

2019 CEQA MEMO & FINAL INITIAL STUDY / NEGATIVE DECLARATION

SUNSET STRIP OFF-SITE SIGNAGE POLICY

PREPARED FOR:

CITY OF WEST HOLLYWOOD

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FEBRUARY 2019/JUNE 2017

MEMORANDUM

To: Bryan Eck, Senior Planner and Sarah Lejeune, Contract Planner, City of West Hollywood
From: Eric Wilson, Dudek
Subject: Sunset Strip Off-Site Signage Policy IS/ND – 2019 Policy Update
Date: February 7, 2019

The Final Initial Study / Negative Declaration (IS/ND) for the Sunset Strip Off-Site Signage Policy (proposed project or proposed policy) was published in June 2017 by the City of West Hollywood (City). In early 2019, the City made updates and clarifications to the text of the proposed policy language, and this update is appended to this memorandum as Exhibit 1. These updates have not changed the environmental impact conclusions presented in the previously published IS/ND, nor do they necessitate revision and recirculation of the IS/ND for public review.

The 2019 updates to the policy language will be considered for approval by City decision makers, superseding and replacing the 2017 version of the policy that was attached to the Final IS/ND published in June 2017 (Appendix A of the Final IS/ND). The purpose of this memorandum is to summarize the environmental review process for the proposed project to date, summarize the 2019 policy updates, describe the criteria that would trigger recirculation of the IS/ND, and explain why the updates to the draft language do not necessitate that the IS/ND be recirculated for public review.

For reference purposes in this memorandum, the earlier version of the policy located in Appendix A of the Final IS/ND will be referred to as the “draft policy,” and the final version being presented to City Council, Exhibit 1 to this memorandum, will be referred to as the “2019 update.”

CEQA Environmental Process

The IS/ND for the proposed project was released for public review and comment on April 6, 2017. The comment period ended on April 27, 2017. Pursuant to the CEQA Guidelines Section 15073(a), a public review period of not less than 20 days was provided. Pursuant to Section 15072(a) of the CEQA Guidelines, a Notice of Intent to Adopt a Negative Declaration (NOI) was prepared and

provided to the public, agencies, and the county clerk. The City also mailed an NOI to the last known name and address of all organizations and individuals who had previously requested such notice and also gave notice by publishing the NOI in a newspaper of general circulation in the area affected by the proposed project, thereby fulfilling the noticing requirements identified in CEQA Guidelines Section 15072(b). The City also mailed a notice to all property owners and residents within a 500-foot radius of the Sunset Strip. Twenty-two comment letters were received on the IS/ND. Responses to these comment letters are addressed in the Final IS/ND in Section 5.0. The Final IS/ND was published on the City's website in June 2017. The June 2017 version of the Final IS/ND was provided to the Planning Commission as part of the agenda materials for Planning Commission consideration of the project at its June 15, 2017, meeting. Based on Planning Commission comments and staff's identification of a minor typo and omission, three small changes were made to the policy subsequent to the June 2017 Planning Commission meeting. These changes were listed in an errata that was included in the Final IS/ND provided to the City Council, as part of the agenda materials for City Council consideration of the project on September 18, 2017.

This memorandum describes changes that have occurred to the policy subsequent to the September 2017 City Council meeting and describes how these changes have been evaluated under CEQA.

CEQA Guidelines Regarding Recirculation

Pursuant to CEQA Guidelines, Section 15073.5, the City is required to recirculate an IS/ND when the document is substantially revised after public notice of its availability but prior to its adoption. A substantial revision is identified as follows: (1) a new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required. As further explained below, the 2019 policy updates would not result in a new avoidable significant effect nor would they result in the need for mitigation measures or additional project revisions.

2019 Update to the Draft Policy

As explained above, a draft of the proposed Sunset Strip Off-Site Signage Policy was released for review as part of the Draft IS/ND and Final IS/ND. Since 2017, City staff have made revisions to the policy language based on feedback from staff, decision makers, and stakeholders. The revisions fall into the following categories: improvements to readability and clarity; minor editorial corrections; and minor policy adjustments.

Revisions from the first two categories (readability, clarity, and editorial corrections) do not change the conclusions presented in the IS/ND, since such revisions would have no change on the proposed project's potential environmental effects. Examples of such changes include re-

ordering of text in the introductory sections, combining the “Background,” “How to Use this Document,” and “Vision” subsections into a single section, inserting a bulleted list in the introduction describing the key components of the policy, incorporating a table summarizing the administrative procedures for different off-site signage types, clarifying the luminance and illuminance monitoring and reporting requirements for digital billboards, reformatting the document, and including an updated off-site signage survey. These organizational and editorial changes have improved the readability and clarity of the policy but would not have the potential to alter the environmental effects of policy implementation and are not addressed further in this memorandum.

Revisions from the third category (minor policy adjustments) require review to determine if these revisions result in any potential for policy implementation to affect the environment that is inconsistent with the analysis in the IS/ND. However, as demonstrated below, these minor policy changes do not change the conclusions presented in the IS/ND and would not lead to new significant environmental effects, project revisions, or mitigation measures requiring recirculation of the CEQA document. These changes are summarized below:

- **Refresh Rate.** The proposed minimum refresh rate for digital billboards has been decreased from 16 seconds to 8 seconds, in response to comments received during public review of the draft policy and the IS/ND. The 16-second refresh rate was conservatively identified in the draft policy to address concerns regarding driver distraction. However, the revised refresh rate aligns with industry standards and is consistent with federal recommendations for display duration (FHWA 2007). Additionally, the 2019 update retains multiple regulations that address the potential for distraction. While images would be allowed to cycle slightly faster than originally proposed, the policy would still have a cap on the refresh rate and would still prevent images from rapidly cycling, thereby continuing to protect drivers and the visual environment. The draft policy proposed restrictions on other digital features that may have the potential to distract drivers and/or be impactful to the visual environment. These restrictions remain in place under the 2019 update. Examples of these restrictions include prohibitions on driver interaction features; prohibitions on stroboscopic or flashing images which rapidly change direction, oscillate, flash, or reverse in contrast; prohibition of scrolling text; and requirements to minimize contrast between emitted and ambient light. As these restrictions would stay in place under the 2019 update, the proposed final policy would continue to protect drivers and the visual environment. As such, decreasing the refresh rate to be consistent with federal standards would not change the conclusions presented in the IS/ND, and no new significant effects would result.

- **Tall Wall Signs.** In the draft policy, new tall wall signs were prohibited but existing tall wall signs were allowed to undergo modifications. The 2019 update could potentially allow new tall wall signs if requested as an “alternative project.” The alternative project provisions already exist in the current Sunset Specific Plan and are not a new concept. The provisions for the modifications to existing tall wall signs in the draft policy remain unchanged. New tall wall signs are currently allowed pursuant to Section 19.34.080 of the City’s municipal code, upon approval of a conditional use permit. Under the 2019 policy, discretionary approvals and project-specific CEQA review would continue to be required for any new tall wall signs, consistent with existing regulations. The level of CEQA review would be determined by the City on a case-by-case basis. To the extent possible, CEQA analysis for future tall wall signs may incorporate information and analysis on off-site signage from the IS/ND by reference. However, the location and design of future tall wall signs are too speculative at this time to adequately evaluate their potential environmental effects. While no significant impacts on the environment are anticipated to result from future potential development of tall wall signs, project-specific CEQA review would ensure that any potential impacts are identified and addressed at the time such projects are proposed. Retaining existing provisions for new tall wall signs results in no change relative to existing regulatory conditions and would not, therefore, affect the conclusions presented in the IS/ND. No new significant effects would result.
- **Distribution of Digital Billboards.** The draft policy specified the number of allowable digital billboards along certain segments of the Sunset Strip. In the 2019 update, the digital billboard distributions have remained the same but have been characterized as a “Recommended Digital Billboard Distribution,” rather than as requirements, to allow for potential flexibility if desired by the City, as the implementation may evolve over time (see the “Recommended Digital Billboard Distribution” map in Exhibit 1). However, the total number of anticipated digital billboards would not change. As described throughout the IS/ND, new digital billboards would be subject to project-specific discretionary approval and CEQA review, and digital conversion of existing billboards would not require further CEQA review. To the extent possible, CEQA analysis for new digital billboards may incorporate information and analysis from the IS/ND by reference. Under the 2019 update, such requirements for further approvals and environmental analysis would still apply for new digital billboards. As such, this update could increase the flexibility of the proposed policy but would not affect the expected development scenario for new digital billboards that is evaluated in the IS/ND. Therefore, the conclusions presented in the IS/ND impact analysis would not change as a result of this policy update, and no new significant impacts would result.

- **New Billboards on New Development and Significant Upgrades/Facade Remodels.** Under the draft policy, new billboards could be conditionally permitted if integrated into certain new development projects or facade remodel projects. In order to qualify for a new billboard, a new development or facade remodel project would need to meet a number of criteria, some of which have been revised as part of the 2019 update.

Under the draft policy, new development projects that could incorporate a new billboard had to be located in the eastern or western regions of the Sunset Strip on a parcel facing Sunset Boulevard and had to achieve a minimum of 75% of the allowable FAR on the north side of the Sunset Strip or 90% of the allowable FAR on the south side of the Sunset Strip. Facade remodel projects that could incorporate a new billboard had to be located in the eastern or western regions of the Sunset Strip on a parcel facing Sunset Boulevard, and the existing building had to be 100% or more of the allowable FAR. In the draft policy, the total number of new billboards was limited to 18. Of these new billboards, up to 7 could be digital billboards on qualifying facade remodel projects and up to 10 could be digital billboards on qualifying new development projects, for a total of 17 possible digital billboards incorporated into development.

