technique from the early 1960s. Although the pylon itself has some characteristics similar to those found on typical Googie style signs, such as the random pattern of holes in various sizes, the pylon and its cladding pattern are not boldly scaled or visually prominent. The stacked sign boxes are utilitarian in design and lack the exaggerated, expressionistic forms and features found on significant examples of Googie-style signs such as bright colors, scripted and slanted typefaces, thematic or exotic imagery, and dynamic, intersecting shapes and forms. In addition, the sign has been repeatedly altered since its initial construction.

Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under National Register Criterion C or California Register Criterion 3.

CRITERION D/4: INFORMATION POTENTIAL

Criterion D/4 is typically used to evaluate potential archeological resources. This evaluation is limited to built resources only and therefore does not evaluate the property for potential significance under National Register Criterion D or California Register Criterion 4.

West Hollywood Cultural Resource

The building and pylon sign at 8250-8254 West Sunset Boulevard are evaluated below within the applicable historic contexts and themes and against the established eligibility criteria for designation as a City of West Hollywood Cultural Resource.

CRITERION A: EXEMPLIFIES SPECIAL ELEMENTS OF THE CITY

As demonstrated in the National Register and California Register analysis above, the building and pylon sign at 8250-8254 West Sunset Boulevard do not exemplify or reflect special elements of the city's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history. They do not embody distinctive characteristics of any identifiable architectural style, period, method, or type of construction (see Criterion B, below), and are not a valuable example of the use of indigenous materials or craftsmanship. They do not contribute to the significance of a historic area and do not represent significant geographical patterns. They do not represent a significant architectural or structural achievement or innovation (see Criterion B, below), and do not have a unique location or singular visual characteristics and do not represent an established and familiar visual feature of a neighborhood, community, or the city. Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under City of West Hollywood Criterion A.

CRITERION B: EXAMPLE OF DISTINGUISHING CHARACTERISTICS

As demonstrated previously in the evaluation of significance under National Register Criterion C/California Register Criterion 3, the building at 8250-8254 West Sunset Boulevard does not possess distinguishing characteristics of any identified architectural style or type. The freestanding pylon sign is not an excellent or distinctive example of an architectural style or promotional technique from the early 1960s. Although the pylon itself has some characteristics similar to those found on typical Googie style signs, such as the random pattern of holes in

various sizes, the pylon and its cladding pattern are not boldly scaled or visually prominent. The stacked sign boxes are utilitarian in design and lack the exaggerated, expressionistic forms and features found on significant examples of Googie-style signs such as scripted and slanted typefaces, thematic or exotic imagery, and dynamic, intersecting shapes and forms. In addition, the sign has been repeatedly altered.

Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under City of West Hollywood Criterion B.

CRITERION C: IDENTIFIED WITH PERSONS OR EVENTS

As demonstrated above in the evaluations of significance under National Register Criteria A and B and California Register Criteria 1 and 2, the building and pylon sign at 8250-8254 West Sunset Boulevard are not emblematic of, and were not constructed directly in response to, the rebirth of the Sunset Strip as a world-renowned center of the live music scene in the 1960s.

Ben Pollock's restaurant opened in 1955; no documentation of the restaurant could be found after 1959, and by 1961 it was closed. This timeframe coincides with the general decline of the Sunset Strip as an entertainment destination from the mid-1950s to the mid-1960s. The restaurant was open for only a few years and never achieved the popularity and fame of earlier local establishments such as *Ciro's* or the *Mocambo*; Ben Pollock's was not mentioned in celebrity news stories or known nationwide through Hollywood gossip magazines. And, as documented in the Ed Ruscha photo series of Sunset Boulevard, the building has been substantially altered since it housed Ben Pollock's so would no longer retain historic integrity if the restaurant had been historically significant.

The Body Shop opened in the former Ben Pollock's building in 1961, before the rebirth of the Sunset Strip as a destination for live entertainment which began with the opening of the *Whisky à Go Go* in 1964. Indeed, the opening of a strip club along the formerly glamorous thoroughfare can be seen as symptomatic of just how far the area had declined in the post-war years. As author and popular music historian William McKeen said: "By the sixties, *Ciro's* and a lot of other clubs on the Strip had degenerated into sleazy dives. No one in his right mind would go into them without a hazmat suit."²⁸

The Body Shop operated concurrently with the second heyday of the Sunset Strip but did not contribute to the Strip's rebirth in the 1960s and was not part of the cultural movement that made the Strip a world-renowned center of the live music scene into the 1990s. Venues like the *Whisky à Go Go*, The Roxy Theatre, the Rainbow Bar & Grill, Gazzari's, and Doug Weston's Troubadour (which was located on Santa Monica Boulevard, but had always been considered something of an honorary member of the Strip club)²⁹ provided intimate club settings that showcased new talent and helped launch the careers of the biggest and most influential acts in the rock, folk, punk, glam, new wave, heavy metal, and grunge genres. They were the most celebrated clubs in the history of rock music and made the Sunset Strip the epicenter of the contemporary music scene for three decades. While the Strip's offerings would expand

²⁸ William McKeen, *Everybody Had an Ocean: Music and Mayhem in 1960s Los Angeles* (Chicago: Chicago Review Press, 2017), Kindle edition, 242.

²⁹ "In Search of the Hottest Music in Town," *Los Angeles Times*, March 13, 1994.

throughout the 1960s to include not only nightclubs and discotheques but bars, coffee houses, and diners as well, these were ancillary businesses that supplemented the Strip's primary venues but did not contribute to its importance. The origins of the area's renaissance remained rooted in music and its role as the voice of a new generation. The Body Shop was not associated with the music scene, was not an internationally known or even locally famous venue, did not foster the careers of universally celebrated artists, and did not contribute to the cultural zeitgeist of the Sunset Strip in the 1960s, 1970s and 1980s. The Body Shop's association with the Sunset Strip is purely geographic.

Neither of the property's two successive occupants since 1955, Ben Pollack's Restaurant and The Body Shop, made important contributions to commercial growth and development in West Hollywood. Ben Pollock, who constructed the existing building at 8250-8254 West Sunset Boulevard in 1955 as his eponymous restaurant, was a noted jazz drummer and band leader in his youth. However, he made poor career choices and failed to live up to his early potential. His ownership of the restaurant in the mid- to late-1950s occurred decades after his musical prime. And, as documented in the Ed Ruscha photo series of Sunset Boulevard, the building has been substantially altered since it housed Ben Pollock's so would no longer retain historic integrity if Pollack had been a historically significant person. No information could be found about Al Deitch, the original owner of The Body Shop. No evidence has been found to suggest that he or any other owner, performer, or occupant of 8250-8254 West Sunset Boulevard was an important individual within the theme of commercial development in West Hollywood. Therefore, 8250-8254 West Sunset Boulevard is not significant under City of West Hollywood Criterion C.

CRITERION D: NOTABLE WORK

As demonstrated above in the evaluation of significance under National Register Criterion C/California Register Criterion 3, the building and pylon sign at 8250-8254 West Sunset Boulevard are not representative of the work of a notable architect, builder, or designer. The names of the building's architect and builder are not legible on the original building permit; but the property has never been associated with any figure of recognized greatness in the fields of architecture or design and does not express aesthetic ideals or design concepts. Therefore, the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under City of West Hollywood Criterion D.

Summary of Significance

The preceding analyses have demonstrated that the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under any of the established eligibility criteria for listing in the National Register or the California Register, or for designation as a City of West Hollywood Cultural Resource. Because the property is not significant, an analysis of historic integrity is not applicable. Historic integrity is based on historic significance; only after a property's significance is fully established can one proceed to evaluate its integrity.³⁰

³⁰ *National Register Bulletin 15*, 45.

10.0 CONCLUSION

This report has evaluated the commercial property located at 8250-8254 West Sunset Boulevard in the City of West Hollywood for potential historic significance and eligibility for designation as a historical resource. The property is currently occupied by a one- and two-story commercial building originally constructed in 1955 as Ben Pollack's restaurant. Since 1961 the building has been occupied by The Body Shop strip club. A pylon sign was constructed on the property in the early 1960s. The property was determined ineligible for designation at the national, state, and local levels in the 2016 City of West Hollywood Commercial Historic Resources Survey.

This report re-evaluated the building and pylon sign at 8250-8254 West Sunset Boulevard within the relevant historic contexts and under the established eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of West Hollywood Cultural Resource. This evaluation has determined that the building and pylon sign at 8250-8254 West Sunset Boulevard are not significant under any of the established criteria and therefore are not eligible for listing in the National Register, the California Register, or as a local Cultural Resource.

11.0 REFERENCES

- Aerial Photography Collection, University of California, Santa Barbara Library.
https://mil.library.ucsb.edu/ap_indexes/FrameFinder/ (accessed June 2025).
- "Ben Pollack Dies; Musician Was 67." *New York Times*, June 9, 1971, 46.
- "Ben Pollack Serves Fine Food 'n Fun." *California Eagle*, November 19, 1959, 10.
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https://ohp.parks.gov/?page_id=30338. Accessed September 2020.
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- "In Search of the Hottest Music in Town." *Los Angeles Times*, March 13, 1994.
- McKeen, William. *Everybody Had an Ocean: Music and Mayhem in 1960s Los Angeles*. Chicago: Chicago Review Press, 2017, Kindle edition.
- State of California Department of Parks and Recreation. "California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison." Sacramento, CA: Office of Historic Preservation, 2011.
- U.S. Department of the Interior. National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, by the staff of the National Register of Historic Places, finalized by Patrick W. Andrus, and edited by Rebecca H. Shrimpton. Washington, DC: 1990; revised for Internet, 2002.
- . National Park Service. *National Register Bulletin 16A: How to Complete the National Register Nomination Form*. Washington, DC: 1997.
- Wake, Matt. "Nikki Sixx and Director Wayne Isham Look Back on 'Girls, Girls, Girls' 30 Years Later." *LA Weekly*, August 22, 2017, <https://www.laweekly.com/nikki-sixx-and-director-wayne-isham-look-back-on-girls-girls-girls-30-years-later/> (accessed June 2025).
- Yanow, Scott. "Ben Pollack: Profiles in Jazz." *The Syncopated Times*, April 30, 2020,
<https://syncopatedtimes.com/ben-pollack/> (accessed June 2025).

APPENDIX A

CURRENT PHOTOGRAPHS, HISTORIC RESOURCES GROUP, JUNE 2025



Context view southwest from Sunset Boulevard



Context view southeast from Sunset Boulevard



Primary (north) façade, view south from Sunset Boulevard



North façade and pole sign, view east on Sunset Boulevard



North façade, primary entrance, view southeast from Sunset Boulevard



North façade, typical light box, view southeast from Sunset Boulevard



West façade, view southeast from Sunset Boulevard



East façade, view west from North Harper Avenue



South façade, view north from parking lot



South façade and parking lot, view northeast

APPENDIX B

ED RUSCHA PHOTOGRAPHS, 1966-2007



The Body Shop Burlesque, Edward Ruscha, 1966. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop Burlesque, Edward Ruscha, 1973. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop Burlesque, Edward Ruscha, 1974. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop Burlesque, Edward Ruscha, 1976. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop Burlesque, Edward Ruscha, 1985. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop, Edward Ruscha, 1990. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop, Edward Ruscha, 1995. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



The Body Shop, Edward Ruscha, 1997. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



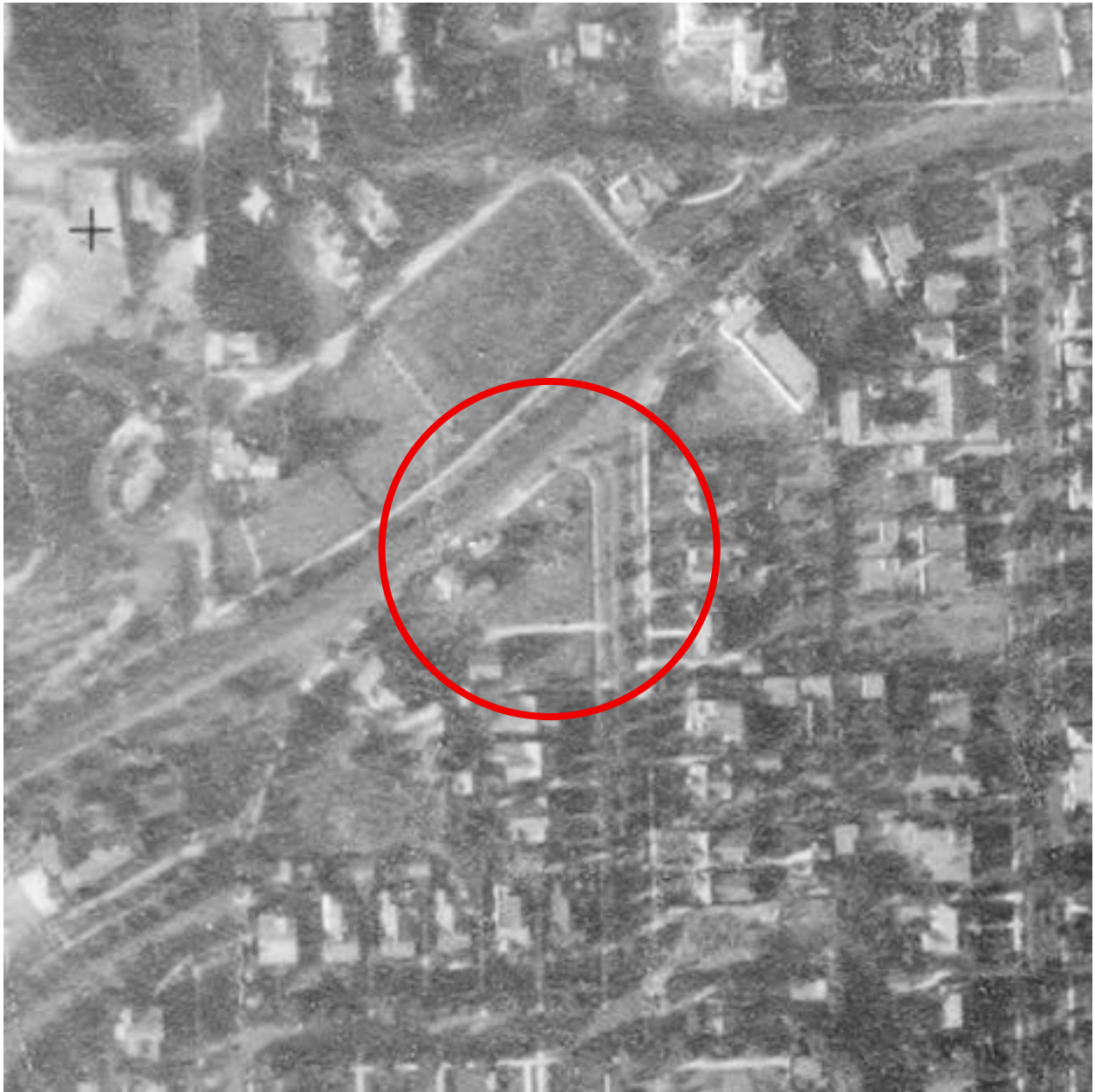
The Body Shop, Edward Ruscha, 1998. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.



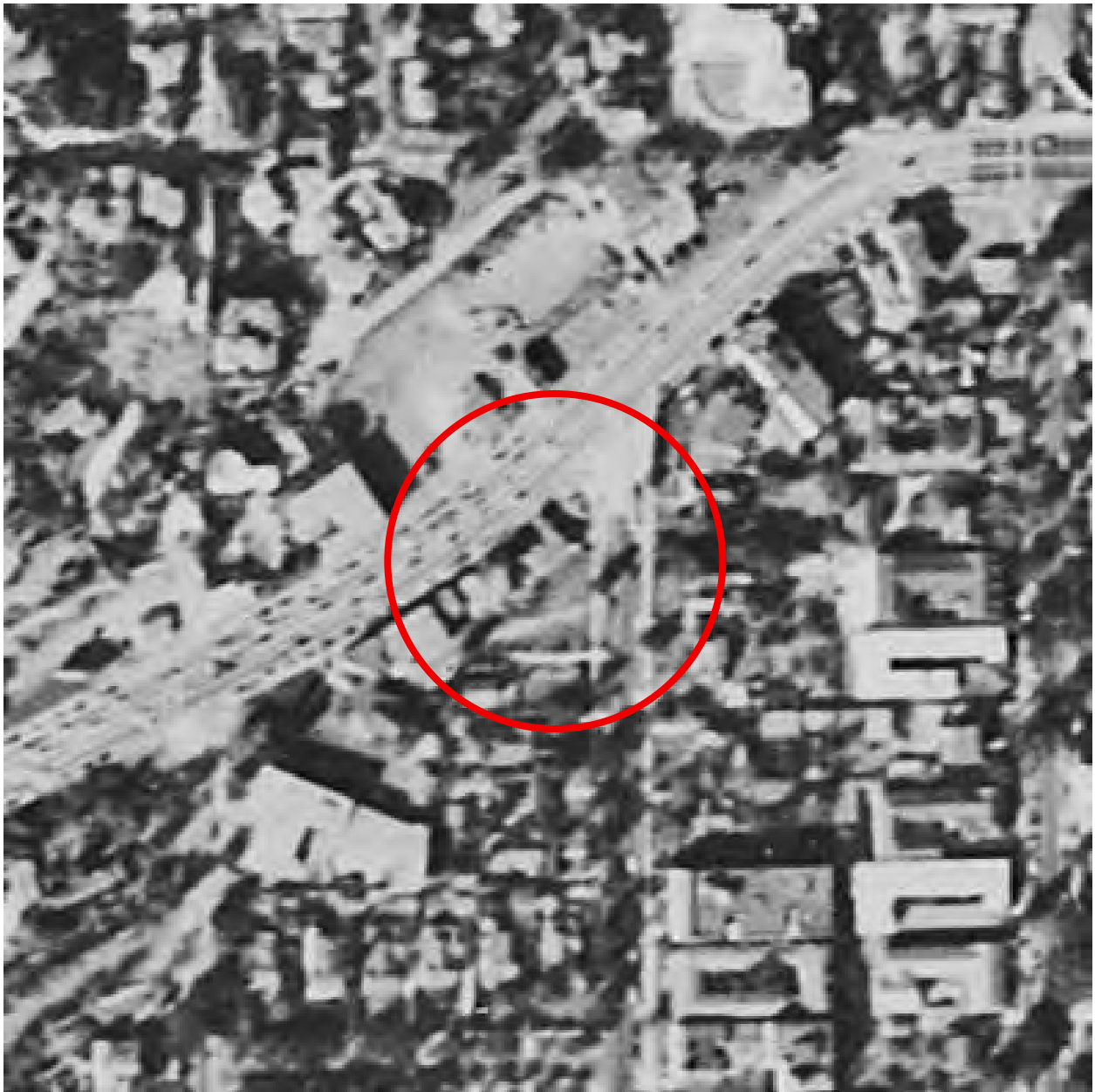
The Body Shop, Edward Ruscha, 2007. Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010, Getty Research Institute, Research Library, Accession no. 2012.M.1.

APPENDIX C

HISTORIC AERIAL PHOTOGRAPHS



Aerial photograph, June 28, 1928. Fairchild Aerial Surveys, Frame A-12, 1:10,000, Flight C-235X. University of California Santa Barbara Aerial Photography Collection.



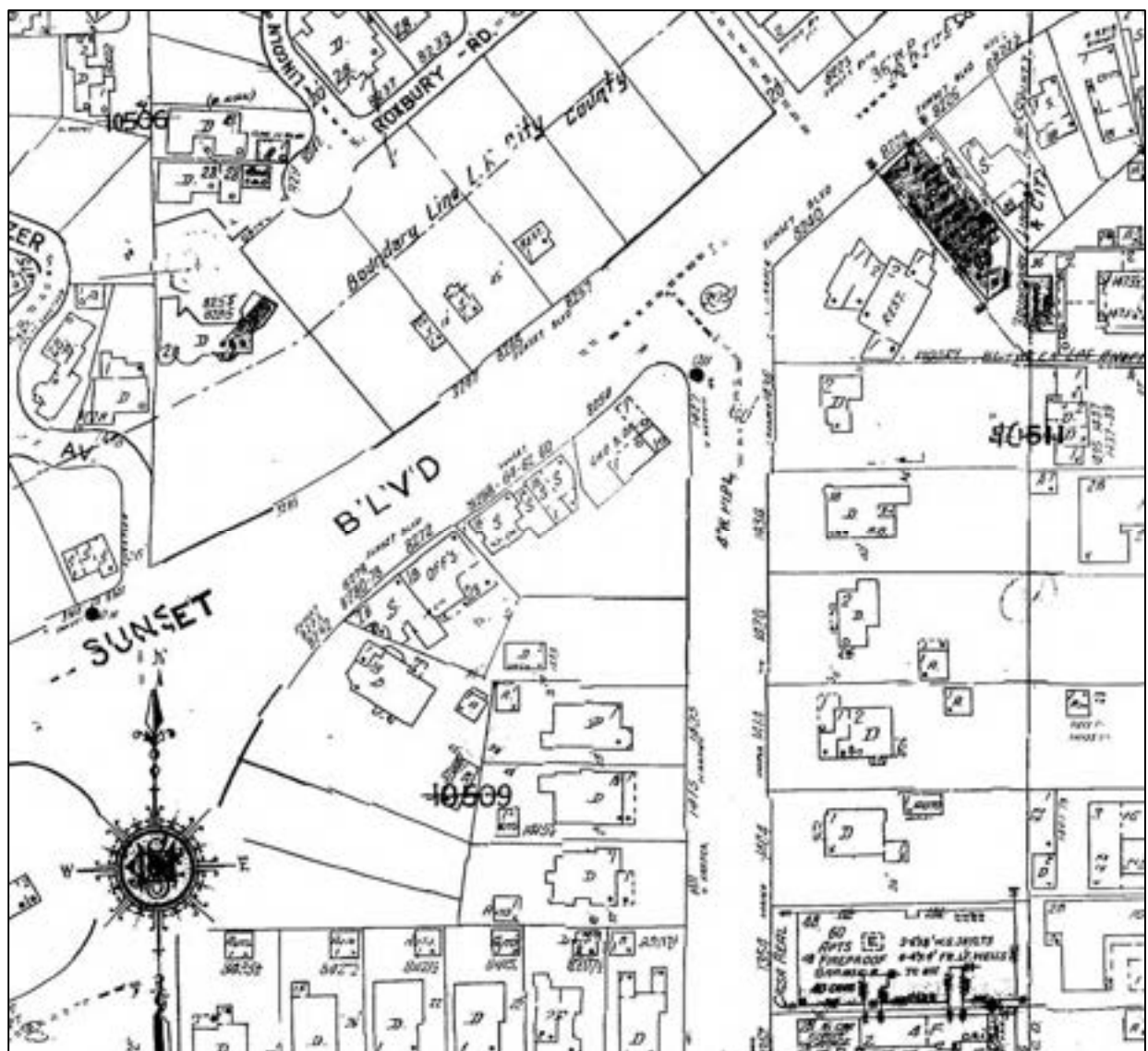
Aerial photograph, November 3, 1952. Fairchild Aerial Surveys, Frame 4K-148, 1:20,000, Flight AXJ-1952. University of California Santa Barbara Aerial Photography Collection.