Under the 2019 update, the requirements for new billboards as part of new development or facade remodels have been streamlined and made more flexible. First, the “facade remodel” category has been refined to include a more comprehensive list of potential types of remodels and renamed as “significant upgrades,” with remodel scenarios that include not only the significant facade remodel but also “an interior remodel improvement project with a valuation of at least 25% of the assessed value of the building according to the County Assessor’s records if the property has been sold within the past 24 months or based on a current appraisal” as well as projects undergoing seismic upgrades.

New development projects and significant upgrades could incorporate a new billboard if 75% of the allowable FAR is achieved. Proposals for new development projects and significant upgrades incorporating new billboards would not necessarily be limited to the eastern or western regions of the Sunset Strip (although guidance for digital billboard distribution still limits new digital proposals to the eastern and western regions; see the “Recommended Digital Billboard Distribution” map in Exhibit 1). The prescriptive numerical limits for 17 new digital billboards would become a guideline for the City’s preferred distribution, rather than a requirement. As such, the maximum billboard development scenario described in the IS/ND, which consisted of 18 new billboards (17 of which could be digital), continues to represent a

reasonably foreseeable development scenario for buildout of the proposed policy, based on the historical number of off-site signs that have been approved since adoption of the Sunset Specific Plan and based on the design criteria in the proposed policy.

The 2019 update guides the distribution of new digital billboards without prescribing a specific number to a particular category of project (e.g., all 17 new digital billboards envisioned under the policy could theoretically be incorporated into remodels alone). The updated language increases the flexibility for types of projects that could qualify for a new off-site sign. Furthermore, as described throughout the IS/ND, new development, remodels, and any associated new billboards would be subject to project-specific discretionary approval and CEQA review. Under the 2019 update, such requirements for further approvals and environmental analysis would still apply. As such, allowing for additional flexibility in qualifying for a new off-site sign would not result in a new significant environmental effect and would not affect the overall digital billboard development scenario analyzed in the IS/ND. The conclusions presented in the IS/ND impact analysis would not change as a result of this policy update, and no new significant impacts would result.

- **Distribution of Digital Billboards for Cultural Resources.** Both the draft policy and the 2019 update incentivize preservation of cultural resources by allowing billboards to be enhanced on designated cultural resources, thereby allowing businesses that are operating within a designated historic structure to increase profits through off-site signage revenue. In the 2019 update, the method of distributing allowable off-site signage for cultural resources has been revised to increase flexibility in billboard design on cultural resources. The draft policy allowed for 3 existing static billboards on designated cultural resource sites to be converted to digital billboards (i.e., up to approximately 3,000 square feet of static to digital signage conversions). The IS/ND analyzed the potential environmental effects of 3 digital conversions, and no significant environmental effects were identified. As stated in the IS/ND, no further CEQA review would be required for the 3 digital conversions, so long as they were in compliance with the proposed policy.

Under the 2019 update, the cumulative digital sign area on designated cultural resources would be limited to 4,000 square feet. Digital billboards would remain limited in size to 1,000 square feet. As such, the 2019 policy could potentially result in the development of an additional 1,000 square feet of digital billboard area on cultural resource sites, relative to what would have been allowed under the draft policy. While the 3 potential digital conversions on cultural resource sites were evaluated in the IS/ND and would not require further CEQA review, the same

analysis and impact conclusions continues to apply to the 4,000 square feet of digital sign area proposed for cultural resource sites under the revised policy, for the following reasons. Digital billboards installed on cultural resource sites would be subject to the design standards and protections set forth in the proposed policy, which has been crafted and informed by experts to contain regulations that, by their very nature, avoid and minimize potential impacts related to construction and operation of future billboard projects (i.e., the policy is self-mitigating). These regulations include light trespass limits, ongoing monitoring to demonstrate compliance with the lighting requirements, protections for potential buried cultural and paleontological resources for projects requiring ground disturbance, protections for existing vegetation and any nesting birds utilizing the vegetation, and a wide variety of design standards to protect the visual environment along Sunset Strip. The policy also includes restrictions and protections for cultural resources, which would ensure that significant impacts to designated cultural resources do not occur as a result of off-site signage development. These protections include requirements for a Certificate of Appropriateness, which would ensure that conversions are designed and installed in conformance with the Secretary of the Interior's Standards for Rehabilitation. As with the 3 static-to-digital conversions that were discussed in the IS/ND, the construction activities required for 4,000 square feet of digital sign area would be minimal to negligible. As with the 3 digital conversions, construction of the proposed 4,000 square feet of digital billboard area would likely be spread along the 1.6-mile Sunset Strip and implementation would be spread over the course of one or more years. As such, an additional 1,000 square feet of digital sign area would not substantially change the construction scenario that was analyzed in the IS/ND, such that the impact conclusions would change. Upon compliance with the requirements set forth in the proposed policy, the addition of 1,000 square feet of digital billboard space beyond what was analyzed in the IS/ND would not change the impact conclusions in the IS/ND. As such, revising the method of distributing allowable billboard area for cultural resources would not change the conclusions presented in the IS/ND, and no new significant effects would result.

Conclusions

As described and substantiated above, the revisions that have been made to the proposed policy subsequent to the draft policy would not result in changes to the impact conclusions in the IS/ND such that recirculation of the IS/ND is warranted. The environmental impact conclusions in the IS/ND that was circulated for public review in April 2017 and finalized in September 2017 continue to apply to the revised version of the policy that is shown in Attachment A. Per CEQA Guidelines Section 15073.5, the City is not required to recirculate the IS/ND for public review. As

described in the IS/ND and above, remodel projects, new development projects, and any associated new billboards (digital or static) would be subject to project-specific CEQA review at the time such projects are proposed. Project-specific CEQA review would also be required for any new tall wall signs that are proposed in the future.

Reference

Federal Highway Administration (FHWA). 2007. “Guidance on Off-Premise Changeable Message Signs.” Policy and Guidance Memorandum, issued September 25, 2007. Updated June 27, 2017. Accessed February 4, 2019.
https://www.fhwa.dot.gov/real_estate/policy_guidance/offprmsgsnnguid.cfm.

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
BUG	Backlight, Uplight and Glare
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CARB	California Air Resources Board
CalEEMod	California Emissions Estimator Model
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH ₄	methane
City	City of West Hollywood
CMP	Congestion Management Program
CNDDB	CNRA
CO	carbon dioxide
CO ₂	carbon dioxide equivalent
CO ₂ E	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
DA	Development Agreement
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
IESNA	Illuminating Engineering Society of North America
IS/ND	initial study/negative declaration
kWh	kilowatt-hour
LED	light emitting diode
LOS	level of service
LST	Localized Significance Threshold
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

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

Acronym/Abbreviation	Definition
N ₂ O	nitrous oxide
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PF	Public Facilities
PM	particulate matter
PM ₁₀	particulate matter with a diameter less than or equal to 10 microns
PM _{2.5}	particulate matter with a diameter less than or equal to 2.5 microns
RCNM	Roadway Construction Noise Model
RPS	renewable portfolio standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SO ₂	sulfur dioxide
SOI	Secretary of the Interior
SSP	Sunset Specific Plan
TAC	Toxic air contaminants
VOC	volatile organic compound

PREFACE TO THE FINAL IS/ND

The Final Initial Study / Negative Declaration (IS/ND) is an informational document intended to disclose to the City of West Hollywood (City) and to the public the environmental consequences of approving and implementing the Sunset Strip Off-Site Signage Policy (proposed project). This document has been prepared in accordance with the California Environmental Quality Act (CEQA) as outlined below.

Public Review Period

The IS/ND for the proposed project was released for public review and comment on April 6, 2017. The comment period ended on April 27, 2017. Pursuant to the CEQA Guidelines Section 15073(a), a public review period of not less than 20 days was provided. Pursuant to Section 15072(a) of the CEQA Guidelines, a Notice of Intent to Adopt a Negative Declaration (NOI) was prepared and provided to the public, agencies, and the county clerk. The City also mailed an NOI to the last known name and address of all organizations and individuals who had previously requested such notice and gave notice by publishing the NOI in a newspaper of general circulation in the area affected by the proposed project, thereby fulfilling the noticing requirements identified in CEQA Guidelines Section 15072(b). The City also mailed a notice to all property owners and residents within a 500-foot radius of the Sunset Strip. The distribution list for the NOI is provided in Appendix C of this Final IS/ND, as well as the newspaper posting and a stamped copy of the county clerk posting. Twenty-two comment letters were received on the IS/ND. Responses to these comment letters are addressed in this Final IS/ND in Section 5.0. Because no mitigation measures were required for this project, no mitigation monitoring and reporting program is necessary.

CEQA Guidelines Regarding Recirculation

Pursuant to CEQA Guidelines, Section 15073.5, the City is required to recirculate an IS/ND when the document is substantially revised after public notice of its availability but prior to its adoption. A substantial revision is identified as follows: (1) a new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required.

The City has determined that based on CEQA Guidelines Section 15073.5, recirculation of the IS/ND prior to adoption is not required. This conclusion is based on the fact that no new, avoidable significant effects have been identified, no new mitigation measures were added, and the text of the document has not been substantially revised in a manner requiring recirculation. While minor changes have been made to the proposed project (for example, additional restrictions on digital signage operations), the City has evaluated these changes and has determined that none of these changes would alter the impact conclusions in the IS/ND. As such, recirculation is not required.

Following this Preface, the original text of the IS/ND is included in its entirety. Several minor revisions have been made throughout the text. These revisions were made to correct typographical errors, to add clarity to the text of the document, and to reflect minor updates that have been made to the proposed project since the release of the IS/ND in April 2017. Text that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final IS/ND is shown as underlined (i.e., underline).

Record of Proceedings

The documents and other materials that constitute the record of proceedings upon which the City's project approval is based are located at the address below:

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

The City's Community Development Department is the custodian of such documents and other materials that constitute the record of proceedings. The location of and custodian of the documents or other materials that constitute the record of proceedings for the proposed project is provided in compliance with CEQA Guidelines Section 15074(c).

1 INTRODUCTION

1.1 Project Overview

The Sunset Strip Off-Site Signage Policy (proposed project) would amend the City of West Hollywood's Zoning Ordinance and the Sunset Specific Plan (SSP) to revise regulations for digital billboards and new off-site signage along a 1.6-mile corridor of Sunset Boulevard known as the Sunset Strip, allowing a limited number of new billboards to be integrated into new development and facade remodels and permitting modifications to existing billboards. The amended policy includes standards and requirements for permitting a limited number of digital billboards and for limited opportunities to convert existing traditional billboards to digital billboards on eligible sites. In addition, the amended policy language allows for modifications to existing signs for changes to height, orientation of sign faces, or pole location. The policy also allows for limited modifications of allocation of sign area for existing tall wall signs.

With the understanding that permitting additional off-site signage on the Sunset Strip has the potential to alter the visual characteristics of the Sunset Strip, the City has prepared new and revised standards, regulations, and design guidelines to address the land use implications of permitting these limited changes to the existing urban design condition of the Sunset Strip as a unique place that celebrates off-site signage.

Implementation of the proposed regulations would require approval by the West Hollywood City Council. If the proposed regulations are approved, the following changes in the regulatory environment for billboards along the Sunset Strip would occur:

1. New billboards would be permitted if integrated into new development projects that meet the density requirements of the revised policy, which are as follows:
 - a. Projects that develop to 90% of allowable floor to area ratio (FAR¹) on the south side of the street would be allowed to incorporate new billboards into the development
 - b. Projects that develop to 75% of allowable FAR on the north side of the street would be allowed to incorporate new billboards into the development
2. New billboards would be conditionally permitted if integrated into facade remodel projects on sites existing as of April 2017 that are currently developed at or above 100% of existing FAR if the facade remodel provides improved pedestrian orientation or funding of an equivalent value for off-site pedestrian improvements on the Sunset Strip.

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

3. The policy would allow up to 20 additional digital billboards on the Sunset Strip, including:
 - a. Up to 3 digital conversions of existing static (i.e., non-digital) billboards on sites with designated cultural resources
 - b. Up to 7 new digital billboards associated with new significant facade remodels
 - c. Up to 10 new digital billboards associated with new development
4. Existing billboards could undergo select modifications, such as changes to size, lighting, site location and height allowances with proven obstructions if they comply with the proposed regulations.
5. Existing tall wall signs could be modified to re-allocate sign area on the building and adjust lighting.

This document evaluates the environmental effects associated with implementation of the proposed policy amendments. As described in Section 2.4, any new development projects or facade remodels within the SSP area that integrate new off-site signs would undergo separate analysis under the California Environmental Quality Act (CEQA), as these types of projects are too speculative to evaluate at this time. See Section 2.4 for a more detailed discussion of the CEQA analysis methodology.

1.2 California Environmental Quality Act

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

As lead agency for the proposed project, the City must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study has been prepared to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the Initial Study environmental checklist (contained herein), the City, as the lead agency, concluded that a Negative Declaration is the proper level of environmental documentation for this proposed project. The Initial Study shows that impacts caused by the proposed project would be less than significant. This conclusion is supported by CEQA Guidelines Section 15070, which states that a Negative Declaration can be prepared when “(a) the initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.” The Initial Study contained herein demonstrates that the proposed project would not have a significant effect on the environment. As such, the proposed project would not result in potentially significant effects, and no mitigation measures are required. Therefore, the City has prepared a Negative Declaration for this project.

2 PROJECT DESCRIPTION

2.1 Location and Setting

The proposed project would apply to existing, entitled, and future billboards located within the Sunset Specific Plan 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.

Figure 2-1 shows the regional location of the project area, and Figure 2-2 shows the boundaries of the project area. The project area extends along Sunset Boulevard approximately 1.6 miles between Sunset Hills Road on the west and just west of Havenhurst Drive on the east (SSP, p.9). 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.

Regional access 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.

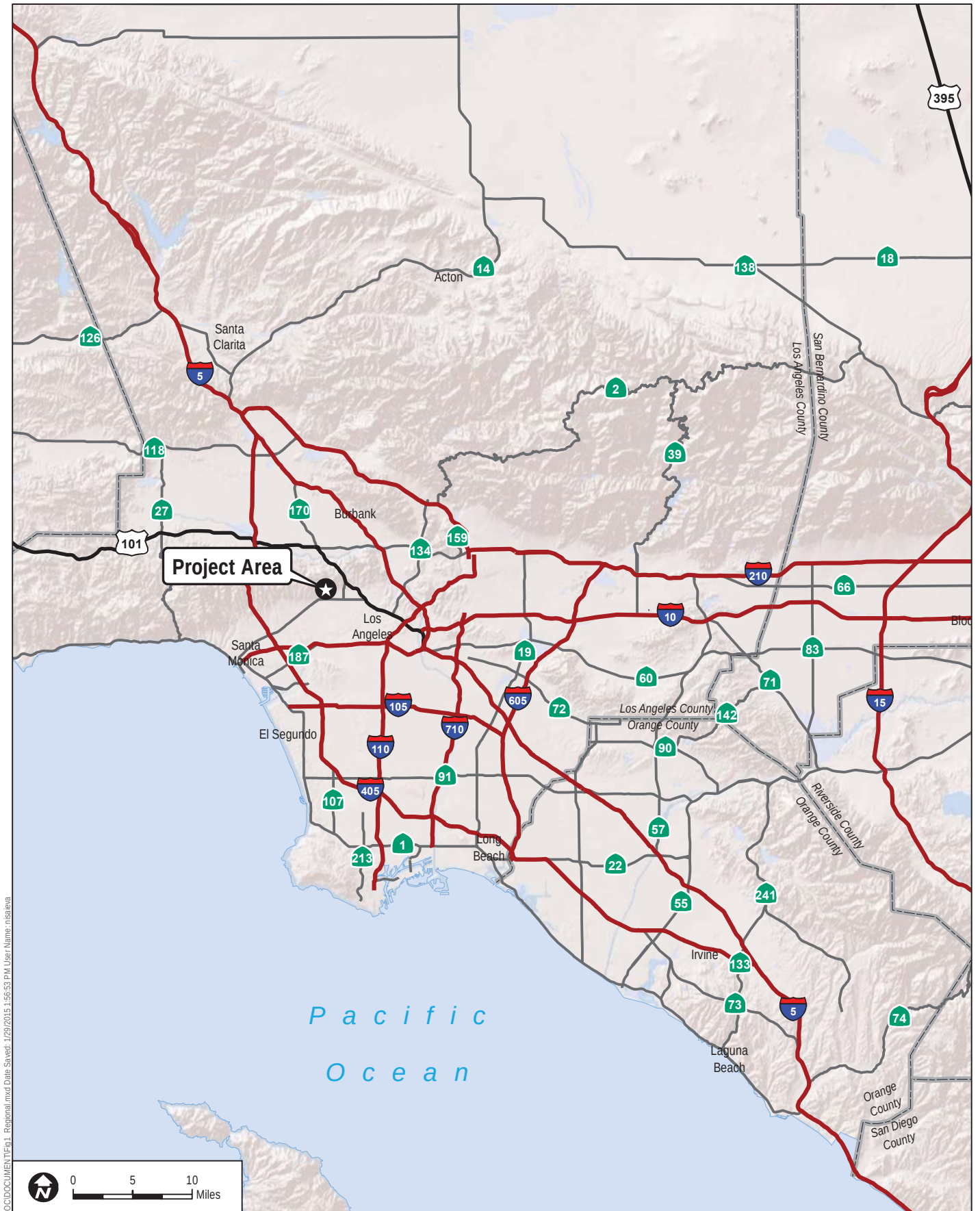
The project area encompasses the same area as the SSP area, since the proposed zoning text and specific plan amendments would apply to the SSP area only. Accordingly, the majority of the project area is designated and zoned as SSP (Sunset Specific Plan) in the City of West Hollywood General Plan and Zoning Ordinance. 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 (City of West Hollywood 2011a, 2011b). 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 1996).

In the SSP, the Sunset Strip is divided into eight geographic areas for land use planning purposes. The proposed project identifies three regions (Eastern, Central, and Western) that simplify the original SSP geographic areas. The project also establishes seven Billboard Zones that align with the intent of the SSP to capture the urban design character of an area equivalent to 2 to 3 urban blocks and including a key intersection. The geographic areas that are referenced in this document are shown on Figure 2-3.

2.2 Background

The Sunset Strip has a rich history of innovative and creative signs, most notably its custom-painted billboards from the 1960s and 1970s that were driven by the music industry and advertised its artists and their album releases and concert performances. The hotels, restaurants, bars, and fashion-based retail along the Sunset Strip have established it as a major driver for the City's local economy. However, the current billboards along the Sunset Strip are no longer seen as uniquely creative or innovative because many of the designs, advertisers, and products can also be seen on off-site signs along major streets throughout the Los Angeles area. As such, the City has engaged in a planning effort to provide the framework to allow the Sunset Strip to be once again in the forefront of unique, creative outdoor media (City of West Hollywood 2016). Under current conditions, off-site signage on the Sunset Strip is regulated under Section 19.34.080 of the City's Zoning Code and under the Sunset Specific Plan, which was adopted in July 1996 and amended in 2016 to change regulations for creative off-site signage. There are currently 74 billboard faces and 15 tall wall signs along the Sunset Strip. Under existing conditions, all of these off-site signs are static sign faces, which typically consist of a series of lamps mounted above or below a fixed image. Lamps are typically light emitting diodes (LED), florescent, or metal halide. Figure 2-4 shows examples of typical static, externally illuminated billboards during the daytime and nighttime along the Sunset Strip.