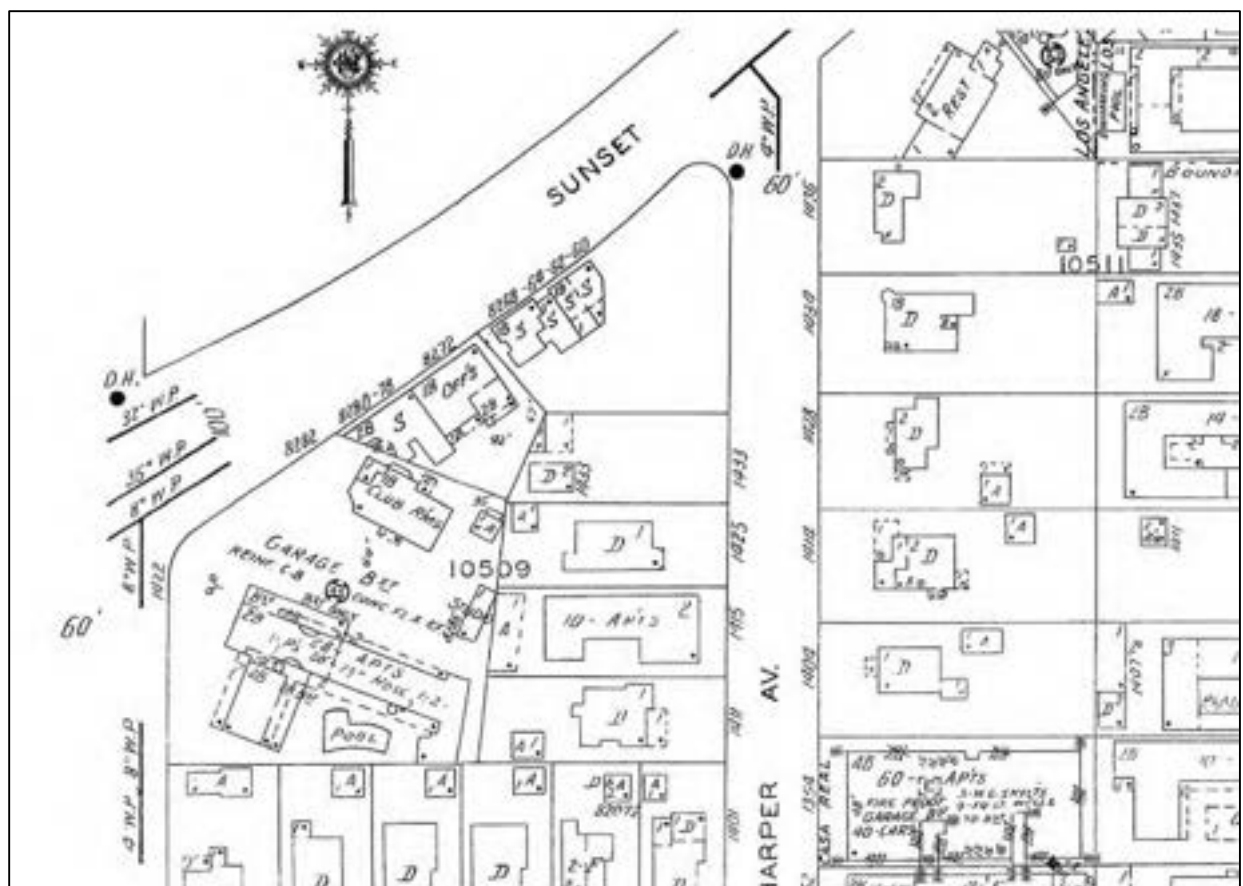
Aerial photograph, October 1, 1962. Fairchild Aerial Surveys, Frame 12-146, 1:12,000, Flight C-24400. University of California Santa Barbara Aerial Photography Collection.

APPENDIX D

SANBORN FIRE INSURANCE MAPS



1951



1955

APPENDIX E

RESUMES OF AUTHORS/CONTRIBUTORS

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105 - 3816

Tel 626-793-2400

historicresourcesgroup.com



Professional License

California Architect C24223

Education

Master's Degree, Historic
Preservation, University of
Southern California

Bachelor of Architecture,
University of Southern California

Honors and Awards

National Trust for Historic
Preservation, Richard H. Driehaus
Foundation National Preservation
Award

Los Angeles Conservancy
Preservation Award

California Preservation
Foundation Preservation Design
Award

City of Pasadena Historic
Preservation Award

AIA Institute Honor Award

JOHN LOCASCIO, AIA

Principal Architect

Experience Profile

Years of Experience: 31

John LoCascio has been with HRG since 2011, involved in historic preservation since 2002, and a licensed, practicing architect since 1993.

John's areas of focus at HRG include historic architecture and technology, building conservation, historic structure reports and federal historic rehabilitation tax credit projects. He provides technical assistance for construction documents, advises on compliance with the Secretary of the Interior's Standards and the use of the State Historic Building Code, provides construction monitoring, and paint and materials sampling and analysis services. John has worked on a wide variety of buildings and structures in California as well as in other states. He is currently advising on historic tax credit projects in Los Angeles, the San Francisco Bay area, and Washington State. In addition, John regularly provides historic architecture consultation for numerous LAUSD campus modernization projects.

John LoCascio meets the *Secretary of the Interior's Professional Qualifications Standards* in Architecture and Historic Architecture.

Selected Projects

28th Street YMCA Rehabilitation and Adaptive Reuse, Los Angeles
Academy Museum of Motion Pictures Rehabilitation, Hollywood
Angelus Funeral Home Historic Tax Credit Project, Los Angeles
CBS Columbia Square Rehabilitation and Adaptive Reuse, Hollywood
Chapman University VPO Packing House Rehabilitation, Orange
Climate Pledge Arena Historic Tax Credit Project, Seattle
Constance Hotel Historic Tax Credit Project, Pasadena
Grand Central Air Terminal Rehabilitation & Adaptive Reuse, Glendale
Los Angeles International Airport Preservation Plan and HSRs
Mayfair Hotel Historic Tax Credit Project, Los Angeles
Venice High School Comprehensive Modernization, Los Angeles

Professional Affiliations

American Institute of Architects

APPENDIX F

DEPARTMENT OF PARKS AND RECREATION PRIMARY RECORD (DPR 523A)

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings _____
Review Code _____ Reviewer _____ Date _____

Page 1 of 4

*Resource Name or #: 8250-8254 W Sunset Boulevard

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☒ Unrestricted

*a. County Los Angeles and

*b. USGS 7.5' Quad Hollywood Date 2022 T 1; R 14W; NW 1/4 of SE 1/4 of Sec 8; San Bernardino B.M.

c. Address 8250-8254 W Sunset Blvd City West Hollywood Zip 90046

d. UTM: Zone 11S, 373692 mE/ 3773549 mN

e. Other Locational Data: APN: 5554-019-023

***P3a. Description:**

8250-8254 West Sunset Boulevard is an irregularly shaped parcel that slopes down rather steeply from the street. A commercial building occupies the north portion of the parcel. The building is set back slightly from the sidewalk on Sunset Boulevard by narrow raised planters veneered in stone tiles, and is set flush to the west property line. The planter extends to the northeast corner of the site and wraps a marble-clad fountain with a curvilinear basin and a cast plaster statue. There is a small surface parking area paved in asphaltic concrete on the northeast portion of the site, and a larger surface parking lot that occupies the rear of the parcel. A pole sign rises at the corner of Sunset Boulevard and Harper Avenue. It has a tapered support and three stacked boxes channel letters outlined in neon tubing that spell, from top to bottom, "BODY SHOP," "18 & OVER," and "LIVE NUDE Girls Girls Girls." The top and bottom boxes are framed in chase lights.

(See continuation sheet)

P5a. Photograph



*P3b. Resource Attributes: HP6. 1-3
story commercial building

*P4. Resources Present: ☒ Building
☐ Structure ☐ Object ☐ Site ☐ District
☐ Element of District ☐ Other
(Isolates, etc.)

P5b. Description of Photo:
View Southeast, June 2025

*P6. Date Constructed/Age and
Source: ☒ Historic ☐ Prehistoric
☐ Both 1955, Research

*P7. Owner and Address:

*P8. Recorded by:
Historic Resources Group
556 S Fair Oaks Avenue, Ste 101-514
Pasadena, CA 91105

*P9. Date Recorded: June 2025

*P10. Survey Type: N/A

*P11. Report Citation:
Historic Resources Group (2025).
"Historical Resource Evaluation
Report 8250-8254 W Sunset
Boulevard, West Hollywood."

*Attachments: ☐ NONE ☐ Location Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other (List): _____

BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # 8250-8254 W Sunset Boulevard

*NRHP Status Code 6Z

Page 2 of 4

B1. Historic Name: Ben Pollack's Restaurant; Al Deitch's Body Shop Burlesque B2. Common Name: The Body Shop

B3. Original Use: Commercial restaurant

B4. Present Use: Commercial

*B5. Architectural Style: No style

*B6. Construction History: In 1955, a one-story commercial restaurant was constructed by owner Ben Pollack.

Alterations based on research:

Between 1961 and 1966, the original sign was replaced by a free-standing pole sign was added to the property.

By 1973 the rooftop billboard had been removed.

By 1974 the pole sign had been modified to display the club's new name, The Sunset Cabaret.

By 1976 the club's name had reverted to The Body Shop Burlesque and the sign was restored accordingly. A plaster parapet had been added atop the side gable roof, possibly part of a second-floor addition. The east part of the building had been clad in wood shingle siding and a Pepsi sign had been mounted on the roof.

By 1985 the exterior walls had been plastered, large murals flanked the entrance, an additional awning had been added, a false mansard had been constructed atop the original roof, and three billboard signs had been added to the roof, one of which promoted BURGERS HOT DOGS.

By 1990 a screen wall had been added around the northeast corner of the site to create an outdoor dining area for the Greek Corner Taverna which then occupied the east portion of the building, the largest roof sign had been removed, the smallest had been replaced, the plank entrance doors had been replaced with a pair of flush doors, and a wider entrance awning had been installed.

By 1995 the front murals had been replaced with light boxes displaying silhouettes of female nudes, a roof sign displaying a female nude had been added to the roof, and additional boxes had been added to the pole sign.

By 1997 the screen wall had been expanded and plastered, the entrance canopy had been removed, and the two lower boxes of the pole sign had been replaced with a single large box sign with channel letters spelling LIVE NUDE GIRLS GIRLS GIRLS.

*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: _____ Original Location: _____

*B8. Related Features: Pole sign at the corner of Sunset Boulevard and Harper Avenue. It has a tapered support and three stacked boxes channel letters outlined in neon tubing that spell, from top to bottom, "BODY SHOP," "18 & OVER," and "LIVE NUDE Girls Girls Girls." The top and bottom boxes are framed in chase lights.

B9a. Architect: _____ b. Builder: _____

*B10. Significance:

The property at 8250-8254 West Sunset Boulevard is not associated with important historic events or persons; does not embody the distinctive characteristics of an architectural style or building type; is not the notable work of a master; and does not exemplify special elements of West Hollywood. Therefore, it is not eligible for listing in the National Register or the California Register, or for designation as a City of West Hollywood Cultural Resource.

B11. Additional Resource Attributes: _____

*B12. References: (See continuation sheet)

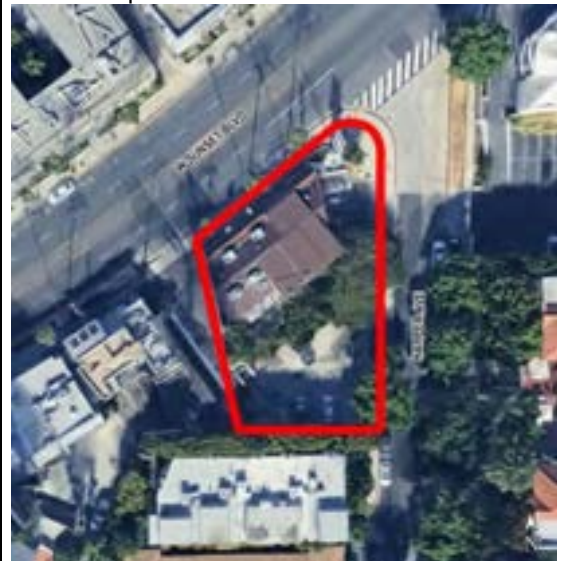
B13. Remarks:

*B14. Evaluator: Historic Resources Group

*Date of Evaluation: June 2025

(This space reserved for official comments.)

Sketch Map



CONTINUATION SHEET

Property Name: 8250-8254 W Sunset Boulevard

Page 3 of 4

P3a. Description (continued)

The commercial building is one story in height at the front (north), facing the street, and two stories at the rear (south). It has a parallelogram plan, simple massing, and asymmetrical composition. It has a side gable roof with shallow eaves. A false mansard with wood shingles extends the width of the north (front) portion of the roof and a shed extends across the south (rear) portion. Two illuminated box signs are mounted on the front portion of the mansard. The exterior walls are veneered in textured cement plaster. The primary entrance is located on the north façade and consists of a recessed door with applied moldings and rosettes. The entrance is flanked with wall-mounted light boxes with cutout silhouettes of female nudes. A mural of silhouetted female nudes decorates the blank west façade. There is a secondary entrance on the east façade, consisting of a flush door accessed by concrete steps. There is minimal fenestration which is located only on the south façade.

B12. References (continued)

Aerial Photography Collection, University of California, Santa Barbara Library.
https://mil.library.ucsb.edu/ap_indexes/FrameFinder/ (accessed June 2025).

"Ben Pollack Dies; Musician Was 67." *New York Times*, June 9, 1971, 46.

"Ben Pollack Serves Fine Food 'n Fun." *California Eagle*, November 19, 1959, 10.

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https://ohp.parks.gov/?page_id=30338. Accessed September 2020.

City of West Hollywood Community Development Department. "City of West Hollywood Commercial Historic Resources Survey." Prepared by GPA Consulting, Inc., September 2016, https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_-Document.pdf (accessed June 2025).

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Edward Ruscha photographs of Sunset Boulevard and Hollywood Boulevard, 1965-2010. Getty Research Institute, Research Library, Accession no. 2012.M.1.

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Wake, Matt. "Nikki Sixx and Director Wayne Isham Look Back on 'Girls, Girls, Girls' 30 Years Later." *LA Weekly*, August 22, 2017, <https://www.laweekly.com/nikki-sixx-and-director-wayne-isham-look-back-on-girls-girls-girls-30-years-later/> (accessed June 2025).

Yanow, Scott. "Ben Pollack: Profiles in Jazz." *The Syncopated Times*, April 30, 2020, <https://syncopatedtimes.com/ben-pollack/> (accessed June 2025).

CONTINUATION SHEET

Property Name: 8250-8254 W Sunset Boulevard

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ADDITIONAL PHOTO



Appendix C3

Paleontological Resources Assessment

MEMORANDUM

To: Jennifer Davis, City of West Hollywood
From: Shawna Johnson, Paleontologist, Dudek
Subject: Paleontological Resources Assessment – Addendum to the Sunset Strip Off-Site Signage Policy IS/ND
Date: August 13, 2025
cc: Michele Finneyfrock, Dudek
Attachments: A – Figures
B – Confidential Paleontological Records Search Results, NHMLA

The memorandum documents the paleontological resources assessment conducted in support of the Addendum to the Sunset Strip Off-Site Signage Policy Final Initial Study/Negative Declaration (IS/ND) (“addendum”). The addendum analyzes amendments to the adopted Sunset Boulevard Off-Site Signage Policy, which is a component of the Sunset Specific Plan (“proposed policy amendments”) together with a series of billboard projects that are being proposed in addition to the signage development scenario that was analyzed in the adopted IS/ND. These additional billboard projects were selected as part of Rounds 1.5 and 2 of the City’s Design Excellence Screening Process and will be referred to herein as the “Round 1.5 and 2 billboard projects.” The Round 1.5 and 2 billboard projects consist of 16 billboard development applications along Sunset Boulevard in the City of West Hollywood (City),¹ located in Los Angeles County, California.

For the purposes of this memorandum, the “Project” refers to the proposed policy amendments and the Round 1.5 and 2 billboard projects. The Project area consists of the Sunset Specific Plan area (Figure 1).

This paleontological resources assessment was conducted in accordance with the California Environmental Quality Act (CEQA) and guidelines of the Society of Vertebrate Paleontology ([SVP] 2010). This technical memorandum was prepared by Shawna Johnson, MSc, with editorial comments by Sarah Siren, MSc, and Michael Willaims, PhD, who are qualified paleontological principal investigators.

To determine the paleontological sensitivity of the Project area, Dudek performed a paleontological resources inventory in compliance with the CEQA and SVP (2010) guidelines. The inventory consisted of a paleontological records search through the Natural History Museum of Los Angeles (NHMLA) and a review of geological mapping and geological and paleontological literature. The results of the paleontological records search were negative for paleontological resources within the Project area, but one locality was reported just within the one-mile radius buffer of the Project area and several from just outside the buffer, from the same sediments that underlie the Project area on the surface and/or at depth.

1 Project Description and Location

The Project area extends along a segment of West Sunset Boulevard approximately 1.6 miles between Sunset Hills Road on the west and just west of Havenhurst Drive on the east (Figures 1 and 2). The Round 1.5 and 2 billboard

¹ 5 of the 16 billboard projects are components of new development projects, which are subject to individual review and analysis under CEQA. Nevertheless, the properties of such projects are included in this inventory in order to provide as much information as possible about the environmental consequences of the Round 1.5 and 2 billboard projects. As appropriate, the information in this report may be incorporated by reference into future CEQA documents for the new development projects.

projects are located along Sunset Boulevard on the following properties: Accessor's Parcel Numbers 5554-018-021, 5554-018-022, 5554-018-006, 5554-018-007, 5554-024-017, 5555-021-005, 5555-021-006, 5555-021-004, 5555-021-003, 5555-002-147, 5560-029-037, 5554-024-006, 5554-019-023, 5555-010-026; 5555-010-025, 5560-022-035, 4339-017-001, 4339-017-006, 4339-017-007, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-008, 5560-023-022, 4340-001-001, 4340-001-021, 5560-024-004, 5560-034-019, 4340-028-002, 4340-028-010, 4340-028-001, 4350-001-036, and 4350-001-033, within the City of West Hollywood. The current addresses for these sites are 8222, 8300, 8371, 8440, 9039, 8410, 8250, 8481-95, 8801, 8850, 8873, 8906, 8919, 9121, 9176, and 9225-9229 Sunset Boulevard.

Development of the Round 1.5 and 2 billboard projects would generally entail some ground disturbance on the properties, including excavation for establishing billboard pole foundations. Such excavations generally range from 22 feet to 45 feet in depth but can extend as deep as 75 feet below grade, depending on the billboard's design and the site's soil conditions.

2 Analysis Methodology

The analysis presented herein considers the potential environmental impacts of the Project relative to existing conditions. Establishment of the Project area's existing paleontological conditions have been informed by reviewing published geological maps and published and unpublished reports to identify geological units located in the Project area and determine their paleontological sensitivity.

A paleontological records search request was sent to the NHMLA on March 19, 2025. The records search area included the Project area and a one-mile radius buffer. The purpose of the records search was to determine whether there are any known fossil localities in or near the Project area.

A pedestrian survey was not conducted due to the developed and hardscaped character of the Project area.

3 Paleontological Resources

Paleontological resources are the remains or traces of plants and animals that are preserved in Earth's crust, and per SVP (2010) guidelines, are older than written history or older than approximately 5,000 years, which approximates the middle Holocene of Cohen et al. (2024). They are limited, nonrenewable resources of scientific and educational value and are afforded protection under state laws and regulations. This analysis complies with guidelines and significance criteria specified by CEQA and SVP (2010). Table 1, Paleontological Resource Sensitivity Criteria, provides definitions for high, undetermined, low, and no paleontological resource potential, or sensitivity, as set forth in and by the SVP (2010) Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

Table 1. Paleontological Resource Sensitivity Criteria

Resource Sensitivity/Potential	Definition
High	Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcanoclastic formations (e. g., ashes or tephra), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.). Paleontological potential consists of both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data. Rock units which contain potentially datable organic remains older than late Holocene, including deposits associated with animal nests or middens, and rock units which may contain new vertebrate deposits, traces, or trackways are also classified as having high potential.
Undetermined	Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist (see “definitions” section in this document) to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
Low	Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.
No Sensitivity	Some rock units have no potential to contain significant paleontological resources, for instance high grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

Source: SVP (2010).

3.1 Regulatory Framework

The California Environmental Quality Act

This paleontological resources evaluation was completed to satisfy the requirements of the California Environmental Quality Act (CEQA). The CEQA Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental impacts, including effects to paleontological resources. Paleontological resources, which are limited, nonrenewable resources of scientific, cultural, and educational value, are recognized as part of the environment under these state guidelines. This study satisfies project requirements in accordance with CEQA (13 PRC [Public Resources Code], 15000 et seq.).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the “Environmental Checklist Form,” which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or ... unique geological feature[s].” This provision covers fossils of significant importance, which include the remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth.