Path: Z:\Projects\187270\MAPDOC\DOCUMENT1\Regional.mxd Date Saved: 1/29/2015 1:56:53 PM User Name: mnsaleva



DUDEK

SOURCE: Shaded Relief ESRI 2014

Sunset Strip Off-Site Signage Policy Project

FIGURE 2- 1
Regional Map

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FIGURE 2-2
Project Location

ATTACHMENT B

Sunset Strip Off-Site Signage Policy Project

SOURCE: ArcGIS Online Basemap, World Imagery

DUDEK

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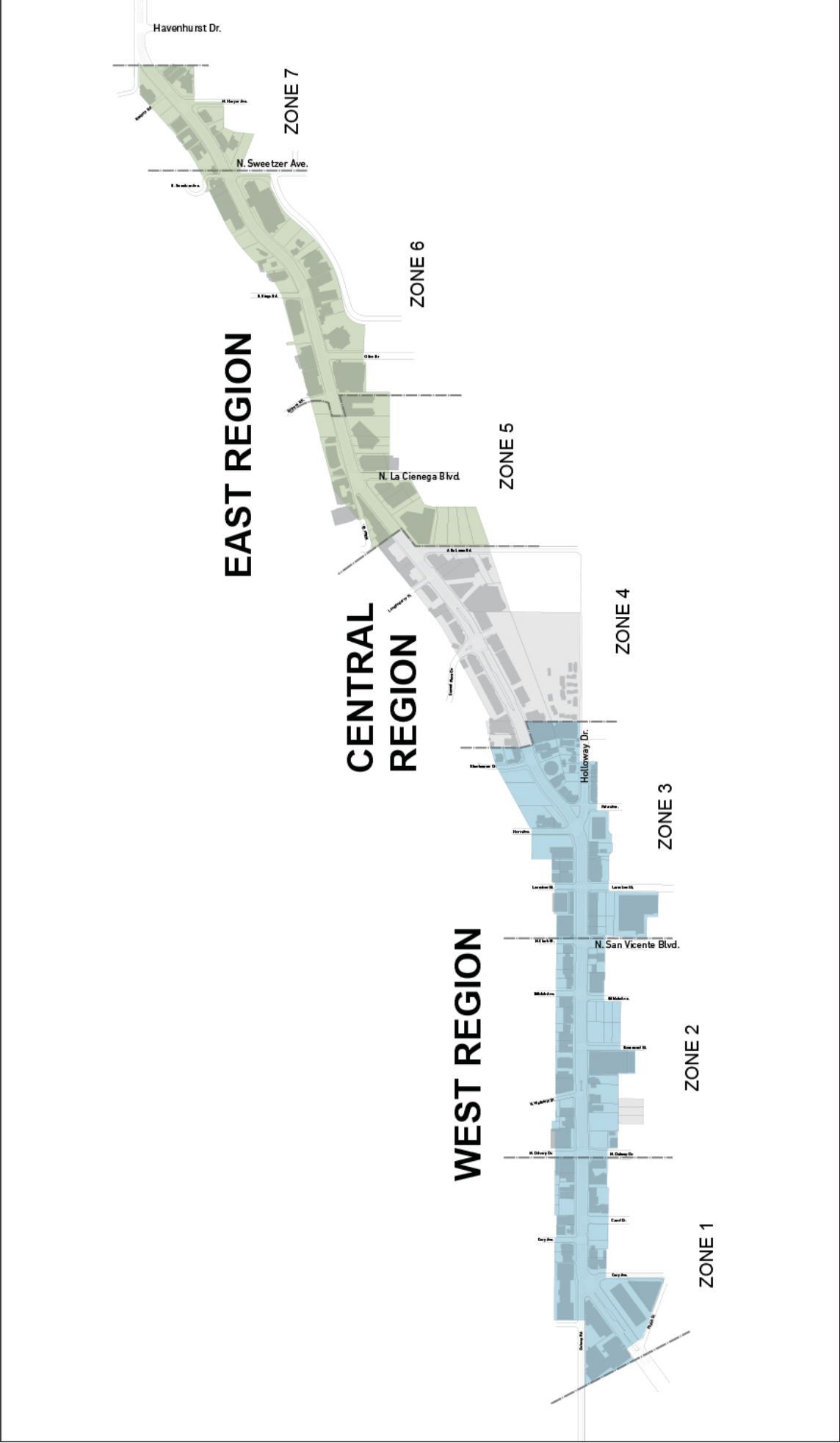


FIGURE 2-3
Sunset Specific Plan Regions

Source: Selbert Perkins Design

Sunset Strip Off-Site Signage Policy Project

DUDEK

ATTACHMENT B

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Photo 1: Static pole-mounted billboard (daytime) at 8351 Sunset Boulevard



Photo 2: Static roof-mounted billboard (daytime) at 8400 Sunset Boulevard



Photo 3: Static pole-mounted billboard (nighttime) at 8585 Sunset Boulevard

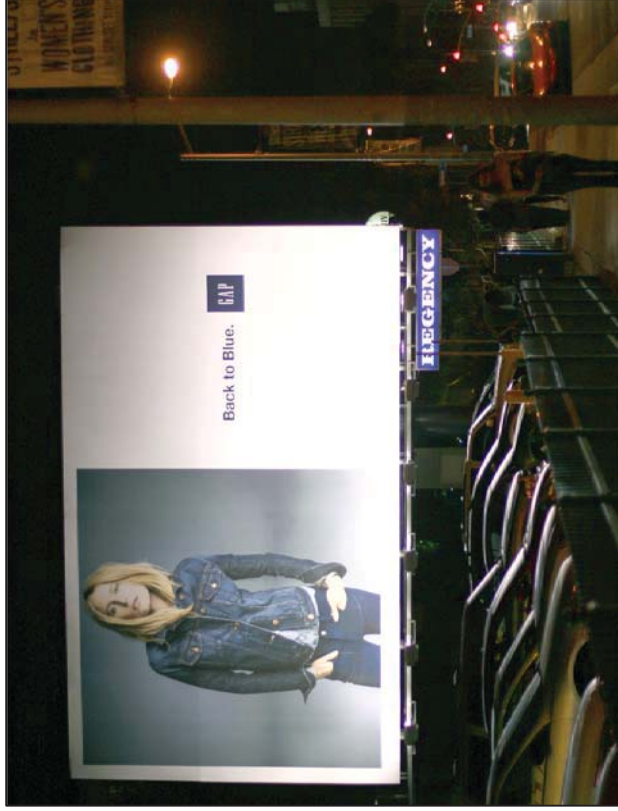


Photo 4: Static pole-mounted billboard (nighttime) at 8455 Sunset Boulevard

DUDEK (2013, 2017)

DUDEK

Sunset Strip Off-Site Signage Policy Project

FIGURE 2-4
Static Billboard Examples

ATTACHMENT B

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Sunset Specific Plan

Under existing regulations, new off-site signs are allowed at eight specific locations along the Sunset Strip that have been designated in the SSP in conjunction with new development and in accordance with SSP and zoning ordinance regulations. The SSP has a provision for alternative proposals that meet the intent of the Plan. Specific projects that meet the intent of the SSP vision have been approved via Development Agreement. Development Agreement projects are included in the City's Development Agreement (-DA) overlay district per Section 19.14.040 of the Municipal Code.

Large Screen Video Signs

Under current City regulations, two digital sign sites have been approved as “large screen video signs” in the Zoning Ordinance and in the SSP. Large screen video signs are currently allowed along Sunset Strip subject to Section 19.34.080(H) of the Zoning Ordinance and the SSP. Under existing conditions, there are two sites with these signs, located at 9039 Sunset Boulevard and 8410 Sunset Boulevard. However, these are not considered commercial off-site signage and were approved by the City for digital art programming purposes (referred to as Art Videos). This project does not permit additional signs of this nature. However, these signs may elect to join the Sunset Strip Billboard District and revise their operations to comply with the proposed off-site signage regulations.

Digital Signs

Since the time of SSP adoption in 1996, the technologies for digital billboards have changed. Digital billboards consist of clusters of LEDs that display illuminated sign content using a computer that receives images remotely via the Internet. Digital billboards are equipped with lighting sensors and controls to adjust brightness based on ambient light conditions. The display can be dimmed at a specified time and/or a photocell can be installed on the sign that automatically adjusts the brightness of the screen based on ambient light levels. The imagery that is displayed typically consists of a series of static slides, a video or animation sequence, or a combination of both. Digital billboards can also be used to display time-sensitive, location-specific, and/or interactive content. Figure 2-5 shows a typical digital billboard in the daytime and nighttime. The displays are typically controlled remotely through computer software. Operation of LED digital billboards typically requires more energy than a traditional standard billboard, since it consists of numerous LED bulbs that are illuminated during both the daytime and the nighttime. (In contrast, a static billboard consists of several larger light fixtures that are only illuminated during the nighttime.) Energy per standard-size digital billboard in California is estimated to range between 29,000 and 94,000 kilowatt-hours per year. (A standard-sized billboard is 14 feet by 48 feet in size.) By comparison, a typical static billboard that is externally illuminated with halide lamps would be expected to require approximately 7,000 kilowatt-hours per year. (Lamar Advertising Company 2016; Outdoor Advertising Association of America 2016; SDG&E 2014; WireSpring 2016; Young 2010).