California Public Resources Code Section 5097.5

In addition to CEQA’s requirements, Public Resources Code Section 5097.5 (Stats 1965, c 1136, p. 2792) regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

City of West Hollywood General Plan

Section 3.10 Paleontological Resources, of the West Hollywood General Plan Final EIR analyzes paleontological resources within the City and uses the SVP (1995) guidelines to determine paleontological sensitivity within the geological units underlying the City (City of West Hollywood 2010). The following is taken directly from the paleontological analysis threshold of significance and the mitigation measure as listed in the Final EIR.

“The City of West Hollywood is completely built out with very limited availability of unconstrained vacant property. Future development within the City will primarily take the form of redevelopment and infill development focused in the five commercial subareas. Site redevelopment could involve earthmoving and excavation activities. Because of the large number of fossils that have been recovered from alluvial fan deposits similar to those that underlie the City, these units are considered paleontologically sensitive rock units under the Society of Vertebrate Paleontology guidelines (1995), suggesting that there is a potential for uncovering additional similar fossil remains during construction-related earthmoving activities in the City. Therefore, the potential for damage to previously unknown unique paleontological resources during earthmoving activities resulting from implementation of the General Plan is considered a potentially significant impact. With implementation of Mitigation Measure 3.10-1, program-level impacts to paleontological resources would be less than significant. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

Mitigation Measure 3.10-1: If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

With the implementation of Mitigation Measure 3.10-1, impacts to paleontological resources would be reduced to a less-than-significant level. Also, in the event that resources were encountered, fossil specimens would be recovered and recorded and would undergo appropriate curation.”

3.2 Environmental Setting

Geological Literature and Map Review

The Project area lies in the northern Peninsular Ranges geomorphic province, just south of the boundary with the Transverse Ranges province. The Peninsular Ranges geomorphic province is characterized by mountain ranges separated by long valleys that are formed from faults branching off the San Andreas Fault (CGS 2002). The province also includes the Los Angeles Basin, of which the project is located within the central block along its northeastern edge, and at the southern edge of the Santa Monica Mountains (Yerkes et al. 1965).

According to surficial geological mapping by Dibblee (1991 a,b) at a 1:24,000 scale and the geological time scale of Cohen et al. (2024), the Project area is underlain by late Pleistocene (129,000 to 11,700 years ago) older slightly elevated and dissected alluvium and alluvial fan sediments (map unit Qae).

Previously conducted geotechnical studies within the Project area show that artificial fill is found on average between 3 to 6 feet below ground surface (bgs), followed by Pleistocene sediments below 6 to 7 feet bgs (PGI 2003; Geotechnologies, Inc. 2020; Geocon West, Inc. 2021). PGI (2003) reported 4 to 6 feet of artificial fill and 2 feet of Holocene (<11,700 years ago) colluvium below fill at 8497 Sunset Boulevard. Geotechnologies reported artificial fill from 3 to 7 feet bgs and older (Pleistocene) alluvial fan deposits below the fill to a depth of 80 feet bgs at 9160 Sunset Boulevard. Geocon West, Inc. (2021) reported artificial fill from 2 to 3 feet bgs and alluvium to depths between 60 and 80 feet bgs; however, they did not differentiate between Holocene and Pleistocene alluvial units at 8850 Sunset Boulevard. There was also a discrepancy between the geologic map (Dibblee 1991a) age as presented in their report (late Holocene to Pleistocene), versus the actual published map which shows the Project area underlain by Pleistocene alluvial deposits.

To further clarify the geologic units present and the depths at which they were encountered, the geotechnical results for the evaluation of the Hollywood fault that lies within close proximity to the Project area are as follows: on average, artificial fill was found to be between 8 feet to 13 feet thick where overlying faults. Sediments overlying faults in two areas were dated from between 16,000 to 8,500 years ago, giving them a late Pleistocene to early Holocene (approximately 11,700 to 8,200 years ago) age where they were found between 15 to 25 feet bgs, with Pleistocene

sediments from 25 feet to 40 feet bgs, and in two instances, Miocene marine sands were encountered below the Pleistocene sediments at 34 feet bgs (Hernandez and Treiman 2014).

The Pleistocene older slightly elevated and dissected alluvium is generally composed of clay, sand and gravel, including alluvial fan sediments (Dibblee 1991 a,b). Pleistocene deposits have high paleontological sensitivity.

The unmapped Holocene alluvial sediments as reported from numerous geotechnical reports have low paleontological sensitivity at the surface, but that sensitivity increases to high at depth where they become early Holocene to Pleistocene in age.

According to Dibblee (1991a), the closest Miocene sediments surficially mapped, that match the description of the Miocene marine sands as reported by Hernandez and Treiman (2014), are those of the Miocene Monterey Formation, in particular map unit Tmss. If encountered, these Miocene sediments would have high paleontological sensitivity.

By analyzing all of the Project-specific data from geologic mapping, the geotechnical studies and fault evaluation, it would be reasonable to expect that potentially fossiliferous sediments could be encountered as shallow as 15 feet bgs within the Project area.

Paleontological Literature Review

The City of West Hollywood General Plan Final EIR lists several fossil localities from near the City from depths as shallow as 10 feet below ground surface. The following is from the City's Final EIR (City of West Hollywood 2010):

“Near the intersection of Sierra Bonita and Oakwood avenues, a fossil bison (*Bison antiquus*) was recovered from a depth of 12 feet. Mastodon and mammoth fossils were recovered from a site near the intersection of Kilkea Drive and Beverly Boulevard. Two known fossil localities are near the intersection of Fairfax Avenue and First Street. Fossils recovered from these localities include pocket gopher (*Thomomys* [sic]), pond turtle (*Clemmys* [sic]), garter snake (*Thamnophis* [sic]), mammoth (*Mammuthus columbi*), cottontail rabbit (*Sylvilagus* [sic]), kangaroo rat (*Dipodomys* [sic]), meadow mouse (*Microtus* [sic]), horse (*Equus occidentali* [sic]), bison, and camel (*Camelops hesternus*). There are many other known fossil localities in the City vicinity, including Park La Brea and Hancock Park.”

A review of Jefferson 1991 (updated 2012) revealed many of the same localities as listed in the above paragraph from the City's General Plan Final EIR.

Paleontological Records Search

The NHMLA paleontological records search results were received on March 23, 2025. The NHMLA reported no fossil localities from within the Project area; however, they reported nearby localities from similar sediments that likely underlie the Project area on the surface and at depth. The closest of these localities is approximately 0.85 miles south of the middle portion of the Project area, LACM (Los Angeles County Museum) VP (Vertebrate Paleontology) 2033 yielded fossils from tortoise, mammoth, camel and bison from unnamed Pleistocene sediments. Four other localities (LACM VP 7673, 7966, 3371, and 3821) are located between just over one mile to one and a half miles away from the Project, from unnamed Pleistocene sediments. These localities yielded the

following fossil taxa: horse; over 150 specimens of plant, invertebrate, and vertebrate material including mastodon elements, from 9 distinct layers; Bison; and an unidentified ungulate (Confidential Attachment B- NHMLA Records Search Results). Depths recorded from these previous discoveries indicate that fossils were discovered as shallow as 12 feet bgs (NHMLA 2025).

4 Impact Analysis and Conclusions

4.1 Thresholds of Significance

The thresholds of significance used to evaluate the impacts of the proposed Project related to paleontological resources are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. A significant impact under CEQA would occur if the proposed Project would:

- a) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.2 Impact Analysis

The adopted IS/ND identifies that geological units underlying the Project area may support paleontological resources. As such, the IS/ND concludes that billboard projects may have the potential to encounter paleontological resources during ground disturbing activities.

Given the expansion of proposed billboard development under Rounds 1.5 and 2 and the time that has passed since writing of the IS/ND, Dudek conducted additional research on paleontological resources in the Project area, as described above. The institutional records search and desktop geological and paleontological review conducted for the project area did not reveal any previous paleontological discoveries within the project area. In addition, the Project area is not anticipated to be underlain by unique geologic features. However, the Project area is underlain by Pleistocene older slightly elevated and dissected alluvium, which has high paleontological sensitivity, and by early Holocene sediments which also have high paleontological sensitivity based on numerous scientifically significant fossil discoveries from these geological units in the region. This means that the soils underlying the project area may support paleontological resources and that paleontological finds could occur during certain ground-disturbing activities. Based on depths reported for previous fossil localities and geological literature results, fossil bearing units (middle Holocene to Pleistocene) could reasonably expected to be encountered at a depth of 12 to 15 feet bgs.

Given that excavation for billboards generally ranges from 22 feet to 45 feet in depth, with the potential for deeper ground disturbance based on the underlying geology, ground-disturbing activities associated with billboard construction have the potential to encounter and potentially destroy a unique paleontological resource or site. This conclusion is consistent with the conclusion reached in the IS/ND. As explained in the IS/ND, the Sunset Boulevard Off-Site Signage Policy includes a requirement to ensure that any ground disturbance associated with changes in billboard pole location would not result in destruction of a paleontological resource. This requirement is shown below and is applied by the City to all billboard projects involving ground disturbance.

If paleontological resources are encountered during excavation, all work within 100 feet of the find must stop and the City of West Hollywood Planning & Development Services Department shall be immediately

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notified. A qualified paleontologist shall be retained to evaluate the finds and recommend appropriate handling and recovery methods. Construction in the vicinity of the find(s) shall not resume until deemed appropriate by the qualified paleontologist.

Given the limited sediment removal amounts from undisturbed geological units with high paleontological resource sensitivity, which are estimated to be less than 250 cubic yards with implementation of the Project, the existing policy requirement is considered to be adequate for the current Project. Required compliance with the existing paleontological resources requirement would ensure that impacts would remain less than significant.

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Attachment A

Figures



SOURCE: USGS 7.5-Minute Series 1:24,000
 Beverly Hills and Hollywood Quadrangles - Township 15 Range 14W Sections 07, 08, 18

DUDEK  0 1,000 2,000 Feet 0 300 600 Meters

FIGURE 1
Project Location
 Sunset Specific Plan



FIGURE 2A

Project Site

Sunset Signs Addendum





FIGURE 2C

Project Site

Sunset Signs Addendum



FIGURE 2D

Project Site

Sunset Signs Addendum

Confidential Attachment B

Paleontological Records Search Results- NHMLA

Appendix D

Noise Modeling

To User: bordered cells are inputs, unbordered cells have formulae

noise level limit for construction phase at residential land use, per City guidance = 65
allowable hours over which Leq is to be averaged = 8

0 = temporary barrier (TB) of input height inserted between source and receptor

Construction Activity	Equipment	Total Equipment Qty	AUF % (from FHWA RCNM)	Reference Lmax @ 50 ft. from FHWA RCNM	Client Equipment Description, Data Source and/or Notes	Source to NRR Distance (ft.)	Temporary Barrier Insertion Loss (dB)	Additional Noise Reduction (existing on-site 6' wall)	Distance-Adjusted Lmax	Allowable Operation Time (hours)	Allowable Operation Time (minutes)	Predicted 8-hour Leq	Source Elevation (ft.)	Receiver Elevation (ft.)	Barrier Height (ft.)	Source to Barr. ("A") Horiz. (ft.)	Rcvr. to Barr. ("B") Horiz. (ft.)	Source to Rcvr. ("C") Horiz. (ft.)	"A" (ft.)	"B" (ft.)	"C" (ft.)	Path Length Diff. "P" (ft.)	Abarr (dB)	Heff (with barrier)	Heff (w/out barrier)	G (with barrier)	G (without barrier)	Lbarr (dB)
													17	5	5	20	25	17.7	20.6	27.7	0.00	0.1	11.0	11.0	0.6	0.6	0.1	
Site Preparation/Excavation	Concrete Saw	1	20	90 Concrete/Industrial Saws	25	0.1	16.1	95.9	8	480	73	17	5	5	20	25	17.7	20.6	27.7	0.00	0.1	11.0	11.0	0.6 <td>0.6</td> <td>0.1</td>	0.6	0.1		
	Backhoe	1	40	78 Tractors/Loaders/Backhoes	25	0.1	16.0	83.9	8	480	64	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Generator	1	50	72 Generator Set	25	0.1	16.0	77.9	8	480	59	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Auger Drill Rig	1	20	84 Drill/Bore Rigs	25	0.1	16.0	89.9	8	480	67	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
Total for Site Preparation/Excavation Phase:												74.4																
New Billboard Installation	Crane	1	16	81 Cranes	25	0.1	16.0	86.9	8	240	60	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
Total for New Billboard Installation Phase:												59.9																
Building and Landscaping Improvements	Crane	1	16	81 Cranes	25	0.1	16.0	86.9	8	480	63	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Backhoe	1	40	78 Tractors/Loaders/Backhoes	25	0.1	16.0	83.9	8	480	64	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Paver	1	50	77 Pavers	25	0.1	16.0	82.9	8	480	64	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Paver	1	50	77 Paving Equipment	25	0.1	16.0	82.9	8	480	64	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
	Roller	1	20	80 Rollers	25	0.1	16.0	85.9	8	480	63	20	5	5	20	25	20.6	20.6	29.2	0.00	0.1	12.5	12.5	0.5 <td>0.5</td> <td>0.1</td>	0.5	0.1		
Total for Building and Landscaping Improvements Phase:												70.5																

Appendix E

Additional Studies

Appendix E1

West Hollywood Updated Billboard Traffic Safety Study

Memo

Date: July 30th, 2025

To: Jennifer Davis & Jennifer Alkire, City of West Hollywood

From: Danielle Caparas, Dominique Vitti, Jeremiah LaRose, & John Muggridge, Fehr & Peers

Subject: West Hollywood Updated Billboard Traffic Safety Study

Introduction

This memorandum updates prior work conducted for the City of West Hollywood, documented in a memorandum dated October 1st, 2023, regarding the influence of full motion billboards on traffic conditions. The previous study, led by Fehr & Peers, evaluated the potential traffic safety implications of a new three-dimensional (3D) billboard located at Sunset Boulevard and La Cienega Boulevard. This new study provides an updated understanding of billboard signage as it relates to Sunset Boulevard. Please note that while the focus of the current study is on full motion billboards (defined here as digital electronic billboards with a dynamic display of moving images, videos, or messages), the prior research discussed in the literature review includes analysis involving digital signage,¹ traditional, and internally illuminated static billboards. Additionally, some prior research refers to full motion billboards as “digital billboard advertisements” or DBAs. In the current study, the term “billboard” or “billboard signage,” will always refer to a “full motion billboard” unless stated otherwise.

Summary

Previous studies led by Fehr and Peers for the City of West Hollywood have explored whether an increase in billboards can cause an increase in collision rates. While this conclusion cannot be made, recent research provides new insights into how complex roadway safety can be, and how multiple and varied factors may contribute to increased roadway safety risk. This analysis found that potential crash risk along Sunset Boulevard cannot be directly linked to full motion billboard signage.

Methodology

This study collects and evaluates existing research regarding the collective effects of full motion billboards on traffic safety conditions and collision rates. Findings from the literature review highlighted the complexity involved in trying to isolate effects of specific, individual factors on roadway safety. With the goal of verifying that the findings of the literature review are applicable to Sunset Boulevard, we performed a comparative collision analysis. Using crash data from the

¹ Watchel (2009) describes “digital signage” as the general term for “commercial electronic variable messaging signs” (CEVMS), a term he coined. CEVMS are internally luminated signs, typically using LED technology, that use visual effects, such as fade, dissolve, or flash, to display pictures.

Statewide Integrated Traffic Records System (SWITRS), we compared crash patterns on Sunset Boulevard with crash patterns on other corridors that have fewer billboards but similar vehicle volumes, land use patterns, and travel lane configurations. By using corridors that are otherwise structurally and contextually similar to Sunset, the comparison aimed to isolate the influence of billboards specifically on the number of crashes and crash types. We also went out into the field to gather observations of the real, on-the-ground conditions along the corridor. Informed by findings in the literature review regarding the complex interplay of contextual factors, such as street geometry and traffic conditions, we noted the context and surrounding details of a full motion billboard, not simply the number/location of billboards. Using these field observations, combined with lessons learned from the literature review, we have developed suggestions for specific safety countermeasures to improve overall traffic safety conditions, which would be suggested with or without the presence of new billboards. These safety countermeasures aim to reduce potential crash risk along Sunset Boulevard, due to the corridor's complex roadway geometry, visual environment, and its unique context as a tourist destination. We then conclude with high-level takeaways regarding traffic safety for the overall corridor.

Literature Review

The presence of full motion billboards along roadways has long raised concerns regarding their potential to distract drivers, and their potential effect on road safety. As the number of full motion billboards increases, the extent to which they contribute to driver distraction or traffic incidents remains a topic of ongoing research. Driver distraction refers to a driver's divergence from focusing on activities necessary for safe driving (Sheykhfard, 2020). This literature review examines past findings, and incorporates new research and perspectives on the collective effects of full motion billboards on driver attention and performance. It concludes with a brief discussion of future considerations and broader safety recommendations.

Previous Literature Reviews (1980–2023)

Fehr & Peers has conducted three prior literature reviews—dated December 2014, May 2017, and October 2023—of both academic and industry-sponsored studies on billboard presence and driver distraction. These prior reviews included literature ranging from 1980 to 2021 and are summarized below.

2014 Literature Review (1980–2014)

The 2014 memorandum, *Digital Off-Site Signage: Implications for Distracted Driving and Traffic Safety*, prepared by Fehr & Peers, summarized studies conducted between 1980 and 2014, evaluating the effects of billboards and digital signage on driver distraction and safety. The analysis pulled heavily from FHWA-commissioned research, such as the 2009 Wachtel report² which reviewed 150 academic and industry studies. The general findings of Wachtel's report were inconclusive, with no compelling evidence linking digital signage to an increased risk of traffic incidents. Wachtel points out that the driving environment is often so complex that it may be impossible to directly connect causality of crash rates to a single external factor.

² Wachtel J. (2009). "Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs: Final Report." The Veridian Group; Berkeley, CA, Project No. NCHRP 20-7 (256)

The 2014 memo found that a large portion of existing studies had limitations that prevented their findings from being generalized. For example, many studies had small sample sizes, and therefore lacked statistical significance. Other studies were conducted in rural or suburban freeway settings rather than urban environments, where the drivers face a very different combination of challenges and risks. A key observation from this review was that studies often assumed higher driving speeds, like those present on rural and suburban roads, rather than those typical of urban areas like the Sunset Strip where the posted speed limit is 35 miles per hour, and the average speed is 35 miles per hour or less at peak times. While the 2014 memo ultimately found limited conclusive evidence on the relationship between digital signage and measurable safety outcomes, it did present a set of potential standards for regulating full motion billboards. These standards are discussed in the following section summarizing the 2017 literature review.

2017 Literature Review

In the years after the 2014 memorandum, full motion billboards continued to rise in popularity. In 2017, an updated literature review was conducted by Fehr & Peers, with the goal of assessing the 2014 full motion billboard standards, and comparing new findings and recommendations to the draft Sunset Boulevard Off-Site Signage Policy (adopted later in 2019).

The 2014 full motion billboard standards included suggested guidance in the categories of:

- Animation and movement
- Sign placement and spacing
- Variations in both the size and amount of text
- Luminance (levels of light a sign can emit)
- Illuminance (levels of light that can reach nearby areas)
- How multiple static images change to comprise a single message (message sequencing)
- How long a complete message remains fixed (message hold time)
- Transition methods and duration
- Total allowed area of digital signs
- The timeframe in which a sign is operational

For the full list of suggested 2014 full motion billboard standards and guidelines, please refer to **Attachment A**. For the full comparison of suggested 2014 billboard standards with the draft Sunset Boulevard Off-Site Signage Policy, please refer to **Attachment B**.

Like the 2014 literature review, the 2017 review found no new compelling studies regarding the topic of billboards and traffic safety outcomes, however, the rise in popularity still led to new regulatory standards aimed at reducing potential distractions. The 2017 review noted, for instance, that the City of Los Angeles adopted specific policies governing lighting levels, transitions, and billboard size in urban settings.

2023 Literature Review

In 2023, an updated literature review conducted by Fehr & Peers focused on research featuring three-dimensional (3D) billboards and potential implications on either driver distraction or traffic safety due to a proposed 3D billboard on Sunset Boulevard and La Cienega Boulevard. This review analyzed a 2021 study³ on the correlation between billboard presence and pedestrian collision

³ Schneider, R. J., Sanders, R., Proulx, F., & Moayyed, H. (2021). United States fatal pedestrian crash hot spot

patterns across the United States. The study specifically looked at urban hotspots—defined as places where arterial roadways have signalized intersections, pedestrian facilities, and a high degree of collision activity. Although the 2021 study found that a high percentage of pedestrian collision hotspots had billboards present, the study did not differentiate between the type(s) of billboards present (traditional static, full motion, or 3D). Additionally, the study did not explicitly compare these urban hotspots to other urban hotspots without billboards. The findings were therefore inconclusive in showcasing billboards as the primary factor for increased collision risk in a dense urban environment.

Another study⁴ on digital billboard presence and traffic collisions on Alabama and Florida highways found a positive correlation. However, the rural highway context of this study is extremely different from the urban arterial context of Sunset Boulevard, and these differences make it challenging to apply the study's findings more widely. Rural highways have highly repetitive visual surroundings, whereas urban arterial roads have more complex visual environments that place a higher demand on a driver's focus/attention. Another vital factor is that speeds are much higher on rural highways than in urban contexts. While this study showed no clear link between an increase in full motion billboards and traffic collisions in an urban environment, an increase in speed, such as the high speeds occurring in rural areas, has a well-established correlation with an increase in the number of vehicle collisions⁵ and their severity.^{6,7}

Overall, the previously reviewed literature did not present compelling evidence that full motion billboards directly lead to traffic collisions, and findings from the reviewed studies were not applicable in a dense urban context such as the Sunset Strip.

Updated Research Findings and Methods

2025 Literature Review

Given that prior research has been unable to find a direct link between the presence of billboards and traffic safety outcomes, the current review conducted by Fehr & Peers, summarized below, examines newer studies on collective effects of billboards as compared to other influencing factors, such as roadway design. The studies discussed in the following sections seek to address gaps from prior reviews, such as studies with a focus on the effects of full motion billboards specifically, and research that examines similar speeds and road contexts to Sunset Boulevard. This shift in perspective incorporates recent studies that go beyond the use of existing crash statistics, and employ advanced methodologies to design new kinds of experiments. Researchers have noted that crash reports, as a source of data, have significant limitations, because they do not provide information about the cognitive process in the driver prior to a collision, and may not reliably capture distraction from billboards, as drivers may be reluctant to self-report any type of distraction factors due to liability concerns (Wang et al., 2021, Farbry et al., 2001).

locations and characteristics. *Journal of Transport and Land Use*, 14(1), 1–23.
<https://doi.org/10.5198/jtlu.2021.1825>

⁴ Sisiopiku, V. et al. (2014). Traffic Safety Risks from Digital Advertising Billboards in Alabama

⁵ Rune, E. (2005). Speed and Road Safety: Synthesis of Evidence from Evaluation Studies – TRID, TRB

⁶ Farmer, M. C. (2019). The effects of high speed limits on traffic fatalities in the United States, 1993–2017, Insurance Institute for Highway Safety

⁷ US Department of Transportation. (2000). Literature Reviewed on Vehicle Travel Speeds and Pedestrian Injuries.

These new studies utilized methods such as Naturalistic Driving Studies (NDS), which are driving simulation experiments that replicate real-world conditions, while isolating billboards as the primary variable. Featured studies used technology that tracked the motion of a driver's eyes as they navigated the experimental environment. They also used electroencephalography (EEG), a technology that tracks levels of brain activity and function as drivers completed different tasks. These tools allowed researchers to measure/assess with precision and detail if external factors stimulate a cognitive or visual response. Findings from NDS indicate that roadway factors (i.e., street geometry, street furniture), environmental factors (i.e., weather, traffic conditions), and human factors (i.e., age, phone use, driving experience) interact in complex ways that contribute to driver distraction and influence overall driving behavior.

DRIVER DISTRACTION FACTORS

As referenced in the 2014 and 2017 Literature Review summaries above, academic and industry-sponsored studies were used to inform and create the standards for the Sunset Boulevard Off-Site Signage Policy with the intention of reducing potential driver distraction. To better understand the nuance behind driver distractions, newer studies (not included in previous reviews) by Sheykhfard et al. (2020), Wang et al. (2021) and Oviedo-Trespalacios et al. (2019) are summarized below.

Driver distraction can stem from both human or internal distraction factors (sources of distraction within a driver's control or inside a vehicle) and external distraction factors (sources of distraction outside a driver's control or vehicle). Internal distraction factors, such as cell phone use (texting or calling while driving), have been extensively studied and are known to significantly impair driver attention and reduce reaction times by up to 25% (Samsa, 2015). External distraction factors are divided into three groups: situational clutter, designed clutter, and built clutter. Situational clutter includes all moving and fixed objects at roadside, such as pedestrians at a crosswalk. Designed clutter includes all traffic control tools, such as traffic signals or parking signs. Sheykhfard (2020) found that built clutter, which includes full motion billboards and other billboards, presents a more complex and variable influence on driving behavior as compared to both situational and designed clutter. This study looked at the complex relationship between road conditions (external), environmental factors (external), and human factors (internal), and found that human factors had the highest influence on driver performance. Findings from Oviedo-Trespalacios et al. (2019) similarly found that younger drivers were more susceptible to distraction from full motion billboards. These two studies conclude that the effect of any individual external distraction factor differs greatly depending on the human and internal distraction factors present, such as who is driving and what distractions are inside the vehicle.

A comparative study, by Wang et al. (2021), took a unique approach to investigating driver distraction by using a driving simulation with eye tracking technology to examine the distraction potential of several factors, including full motion billboards, static speed signs, dynamic speed feedback signs, static speedometers (analog needle showing current speed), and dynamic speedometers (display that actively adjusts based on current speed). The latter four factors are designed to assist driving rather than divert attention. Across all test scenarios, drivers looked at static/dynamic speed signs and static/dynamic speedometers for a longer duration of time (in seconds) as compared to full motion billboards. These findings reassert that billboards themselves are not a uniform risk factor. Rather, studies show that elements such as luminance, dwell time, and billboard size all contribute to the level of distraction. In other words, the specific characteristics of billboards in the context of other factors can influence distraction levels to varying extents depending on the combination of these characteristics.

While these studies did not specifically focus on Sunset Boulevard or similar urban environments, they found that human factors along with other internal and external factors play a significant role in determining the degree of driver distraction. These findings show us that human factors, such as age and years of driving experience, may amplify internal distraction factors, making it more difficult to isolate the potential impact of external distractions like full motion billboards.

ADDITIONAL FINDINGS ON FULL MOTION BILLBOARDS AND DRIVER IMPACTS

West Hollywood policy makers used the previous literature reviews, summarized above, to inform regulations about specific billboard characteristics with the goal of limiting potential driver distraction on Sunset Boulevard. In more recent years, additional driver simulation studies (Meuleners et al. 2020, Brome et al., 2021, Yang et al., 2024), provided further insights on how full motion billboards might impact drivers (however, the findings of these studies were limited to simulated environments and have not been shown to apply to real-world environments):

- **Degrade Driving Performance:** Increased lane deviation (unintentionally leaving a lane) and slower reaction times (Brome et al. 2021)
- **Reduced Visual Attention:** Reduced road fixation (shorter times spent looking at the road), increased fixation duration on full motion billboards (longer times spent looking at billboards), and more frequent gazes toward full motion billboards (Meuleners et al. 2020) as compared to other types of billboards (traditional static)
- **Increased Cognitive Load:** Higher brain activity, indicating greater cognitive distraction (Brome et al., 2021).

While these simulation studies have demonstrated potential effects specifically on driver distraction, it's important to note that other real-world and simulation studies (*as summarized in the previous section*) have not found a statistically significant causal relationship between billboards and real-world outcomes for vehicle collisions.

As mentioned, the complex interaction between both internal and external factors other than billboards may contribute to the potential of driver distraction. For example, research suggests placing full motion billboards next to vital traffic signs (like turn restrictions) can affect drivers' ability to recognize those signs and potentially alter their driving behavior (Yang et al., 2024). This study found that when billboards were further away from important traffic signs, the driver was more easily able to recognize these signs and react accordingly. Studies also found specifically that billboards positioned near complex intersections and curves were among the primary factors increasing driver inattention (Sheykhfard and Haghighi, 2020, Beijer, 2002). These findings suggest that a billboard's relative position can potentially impact drivers more than the billboard itself. Additional external factors such as the geometry of an intersection, and traffic sign coherence (the clear, comprehensible combination/arrangement of signs) can also affect driver distraction. Given the complex interplay of external factors (billboard placement, traffic sign coherence, intersection geometry), it is difficult to discern which factor may be contributing the most to driver distraction or traffic safety outcomes. However, these findings can help inform future road design decisions.

Recommendations

These findings emphasize that it is nearly impossible to attribute a single factor as the cause of vehicle collisions. Rather, on a corridor like Sunset Boulevard, it is important to consider the safety of the roadway design as a whole since there is potential for driver distraction. When there is a high density of billboards and additional external distraction factors, improved roadway design that minimizes the risk of serious collisions is vital. The *Traffic Safety Suggestions* section below proposes roadway design improvements, such as curb extensions and turn restrictions, that may reduce speed and provide separation for vulnerable road users to counter the worst safety outcomes.

While these studies do not establish a direct link between full motion billboards and increased vehicle collisions, they refine our understanding on the complex interactions between internal and external factors that influence driver distraction. This study aims to show how billboards influences driver distraction, but this increased distraction has not been found to lead to outcomes of increased vehicle collisions. This research suggests a nuanced approach to billboard traffic safety: implementing safe streets design to increase driver attentiveness in general, wherever and whenever possible. The evolving nature of digital advertising necessitates continuous research and policy adaptation to balance commercial interests with road safety.

Collision Analysis – Comparing Four Los Angeles Corridors

This collision analysis evaluates the relationship between off-site signage density and vehicle collision trends on four arterial corridors within Los Angeles County. This analysis evaluates how Sunset Boulevard, a corridor with a high volume of billboards, including full motion billboards, compares to three similar commercial corridors with significantly fewer billboards.

The three comparison corridors are:

- Beverly Boulevard from S. San Vicente Boulevard to N. Fairfax Avenue
- Ventura Boulevard from Whitsett Avenue to Tujunga Avenue
- Colorado Boulevard from Pasadena Avenue to N. Hill Avenue

Each corridor was selected based on similarities to Sunset Boulevard’s physical and functional characteristics, including peak-hour traffic volumes, intersection spacing, travel lane configuration, commercial/mixed-use land use, and low or zero-setback development patterns. All four corridors serve primarily commercial and mixed-use contexts with low building setbacks, have a similar spacing of intersections, ranging between 250 to 400 feet, and have a similar roadway configuration with two travel lanes in each direction. Average peak-hour traffic during a typical weekday for each corridor ranges from approximately 1,900 to 2,300 vehicles, except for Colorado Boulevard, which has notably lower peak hour traffic.

Collision Analysis Results

The following collision statistics were summarized using Statewide Integrated Traffic Records System (SWITRS) crash data for the 2015–2024 time period.

Collision Volume and Severity

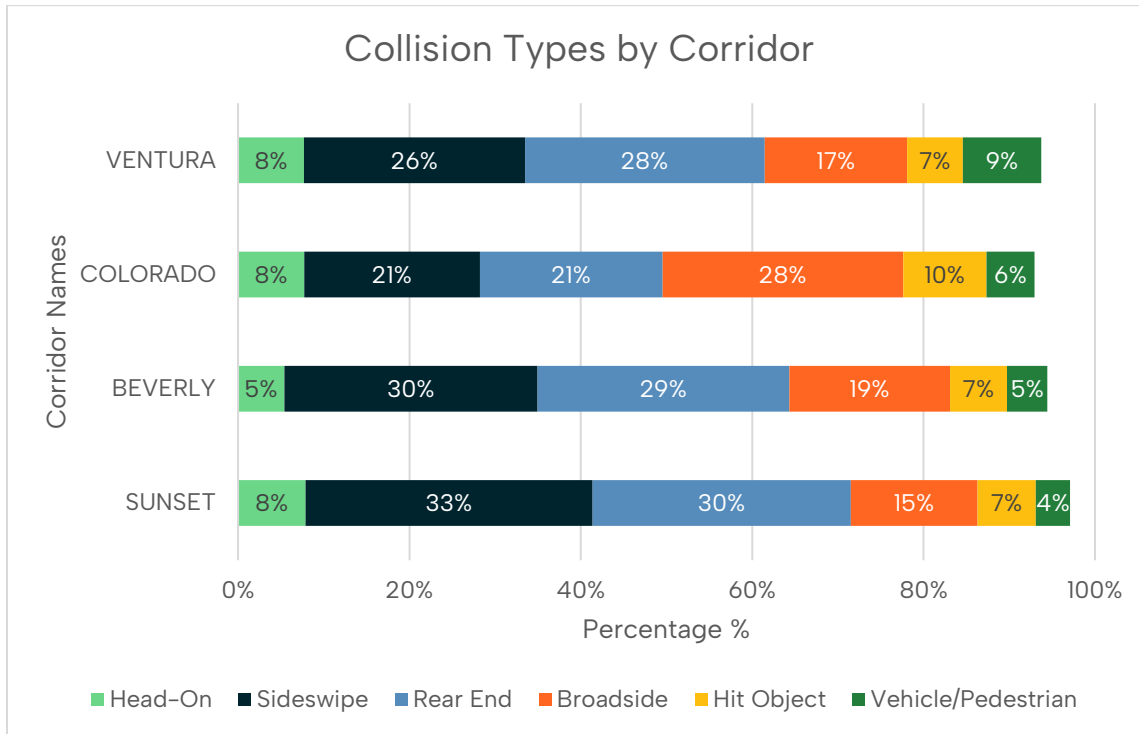
Corridor	Fatalities	Severe Injuries	Other Injuries	Complaint of Pain	Property Damage Only (PDO)	Total Collisions
Sunset Blvd.	1	22	78	102	520	723
Beverly Blvd.	3	9	53	146	510	721
Colorado Blvd.	3	18	112	163	455	751
Ventura Blvd.	3	25	74	147	166	415

Source: SWITRS.

The total number of collisions and severity of crashes along Sunset Boulevard is within range of the other comparison corridors, excluding Ventura Boulevard, which has a notably lower count of property damage only (PDO) crashes. Sunset Boulevard has the lowest number of fatalities and complaint of pain injuries compared to the other corridors.

Collision Types Most Associated with Distraction while Driving

The figure below shows a comparison of the breakdown of collision types by corridor. Collision types describe a collision by the first injury or damage-causing event.



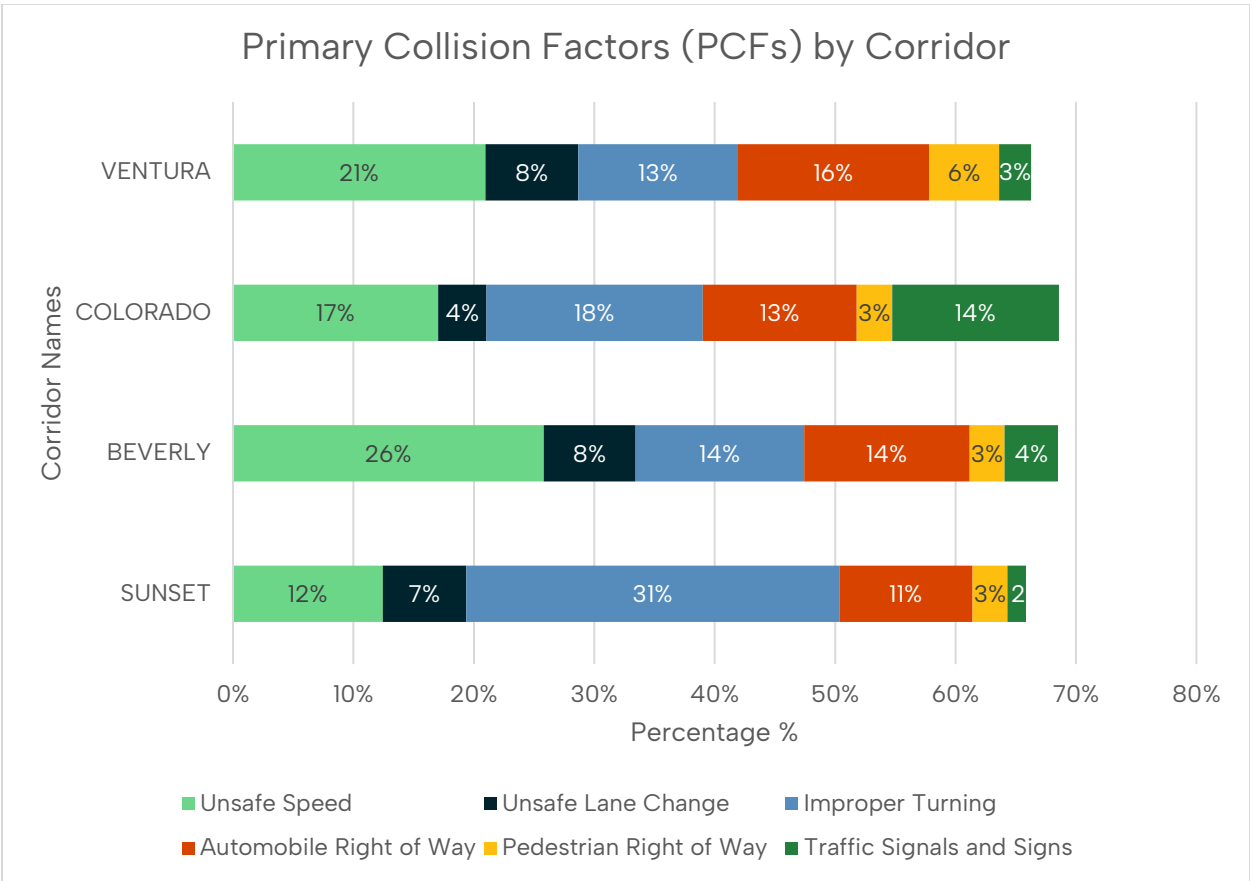
Source: SWITRS.

Note: Only collision types most associated with driver distraction have been included, which is why the percentages shown do not add up to 100 percent.

Sideswipe, rear end, and broadside crashes were the most frequent collision types across all corridors. Sunset Boulevard had the highest proportion of side swipe and rear end collisions, but these rates were not significantly higher than the remaining corridors.

Primary Collision Factors

The figure below shows a comparison of the breakdown of primary collision factors (PCFs) by corridor. PCFs are traffic violations, as defined in the California Vehicle Code, that describe the primary cause of the collision.

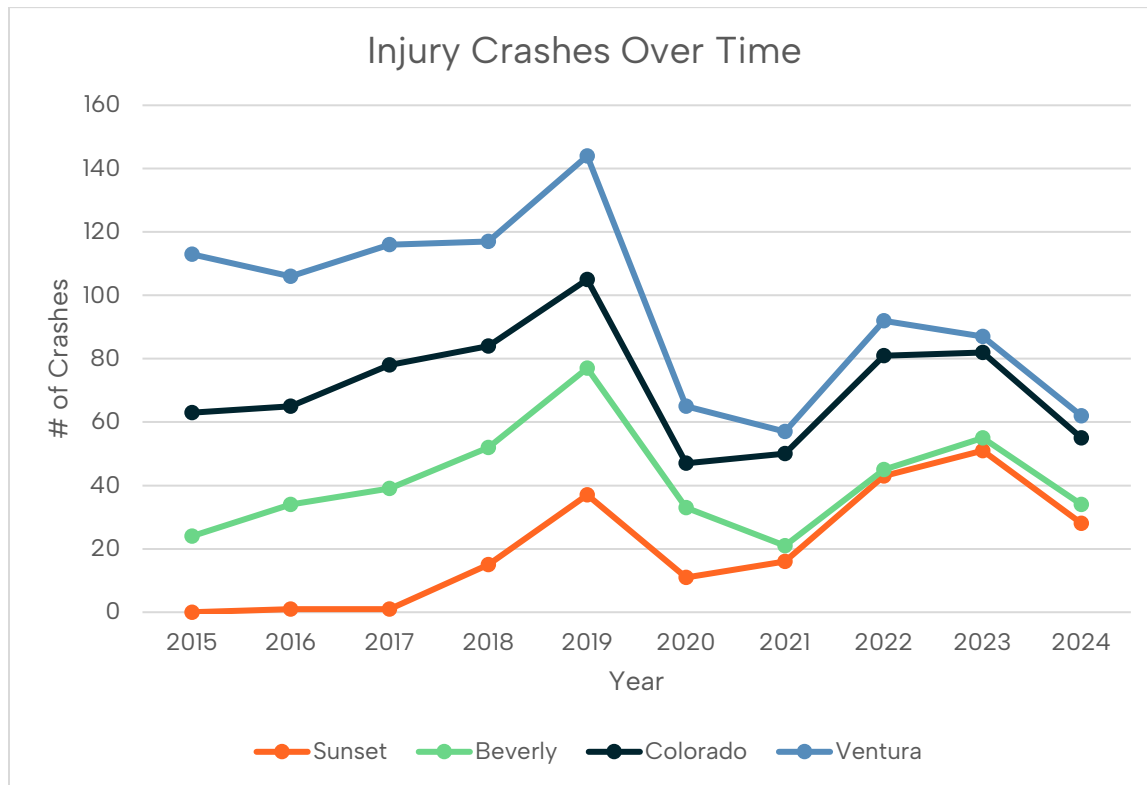


Source: SWITRS.
Note: Only PCFs most associated with driver distraction have been included, which is why the percentages shown do not add up to 100 percent.

Sunset Boulevard had a notably higher rate of collisions related to improper turning, which occurs when vehicles fail to yield to the right of way, typically during left turning movements. This pattern could reflect the combination of frequent unsignalized driveways, angled intersections, and driver distraction due to a complex visual environment. Additionally, the Sunset Strip is an iconic corridor within Los Angeles that attracts a high number of tourists who may be unfamiliar with the area. Therefore, the higher rate of improper turn collisions along Sunset Boulevard cannot solely be attributed to higher billboard presence.

Injury Crashes and Property Damage Only (PDO) Crashes Over Time

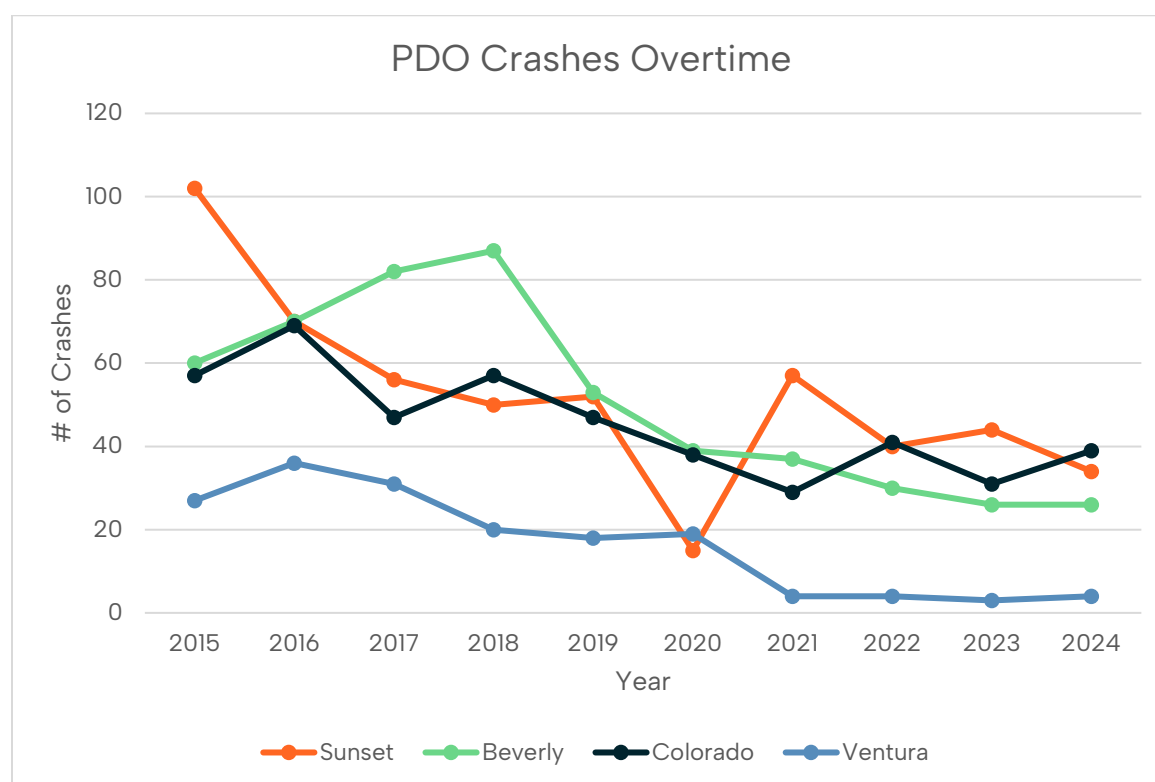
The figure below shows a comparison of injury crashes by corridor over time. Injury crashes include fatalities, severe injuries, other injuries (minor injuries), and complaint of pain crashes.