One of the goals of the City's planning effort for the Sunset Strip is to facilitate a signage environment that is innovative and noteworthy in contrast to the typical signage that can be found along a less iconic urban roadway. Other goals include encouraging creativity in off-site signage, developing a framework to better address new sign

proposals and new technology, and continuing to attract and welcome visitors to the Sunset Strip. New digital signage along the Sunset Strip would allow for individual and coordinated displays of public art. This project also proposes formation of the Sunset Strip Billboard District, which would involve art displayed on participating billboards and special arts events with billboard displays of public art. The off-site advertising billboards are intended to function as the catalyst for activities such as coordinated daily or weekly art displays and larger cultural events that would occur on an annual or biennial basis, incorporating the City's creative brands and the traditional synergy of layered creative endeavors on the Sunset Strip. The proposed Sunset Strip Off-Site Signage Policy is intended to keep the Sunset Strip iconic by creating an immersive urban experience, promoting good signage design, and protecting and enhancing the value of existing and new signage along the strip. The regulations for limited new digital billboards will allow recent technological advances to be accommodated in a manner that protects sensitive receptors and visual quality, while ensuring that the Sunset Strip is on the forefront of new signage technology and design. To meet these goals, the City is setting forth the proposed regulations to allow for digital billboards and increased creativity in such digital billboards, while ensuring that adverse effects to sensitive receptors and to visual character and quality are reduced and avoided. The City is also setting forth the proposed regulations to comprehensively define its policy relative to off-site signage on the Sunset Strip and to allow for an optimal balance of signage to support the built environment.

2.3 Project Details

This section consists of a summary of the proposed regulations and a description of the types of signage developed that could occur upon approval of the proposed regulations. For the complete text of the proposed regulations, see Appendix A of this document. In summary, the proposed regulations would allow for the following:

1. Updated standards, requirements, and guidelines for integrating new billboards into new development and facade remodels that supply major aesthetic improvements to existing buildings;
2. Opportunities for providing a limited number (20) of digital sign faces on the Sunset Strip, either integrated into new development or facade remodel projects, or as 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").



Photo 1: Example of a digital pole-mounted billboard (daytime)



Photo 2: Example of a digital pole-mounted billboard (evening)

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The project does not propose any new off-site signs or digital conversion of particular billboard faces. Rather, the proposed project provides regulations for how many digital billboard faces would be allowed and for the nature of development projects that could incorporate off-site signage into the project design. All projects that include new billboards as part of new development or facade remodels and conversions of existing billboards would only be permitted by Development Agreement. (Development Agreement projects are included in the City's -DA overlay zoning district per 19.14.040 of the Municipal Code.) As such, digital conversions and new billboards would therefore respond to specific site conditions and City priorities. The anticipated number and regional location of new billboard faces that would be allowed in conjunction with new development is shown in Table 2-1 (this includes both traditional and digital). The number and distribution of location by Billboard Zone for new digital billboard faces that would be permitted upon project approval is shown in Table 2-2.

Table 2-1. Existing and Potential Off-Site Sign Faces

Baseline Existing and Proposed Billboards and Tall Walls			Potential Assumed New Billboards (2032)		
<i>Sunset Strip Geographic Region</i>	<i>Existing Billboard & Tall Wall Faces</i>	<i>Entitled or in Progress Billboard Faces</i>	<i>Potential Second Face</i>	<i>Potential Additional Billboard Faces (with New Development or Facade Remodels)</i>	<i>Total</i>
West Region	33	2 (foreseeable)	1	9	45
Central Region	9	0	0	0	9
East Region	47	2 (entitled)	2	9	60
Total	89	4	3	18	114

Source: City of West Hollywood 2017

Note: See Figure 2-3 for the boundaries of the geographic regions identified in this table.

Table 2-2. Existing and Potential Digital Billboards

Billboard Zone	Entitled or In Progress	Potential New Faces (with New Development or Facade Remodels)	Potential Conversion (by Region)	Total Potential Digital Billboard Faces (2032)
West Region				
Zone 1	0	3	1	3
Zone 2	2 (foreseeable)	3		5
Zone 3	0	4		4
West Region Subtotal				13
Central Region				
Zone 4	0	0	1	1
Central Region Subtotal				1

Table 2-2. Existing and Potential Digital Billboards

Billboard Zone	Entitled or In Progress	Potential New Faces (with New Development or Facade Remodels)	Potential Conversion (by Region)	Total Potential Digital Billboard Faces (2032)
East Region				
Zone 5	0	3	1	3
Zone 6	2 (entitled)	2		4
Zone 7	0	2		2
East Region Subtotal				10
Potential Digital Conversions (all zones)				3
Totals	4	17	3	24

Source: City of West Hollywood 2017

Note: See Figure 2-3 for the boundaries of the geographic regions and billboard zones identified in this table.

The planning horizon for the development of digital billboards, new off-site signage, and standard modifications is assumed to be 15 years. As such, assuming project approval in approximately 2017, the 71 standard modifications, 3 conversions, 20 digital billboards, and approximately 18 new billboard faces associated with new development and facade remodels (17 of which could be digital) ~~is expected to may~~ be developed between 2017 and 2032.

The components of the regulations, (standard modifications, digital billboards, and integration of new off-site signs into new development or faced remodels) are described in detail below.

Standard Modifications

Existing billboards would be allowed to undergo several types of minor structural or design modifications. As described in Section 1.1, some of the modifications described in this document and in the proposed regulations are currently allowed in the project area. However, this analysis assumes that the proposed project would reinvigorate the overall billboard environment along Sunset Strip, thereby encouraging billboard operators to apply for improvements to their signs. As such, the environmental analysis in this document conservatively assumes that all the existing static billboard faces that do not convert to digital would undergo other modifications over the course of the 15-year study period. This equates to 71 potential modifications. Some existing static billboards that convert to digital may also involve one or more other types of modifications. The following modifications would be permissible, assuming all relevant conditions of the Zoning Ordinance and SSP are met

- **Replacement Billboards.** An existing billboard could be replaced and upgraded in the same position, location, and dimension as the existing billboard, upon participation in the Sunset Strip Billboard District and upon obtaining an Administrative Permit. Replacement billboards are currently allowed in the project area under existing City policy. An existing billboard could also be expanded in dimension, up to a limit specified in the proposed policy.

- **Height Adjustment.** Billboards with sightlines that are currently obstructed by trees or buildings may be permitted a one-time opportunity for additional height up to 14 feet above the SSP height limit. Height adjustments would be subject to Administrative Permit review by the Director of Community Development, and if granted, would require participation in the Sunset Strip Billboard District. Billboard owners would also be required to conduct and provide a sightline study to ensure that the height adjustment would not cause obstructions to other existing outdoor advertising facilities, designated cultural resources, or public viewsheds.
- **Reorientation.** The angle of the face(s) on an existing billboard would be allowed to be adjusted to resolve existing visibility issues. Reorientation would be subject to inclusion in the Sunset Strip Billboard District and an Administrative Permit. Reorientation of a billboard face is prohibited if the proposed new orientation would cause a nuisance, obstruct other existing signage, create a safety hazard, and/or create visual blight. Billboard owners would also be required to conduct and provide a sightline study to ensure that the reorientation would not cause obstructions to other existing outdoor advertising facilities, designated cultural resources, or public viewsheds.
- **Location Adjustment.** The location of a billboard pole would be allowed to be relocated on the same site. Relocation of any pole structures would be subject to inclusion in the Sunset Strip Billboard District and approval of an Administrative Permit. Reorientation of a billboard face is prohibited if the proposed new orientation would cause a nuisance, obstruct other existing signage, create a safety hazard, and/or create visual blight. Any height adjustments or billboard reorientations would also be subject to review as described above. Billboard owners would also be required to conduct and provide a sightline study to ensure that the location adjustment would not cause obstructions to other existing outdoor advertising facilities, designated cultural resources, or public viewsheds.
- **Addition of a Second Billboard Face.** Billboards with one sign face could have a second face added to the backside of the existing face. The intent of allowing a second billboard face is to cover the unsightly supporting back structure of existing single-sided billboards. The addition of a second face is an action that is currently allowed in the project area under existing City policy. Due to the number of single-sided billboards on the Sunset Strip and the restrictions imposed, a survey of the Sunset Strip shows that there are currently three existing billboards that would be allowed to have a second billboard face (see Table 2-1). Approval is subject to inclusion in the Sunset Strip Billboard District and Administrative Permit review. ~~Billboard owners would also be required to conduct and provide a sightline study to ensure that the additional face would not cause obstructions to other existing outdoor advertising facilities, designated cultural resources, or public viewsheds.~~

New Billboards (Static and Digital) and Digital Conversions

As described in Section 2.2, the City is revising regulations for new off-site signage applications as part of the amendment to the SSP. Under the revised regulations, new off-site signage would be permitted via a Development Agreement in conjunction with new development of a certain density along Sunset Strip. (Development Agreement projects are included in the City's -DA overlay zoning district per 19.14.040 of the Municipal Code.) For a project that

includes a new billboard on the north side of the street, the new development would need to be at least 75% of allowable FAR, and for a project on the south side of the street that includes a new billboard, the new development would need to be 90% of allowable FAR. In addition, the new policy will allow new billboards integrated into facade remodels for buildings that are already over 100% of FAR and that include improvements to the pedestrian realm. For facade remodels, applicants would also be required to conduct and provide a sightline study to ensure that obstructions to other existing outdoor advertising facilities, designated cultural resources, or public viewsheds would not result from the remodel.