Source: SWITRS.

When analyzing injury crashes across the four study corridors, a similar pattern emerges in the number of crashes over time. Injury crashes steadily increase across all four corridors, reaching a peak in 2019, and then dropping significantly between 2020–2021 due to the COVID-19 pandemic. Among the four corridors, Sunset has the lowest amount of injury related crashes overall, trending below the other corridors each year.

The figure below shows a comparison of property damage only (PDO) crashes by corridor over time. Property damage only crashes are non-injury crashes.



Source: SWITRS.

Sunset Boulevard recorded the highest count (520) of property damage only collisions, with nearly 20% of all collisions within the 2015–2024 time period occurring in 2015 alone—a period when significantly fewer full motion billboards were present along the corridor. If billboards were a primary cause of PDO collisions, there would be an observed increase over time; however, no such trend is observed. In 2021, digital advertisements for bus shelters became operational, as did full motion billboards in 2022. Despite these new additions, there were no observable spikes in total PDO collisions in 2021 or 2022 (compared to pre-pandemic levels). In fact, PDO collisions each year tend to average fewer than they did before 2020, even excluding 2015. Thus, it may be concluded that these potential distractions did not result in a sharp increase in PDO crashes from previous years and therefore billboards were not a main contributing factor in property damage collisions.

Observations and Implications

The high proportion of side swipe collisions, rear end collisions, and elevated improper turning collisions on Sunset Boulevard reveal an opportunity to implement safety countermeasures that focus on increasing driver awareness and attentiveness along the corridor. For example, rear end collisions may indicate reduced driver reaction times to objects in front of them, leading to insufficient stopping distance for vehicles. Thus, safety countermeasures that focus on bringing driver attention back to the roadway would be appropriate.

Overall and in conclusion, the comparative collision analysis does not reveal any trends that suggest the presence of numerous billboards leads to a greater number of collisions compared with corridors in a similar urban environment with fewer billboards.

Traffic Safety on Sunset

Fehr & Peers conducted field visits along Sunset Boulevard, between Havenhurst Drive and Doheny Road, to evaluate potential traffic safety concerns. The field visits were conducted during both daytime and nighttime to assess how conditions may vary in terms of visibility of regulatory traffic signs and signals, and potential conflicts with other road users. The findings of our field visits are summarized below. We have developed suggestions for locations throughout the corridor that present a menu of options for the City to further explore. The suggested countermeasures below do not commit the City to employ them, but provide a number of options to further analyze for implementation.

Field Observations & Traffic Safety Suggestions

Corridor-wide, the following countermeasures may be applied to help increase driver awareness and attentiveness along Sunset Boulevard:

- **Upgrading signal heads to incorporate yellow retro-reflective backplates** at major signalized intersections or intersections where there is a high density of proposed and/or existing signage;
 - **Implementing left turn restrictions**, particularly at major driveways and skewed intersections;
 - **Tightening turning radii at intersections**, particularly at skewed intersections and/or locations with long pedestrian crossing distances; and
- Upgrading existing pedestrian infrastructure by installing leading pedestrian intervals at major signalized intersections**, increasing pedestrian walk times, and converting unsignalized crosswalks into signalized crosswalks.

Between Havenhurst Drive and Harper Avenue, we made the following field observations:

- Westbound (WB) traffic along Sunset Boulevard travels along a curve, which reduces visibility of oncoming vehicles and vehicles exiting driveways
 - **Suggestion:** Coordinate with the City of Los Angeles to install curve warning signs (W1-8⁸) for WB traffic traveling along the curve
 - **Suggestion:** Coordinate with the City of Los Angeles to change the current dashed striping along the curve to a solid white stripe to discourage lane changes
 - **Suggestion:** Coordinate with the City of Los Angeles to stripe hatching along the curb of the roadway to narrow the vehicle lane and slow vehicles along the curve
- At the driveway located at 8222 Sunset Blvd, vehicles turning left from the driveway onto Sunset Boulevard have limited visibility of WB vehicles due to the curvature of the roadway
 - **Suggestion:** Add left turn restrictions at the driveway through signage

At Sunset Boulevard and Harper Avenue, we made the following field observations:

- The skewed intersection geometry at Harper Avenue results in increased pedestrian crossing distances and higher vehicle turning speeds

⁸ The W1-8 "Chevron Alignment" sign provides additional emphasis and guidance at sharp turns or curves. Please see the 2014 California Manual on Uniform Traffic Control Devices (CA MUTCD Rev 9) Section 2C.09 for additional information on the W1-8 "Chevron Alignment" sign.

- **Suggestion:** Add a quick-build curb extension at Harper Avenue by using paint and plastic bollards at each corner of the intersection to make the intersection geometry more square. This will reduce pedestrian crossing distances, and reduce vehicle turning speeds.
- The signal at Roxbury Road and Sunset Boulevard causes a queue that extends past the intersection at Harper Avenue
 - **Suggestion:** Add left turn restrictions at Harper Avenue through a diverter. A diverter prevents left turns for a single approach at the intersection, using paint and plastic bollards, by angling vehicles in such a way that they must turn right.

At Sunset Boulevard and Olive Drive, we made the following field observations:

- We observed improper turning movements from the WB left turn from Sunset Boulevard onto Olive Drive
 - **Suggestion:** Add left turn restrictions at Olive Drive by hardening the centerline to restrict left turns from Olive Drive onto Sunset Boulevard and from Sunset Boulevard onto Olive Drive. Centerline hardening adds plastic bollards along the painted roadway centerline to prevent all left turns at an intersection.
- At night, we observed pedestrian crossing activity between Olive Drive and Kings Road outside of a marked crosswalk
 - **Suggestion:** Add a signalized crosswalk on the east leg of the Olive Drive and Sunset Boulevard intersection and install a pedestrian refuge island in the existing left turn lane. Pedestrian refuge islands are concrete medians, typically installed halfway through the crosswalk, that provide a buffer for pedestrians to navigate only one direction of traffic at a time.

At Sunset Boulevard and La Cienega Boulevard, we made the following field observations:

- There are long pedestrian crossing distances and short crossing times, especially on the south leg of the Sunset Boulevard and La Cienega Boulevard intersection
 - **Suggestion:** Increase the length of pedestrian phase walk signals during traffic cycles
 - **Suggestion:** Add leading pedestrian intervals (LPIs) during the pedestrian phase to increase visibility of pedestrians at the crosswalk. LPIs give pedestrians the opportunity to better establish their presence within the crosswalk approximately 3–7 seconds before vehicles are given a green light.

Between Cory Avenue and Doheny Drive, we made the following field observations:

- There is a slight visibility obstruction for WB traveling vehicles due to the inclined roadway
 - **Suggestion:** Add left turn restrictions at Cory Avenue and Carol Drive through a diverter. A diverter prevents left turns for a single approach at the intersection, using paint and plastic bollards, by angling vehicles in such a way that they must turn right.
- There is an unsignalized crosswalk on the east leg of the Cory Avenue and Sunset Boulevard intersection

- **Suggestion:** Convert the unsignalized crosswalk into a signalized crosswalk and add a pedestrian refuge island in the center turn median to increase visibility of pedestrians crossing. Pedestrian refuge islands are concrete medians, typically installed halfway through the crosswalk, that provide a buffer for pedestrians to navigate only one direction of traffic at a time.

At Sunset Boulevard and Cory Avenue, we made the following field observations:

- There is poor visibility for vehicles turning right at the northbound approach of Cory Avenue due to the inclined roadway and skewed intersection geometry
 - **Suggestion:** Implement a no-right-turn-on-red (NRTOR) restriction at the northbound approach of Cory Avenue and Sunset Boulevard
- There are long pedestrian crossing distances and short crossing times at the intersection
 - **Suggestion:** Increase the pedestrian phase walk times
 - **Suggestion:** Add leading pedestrian intervals (LPIs) during the pedestrian phase to increase visibility of pedestrians at the crosswalk. LPIs give pedestrians the opportunity to better establish their presence within the crosswalk approximately 3–7 seconds before vehicles are given a green light.
- The unique intersection geometry, in addition to the northside office building driveway located at 9201 Sunset Blvd., could create confusion for drivers, resulting in improper turning movements
 - **Suggestion:** Modify the existing “Right Turn ONLY” (R3–5⁹) sign to “Right Turn on Doheny Road ONLY” to prevent potential conflicts between WB vehicles traveling straight onto Sunset Boulevard and improper turning movements from the office building driveway

West Hollywood Target Vision Zero Plan

The City of West Hollywood’s West Hollywood Target Vision Zero Plan (2023) identifies Sunset Boulevard and Sherbourne Drive as another priority intersection for traffic safety improvements. The potential countermeasures identified in the report include:

- Reduce the posted speed limit on Sunset Boulevard to 30 mph if feasible under expanded authority granted by the state after June 2024.
- Convert the pedestrian crossing across Sunset Boulevard to a raised crossing if permitted by the Los Angeles County Fire Department.
- Add a curb extension on eastbound Sunset Boulevard to reduce the crossing distance and improve visibility of pedestrians in the roadway.
- Add a curb extension on the northeast corner to slow vehicles turning onto Sherbourne Drive.

⁹ The R3–5 “Right Turn ONLY” sign indicates that right turns are the only permitted movement at the intersection approach. Please see the 2014 California Manual on Uniform Traffic Control Devices (CA MUTCD Rev 9) Section 2B.19 for additional information on the R3–5 “Right Turn ONLY” sign.

Corridor Safety Conclusion

Our assessment of Sunset Boulevard from a traffic safety perspective is that a variety of factors contribute to potential traffic safety risk. Within just the roadway itself, there are a frequent number of unsignalized driveways, skewed intersections, uncontrolled crosswalks, and long pedestrians crossing distances at major signalized intersections. Additionally, Sunset Boulevard has long stretches of curved roadway and numerous side streets that intersect Sunset at steep inclines. These factors alone can contribute to higher potential crash risk.

As for the overall visual environment, several factors, in addition to off-site signage, may contribute to driver distraction along the corridor. Sunset Boulevard has many pedestrian-generating destinations, such as concert venues, restaurants, and hotels. The movement of pedestrians at intersections and mid-block contributes to high distraction potential. Other potential distractions contributing to the overall visual environment include the flashing and neon signs placed throughout the corridor. Additionally, digital bus shelter advertisements, which are located at eye level with drivers, present a risk that is potentially larger than billboards when it comes to driver distraction.

The findings of the literature review demonstrate how complex roadway safety can be, and isolating one variable, such as off-site signage, can be difficult due to the presence of multiple and contributing factors. Therefore, driver distraction cannot solely be attributed to the presence of billboards along Sunset Boulevard, and the results of the collision analysis demonstrate that any increase in driver distraction caused by billboards has not led to an increase in crashes. Instead, crash risk is influenced by a complex mix of contextual factors such as roadway design, land use, and traffic patterns.

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Attachment A: Digital Off-Site Signage – Implications for Distracted Driving and Traffic Safety (2014)



DRAFT MEMORANDUM

Date: December 16, 2014

To: Bianca Siegl, City of West Hollywood

From: Jeremy Klop and Chelsea Richer, Fehr & Peers

Subject: *Digital Off-Site Signage: Implications for Distracted Driving and Traffic Safety*

Ref: LA14-2717.00

The City of West Hollywood is embarking on an effort to develop a unique and immersive signage district along a 1.6-mile corridor of Sunset Boulevard known as the Sunset Strip. This effort aims to capitalize on the creativity within the City and the history of unique signs on Sunset, to encourage distinctive and engaging content that cannot be found anywhere else. In recognition that some of the most creative signage and advertising efforts are integrating digital and potentially animated components, and to appropriately address any potential concerns about the effects of these components on traffic safety along the Sunset Strip, the City of West Hollywood has commissioned research into the safety effects of digital signage in advance of the development of new signage regulations.

This memo summarizes and applies the available research to the context of the Sunset Strip. Reports on the effects of digital off-site signage on traffic safety fall primarily into two categories: academic studies, which largely support the idea that digital billboard signage in general is distracting and unsafe, and industry studies or reports, which primarily support the idea that academic research is inconclusive and causality cannot be proven. As such, signage industry reports often offer standards for optimal operation of digital signage, while land use and zoning industry reports present strategies for legally constraining digital signage proliferation.

The remainder of this memo first presents a summary of findings in each category, then provides recommended standards of operation, and finally includes a discussion of the application of the research to the development of an iconic signage district along Sunset Strip in West Hollywood. Appendix 1, attached, includes additional information about the existing conditions with regard to average daily traffic volume and collisions along the Sunset Strip and a comparative site within the City of West Hollywood, Santa Monica Boulevard.

ACADEMIC STUDIES

A series of FHWA-commissioned studies comprehensively review the literature on electronic and digital signage, beginning with Wachtel and Netherton in 1980, continuing with Farbry, et al in 2001, and most recently with Wachtel in 2009. Many of the studies referenced in these reviews establish a theoretical



underpinning of the traffic safety concern in human factors research, cognitive science, and the field of psychology. The 2009 Wachtel report reviews 150 academic and industry studies, pointing out the challenges of generalizing findings from any single study, particularly in developing context-specific regulations (Wachtel, 2009). A corollary report for the FHWA outlining future research needs in this area states that the available literature is inconclusive, despite a trend of minimal but present safety effects due to digital signage (Molino, et al, 2009). Wachtel concludes that existing research, along with the established (and intended) cognitive and psychological effects of digital billboards on driver distraction, are concerning enough to warrant a conservative approach to developing regulations for digital billboard signage (Wachtel, 2009).

The 2009 Wachtel report, other recent academic studies, and numerous professional presentations and reports cite a “breakthrough study” conducted in 2006 using data collected over 18 months in a naturalistic setting, tracking the behavior of 100 vehicles equipped with video and sensor devices (Wachtel, 2009; Klauer, et al, 2006). The database generated by this study allowed for analysis of factors associated with crashes, near crashes, and critical incidents. A follow-up analysis to the initial study, released by the National Highway Traffic Safety Administration (NHTSA) in 2006, found that distractions causing the driver to glance away from the forward roadway for more than two seconds increased the risk of crashing or having a near crash by at least two times over normal driving (Klauer, et al, 2006). However, the study also found that for drivers reporting drowsiness, the presence of a demanding driving environment resulted in lower crash risk compared to flat and less visually demanding environments (Klauer et al, 2006). While crash incidence was shown to increase overall with diverted glances longer than two seconds, correlations based on the type and severity of crashes were not included in the study.



Figure 1: Four perspectives captured by the instrumentation in vehicles participating in the 100 Car Naturalistic Study

Since the 2009 Wachtel report, several studies that aim to expand our understanding of the effects of digital billboards and signage on driver distraction and traffic safety have been published. These peer-reviewed studies consistently report adverse effects on driver behavior associated with the presence of digital billboards, often using the two-second rule established by the 100 Car Naturalistic Study (Edquist, et al, 2011; Milloy and Caird, 2011; Dukic, 2013; Roberts, 2013; Divekar, et al, 2013). However, the driving environment is often so complex that, as Wachtel points out, it may be impossible to attribute direct causality between a feature of the external environment and an increase or decrease in the number of traffic collisions (Wachtel, 2009).

Similarly, one major limitation of the above studies is that they do not consider, explicitly describe, or disaggregate data based on land use context. The nuance in how driver distraction differs on heavily trafficked arterials with a lot of commercial activity compared to rural arterials or compared to highways is



lost in the analysis. Those that do specify context face the challenge of demonstrating their findings are generalizable.

Of the studies reviewed, one described a land use and development pattern similar to the Sunset Strip (Smiley, et al, 2005). The study took place in Downtown Toronto, using three arterial intersection sites to assess safe behavior and conflicts associated with video billboards. This study found that the presence of video billboards, particularly at wide viewing angles off the line of sight or in areas without other visual clutter, contributed to more dangerous driving behavior with longer periods of the drivers' eyes off the road. In a collision analysis comparing the number of collisions before sign installation with the number of collisions after sign installation, the authors found a statistically insignificant increase of 13% and 43% for rear-end crashes and injury crashes, respectively (Smiley, et al, 2005). The results are statistically insignificant due to small sample size (Smiley, et al, 2005).

Driver distraction on a highway poses different risks than it does along an urban arterial. On a highway, vehicles travel faster but encounter fewer vulnerable users such as pedestrians or bicyclists. The presence of distractions along an urban arterial demands a constant level of attention, while highway users can become lulled into inattention and then surprised by unexpected events. Higher ambient lighting levels along urban arterials may mitigate some of the concerns about the blinding effects of digital signage that otherwise exist on rural or suburban roads.

Similarly, driver characteristics affect the risk of distraction or inattention. Results from a survey given all participating drivers as part of the 100 Car Naturalistic Study indicated that driver age, experience, self-reported traffic violations and accidents, daytime sleepiness rating, and personality result in significantly different levels of involvement in inattention-related crashes and near crashes (Klauer, et al, 2006). These factors are largely outside the control of the regulatory environment for digital signage, particularly for a corridor such as the Sunset Strip, which serves commuters, nightlife, tourists, young and old drivers, among others.

INDUSTRY REPORTS

Four key studies have been published with support from the advertising industry, all demonstrating no adverse effects from digital billboards (Lee, et al, 2007; Tantala and Tantala, 2007; Tantala and Tantala, 2009; Hawkins, et al, 2012). These studies range from more naturalistic experiments with real drivers on real roadways to simulator studies in a laboratory.

Though these studies have been promoted as "groundbreaking" findings that demonstrate no causal relationship, in actuality, they are not more or less conclusive than most of the academic literature cited above. These studies have been "debunked" by academic researchers cited above such as Wachtel and Morris, and given those severe methodological deficiencies, the data presented in these studies does not paint a compelling picture of safety related to digital billboards (Wachtel, 2007; Morris, 2009).

In addition to industry-sponsored studies, industry reports provide summaries and interpretations of the research related to digital signage and driver distraction. A 2004 report claims that despite the conservative approach to safety concerns, the ensuing 20 years of "inevitable" technology proliferation in billboards has shown there to be no observable spike in traffic safety concerns related to billboards. The report goes on to document some guidelines that have become regulatory standards (US Sign Council,



2004). The report also points out that many cities permit or encourage engaging signage, frequently digital, in the urban core to help cultivate a feeling of excitement and engagement (US Sign Council, 2004).

Similarly and more recently, the International Sign Association (ISA) produced guidelines for the “five key regulatory distinctions:” brightness, message hold times, transition method, transition duration, and area/square footage (Carpentier, et al, 2014). These are discussed in the final section of this memo.

APPLICATION TO SUNSET STRIP SIGNAGE DISTRICT

Despite the limited conclusive evidence provided by the academic or industry studies, several key lessons from the literature review can be applied to the Sunset Strip context:

- Digital signage with full motion animation or interactive components should not be targeted at drivers. Instead, full motion animation or interactive digital signage is appropriate for the pedestrian scale. It is possible that over time, technological advancements may allow marketers to target interactivity only at vehicle *passengers* and not vehicle *drivers*. Until this technology is demonstrable, passively interactive billboard components may be acceptable under certain conditions, but components that require the active, real-time participation from the driver should be avoided.
- Digital signage with changing messages should be regulated to avoid negative effects on driver focus and decision-making associated with rapid motion.
- Synchronize and coordinate signal timing along the corridor to encourage slower speeds during periods when high speeds are observed.
- Consider coordinating signal timing patterns with digital signage movement or transitions, changing the message or allowing for animation only when vehicles along Sunset Blvd are fully stopped or fully moving; avoid signage movement in the time leading up to the signal phasing change. Based on the literature reviewed for this document, this approach to digital signage has not yet been attempted by any cities. Furthermore, it may be difficult to achieve coordination along Sunset Blvd based on the curving/sloping roadway geometry, sight lines, and the adjacent land uses.
- Consider requiring operator control of digital signage which can dynamically change with roadway conditions such as speed, weather, time of day, or congestion, to provide a temporally-sensitive and spatially-sensitive approach to digital signage operations.
- Consider requiring digital billboards to include a certain amount of public content, such as Public Service Announcements, which address safety concerns along the corridor. For example, late at night, PSAs could cycle through normal advertising, featuring content about drinking and driving.

Tantala succinctly summarizes overarching traffic safety concerns: “Accidents occur with or without billboards” (Tantala, 2009). In developing a unique and immersive signage district for the Sunset Strip, West Hollywood could consider the following additional treatments to address existing traffic safety concerns, related or unrelated to the signage context, and improve future traffic safety along the corridor:



- Improve the pedestrian environment by continuing to install facilities such as frequent pedestrian crossings, curb-bulb outs, median islands, hybrid beacons, street trees or other landscaping, and pedestrian scale street lighting.
- Continue pursuing leading pedestrian interval signals that give pedestrians a head-start crossing the street.
- Continue to limit or prohibit right turns on red at locations where pedestrian collisions have been observed. Permitted right turns on red can encourage drivers to make dangerous maneuvers that affect pedestrian safety.
- Encourage visitors to the Sunset Strip to move about as pedestrians rather than drivers or passengers by implementing a “park once” strategy, expanding or adjusting routes on local transit service (i.e., CityLine and PickUp Line), and by engaging in an encouragement campaign with shops, bars, restaurants, and entertainment venues along the Sunset Strip.
- Implement design treatments that naturally reduce the travel speed of the corridor during hours when speeding is a problem.

With the academic and industry studies in mind, it can be helpful to look to other cities that have confronted this type of regulatory challenge. Times Square in New York City offers a unique case where a city has encouraged digital sign proliferation by explicitly requiring size and brightness minimums for each parcel within the special Theater Subdistrict overlay zone, along Broadway and 7th Avenue between 43rd Street and 50th Street. The New York City Department of City Planning sets these requirements based on a luminance unit of measure created specifically and uniquely for Times Square. In conversations with NYC Department of Transportation and Department of City Planning officials, the traffic safety concern related to digital signage distraction is relatively minimal. Even after the 2009 conversion of Broadway to a pedestrian plaza – a significant change in the traffic environment – the guidelines related to digital signage did not change.

Times Square has long been a pedestrian-oriented environment; the 2009 change to the Broadway built environment cemented that orientation by providing more space for pedestrians to linger. In a 2014 market research report released by the Times Square Alliance, survey data showed that 95% of respondents (all surveyed on foot) spent more than 1 minute looking at the signs and billboards in Times Square, and 83% of respondents said that signs/advertising added to the appeal of Times Square.

The context in Times Square is considerably different than the Sunset Strip. The 1.6-mile Sunset Strip is nearly five times longer than the 0.35-mile Special Times Square zone in the Theater Subdistrict in Manhattan. Average vehicle speeds through Times Square hover around 7 miles per hour, and over 60% of vehicles traveling through Times Square are taxis or black cars (Green Light for Midtown, 2010). The New York City street grid provides many alternate north/south routes that eliminate the need to travel through Times Square by vehicle. Pedestrians in Times Square outnumber vehicles ten-to-one (Green Light for Midtown, 2010). Still, Times Square offers some key lessons for the development of a special signage district along Sunset Strip:



- Context-sensitive standards for illuminance of digital signs should take into account ambient light that already exists along Sunset Boulevard at different times of the day, in order to avoid any blinding effects on drivers.
- Immersive signage environments are especially effective for advertisers in slower, pedestrian-oriented spaces (Times Square Alliance, 2014).
- Slow traffic speeds and sufficient facilities for other modes such as pedestrians and bicyclists can mitigate some concern over driver distraction.



POTENTIAL SIGNAGE STANDARDS

The following categories summarize the available regulatory options, some or all of which may be desirable regulatory options for the City of West Hollywood along Sunset Blvd. Areas of particular concern would include lighting or motion characteristics that could be mistaken by a driver as a traffic control device or an emergency vehicle, such as red or yellow lights accompanied by flashing or strobing effects. Similarly, flashing motion, strobing effects, or blinding luminance would be a high priority area for regulations in light of traffic safety concerns.

Animation and Movement

This key regulatory issue has significant potential safety implications. Full motion video signage typically appears in areas outside a particular municipal jurisdiction, such as along highways running through unincorporated areas. This type of signage also appears in high density commercial districts such as Times Square (Mandelker and Baker, 2014). Some types of movement are considered to be more distracting than other types, and accordingly regulations can be crafted to prohibit “flashing, strobing, or racing” effects (Morris, 2009; Roberts, 2013).

The State of California also prohibits any “red or blinking or intermittent light likely to be mistaken for a warning or danger signal” if the sign is visible from a highway (Caltrans, 2014).

Placement and Spacing

Lateral placement should reduce the driver’s need to turn his head in order to view the sign by minimizing the angle away from the forward view (Roberts, 2013; Smiley, et al, 2005).

Signage should not be placed in spaces that are already visually cluttered or along segments that are highly demanding for drivers based on the geometry of the roadway (Roberts, 2013).

Though this issue has become a key point in developing signage regulations that can hold up under legal scrutiny, whether or not a sign is advertising on-site or off-site may not make a difference in terms of safety for drivers (Mandelker and Baker, 2014).

Text Size and Amount

Roberts (2013) recommends the quantity of information be confined to the number of words that can be read during the approach within two seconds, or the point at which away-from-forward glance becomes twice as likely to result in a crash. This formula first requires an estimated “legibility distance,” which takes into account distance and speed, and a comprehension rate (Roberts, 2013). Roberts recommends a comprehension rate of three words per second, depending on font size and complexity, and text formatting and design (Roberts 2013).

Text size may be regulated to be larger than a minimum size, set by the speed limit of the road and the sign industry’s “best practices” formula, or regulated to a maximum number of words, but notes that this standard is rarely applied (Morris, 2009).



Illuminance

Illuminance refers to the level of lighting in context with existing ambient lighting. Dr. Ian Lewin of Lighting Sciences, Inc. suggests differing illuminance standards for areas of low ambient light and for areas of medium to high ambient light. The FHWA recommends adjusting brightness in response to ambient light levels to ensure signage is not “unreasonably bright for the safety of the motoring public” (FHWA, 2007). In areas of low ambient light, digital signs should not exceed 0.3 footcandles (fcs) when measured at the recommended distance based on the size of the sign (Carpentier, 2014). For areas of medium to high ambient light, digital signs should not exceed 0.8 fcs (Gottwald, 2011). All digital signs should be equipped with auto-dimming technology. These standards refer specifically to on-site signage; a lighting engineer should be consulted to ensure appropriate application of standards for off-site signage.

Message Sequencing

Concern about message sequencing developed out of an understanding of the Zeigarnik Effect, which refers to the subconscious compulsion to wait until a message is complete before looking away. For signs with scrolling or sequential messages, this effect may encourage drivers to unexpectedly slow down to see the conclusion of the sequence (Morris et al, 2009). Roberts (2013) recommends message sequencing should be prohibited.

Message Hold Time

Message hold time refers to the length of time a message must remain fixed before transitioning to another message (Carpentier, et al, 2014). The 2004 US Sign Council report recommends a minimum on-time for each message in a sequence of messages such that “a motorist traveling the affected road at the 85th percentile speed would be able to read not more than one complete nor two partial messages in the time required to approach and pass the sign” (US Sign Council, 2004). Similarly, Roberts (2013) recommends message hold time be adjusted based on the speed environment and visibility distance.

The FHWA recommends an eight-second duration of display (FHWA). Other researchers similarly recommend an average of seven messages per minute, or 8.5 seconds per message (Durham, 2009).

Fully animated signage would require different standards, for example, the maximum number of seconds a video story may run. If fully animated signage is permitted, regulating message hold time for static images or scrolling text may not be necessary. Instead, it would be prudent to apply message transition standards, discussed below, to determine the type of motion that may be included in a video.

Transition Method

Transition method refers to the way in which one message changes to another message (Carpentier, 2014). This transition can occur instantaneously, via a dissolve effect, or through some other motion-dependent effect. Similar to the considerations for message hold time, if fully animated messages are permitted, setting a standard for transition methods for otherwise static images or text may not be necessary. Roberts (2013) recommends transition method should be instantaneous in order to minimize the potential for involuntary distraction or prolonged driver dwell time.



Transition Duration

Transition duration refers to the amount of time it takes to switch from one message to another (Carpentier, 2014). The FHWA recommends the transition is kept between 1-2 seconds (FHWA, 2007). Similarly, industry standards recommend transition duration specifically for Electronic Message Centers is kept to a maximum of one second (Carpentier, 2014). Roberts (2013) recommends transition time should be instantaneous.

Similar to the considerations above, if fully animated messages are permitted, setting maximum transition durations may not be necessary.

Area of Digital Sign

Area can be regulated by setting a minimum or maximum square footage for a digital sign, or by setting a minimum or maximum percentage of the entire sign that may be covered by digital content (Carpentier, 2014). Industry guidelines recommend billboard area be determined based on context, in coordination with the expectations of the community, and with different standards for different zoning districts (Carpentier, 2014). Legally, size restrictions do not violate the First Amendment (Baker and Wolpert, 2011).

Operations

The timeframe during which a sign is operational can be regulated if the standards pass the “time, place, manner” test (Mandelker and Baker, 2014). The standards must be content-neutral, but may require all digital or internally-lit signage to turn off or dim after a certain time of night, for example. The standards can also require a sign to “rest in dark” rather than “rest in light”. These types of regulations can ameliorate community concerns about light pollution or about exacerbating the dangers of impaired drivers past a certain time of night.

The FHWA recommends requiring a default designed to freeze the image in the event of a malfunction (FHWA, 2007).

Operations standards could also address remote operation requirements or prohibitions, or concerns about “hacking” and security, however, these are standards are not addressed here as they do not contribute to traffic safety concerns.



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APPENDIX 1

Based on data from the Statewide Integrated Traffic Records System (SWITRS), accessed through the Transportation Injury Mapping System, the following analysis was conducted on collision data from 1/1/2008-12/31/2012 for two segments within West Hollywood. The first segment is the Sunset Strip – along Sunset Blvd between Sierra Dr and Marmont Ln. The second, comparison segment is along a commercial stretch of Santa Monica Blvd, between Doheney Dr and Fairfax Ave. Segment 1 is 1.65 miles in length, while Segment 2 is 1.85 miles in length, so all data has been normalized to reflect a “per-mile” figure. The comparison segment was selected because it shares similar land use characteristics with the Sunset Strip.

Table 1 presents the Existing Daily Segment Volumes and 85th Percentile Speeds for each segment, from the General Plan 2035 and the West Hollywood Neighborhood Traffic Management division.

		From	To	Volume	85th Percentile Speed
Segment 1	Sunset Blvd	Sierra Dr	La Cienega Blvd	51,462	35 mph
		La Cienega Blvd	Marmont Ln	52,231	35 mph
Segment 2	Santa Monica Blvd	Doheny Dr	La Cienega Blvd	53,388	34 mph
		La Cienega Blve	Sweetzer Ave	45,313	32 mph
		Sweetzer Ave	Fairfax Ave	46,468	32 mph
Source: West Hollywood General Plan 2035, http://www.weho.org/home/showdocument?id=17230					

Table 2 summarizes the total number of collisions per mile on each segment, and key collision factors related to corridors with high levels of night-life.

Table 2: Collision Factors						
		Total Collisions Per Mile	Percent of Total Collisions DUI	Percent of Total Collisions "Late Night" (between 12:00am-2:59am)	Percent of "Late-Night" Collisions DUI	Percent of "Late Night" Collisions Speed- Related
Segment 1	Sunset Blvd	105	9%	16%	30%	15%
Segment 2	Santa Monica Blvd	161	6%	19%	24%	13%
Source: SWITRS 2008-2012, Fehr & Peers						

		Total Collisions Per Mile	Total Number Fatal Collisions Per Mile	Percent of Total Collisions Resulting in a Fatality	People Injured Per Collision
Segment 1	Sunset Blvd	105	0.6	1%	1.3
Segment 2	Santa Monica Blvd	161	0.0	0%	1.2

Source: SWITRS 2008-2012, Fehr & Peers

		Total Collisions Per Mile	Total Pedestrian Collisions Per Mile	Percent of Total Collisions Involving a Pedestrian	Total Bike Collisions Per Mile	Percent of Total Collisions Involving a Bicyclist
Segment 1	Sunset Blvd	105	20.6	20%	9.1	9%
Segment 2	Santa Monica Blvd	161	45.4	28%	18.4	11%
Source: SWITRS 2008-2012, Fehr & Peers						

	Total Pedestrian Collisions Per Mile	Total Number Pedestrians Injured Per Mile	Total Number Pedestrians Killed Per Mile	Percent of Pedestrian Collisions Resulting in Fatality	Total Bike Collisions Per Mile	Total Number Bicyclists Injured Per Mile	Total Number Bicyclists Killed Per Mile
Segment 1 Sunset Blvd	20.6	20.6	0.6	3%	9.1	8.5	0
Segment 2 Santa Monica Blvd	45.4	47.0	0.0	0%	18.4	18.9	0

Source: SWITRS 2008-2012, Fehr & Peers

Attachment B: Updated Digital Off-Site Signage Analysis Addressing Traffic Safety (2017)



DRAFT MEMORANDUM

Date: May 31, 2017

To: Bianca Siegl, City of West Hollywood

From: Jeremy Klop and Chelsea Richer, Fehr & Peers

Subject: *Updated Digital Off-Site Signage Analysis Addressing Traffic Safety*

Ref: LA14-2717.00

This memorandum updates prior work conducted for the City of West Hollywood, documented in a memorandum dated December 16, 2014. The previous memo was attached to the Negative Declaration for the Creative Billboard Ordinance in 2016. The purpose of this memorandum is compare the standards recommended in the previous memo to the draft Sunset Boulevard Off-Site Signage Policy, key points of which are shown in italics.

The remainder of this memo describes the application of industry standards as they relate to the draft *Sunset Boulevard Off-Site Signage Policy*. The memo also includes a brief summary of the research related to this topic and concludes with a brief discussion of future digital signage considerations and broader safety recommendations for the Sunset Strip Billboard District.

LITERATURE REVIEW SUMMARY

The previous work conducted for the City of West Hollywood, documented in a memorandum dated December 2014, included an extensive literature review of both academic and industry-sponsored studies. This review included literature ranging from 1980 to 2013. Overall, the literature did not present compelling evidence in either direction on the question of whether digital signage worsens driver distraction, causes traffic safety concerns, or is generalizable and applicable in a context such as the Sunset Strip. Many studies were limited in their sample size, conducted along rural or suburban freeways (i.e., a substantially different context than the Sunset Strip), or did not demonstrate statistically significant causality related to collision patterns. Average driving speed on the Sunset Strip is 32-35 miles per hour, typically lower than the assumed speed for studies that evaluate Digital Billboards that are viewed from freeways and rural area. Since 2013, few additional studies have been released, none of which present findings that are more compelling than those published between 1980 and 2013. However, in that time frame, digital Billboards have become more popular, and neighboring jurisdictions, including the City of Los Angeles, have continued to advance their standards for regulation. Significantly, the City of Los Angeles is in the process of increasing the digital billboard presence in the downtown area, and developed a Specific Plan and several Sign Use Districts that include regulations tailored for digital billboards in an urban setting.



Policies to regulate digital signage focus on standards related to acceptable lighting levels and the reduction of excessive distractions such as interactive components, visually jarring transitions, and the size of the signs. These standards have been tailored to the specific context of Sunset Blvd (32-35 mph average speed; high ambient light), and are described in the next section alongside the components of the *Sunset Boulevard Off-Site Signage Policy* that relate to them.

APPLICATION OF SIGNAGE STANDARDS WITHIN THE SUNSET BOULEVARD OFF-SITE SIGNAGE POLICY

The draft West Hollywood policy focuses on reducing contrast as an effective means of reducing distraction rather than limiting advertising content. The draft Sunset Boulevard Off-Site Signage Policy requires significantly lower light levels than the current industry norm, as indicated in a May, 2017 memorandum by the firm Francis Krahe & Associates, including regulations for monitoring and sensors that automatically adjust brightness in relation to ambient light.

The following categories, reviewed in the 2014 memorandum, summarize the full set of available regulatory options and the draft policy response. Areas of particular concern include high intensity and/or color lighting or moving images that could be mistaken by a driver as a traffic control device or an emergency vehicle, such as red or yellow lights accompanied by flashing or strobing effects. Similarly, flashing motion, strobing effects, or blinding luminance are a high priority area for regulations in light of traffic safety concerns.

Animation and Movement

Some types of movement are considered to be more distracting than other types, and accordingly regulations can be crafted to prohibit “flashing, strobing, or racing” effects (Morris, 2009; Roberts, 2013). The State of California also prohibits any “red or blinking or intermittent light likely to be mistaken for a warning or danger signal” if the sign is visible from a highway (Caltrans, 2014). This provision is similar to the overarching provision already found within the West Hollywood Municipal Code (Section 19.34.040) that prohibits colored lights or other design elements that may be confused with or mistaken for traffic-control devices.

The draft Sunset Boulevard Off-Site Signage Policy allows animation but prohibits moving patterns that use stroboscopic or flashing images, prohibits signage that could be confused with traffic control devices, and only permits moving patterns from sunrise to 2:00 AM. Additionally, the recommendations described in the May, 2017 memorandum by the lighting engineering firm Francis Krahe & Associates focus on reducing contrast as an effective means of avoiding potential distraction in a highly urban area.

Placement and Spacing

The 2014 memo recommends standards for placement and spacing to avoid too much visual clutter.

The Sunset Boulevard Off-Site Signage Policy limits the total number of signs along the 1.6-mile corridor to 20, and spaces the digital signs across seven zones of approximately 2-3 blocks each, along the West Region, Central Region, and East Region of Sunset Boulevard.



Text Size and Amount

Roberts (2013) recommends the quantity of information be confined to the number of words that can be read during the approach within two seconds, or the point at which away-from-forward glance becomes twice as likely to result in a crash. This formula first requires an estimated “legibility distance,” which takes into account distance and speed, and a comprehension rate (Roberts, 2013). Roberts recommends a comprehension rate of three words per second, depending on font size and complexity, and text formatting and design (Roberts 2013).

Text size may be regulated to be larger than a minimum size, set by the speed limit of the road and the sign industry’s “best practices” formula, or regulated to a maximum number of words, but notes that this standard is rarely applied (Morris, 2009).

The Sunset Boulevard Off-Site Signage Policy does not currently specify text size but could consider setting a minimum text size standard based on the guidelines set forth in the United States Sign Council’s 2006 Sign Legibility Rules of Thumb (available online at <http://www.usscfoundation.org/USSCSignLegiRulesThumb.pdf>). The policy prohibits scrolling text. The recommendations from Francis Krahe & Associates focus on reducing contrast as an effective means of avoiding potential distraction in a highly urban area.

Illuminance and Luminance

Illuminance refers to the light energy landing on a surface at a distance from a sign, while luminance refers to the light energy at the sign surface itself. The FHWA recommends adjusting luminance in response to ambient illuminance to ensure signage is not “unreasonably bright for the safety of the motoring public” (FHWA, 2007). For areas of medium to high ambient illuminance, academic literature recommends digital signs should not exceed 0.8 foot candles and that digital signs should be equipped with auto-dimming technology (Gottwald, 2011). These standards refer specifically to on-site signage; a lighting engineer should be consulted to ensure appropriate application of standards for off-site signage.

The Sunset Boulevard Off-Site Signage Policy sets the maximum illuminance levels at 1.4 foot candles at adjacent residential zones property lines. Although this maximum level exceeds the recommendations of 0.8 foot candles, it was developed based in part on a review of the 2016 CALGreen California Building Code, Los Angeles Municipal Code, which specifies a maximum of 3 foot candles in special signage districts, and the applicable recommendations from the IESNA. The Illuminating Engineering Society of North America (IESNA) defines Nighttime Outdoor Lighting Zones, where LZ4 refers to “areas of human activity where the vision of residents and users is adapted to high light levels, and where illuminance should not exceed 15 lux (1.4 footcandles) at adjacent residential property lines where light trespass would be significant. Similar standards apply with respect to drivers vision: where the drivers vision is adapted to high ambient luminance, sign luminance will be a lower contrast to the surrounding surfaces and will be less prominent, therefore cause less distraction. This analysis was conducted by Francis Krahe & Associates, and the recommendations are documented in the May, 2017 memorandum.

Message Sequencing

Message sequencing refers to the use of multiple static images that comprise a single message, displayed in subsequent order to convey a longer message. Concerns about message sequencing developed out of an understanding of the Zeigarnik Effect, which refers to the subconscious compulsion to wait until a



message is complete before looking away. For signs with scrolling or sequential messages, this effect may encourage drivers to unexpectedly slow down to see the conclusion of the sequence (Morris et al, 2009). Roberts (2013) recommends message sequencing should be prohibited.

Although animated content is permitted in the draft Sunset Boulevard Off-Site Signage Policy, message sequencing is not addressed explicitly permitted or prohibited, but scrolling text is prohibited. The recommendations from Francis Krahe & Associates focus on reducing contrast rather than regulating advertising content as an effective means of avoiding potential distraction.

Message Hold Time

Message hold time refers to the length of time a message must remain before transitioning to another message (Carpentier, et al, 2014). The 2004 US Sign Council recommends a minimum on-time for each message such that “a motorist traveling the affected road at the 85th percentile speed would be able to read not more than one complete nor two partial messages in the time required to approach and pass the sign” (US Sign Council, 2004). Similarly, Roberts (2013) recommends message hold time be adjusted based on the speed environment and visibility distance.

The FHWA recommends an eight-second duration of display (FHWA). Other researchers similarly recommend an average of seven messages per minute, or 8.5 seconds per message (Durham, 2009).

The draft Sunset Boulevard Off-Site Signage Policy requires that static and animated messages are refreshed no more frequently than every 16 seconds to account for the average vehicle speed of 32-35 miles per hour. The recommendations from Francis Krahe & Associates focus on reducing contrast as an effective means of avoiding potential distraction in a highly urban area.

Transition Method and Duration

Transition method refers to the way in which one message changes to another message (Carpentier, 2014). This transition can occur instantaneously, via a dissolve effect, or through some other motion-dependent effect. Roberts (2013) recommends transition method should be instantaneous in order to minimize the potential for involuntary distraction or prolonged driver dwell time.

Transition duration refers to the amount of time it takes to switch from one message to another (Carpentier, 2014). The available research recommends between zero and two seconds for the transition duration (FHWA; Roberts, 2013; Carpentier, 2014). The available research indicates that if fully animated messages are permitted, it may be unnecessary to regulate transition methods and duration.

The draft Sunset Boulevard Off-Site Signage Policy permits animated messages, and requires a fade rate of at least one second between messages. The draft Policy also requires animated content to avoid edits at a rate of more than one edit every three seconds.

Area of Digital Sign

Area can be regulated by setting a minimum or maximum square footage for a digital sign, or by setting a minimum or maximum percentage of the entire sign that may be covered by digital content (Carpentier, 2014). Industry guidelines recommend billboard area be determined based on context, in coordination with



the expectations of the community, and with different standards for different zoning districts (Carpentier, 2014). Legally, size restrictions do not violate the First Amendment (Baker and Wolpert, 2011).

The draft Sunset Boulevard Off-Site Signage Policy establishes a maximum size for digital billboards of 1,000 square feet in total area unless it is converted from an existing billboard that is greater than 1,000 square feet, in which case it may be the size of the existing traditional billboard, not to exceed 1,200 square feet.