The proposed policy language includes comprehensive standards, requirements, and guidelines for digital billboards and limits the number of digital billboards to no more than 20 sign faces constructed over the next 15 years (see Table 2-2 for the allowable billboard locations). Recognizing that the opportunities are valuable and limited, the City is ~~proposing a series of non-preferential lotteries~~ would undertake a selection process to award opportunities to install digital billboard faces at these 20 locations. The multi-phase ~~lottery system which~~ selection process would provide opportunities for: (a) up to 3 conversions from existing standard billboard faces that are located on sites that have designated cultural resources (e.g., sites with historic buildings that have been officially designated at the local, state or national level); (b) 7 new billboards as part of facade remodels; and (c) up to 10 new billboards integrated into new development (see standards above). ~~Multiple lotteries would occur during this 15-year period.~~ Approval of the selected digital billboards would be allowed to proceed upon completion of the lottery selection process and upon approval of the associated Development Agreements. All ~~winning lottery~~ selected projects would be required to enter into a Development Agreement negotiation with the City. If a Development Agreement is not negotiated, the right for digital billboard at that site will no longer be valid.

As stated below, additional CEQA review would be required for any new development and facade remodel projects.

2.4 Methodology for Environmental Analysis

Standard Modifications

If the proposed project were approved, existing billboards would be allowed to undergo one of the modifications listed above in Section 2.3, subject to the proposed regulations. As such, this document analyzes the potential environmental effects of allowing one or more of the allowable standard modifications on existing billboards that do not undergo a digital conversion. Because it is currently unknown which of the existing billboard faces would undergo a digital conversion, the specific location and number of existing billboards that would undergo standard modifications is currently unknown. This analysis conservatively assumes that all existing billboards that are eligible for a digital conversion would convert and that the balance would undergo standard modifications, resulting in up to 71 standard modifications. No further CEQA review would be required for the 71 standard modifications.

Digital Conversion of Existing Billboards

If the proposed project were approved, a limited number of existing traditional billboards on sites with a designated cultural resource would be allowed to convert to a digital sign through the ~~lottery process~~selection process referenced described in Section 2.3 and through a Development Agreement process. This document analyzes the potential environmental effects of installing and operating a maximum of 3 projects that convert static faces to digital sign faces along Sunset Strip. Each of these conversions must comply with the proposed signage regulations and may be subject to additional conditions set forth in the Development Agreement. No further CEQA review would be required for the 3 digital conversions.

In-Progress Digital Billboards

As shown in Table 2-2, 4 digital billboard faces are anticipated for development projects that are in progress. While these signs are not currently in place, they are planned, approved, and/or reasonably foreseeable digital sign faces. The environmental impacts associated with these digital billboard faces are being evaluated in other CEQA documents. For the purposes of this analysis, they are considered a part of the cumulative scenario for Sunset Strip signage described and analyzed in Section 3.19 of this IS/ND.

New Billboards Integrated into New Development or Facade Remodels

If the proposed project were approved, new billboards would be allowed in the project area through a Development Agreement process, as described in Section 2.3. This IS/ND analyzes the potential environmental effects of installing and operating new billboards along the Sunset Strip, including 17 new digital billboards. New billboards would be required to comply with the proposed signage regulations and may be subject to additional conditions set forth in the Development Agreement. As explained in Section 2.3, the proposed signage regulations would allow for new billboards only in association with facade remodel projects or new development projects. New development projects or facade remodels, including those that integrate new billboards, would be required to undergo separate project-specific CEQA analysis. This is because the nature of future development projects and facade remodels, including the design, location, size, and land use mix of such projects, is currently unknown and is therefore considered highly speculative. Because CEQA requires evaluation of the whole of an action, the CEQA analysis for such future projects would also include any associated new off-site signage that is part of the project.

Note that the type of anticipated facade remodels that could include off-site advertising has some precedent in recent City projects. A facade remodel of sufficient scale to include a new billboard complying with the Sunset Strip Off-Site Signage Policy is likely to include non-structural changes to the exterior of the building, resulting in visual changes, but not altering floor area, land uses, or parking requirements. A typical facade remodel that changes the appearance of a building can be constructed in a shorter time frame than a new development project and would not likely require excavation, site grading, foundation work, or installation of building systems. It is likely that such projects could be determined to be exempt from additional CEQA analysis. However, as the location and full scope of these projects are

unknown at this time, the City will evaluate these projects on a case-by-case basis to determine if additional CEQA analysis would be required. To the extent that non-speculative information is available at this time (such as how many sites could potentially undergo one of these projects and what types of activities are associated with facade remodels), it is provided herein. As appropriate, the information in this IS/ND may be incorporated by reference into future CEQA documents for new development or facade remodel projects that include new billboards in their designs.

Maximum Billboard Development Scenario

As summarized in Table 2-2, 24 digital billboard faces along the Sunset Strip would result over the life of the project (i.e., prior to 2032). It is currently unknown whether all allowable digital conversions would occur, what the timing of such conversions would be, whether all allowable new digital billboards would be constructed, when they would be constructed, and where such new signs would be located. To ensure a conservative analysis, the following assumptions have been made:

- **Digital Conversions.** Up to 3 existing billboard faces could convert to digital. These conversions would likely occur within the first several years after ~~the first lottery is completed~~ policy approval.
- **In-Progress Digital Billboards.** The 4 in-progress digital sign faces are anticipated to be constructed by 2021. These digital sign faces are included in the cumulative development scenario that is analyzed in Section 3.19 of the IS/ND.
- **New Billboards.** New billboards (up to 17 of which could be digital) would be integrated into new development and facade remodels via a ~~lottery selection process~~ system, prior to 2032. Note that this is highly speculative, as no projects are currently proposed on the assumed sites, and the rate at which such sites are developed is unknown. Nonetheless, this IS/ND analyzes the potential for new billboards (static and digital) to be constructed and operated.
- **Standard Modifications.** Although the precise number of standard (i.e., non-digital) modifications is currently unknown, it is conservatively assumed to be 71 for the purposes of this analysis. The maximum number of standard modifications occurring in a single year is expected to be approximately 10 standard modifications.

2.5 Construction Scenarios

Standard Modifications

Based on the above assumptions, the proposed project would result in standard modifications for up to 71 billboard faces along the Sunset Strip across a period of 15 years. The City estimates a maximum of 10 standard modifications would occur in a given year. The types of activities that would be involved with each standard modification would vary for each billboard and each type of modification. The construction scenario for a typical modification is expected to be similar to the construction scenario for a digital conversion that is described above. Additional activities would be required for standard modifications that involve pole location adjustments. For adjusting the pole location, a drill

rig would be required on the first day of construction and is assumed to operate for 4 hours. If a new foundation is required, an area approximately 35 to 45 feet deep and 5 feet in diameter would be excavated, resulting in approximately 50 cubic yards of excavated soils. Soils would be hauled to the City's designated depository at an Athens facility. Once the new foundation is established, the billboard footing would be placed followed by pouring of concrete to hold the pole in place, which would require a cement truck. Next, a crane would be used to place the billboard column into the footing. As with other types of modifications, the crane is assumed to operate for 4 hours on both days of construction. Six construction personnel, three roundtrip vendor truck trips per day, and a total of 12 haul truck trips would also be required.

As with the construction scenario for digital conversions, some standard modifications may involve temporary sidewalk closure. In these cases, an encroachment permit would be required for temporary use of the public right of way. The permit includes conditions to ensure the safety of pedestrians and drivers during any closure. So long as the existing billboard is illuminated, power connections will already be in place at the site of the billboard. Because the majority of off-site signage along the Sunset Strip is currently illuminated, it is assumed that no ground disturbance would be required to provide power to modified billboards.

Digital Conversion of Existing Billboards

Based on the above assumptions, the proposed project would result in a maximum of 3 digital conversions along the Sunset Strip across a period of 15 years, with a maximum development intensity of up to 3 conversions within the first several years after policy approval. The types of activities that would be involved with each digital conversion would vary for each billboard. However, a typical digital conversion process has been assumed for all billboard faces for the purpose of this environmental analysis. The typical process would require 2 days for installation of the digital sign face, as described below. The equipment would be delivered and installed on day one of construction. On day two, the connections for power and the sign content would be installed and equipment would be removed from the site.

The materials required for a digital sign would vary, depending on the size and design of the sign. It is assumed that each digital conversion would require approximately three roundtrip vendor truck trips per day and a total of four haul truck trips. Approximately six construction workers would be required per day. One crane would be required, which would be expected to operate for 4 hours on each day of construction. In the event that construction activities require temporary sidewalk closure, an encroachment permit would be required for temporary use of the public right of way. The permit includes conditions to ensure the safety of pedestrians and drivers during any closure. Digital conversions are likely to switch the orientation of the sign face from horizontal orientation to vertical. So long as the existing billboard is currently illuminated, power connections will already be in place at the site of the billboard. Because the majority of off-site signage along the Sunset Strip is currently illuminated, it is assumed that no ground disturbance would be required to provide power to digital billboards.

New Billboards

Construction activities for new billboards would be similar to the process for standard modifications and digital conversions identified above. Specifically, new billboards may have their own poles or free-standing support structures; as such, there is the potential that new billboards could also result in ground disturbing activities, with excavation of holes that are 35 to 45 feet in depth.

2.6 Operational Scenarios

Digital Conversion of Existing Billboards

Operation of existing billboards that have converted to digital billboards would not result in daily operational vehicle trips to the billboard locations. It is assumed that the digital billboard faces would use electrical power provided at the sign location and that no generators or other sources of electricity would be required. It is anticipated that each digital billboard face would consume between 29,000 and 94,000 kilowatt-hours of electricity per year (SDG&E 2014). Digital billboard faces would be required to operate in accordance with the proposed regulations summarized in Section 2.3 and included as Appendix A. Little to no maintenance activities are required for digital billboards. The lightbulbs in digital billboards typically have a lifespan of approximately 5 years. As such, it is assumed that each digital billboard face would require new lightbulbs once every 5 years. Note that LED bulbs are expected to become more efficient over time, so with each bulb replacement, the energy usage per billboard is expected to decrease. When the old bulbs are removed, they would be transported to a solid waste facility that is approved to safely handle electronic waste.