Operations

The timeframe during which a sign is operational can be regulated if the standards pass the “time, place, manner” test (Mandelker and Baker, 2014). The standards must be content-neutral, but may require all digital or internally-lit signage to turn off or dim after a certain time of night, for example. The standards can also require a sign to “rest in dark” rather than “rest in light”. Furthermore, the FHWA recommends requiring a default designed to freeze the image in the event of a malfunction (FHWA, 2007). These types of regulations can ameliorate community concerns about light pollution or about exacerbating the dangers of impaired drivers past a certain time of night.

The draft Sunset Boulevard Off-Site Signage Policy regulates digital billboard operations in the following ways:

- *Digital billboards shall have control systems that enable programmed coordination between digital billboards owned or operated by different individuals*
- *On-site sound is permitted only during special events, subject to prior approval*
- *Animated sequences that result in visible brightness change over more than 10% of the total display area at a greater rate of three changes per second are prohibited*
- *Maximum luminance levels differ by time of day and ambient lighting conditions to minimize contrast. Automatic sensors are required that adjust sign luminance in relation to changes in ambient illuminance.*
- *Digital billboard operators are required to submit monitoring reports to the Community Development Department on a regular basis (at specified intervals after installation, and then annually for the duration of the sign's operation)*

DISCUSSION AND APPLICATION TO SUNSET STRIP BILLBOARD DISTRICT

Several key lessons from the literature review are applied to the Sunset Strip context via the draft Sunset Boulevard Off-Site Signage Policy:

- Luminance, illuminance, duration, and transition standards are strictly regulated according to industry recommendations and local precedents as researched by local lighting experts.
- Driver interactive components are prohibited. Full motion animation is permitted but strictly regulated to the same standards as static images for illuminance, luminance, duration, and transitions.



- Rapid motion, resemblance to traffic control devices, and strobing effects are prohibited.

Future considerations for digital billboards within the Sunset Strip Billboard District that may be enabled by more advanced technology include:

- Synchronization and coordination of signal timing along the corridor to encourage slower speeds during periods when high speeds are observed
- Coordination of signal timing patterns with digital signage movement or transitions to avoid distraction or confusion with traffic signal indications at intersections
- Dynamic control of digital signage to respond to roadway conditions such as speed, weather, time of day, or congestion
- Use of digital billboards to promote a certain amount of public safety content and messaging during the most relevant time of day (i.e., messaging to discourage drinking and driving during the hours when patrons leave nightlife establishments along the corridor)

Finally, West Hollywood is additionally focusing on addressing traffic safety within the Sunset Strip Billboard District by improving pedestrian facilities, bicycle facilities, and adopting policies aimed at improving safety along the corridor. City Council recently adopted the West Hollywood Pedestrian and Bicycle Master Plan, which includes programs and projects intended to improve safety and comfort for pedestrians and bicyclists city-wide. These programs and projects include education strategies and engineering strategies such as more frequent and visible pedestrian crossings, curb-bulb outs, median islands, hybrid beacons, street trees or other landscaping, and pedestrian scale street lighting.

Additional actions could include the adoption of a “park once” policy for the Sunset Strip Billboard District, encouraging visitors to the Sunset Strip to move about primarily as pedestrians rather than drivers, expanding or adjusting routes on local transit service (i.e., CityLine and PickUp Line), and engaging in an encouragement campaign with shops, bars, restaurants, and entertainment venues along the Sunset Strip.



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Attachment C: Digital Off-Site Signage Analysis Addressing Traffic Safety (2023)

Memorandum

Date: October 1, 2023
To: Jennifer Davis, City of West Hollywood
From: Jeremiah LaRose, Fehr & Peers
Subject: ***Digital Off-Site Signage Analysis Addressing Traffic Safety***

LA23-3460.00

This study evaluates the potential traffic safety implications of a proposed digital billboard with three-dimensional display capability to be constructed on Sunset Boulevard at the intersection of La Cienega in West Hollywood, CA. We first reviewed all literature regarding the effects of billboards on driver attentiveness and traffic safety, particularly seeking recent studies that pertain to digital and 3D billboards. The literature review, site visits, and an interview with City of Los Angeles staff inform our recommendations for the Sunset Boulevard sign location. Some physical improvements along the sidewalk and changes in the intersection operation and signal design could help reduce the risk for vehicle and pedestrian safety conflicts.

Literature Review

Fehr & Peers has reviewed literature ranging from 1980 to 2023 on billboard effects on driver attentiveness and traffic safety, particularly more recent research on the influence of digital video signage. In total, most research has not found compelling evidence in either direction on the question of whether digital signage worsens driver distraction or increases risk of collisions in urban environments, although relatively few studies have been carried out in a context comparable to the Sunset Strip. Many studies were limited in their sample size, conducted along rural or suburban freeways, or did not demonstrate statistically significant causality related to collision patterns.

A United States study in 2021 on 60 pedestrian collision hot spot locations across the U.S. found that billboards were present at 72% of the hot spots, which is a high percentage, but should be considered in the context that urban collision hot spots have a very high degree of activity and other factors that contribute to collisions. The hot spots were identified in "Urban Primary arterial Roadway(s)" and in "New York City Thoroughfares" which had signalized intersections and



pedestrian facilities. The study does not differentiate between traditional, video, or 3D video billboards. Given that the focus of the study is not on comparing locations for presence of billboards and the wide variety of other variables that contribute to collisions, it cannot be said whether billboards play a primary role in increased traffic safety risk independent of other factors in a dense urban environment.

A study on Alabama highway traffic billboards shows a positive correlation between the presence of digital billboards and traffic collisions. A simulated experiment in Poland had test subjects pretend to drive in a stationary vehicle while projecting digital images of an urban road directly in front of the subject. An LED billboard image was projected to the subject's right while an object or animation appeared on the screen in front of the subject. Ultimately, observers saw that digital billboards with increased luminance and size of images found that reaction times increased among drivers, which could result in more collisions. Another simulation conducted in Belgium found that digital billboards with shorter display times garnered more glances from drivers. These more recent studies (since about 2013) do suggest an increased risk of collision in environments with billboards that underscores the importance of reducing vehicle speeds and increasing visibility of traffic controls to minimize the risk of serious crashes.

Digital Billboard Policy and Experience in Los Angeles

Digital billboards have become more common in the last decade, and cities around the region including West Hollywood and the City of Los Angeles, have continued to adapt sign regulations to these changing technologies. We spoke with City of Los Angeles staff regarding the process and outcomes of 3D billboards installed in downtown Los Angeles at the intersection of Figueroa Street and Pico Boulevard, and another a block north at 11th Street. The 3D billboards were approved under a signage district overlay zone.

The billboard at the intersection of Pico Boulevard is more analogous to the Sunset Boulevard location than 11th Street (which is a relatively minor cross-street). It is located at a busy and wide urban intersection, with the 3D effect primarily visible from the opposite corner sidewalk, similar to the proposed Sunset installation, and is just above the natural line-of-sight for eastbound drivers on Pico Boulevard facing the traffic signal and can be seen by drivers northbound on Figueroa Street.

The City of Los Angeles approach to regulating digital billboards has evolved since 2012 when a prior policy with illumination standards, video refresh rates, and other technical specifications was rescinded in favor of a standard focused on encouraging placement of the billboard where it would not be conflicting with driver attentiveness, especially on high-injury corridors such as those identified by the City's Vision Zero program. For example, the reviewer must evaluate if the proposed sign or its structure would obstruct a driver's view of traffic signals, as well as considering the design of the road where curves or changing lanes or unsignalized midblock



crosswalks may be present. This approach allows LADOT staff to evaluate suitability of a billboard's location based on the complex relationship of all the conditions in the roadway and built environment that demand a driver's attention.

Since the implementation of the 3D billboard at Figueroa and Pico, City of Los Angeles staff have not observed or been made aware of any increase in collisions or other safety concerns around the intersection.

Fehr & Peers conducted multiple site visits of the Figueroa and Pico 3D billboard both on foot and driving through the intersection. Although the billboard is highly visible to drivers in all directions, its visibility is greatest for eastbound drivers on Pico Boulevard. The billboard is not directly in view of (behind) the traffic signal, so it is easy enough to distinguish the signals from the signage. The 3D imagery can also be seen from the northbound Figueroa Street direction, and again is not in the direct view of the traffic signals. The intersection often has significant pedestrian activity with the Los Angeles Convention Center located along the western side of Figueroa Street.



Figure 1 Billboard at Figueroa and Pico, Los Angeles



Collision History & Context

The proposed 3D billboard is in the midst of the Sunset Strip, known for its many billboards dating back decades. There are already several other digital 2D billboard installations in the corridor, including new bus shelters with video billboards that are at eye-level for motorists. Fehr & Peers considered the collision history of both the corridor over the past ten years, and specifically the intersection of La Cienega, which has its own unique geometric characteristics that could affect traffic safety regardless of billboards.

Corridor Collisions

Using California reported collision data aggregated by the Transportation Injury Mapping System (TIMS), Fehr & Peers analyzed collisions along approximately one mile of the Sunset Boulevard corridor between San Vicente Boulevard and Sweetzer Avenue over the course of ten years (2013-2022). The data covered all collision types (bicycle-involved, pedestrian-involved, and vehicle-involved).

An average of 29 collisions per year occur on the mile-long corridor. In total, there were 292 collisions over the ten-year period with 76% (222) involving vehicle-vehicle crashes. Pedestrian-involved collisions total 57 and bicycle-involved accounted for 13 in the same period. Between 2015 and 2019, pedestrian collisions appeared relatively high averaging 8-10 collisions annually on the corridor, compared with 5 or fewer each year prior to 2015 and since 2020.

Intersections were the primary location for all of the collisions as well as for vehicle only collisions and pedestrian-involved collisions. Bicycle collisions were about the same, but occurred slightly more often outside of the intersection.

La Cienega Intersection Collisions

From 2013-2022, 35 collisions occurred in the intersection, with 8 involving pedestrians and 27 involving vehicles only. In 2017, 2019, and 2022, pedestrian-involved collisions reached the highest count of 2 collisions in each year. Vehicle only collisions at the intersection also saw its highest count in 2022 at 6 collisions.

The primary violation category for pedestrian-involved collisions was "Pedestrian Right of Way Violation" (6), meaning the vehicle collided with a pedestrian who had an indication to cross the street. Most of these collisions (5) occurred during the overnight period between 7PM and 6AM. The at-fault parties in the pedestrian-involved collisions were observed as making a left turn (5), making a right turn (2), or proceeding straight (1).

The majority of vehicle-only collisions were "Vehicle Right of Way Violation" (17), which generally means another party (whether a vehicle, bicyclist, or pedestrian) entered the path of a vehicle that



had the right-of-way. Many vehicle only collisions occurred when the at-fault party made a left turn (19). The majority of these collisions (20) also occurred during the overnight period.

There is no trend over the past ten years, either at the intersection or corridor level that suggests the increasing proliferation of digital billboards along this one-mile stretch of Sunset Boulevard has led to an increase in collisions. Collisions fluctuate significantly year-to-year even prior to the pandemic when traffic volumes and congestion were relatively steady from one year to the next.

Comparison to Figueroa and Pico Boulevard Intersection Safety

We drew data from the intersection of Figueroa & Pico Boulevard for a comparison of another location with high traffic and a recently installed 3D billboard. There are a similar number of collisions and incident types over a ten-year period. From 2013-2022, 41 collisions happened in the intersection with 7 involving pedestrians, 8 involving bicycles, and 26 involving vehicles only. In 2017, pedestrian-involved collisions reached its highest one-year count of 4 collisions. Bicycle-involved collisions were at most 2 collisions each year. In 2019, vehicle-only collisions reached the highest count of 6 collisions in a single year. The digital billboard at the Pico & Figueroa was established in 2022 so it is inconclusive if the billboard has made an impact on collisions at the intersection.

Based on the following details, the overall collision history between these two intersections is similar in number and issues with driver compliance with signals and attentiveness to pedestrians and cyclists. A key difference is that the majority of collisions at the Figueroa and Pico intersection occur in the daytime or evening hours compared with greater night-time collisions on Sunset. Another key difference at this intersection is the sidewalk space available for viewing the billboard. Because the 3D billboard is facing the convention center, its primary viewing angle has substantially more space available for people to gather thanks to the large plaza in front of the convention center.

The primary violation category for pedestrian-involved collisions was "Pedestrian Violation" (3), meaning those incidents involved a person crossing the street improperly. Unlike the Sunset and La Cienega intersections, the collisions were about evenly split between occurring during the midday (2) or evening peak (3). The at-fault parties in the pedestrian-involved collisions were observed as making proceeding straight (4), making a right turn (1), or entering traffic (1).

Compared with the West Hollywood location, this intersection likely hosts a greater volume of bicycle traffic given it is a major northbound bicycle route to downtown Los Angeles, which corresponds with a higher number of bicycle collisions. The majority of violation categories for bicycle-involved collisions fall under two classifications. The first is "Vehicle Right of Way Violation" (2), where a party (of any mode) does not yield to a driver's right-of-way or the driver observing his or her right-of-way improperly, depending on which party is listed at fault. The second category is "Traffic Signals and Signs" (2), where a driver does not observe the rules of a



particular signal or sign. Most of the bicycle-involved collisions occurred during the midday (3) or evening peak hours (4). The at-fault parties were stopped (3), making a left turn (3), or committing another unsafe turning (1), such as an illegal U-turn.

The main category vehicle-only collision was "Vehicle Right of Way Violation" (see definition above, 12). Most vehicle-only collisions occurred during the overnight period (11), followed by midday (7), evening peak (5), and then morning peak (3). The at-fault parties for the vehicle-only collisions were making a left turn (14), proceeding straight (6), passing other vehicles (1), or committing other unsafe turning (1).

Recommendations for "The NOW" Sunset 3D Billboard

Based on the site conditions, there are three relatively low-cost improvements to consider at the intersection. Two are aimed at addressing driver attentiveness to the intersection control and right-of-way, while another addresses the pedestrian safety along the sidewalk. The recommendations and their application around the intersection area is shown on a conceptual image attached to this memo.

Importantly, the City is developing plans to narrow the width of the intersection and Sunset Boulevard on the east leg to improve the lane alignment, reduce pedestrian crossing distance, and reduce vehicle speeds through the intersection. These plans are still in the conceptual design phase but include curb extensions at the intersection, narrowed and realigned lanes, sidewalk extension on the north side of Sunset Boulevard, and sidewalk extension on the east side of La Cienega Boulevard.

Pedestrian Safety Railing

Per the project applicant, the optimal 3D viewing angle for the proposed sign is on the southeast corner of the Sunset and La Cienega intersection in front of the 1 Hotel, between the intersection corner and the hotel driveway where the sidewalk width is relatively limited. Because people may wish to stop to observe the 3D billboard on the sidewalk, there is a risk of this small section of sidewalk becoming overcrowded. A physical feature to deter pedestrians from stepping off the curb into the travel lane, such as a railing, should be installed along the curb for as much of the length of the viewing range as is possible within other clearance requirements. A railing is assumed for the purpose of this memorandum and referred to as such, but the design could consist of other built features that serve the same purpose, at the discretion of the City. Figure 2 shows the area of sidewalk where the railing is recommended.

The railing or other physical feature must be designed by the City to meet applicable standards including clear area near the fire hydrant that is located approximately 40-50' east of the intersection corner, setback from the travel lane, and ADA-compliant clear width for the path of travel along the sidewalk. The railing height should be sufficient to deter pedestrians from



stepping over the railing and avoid the risk of creating a trip hazard. Note that standard practice per the California Highway Design Manual (HDM 309.1[3]) is to set back any vertical barrier on the sidewalk (which also includes sign posts and other fixed elements) at least 18" from the face of the curb.

The estimated cost of a sidewalk railing, depending on the feasible length, would range from \$1,500 and up.



Figure 2 Sidewalk Opposite the Proposed Billboard, West Hollywood

Traffic Signal Visibility

We recommend the upgrade of signal heads to incorporate a yellow retro-reflective border around each signal head. This treatment, which is increasing in adoption around the country, helps draw more attention to the signals, and is particularly effective in improving the visibility of signal heads in high-contrast environments. The Federal Highway Administration Office of Safety notes that these proven countermeasures are effective in both day and night conditions. The reflective backplates are recommended at the Sunset/La Cienega intersection in all directions, particularly because the signals for La Cienega Boulevard would be in view of the 3D billboard, and for eastbound and westbound Sunset Boulevard traffic would be in view during sunrise or sunset. Given that most crashes at the intersection occur at night, and the implementation of the billboard would significantly affect both daytime and nighttime brightness and contrast, the reflective backplates should reduce the risk of drivers failing to observe signal indications.



The estimated cost of applying this intervention on all signal heads is less than \$2,000 at approximately \$100 per signal head.

Because this countermeasure is advisable regardless of the billboard, it is best included in the city's intersection improvement project.

Right Turn on Red Restriction

The northbound approach of La Cienega Boulevard to Sunset Boulevard is on a steep uphill grade, with a right-turn pocket designated for people turning onto eastbound Sunset. Currently, the intersection configuration allows right turns on red, and the turn also has a green arrow indication ("overlap") when westbound Sunset has a left turn signal onto La Cienega. Because drivers turning right onto Sunset are both climbing the hill and needing to creep into the intersection for adequate visibility of eastbound traffic, those drivers may be less focused on pedestrians entering the crosswalk. Several collisions at the intersection have involved pedestrians who had the right-of-way while a vehicle was turning.

We recommend that in conjunction with the city's improvement plan for the intersection, a no-right-turn-on-red (NRTOR) restriction be implemented, using the CAMUTCD signs shown on the attached conceptual plan and specifically to include a lighted "blank out" sign. These blank-out signs are only visible when La Cienega has a red traffic signal, which is more likely to capture a driver's attention and improve compliance with the restriction. The justification for implementing a NRTOR restriction based on the CAMUTCD, Section 2B.54.03, includes inadequate sight distance for vehicles approaching from the left (eastbound on Sunset Boulevard), and the skew angle of the eastbound Sunset approach makes it difficult for drivers on La Cienega to see oncoming traffic. These conditions can contribute to drivers needing to creep significantly over the crosswalk and may not be fully attentive to pedestrians entering the crosswalk.

Importantly, the implementation of NRTOR should include the maintenance of the northbound right turn overlap phase with the westbound left from Sunset onto La Cienega. Because the westbound left turn phase would not operate concurrently with any pedestrian crossings, this is a benefit for providing a right turn overlap to maintain traffic flow through the intersection without increased risk for pedestrians.

As stated, this intervention is recommended regardless of the proposed billboard and is best suited for incorporation in the city's intersection safety improvement plans.



Figure 3 Project Site at Sunset and La Cienega Showing Right Turn Overlap Phase



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Appendix E2

Analysis of Lighting Effects on Wildlife

MEMORANDUM

To: Jennifer Davis, Senior Contract Planner, Community Development Department, City of West Hollywood

From: Brock Ortega, Principal, Senior Wildlife Biologist, Dudek

Subject: Sunset Boulevard Arts and Advertising Program – Analysis of Lighting Effects on Wildlife

Date: April 4, 2024

cc: Michele Finneyfrock, Environmental Planner, Dudek

Attachments: Figure 1, Wildlife Study Area
Figure 2, Lighting Study Area & Wildlife Receptors

Dudek has been requested by the City of West Hollywood (City) to provide a memorandum addressing concerns regarding the effects of lighting on wildlife related to continued implementation of the Sunset Boulevard Arts and Advertising Program (Program). The focus of our analysis is nighttime lighting of the off-site signs associated with the Program, because daytime lighting from off-site signs would generally be less than that of ambient sunlight and thus would not have the potential to adversely affect wildlife. The Program is being implemented in accordance with the City's Sunset Boulevard Off-Site Signage Policy (Policy), which was adopted in 2019 as an amendment to the Sunset Specific Plan. Program implementation consists of developing off-site signage projects along Sunset Boulevard. Such projects primarily consist of new static (typically internally illuminated) or full motion animated billboards and the conversion of existing static billboards to internally illuminated or full motion animated billboards. Subsequent to approving the Policy in 2019, the City began accepting off-site signage applications for review and selected a subset of those applications to proceed through the development process via a Design Excellence Screening and scoring process. To date, the City has conducted three rounds of the Design Excellence Screening process.¹ Although not anticipated, full buildout of all selected off-site signage projects would result in the development of approximately 35 off-site signage projects along the Sunset Strip, several of which have already been constructed. The analysis within this memorandum assumes a worst-case scenario in which all 35 off-site signage projects are approved and constructed, and this scenario is referred to as the "full buildout scenario" of the Sunset Boulevard Arts and Advertising Program.

The City's lighting consultant, Francis Krahe & Associates (FKA), has prepared a detailed cumulative lighting analysis of this full buildout scenario, which will be referenced herein. Dudek did not perform any lighting analysis or modeling in support of this memorandum; rather, the information and findings in this memorandum rely on lighting analysis and modeling performed by FKA.

¹ Whether additional rounds of Design Excellence Screening would be conducted, beyond the three rounds that have already occurred, is currently unknown and is thus considered highly speculative and outside the scope of this analysis.

In order to address concerns related to potential effects of Program-related lighting on wildlife in the vicinity of the Sunset Strip, this memorandum presents the following:

- Review of current literature regarding the effects of lighting on wildlife
- Identification, but not specific counting or logging, of the potential sensitive wildlife receptors within the area that could experience light trespass resulting from the Program
- Analysis of potential Program-related effects on the identified wildlife receptors

1 Current Literature Review Summary

The following summary outlines a literature review of the effects of artificial light on wildlife. A list of publications reviewed for the purposes of this summary is included in Section 5.

Artificial lighting has been associated with nighttime environments for over a century, causing more than 10% of land areas in 66 countries to exhibit artificially brightened skies exceeding natural background levels. Artificial light at night (ALAN), such as those emitted by streetlights, illuminated billboards, and vehicle headlights, covers more of the globe with the growth of human population and urbanization. This widespread illumination is altering the natural light regimes that organisms have evolved under, with significant ecological consequences. The impact of ALAN on wildlife, particularly nocturnal species, has gained recognition as a significant threat to biodiversity, with 30% of all vertebrates and greater than 60% of all invertebrates being affected. Recent research has unveiled a range of impacts (some negative and others positive, dependent on the species and situation) resulting from ALAN, encompassing alterations in animal behavior and even the composition of whole communities. However, despite recognition of ALAN as an emerging environmental issue, studies on its ecological implications remain relatively scarce.