The proposed Sunset Strip Off-Site Policy would require that all conversions to digital billboards offset all new energy usage through purchase of renewable energy credits and/or construction of on-site renewable energy resources. In the case of a digital billboard replacing a traditional billboard, the energy credits would be calculated based on the net increase in energy usage.

Standard Modifications

Billboards that undergo height alterations, reorientation of the face(s), or adjustments in pole location would require little to no maintenance activities relative to the minor maintenance activities that already occur for such billboards, such as copy changes and lightbulb replacement.

New Billboards

The operational scenario for new digital billboards would be the same as the operational scenario described above for existing billboards that have converted to digital. As with digital conversion, the proposed Sunset Strip Off-Site Policy would require that all new digital billboards offset all new energy usage. The calculation for the net increase in energy usage would be based on new energy usage associated with the new digital billboard. Additional details are provided in Appendix A.

The operational scenario for new static billboards would be generally the same as the operational scenarios for existing static billboards. This generally entails advertising copy changes and occasional lightbulb replacements. The advertising copy changes generally occur one time per month and involve one roundtrip truck trip with two to four workers. Application of copy to a billboard face typically entails installation of staging and safety rigging on the top of the billboard structure and affixing the copy to the billboard face. The copy that is removed is generally recycled or returned to the advertiser. Installation of new advertising copy generally takes approximately 4 hours. The use of heavy equipment is not generally required for copy changes.

Sunset Strip Billboard District

New off-site signage, digital billboards, billboards that undergo a standard modification, and existing tall wall signs that undergo modifications would be required to become members of the Sunset Strip Billboard District. Off-site signs that are part of the district would have minimum requirements for arts programming and would also be required to participate in a biennial or annual special arts event. During the special events, regular billboard programming would be interspersed with arts programming. Such events are anticipated to last for several days (for example, over the course of a weekend). The specific nature of such future events is currently unknown. The events may be targeted toward existing travelers and visitors to the Sunset Strip, but could potentially build in popularity over time. Any events associated with the Sunset Strip Billboard District would occur in conformance with the City's requirements for special events, which include standards to support safety in the event vicinity. The City's protocol for special events includes measures to protect traffic flow and to facilitate pedestrian and traffic safety.

2.7 Required Permits and Approvals

The following approvals would be required prior to incorporating the proposed regulations into the Zoning Ordinance and into the SSP:

- **City of West Hollywood Planning Commission.** Approval of the proposed zoning text amendments and the proposed SSP amendments.
- **City of West Hollywood City Council.** Approval of the proposed zoning text amendments and the proposed SSP amendments.

References

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http://www.energy.ca.gov/appliances/2013rulemaking/documents/responses/Lighting_12-AAER-2B/Ban_Billboard_Blight_Comments_and_Report_2013-05-09_TN-70730.pdf.

3 INITIAL STUDY CHECKLIST

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2017) to determine if the proposed project may have a significant effect on the environment.

1. Project title:

Sunset Strip Off-Site Signage Policy

2. Lead agency name and address:

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

3. Contact person and phone number:

Bianca Siegl, AICP, Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, California 90069
323.848.6853
bsiegl@weho.org

4. Project location:

Sunset Specific Plan area
West Hollywood, California 90046

5. Project sponsor's name and address:

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

6. General plan designation:

Sunset Specific Plan

7. Zoning:

Sunset Specific Plan (SSP); one property designated as Public Facilities (PF)

8. Description of project:

Refer to Chapter 2.0 of this IS/ND

9. Surrounding land uses and setting:

Refer to Section 2.1 of this IS/ND

10. Other public agencies whose approval is required:

None.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Yes; however, consultation has concluded. Refer to Section 3.17 of this IS/ND.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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


Signature


Date

EVALUATION OF ENVIRONMENTAL IMPACTS

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
- The significance criteria or threshold, if any, used to evaluate each question; and
 - The mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. There are no officially designated scenic vistas in the City (City of West Hollywood 2010). However, views of the Hollywood Hills and the Los Angeles Basin are available from Sunset Boulevard. Note that the City does not have policies for protection of private views; as such, this analysis addresses views from public vantage points. As described in the Sunset Specific Plan, public views of the Hollywood Hills and the Los Angeles Basin are available through open spaces between buildings that provide unobstructed views from the ground to the sky ("view corridors"), from open plazas or patios accessible from the street level that provide expansive views ("view terraces"), and from openings through buildings that provide a clear view from street level ("view portals"). Preservation of views is encouraged by the Sunset Specific Plan, and enhancement of views through incorporation of view corridors, view terraces, or view portals into the design of new development is required at 13 specified sites along the Sunset Strip. Because digital conversions and/or standard modifications would occur at the sites of existing billboards, they do not constitute new development that is subject to the SSP requirements of incorporating view corridors, view terraces, or view portals into the design of development projects. The proposed regulations

set forth provisions to ensure that any changes to existing billboards and new billboards associated with facade remodels do not compromise any of these viewsheds identified in the SSP.

The proposed project would result in a maximum of 3 digital conversions, new billboards (up to 17 of which can be digital), and minor structural modifications to existing billboard faces (“standard modifications”). Standard modifications, digital conversions, and installation of new billboards (static and digital) would occur in a phased process between the time of project approval (anticipated to occur in 2017) and approximately 2032. Each of these components is addressed below relative to potential effects of policy implementation on scenic vistas.

Standard Modifications

Standard modifications would allow for existing billboards to undergo minor structural changes. Possible changes include the following: replacement of the billboard in the same position, location, and dimension; alteration in height, orientation, or location; and, for single-faced billboards only, addition of a second face. Certain standard modifications would not have the potential to affect existing scenic vistas. For example, the addition of a second face to the backside of an existing billboard structure would not obstruct any scenic vistas that are currently available. The second face would merely cover the exposed supporting back structure of an existing billboard and would not substantially alter existing sightlines. Conversely, standard modifications involving changes in height, location, or orientation of an existing billboard face would have the potential to alter a billboard structure such that an existing view could become obstructed. However, the majority of existing billboards are located on developed properties and are integrated into existing development such that the billboards themselves do not obstruct views of the Los Angeles Basin or the Hollywood Hills. While billboards are a prominent visual feature along the Sunset Strip, they are generally not sized or positioned such that they obstruct public views to the north and south. The billboards are positioned so that they are visible to east-west travelers along Sunset Boulevard, not to observers who are looking north toward the Hollywood Hills or south towards to the Los Angeles Basin.

For the reasons described above, it is unlikely that the proposed standard modifications would result in substantial, adverse impacts to scenic vistas along the Sunset Strip. Nonetheless, the proposed regulations set forth numerous restrictions specifically designed to avoid the creation of new view obstructions within the project area. As shown in Section 2.3, modifications involving changes in height, size, location, and orientation, ~~as well as the addition of a second face,~~ would require a sightline study. The sightline study must show that sightlines to nearby outdoor advertising facilities, designated local, state and national cultural resources, and public viewsheds identified for view protection and enhancement in the Sunset Specific Plan are not additionally impeded by the repositioning of the billboard. Photo simulations, plan views identifying primary site lines, and 3D massing studies would be required components of the sightline study.

As such, the proposed regulations have been designed to preclude future standard modifications from resulting in substantial adverse effects to scenic vistas.

Digital Conversion of Existing Billboards

Conversion of existing billboard faces from static to digital would not have the potential to obstruct existing scenic vistas that may be available from public spaces along Sunset Boulevard. Such conversions would not involve substantial changes in the size or height of the sign face. While the orientation of the sign face may change upon a digital conversion (for example, a horizontal sign face may be converted to a vertical sign face), this type of change would not be expected to adversely affect a scenic vista. As described above, existing billboards are generally oriented perpendicular to the Hollywood Hills and the Los Angeles Basin, such that they are visible to east-west travelers along Sunset Boulevard. As such, existing billboards do not generally obstruct views to the north and south along Sunset Boulevard. As such, the conversion of existing billboard faces from static to digital would not substantially affect any existing scenic vistas. The sightline criteria described above would also be required for digital conversions and would protect and enhance public viewsheds designated in the SSP, as well as views to and from existing off-site advertising assets.

New Billboards Integrated into New Development or Facade Remodels

Under the proposed regulations, new billboards would be allowed if integrated into new development or facade remodels and upon compliance with the proposed Sunset Strip Off-Site Signage Policy. New billboards would have the potential to partially obstruct or compromise public views of the Hollywood Hills and/or the Los Angeles Basin. However, provisions have been included in the proposed Sunset Strip Off-Site Signage Policy to prevent new billboards from obstructing these public views. For example, sightline studies would be required for all new billboards installed in association with facade remodels, and new billboards must be integrated into the building face, preventing new billboards from protruding above or beyond a building facade. As such, new billboards that comply with the proposed regulations are not expected to result in substantial adverse effects to scenic vistas.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to scenic vistas resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Summary

There are no officially designated scenic vistas in the City (City of West Hollywood 2010). Nevertheless, new billboards and modifications to existing billboards undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to substantially alter existing public views of the Hollywood Hills and the Los Angeles Basin for the reasons provided above. The proposed regulations have been designed to prevent changes in billboard height, location, and orientation that would interfere with public viewsheds. Additionally, design standards have been included in the policy to prevent new billboards from obstructing public views. For these reasons, effects on scenic vistas resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

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

No Impact. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 12 miles northwest of the proposed project area. Due to this distance, the proposed project area is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources within a state scenic highway would occur.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Under existing conditions, the Sunset Strip is a brightly lit, vibrant urban corridor with high volumes of vehicular and pedestrian traffic. It is developed with numerous attractions that support both daytime entertainment and nightlife. Along the Sunset Strip, there are currently 74 existing billboard faces and 15 tall wall signs. Under existing conditions, there are also 4 digital screens that have been installed as video art. The proposed project would result in the conversion of up to 3 existing static billboard faces to digital, minor structural modifications to a maximum of 71 existing billboard faces along the 1.6-mile Sunset Strip, and new billboard faces (17 of which could be digital). Standard modifications, digital conversions, and installation of new billboards (static and digital) would occur in a phased process between the time of project approval (anticipated to occur in 2017) and approximately 2032. The incremental conversion of a limited number of existing static billboard faces to digital, minor structural adjustments in other billboards, and the installation of new billboards (static and digital) would alter the visual character of the Sunset Strip. However, these changes to the existing billboard environment are subject to the regulations set forth in the Sunset Strip Off-Site Signage Policy, which are intended to enhance the visual character of the Sunset Strip through standards related to building design, integrations of billboards and architecture, design

excellence, and the addition of public art. Implementation of this policy would not substantially degrade the existing visual character or quality of the project area, as further described in the paragraphs below.