Street lighting often features narrow-spectrum Low Pressure Sodium (LPS) lighting with an orange hue, but there has been adoption of broader spectrum sources like High Pressure Sodium (HPS), Light Emitting Diode (LED), and Metal Halide (MH) lamps, offering improved color representation for human perception and possibly some species (i.e., they can see it better). Full motion animated billboards are typically illuminated with LEDs, and traditional or internally illuminated static billboards may also be illuminated with LEDs. This shift to broader spectra could trigger unforeseen environmental consequences since animals have adapted to natural light sources and use the spectral signature reflected from objects as a vital cue for diverse behaviors such as resource detection, mate selection, and navigation. Conversely, broad-spectrum light sources like LEDs can improve color discrimination, aiding animals in tasks like recognizing flowers for nectar sources.

Species vary in the light intensity required to identify objects, and nocturnal activity often occurs during periods of “biologically useful semi-darkness” with wildlife using the relatively low light levels during twilight and moonlight. However, nocturnal species may adjust their activity during these periods to avoid competition or predation. Light intensities from artificial sources often fall within the range that enhances animal vision and triggers behavioral changes. The extent to which ALAN might disrupt vision systems adapted to darkness remains poorly understood and documented.

LED lighting technology activates more of the segment of the light spectrum to which animal visual systems are responsive across birds, mammals, arachnids, insects, and reptiles. The shift from monochromatic street lighting to LED lighting has become prominent, with LEDs emitting a higher proportion of blue light that can potentially affect

the visual systems of animals. Blue light has been found to inhibit melatonin production, disrupting biological rhythms and overall fitness in a wide range of organisms.

ALAN effectively alters the perceived lengths of night and day. The duration of nighttime and daytime can impact various ecological factors such as foraging chances, risks of predation and competition, and the resulting trade-offs among these factors. Consequently, ALAN can have implications for the populations of organisms impacted by ALAN such as predator–prey interactions, foraging efficiency, reproductive behavior, activity patterns, movement and migration, mortality, and circadian rhythms. Many species have adapted to utilize artificial lighting in urban settings, which can lead to behavioral shifts, potentially driven by reduced competition, decreased predation risk, or increased resource access. The consequences of ALAN are diverse and intricate, influencing different species in distinct ways—some for the worse, some for the better. For example, the presence of additional light, whether from natural sources like moonlight or human-made sources, tends to enhance the foraging efficiency of predators while decreasing the activity of prey (Longcore and Rich 2004; Rich and Longcore 2006; Seligmann et al. 2007). There are consistent observations of certain diurnal species making use of what is termed a “night-light niche,” where they adapt to nocturnal behaviors in urban settings. These species seem to exploit the availability of ALAN to engage in activities that they would typically perform during the day. However, predator defenses of some species exhibit variations between night and day, and other species exhibit significant decreases in activity due to both natural and artificial light with reduced foraging, investigation, and altered predator-avoidance behaviors. Increased artificial light can affect these behaviors.

In summary, anthropogenic light sources likely improve the ability of animals to detect light reflected from objects in their environment at night with the potential to affect classes of animals differently. Improvements in object detection under ALAN can impact the execution of visually guided behaviors in animals, altering normal activity times and spatially extending or fragmenting habitats depending on the species. The response, whether positive or negative, of species to broadening artificial light spectra likely depends on the specific species and behavior being evaluated. Overall, the effects of ALAN on wildlife behaviors and ecological dynamics are complex, emphasizing the need for conservation efforts to mitigate its negative impacts.

2 Wildlife Study Area

2.1 Location and Setting

The Program is being implemented along the portion of Sunset Boulevard that extends through the City. This area is also referred to as the Sunset Strip and is described in the Sunset Specific Plan as the area extending along Sunset Boulevard approximately 1.6 miles between Sunset Hills Road on the west and just west of Havenhurst Drive on the east. The City of Beverly Hills is to the west and the City of Los Angeles is to the east and north of the Sunset Strip. The Sunset Specific Plan boundary is shown in Figure 1, Wildlife Study Area.

Sunset Boulevard is a highly urbanized area within the City. The street extends along the base of the Hollywood Hills and is characterized by rolling topography with frequent curves along the street. It contains a mix of low- and high-rise buildings, most of which front directly onto the street. Billboards and tall wall signs are also dominant elements of the visual environment. The urbanized nature of the Sunset Strip combined with the abundance of entertainment and tourist destinations leads to a high level of automobile and pedestrian activity.

For the purpose of this analysis, Dudek has defined a Wildlife Study Area extending out approximately 0.5 miles to the north of the Sunset Strip (see Figure 1). The majority of properties fronting Sunset Boulevard are developed with commercial uses, although several properties are developed with multifamily residential units. Adjacent land uses to the north, south, east, and west also include a mix of commercial and residential uses with larger but developed parcels to the north and west (Figure 1). These neighborhoods to the north and west include a variety of landscaping, but all such landscaping could be described as urban landscaping with few, if any, native species present. The closest undeveloped patches of land are generally associated with nearly undevelopable steep slopes and canyons that support a mix of ornamental and remnant, patchy native plant species. The closest of such areas is located approximately 750 feet north of the Sunset Strip, just above St. Ives Drive in the City of Los Angeles. This area represents a worst-case-scenario location for potential lighting impacts from off-site signage along the Sunset Strip. Off-site signage is analyzed in Section 3, Analysis, for its potential effects on this area. All other interstitial open areas with potential habitat in the vicinity of the Sunset Strip are located further than 750 feet from Sunset Boulevard and would thus experience reduced light trespass when compared to this worst-case location. This worst-case location will be referred to as the “Wildlife Receptor Location” and is shown on Figure 2, Lighting Study Area & Wildlife Receptors.

For the purposes of this analysis, Dudek has reviewed the potential effects of Program-related lighting on special-status species (i.e., federally or state listed or proposed species, state candidate and fully protected species, and state species of concern as identified in the California Natural Diversity Database 2023 listings). Dudek also reviewed the potential effects on other non-protected wildlife species both within the City and within areas adjacent to the City that might be plausibly deemed to have potential to occur based on their habitat preferences, such as raccoons, striped skunks, and bird species.

2.2 Wildlife Species Expected within Study Area

As noted above in Section 2.1, Location and Setting, the Wildlife Study Area consists of densely developed commercial and residential land. These areas typically support pest or non-native species (e.g., rats, house mice, rock pigeons, European starlings, European house sparrows, non-native parrots) or urban-adapted species (e.g., American crows, house finches, black phoebes, mourning doves, Anna’s hummingbirds, raccoons, Virginia opossums, occasional Cooper’s hawk, and striped skunk, among other similar species). These species have adapted to the existing lighting and other indirect effects associated with an urban landscape. Trees within the Wildlife Study Area also likely support some nesting birds during the spring (e.g., hooded orioles, Cassin’s kingbird, northern mockingbird), but such species are also urban tolerant (i.e., live and apparently thrive within urban areas). It is expected that few, if any, native reptiles or amphibian species are present within the Wildlife Study Area. As such, there are no special-status species that are expected to occur within the Wildlife Study Area.

2.3 Wildlife Species Expected near Study Area

The surrounding neighborhoods to the north and west of the Wildlife Study Area include larger properties with more tree canopy. These areas are likely characterized by slightly higher avian species diversity, but all would be expected to be urban tolerant, non-special status species that are frequently observed. A review of the California Natural Diversity Database shows that one Southern California legless lizard (*Anniella stebbinsi*), a California species of special concern, was identified in 2012 within 1,000 feet of the Wildlife Study Area. This is a fossorial species that lives underground much of the time. Should this species remain present within or near the Wildlife Study Area, it would not be expected to be affected by light.

In addition to the species that are noted in Section 2.2 above, coyote, brush rabbit/desert cottontail, and native rodents (deer mice, woodrats) may occur within the interstitial non-developed slopes. Because of the small amount of non-developed habitat and proximity to surrounding development, it is not expected that mountain lion, mule deer, or bobcat would be commonly present. More open habitat occurs further to the north toward the crest of the Hollywood Hills, and such species would be expected to favor these more open areas.

3 Analysis

This analysis relies on the modeling presented in FKA's Sunset Boulevard Arts and Advertising Program Sign Lighting Study (Lighting Study). This study examines a worst-case-scenario condition in which all off-site signage projects selected through the City's Design Excellence Screening process are approved and constructed (equating to the development of approximately 35 off-site signage projects along the Sunset Strip). The Lighting Study presents a quantitative analysis of off-site signs along a particular section of the Sunset Strip, selected based upon density of sign concentration and proximity to residentially zoned properties. This section of the Sunset Strip is outlined as the "Lighting Study Area" in Figure 2. The Lighting Study Area is just south of the Wildlife Receptor Location. In the Lighting Study, proposed signage was modeled with worst-case scenario assumptions, consisting of all sign surfaces operating simultaneously at a maximum luminance of 300 candelas per meter squared (cd/m^2), all white, at night. Illuminance from the signs was measured in footcandles (fc), which is defined as lumens per square foot. It is assumed that the lighting will be RGB (i.e., red, blue, green colors) full spectrum and would be generated by LEDs.

The Lighting Study describes the baseline (i.e., existing) nighttime lighting conditions in the vicinity of the Sunset Strip. Existing lighting levels were measured at a number of "monitoring sites." Existing lighting levels at monitoring sites located closest to the Wildlife Receptor Location range between 1.89 fc and 0.25 fc at night (FKA 2024). These locations are as close as 640 feet to the Wildlife Receptor Location. FKA prepared illuminance modeling for the Wildlife Receptor Location (generally represented as modeling location VP-N6a within the Lighting Study) and determined that the average light trespass at this location resulting from the full buildout scenario of the Program would be approximately 0.01 fc. As shown in Figure 2, the Wildlife Receptor Location is slightly south of VP-N6a; however, FKA has confirmed that lighting levels at VP-N6a are still representative of those that would occur at the Wildlife Receptor Location (FKA, pers. comm. 2024). Full moon illuminance is reported between 0.03 fc to 0.005 fc but can vary depending on latitude, stage, season, cloud cover, precipitation, pollutants, and other factors (Kyba et al. 2017; RASC 2018; The Engineering Toolbox 2024; Illinois Coalition for Responsible Outdoor Lighting 2011).² Light trespass at the Wildlife Receptor Location would be, on average, the same or less than that of the higher ranges for full moon illuminance that have been reported. It is noted that the lowest reported existing illuminance value in the Lighting Study Area and its vicinity is 0.15 footcandles (reported at 1115 Larrabee Street) (FKA 2024). As such, it is anticipated that existing illuminance at the Wildlife Receptor Location exceeds full moon illuminance under existing conditions. Even distant illumination of skyglow from a nearby city can exceed full moon levels (RASC 2018).

Additionally, the state has established designations for outdoor Lighting Zones (LZs), which correspond to light trespass recommendations established by the Illuminating Engineering Society (IES) and the International Dark Sky

² There is no common reference value for the illuminance of the full moon. A variety of sources reviewed have reported illuminance levels ranging from 0.03 fc to 0.005 fc. A publication in *Astronomy & Geophysics* in 2017 reports various ranges of moonlight illumination but concludes with identifying a need for further study on long-term typical values of moonlit nights for use in the field of biology (Kyba et al. 2017).

Association (IDA). Specifically, Section 10-114 of the California Building Energy Efficiency Standards establishes rules for implementing outdoor LZs, and Table 10-114-A shows definitions for LZ0 through LZ4. As defined therein, LZ0 applies to areas of very low ambient lighting, and LZ4 applies to areas of high ambient lighting. All urban areas as defined by the U.S. Census are designated as LZ3 (moderately high ambient illumination) by default under the California Energy Code. The Wildlife Receptor Location falls within LZ3, since it is part of a U.S. Census designated urbanized area (California Building Energy Efficiency Standards Table 10-114A, SCAG 2024). However, Table 10-114-A also indicates that in certain circumstances, more conservative lighting thresholds for LZ2 or LZ1 may be applied in areas that would otherwise be considered within LZ3 (e.g., for a government designated park). The light trespass recommended by the IES and IDA for LZ1 is 0.1 fc (IDA – IES 2011). While the Wildlife Receptor Location is not within a government designated park, parks often contain habitat areas, and therefore a trespass limitation of 0.1 fc may be considered an appropriate threshold for habitat areas. It is noted that the average light trespass at modeling location VP-N6a falls well below this threshold of 0.1 fc.

The Lighting Study also evaluated changes in glare (defined as occurring when the eye is unable to adapt to the visual scene). This may occur when the overall light level is too great, or where there is a large difference of brightness in a visual field. A bright light source, such as a flood light or street light, viewed against a dark sky may be uncomfortable to look at and may create a temporary sensation of blindness, which is referred to as disability glare. Glare is evaluated by measuring the luminance (footlamberts or metric units cd/m^2) at the source of light, such as a billboard, in comparison to the surrounding adjacent luminance (FKA 2024). FKA calculated the contrast ratios for signs within the Lighting Study Area versus average existing measured luminance to determine the extent of glare at various monitoring locations within and near the Lighting Study Area. Contrast ratios greater than 30:1 are usually deemed uncomfortable and evaluated as “high;” contrast ratios less than 30:1 but greater than 10:1 are considered “medium;” contrast ratios of 10:1 are clearly visible but evaluated as “low;” and, contrast ratios less than 3:1 appear to be equal and are evaluated as “very low” (FKA 2024). FKA (2024) notes that contrast ratios above 30:1 are generally uncomfortable for the human eye to perceive. At the time of this writing, there are no known glare thresholds for wildlife species, and no known, comprehensive studies on wildlife perception of glare have been conducted. As described above in Section 1, Current Literature Review Summary, even the effects of artificial lighting on wildlife are poorly understood. It should be noted, however, that for all of the monitoring locations within the vicinity of the Wildlife Receptor Location, the contrast ratios attributable to the Program would range from 0.5:1 to 2.7:1, which fall within the “very low contrast” category. FKA determined that the proposed signs would not present a glare condition for the monitoring locations evaluated in the Lighting Study or more distant properties, which would be inclusive of the Wildlife Receptor Location. For these reasons, glare associated with the Program is not anticipated to be substantially noticeable or impactful for wildlife species in the area.

3.1 Effects on Special-Status Species

No special status species are expected to occur within the Wildlife Study Area or within the surrounding areas, including the interstitial areas discussed above. These areas are highly unlikely to support requisite habitat for diurnal special status songbirds (e.g., California gnatcatcher) due to steep slopes and unsuitable habitat. The only known special-status species in the vicinity, legless lizard, is subterranean. Further, the state candidate species, mountain lion, is highly unlikely to use these interstitial areas as they are narrow, close to multiple residences and highly isolated from other interstitial open areas. Regardless, if special-status species were to occur, light trespass and glare would be negligible by the time it reaches the interstitial open areas situated a minimum of 750 feet to the north of the Sunset Strip and would generally be the same or less than bright full moon illuminance and less

than 2.7:1 contrast with respect to glare conditions. Therefore, impacts to special-status species are not expected to occur as a result of full buildout of the Program.

3.2 Effects on Other Species

A number of common and urban-tolerant species were discussed as having potential to occur both in the Wildlife Study Area and the surrounding neighborhoods. These species already exist within an environment in which the existing illuminance far exceeds the illuminance that would be generated by the signage associated with the Program. Specifically, baseline conditions approximately 640 feet south of the Wildlife Receptor Location were reported as ranging between 1.89 fc and 0.25 fc, while modeled light trespass from off-site signage projects at the Wildlife Receptor Location would be an average of 0.01 fc. Furthermore, the modeled illuminance caused by the off-site signage projects would generally be the same or less than that of a bright full moon. It is expected that the existing baseline condition within the Wildlife Receptor Location is well above full-moon illuminance due to existing residential lighting. Additionally, it is noted that common and urban-tolerant species are generally adapted to urban environments and thus would not be expected to be adversely affected by incremental increases in ambient lighting. Further, glare attributable to the off-site signage projects would be considered very low within the vicinity of the Wildlife Receptor Location. For these reasons, buildout of the Program is not expected to result in impacts to more common and urban-tolerant (i.e., non-special status) species.

4 Conclusion

While implementation of the Program would incrementally increase ambient nighttime lighting along the Sunset Strip and in the immediate vicinity, wildlife in the area already exists within an artificially illuminated environment, with existing lighting measurements north of Sunset Boulevard already exceeding full-moon lighting conditions. When lighting associated with the proposed off-site signage reaches the nearest potential habitat area, it would be substantially diminished due to distance, generally to an average level that would fall at or below that of a bright full moon. Additionally, substantial glare effects have not been identified at locations to the north of the Sunset Strip.

As documented in Section 1, the effects of artificial nighttime lighting on wildlife are poorly understood and variable at the time of this writing. Overall, artificial nighttime lighting of any kind (even a streetlamp, a camping lantern, or a vehicle's headlights) can have both adverse and positive impacts to wildlife diversity, behavior, and/or survival, depending on the species. The environment in the area of the Sunset Strip has already been substantially altered by existing artificial nighttime lighting sources, such as streetlamps, building and security lighting on residences and businesses, vehicle headlights, sky glow from the Los Angeles basin, etc. Wildlife in the vicinity of the Sunset Strip is thus already adapted to these conditions, which have likely resulted in both positive and negative effects to wildlife behavior and biodiversity in the area. The proposed addition of new lighting sources to this area in the form of off-site signage would not substantially change these conditions, particularly given the diminishment of illuminance by the time sign-related lighting reaches the nearest naturalized area. As such, while artificial nighttime lighting sources have various effects to wildlife, given the existing conditions in the area of the Sunset Strip and the calculated light trespass levels, substantial effects attributable to the Program would not be expected.

5 References

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The following publications were reviewed for the purposes of the literature review summarized in Section 1. Not all of these sources contain information that directly pertains to the lighting and/or biological conditions on or near the Sunset Strip. Rather, the information contained in these references informs a general understanding of the relationship between lighting and biological resources. Conclusions from our review of these publications are described in Section 1 of this memorandum.

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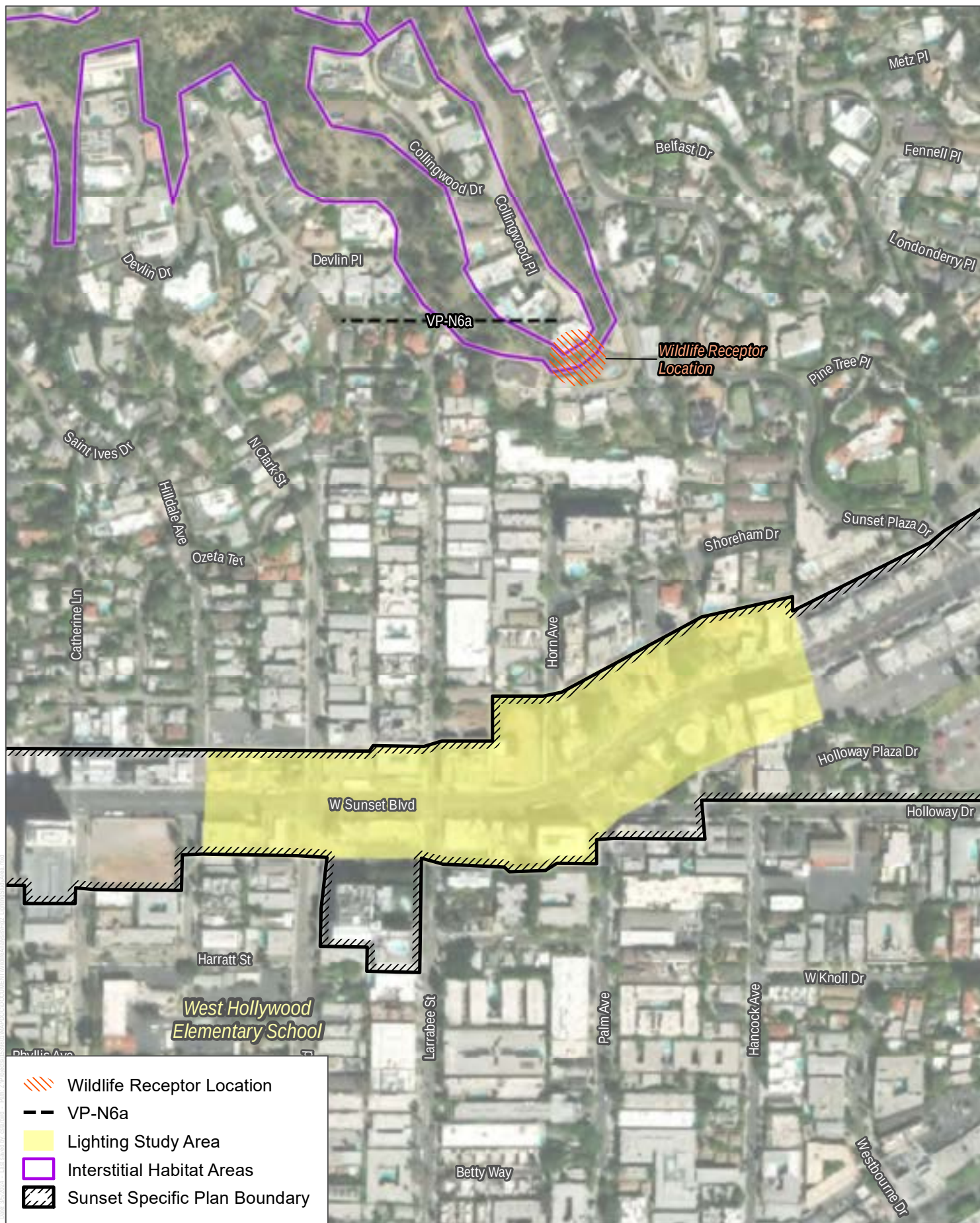
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SOURCE: ArcGIS Online Basemap: World Imagery

DUDEK



0 175 350 Feet

FIGURE 2

Lighting Study Area & Wildlife Receptors

Sunset Signs Lighting Wildlife Analysis