Standard Modifications

Standard modifications would allow for existing billboards to undergo minor structural changes. Possible changes include the following: replacement of the billboard in the same position, location, and dimension; alteration in height, orientation, or location; or, for single-faced billboards only, addition of a second face. The potential for these changes to adversely degrade the visual quality of the Sunset Strip is described below for each allowable change.

Replacement in Place

Replacing billboards in the same position, location, and dimension would not have the potential to substantially alter the visual character or quality of the Sunset Strip. As the Sunset Strip is known for its environment of multiple billboard faces and consistently changing billboard content, some minor updates could be made to replaced billboards, such as the color or style of the pole structure, and these changes would not substantially alter the appearance of billboards on the Sunset Strip such that an adverse effect to visual character or quality would occur. Minor changes in design without changing location, position, or dimension of billboards would not be highly noticeable to viewers in the project area or vicinity of the 1.6 miles Sunset Strip with an existing inventory of 89 off-site sign faces.

Height Modifications

Under the proposed project, existing billboard structures may be raised by 14 feet, if the billboard has sightlines that are currently obstructed by trees or buildings. Billboards that currently exceed the allowable height in the Sunset Specific Plan may be either kept at the same height or lowered so as not to exceed the height limit. Changes in the heights of numerous billboards along the Sunset Strip may represent a noticeable change in the visual environment. For example, a billboard that is raised by 14 feet may become visible from properties or nearby roadways where it was previously obstructed by other development or landscaping. However, due to the unique baseline visual conditions of the Sunset Strip, in combination with the required sightline and viewshed analyses described under Section 2.3 and Section 3.1(a), such changes would not cause a substantial degradation in the visual character or quality of the Sunset Strip.

Under existing conditions, the heights of billboards, tall wall signs, and other structures vary greatly along the Sunset Strip. The building heights range from single-story structures (typically 10 feet in height) to buildings that are over 100 feet in height. Examples include the building at 9000 Sunset Boulevard (14 stories, or 194 feet, in height), the building at 9229 Sunset Boulevard (144 feet in height), the building at 9200 Sunset Boulevard (195 feet in height), the building at 9201 Sunset Boulevard (140 feet in height), the Mondrian hotel building at 8440

Sunset Boulevard (147 feet in height), and the Andaz West Hollywood hotel building at 8401 Sunset Boulevard (150 feet in height). The building at 8560 Sunset Boulevard has tall wall signs that are 118 feet in height and 99 feet in height, and the building at 8440 Sunset Boulevard has a tall wall sign that is 112 feet in height. In contrast, there are numerous single-story structures along the Sunset Strip, such as the Tower Records building at 8801 Sunset Boulevard (one story), the Rainbow Bar and Grill at 9015 Sunset Boulevard (one story), and the Coffee Bean and Tea Leaf at 8789 Sunset Boulevard (one story). Given the existing variations in the height of structures along Sunset Strip, as well as the proposed restrictions in billboard height modifications, extensions in the height of existing billboards by a maximum of 14 feet or lowering of billboards to meet Sunset Specific Plan requirements would not represent a substantial change in the visual character of the project area or the surroundings such that the existing visual character or quality is degraded.

Furthermore, under the proposed regulations, extensions in height would only be allowed if a proven visual obstruction would be resolved. As such, changes in height would be limited to billboards that are currently being blocked or partially blocked from view. As such, height extensions would resolve overlapping signage and other visual obstructions and may, therefore, represent an improvement in visual conditions. Before a billboard owner proceeds with a height modification, the owner would be required to conduct a sightline study to ensure that altering the height would not create a new visual obstruction. The existing variations in height along the Sunset Strip, in conjunction with the proposed limitations on the extent of billboard height modifications, would ensure that future height modifications do not degrade the visual character or quality of the Sunset Strip and its surroundings.

Orientation and Location

Minor changes in the orientation of a billboard face and/or the location of the pole structure would not substantially alter the visual character or quality of the Sunset Strip. As with height modifications, a sightline study would be required to determine whether or not such changes would cause a new visual obstruction. This requirement would protect existing views along the Sunset Strip, thereby ensuring that visual character would not change to the extent that the visual environment is substantially degraded. Furthermore, the changes in orientation and/or location would allow billboard owners to resolve existing visibility issues, land use compatibility issues, and/or to reduce the number of pole structures. As such, changes in orientation and location could in fact improve visual quality by resolving existing visual issues such as unnecessary pole structures and overlapping signs.

Addition of a Second Face

The addition of a second face on single-sided billboards would not substantially alter the visual character or quality of the Sunset Strip. The purpose of this modification is to allow billboard owners to cover the unsightly supporting back structure of an existing billboard. As such, adding a second face may in fact

improve the visual quality of sites that have existing single-sided billboards with exposed back structures. Under the proposed regulations, the allowable changes that can be made to a billboard upon addition of a second face are limited. For example, the height cannot increase. If the height currently exceeds the height limit established in the zoning ordinance, the billboard height must be reduced to comply with the height limitations established in the Sunset Specific Plan. As described above under “height modifications,” minor changes in billboard height within the project area would not have a substantial adverse effect on the visual character or quality of the project area. By allowing the addition of second face within the parameters established in the proposed regulations, the project would allow for improvements in the visual quality of existing billboard structures that may currently be unsightly while ensuring that the addition of a second face does not create a new impairment to visual character or quality.

Overall, standard modifications would represent minor changes in the visual character of existing billboards. Such modifications would be limited in scope by the proposed regulations, which would protect the Sunset Strip from degradation caused by highly obstructive or otherwise drastic alterations to existing billboards. Furthermore, the proposed changes would occur on existing billboards; as such, the properties and surfaces on which standard modifications would occur have already undergone substantial alteration by the presence of existing advertising images. As such, the modifications to existing billboards that may occur under the proposed project would not represent substantial degradation in the existing visual character or quality of the Sunset Strip or its surroundings.

Digital Conversion of Existing Billboards

Across the 1.6-mile Sunset Strip, the proposed conversion of up to 3 existing billboard faces from static to digital would change the existing visual character of the Sunset Strip and its surroundings. However, these digital conversions would not substantially degrade the visual character or quality of the project area. Rather, they would be generally consistent with the existing bright, urban area and wide variety in signage that currently characterizes the Sunset Strip. For digital conversions, as well as new billboards, the content would include an arts programming component, which is intended to enhance the viewing experience and provide a consistent high-quality alternative to advertising. Furthermore, the visual changes attributable to digital conversions would occur on existing billboards, where advertising copy already exists. The appearance of the billboard surfaces would change from static images to digital imagery. Unlike static billboards, digital billboards would introduce moving images and/or changing static images to billboard surfaces, which would change the aesthetic of the off-site advertising environment along the Sunset Strip. The proposed regulations set forth numerous restrictions specifically designed to reduce the potential for digital imagery to adversely affect the visual character and quality of the project area. As shown in Section 2.3, the following regulations would impose limits on the operation of digital signs such that the project would not represent a substantial change to the existing appearance of the Sunset Strip.

New Billboards Integrated into New Development or Facade Remodels

Under the proposed regulations, new billboards would be allowed if integrated into new development or facade remodels and upon compliance with the proposed Sunset Strip Off-Site Signage Policy. Of the new billboard faces, up to 17 could be digital. The new billboards, both digital and static, would have the potential to change the character and visual quality of the project area by introducing new visual elements and by altering the overall aesthetic of the off-site signage environment. However, provisions have been included in the proposed Sunset Strip Off-Site Signage Policy to prevent new billboards from leading to degradation in visual character or quality. For example, the policy dictates architectural standards for integration of signage into buildings, sets a threshold for design excellence, and requires arts programming, which will create visual interest and cohesion on off-site signage. In addition, the policy limits the number of new signage opportunities in specific areas along the Sunset Strip to avoid clustering of digital signs. It is the intent of the policy to improve and protect the visual character and quality of the Sunset Strip, and new billboards that comply with the proposed regulations are not expected to substantially degrade the visual character or quality of the project area.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to visual character and quality resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Summary

For the reasons described above, new billboards and modifications to existing billboards undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to represent substantial changes in the existing visual conditions of the Sunset Strip or the surrounding areas such that the visual character or quality of these areas would be substantially degraded. As described above, the proposed regulations set forth a number of standards that would prevent new billboards and changes to existing billboards from causing visual blight or new obstructions. Furthermore, colorful signage, lights, and entertainment are an integral part of the existing visual environment along the Sunset Strip. The prominent billboards are part of the historical and expected visual environment within the project area. Baseline visual conditions are 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. Accordingly, minor alterations in the physical characteristics of existing billboard structures, a limited number of digital conversions along the Sunset Strip, and a limited number of new billboards would not represent a change over these unique baseline conditions

to the extent that the existing visual character or quality of the project area would become substantially compromised. Additionally, goals for the City's planning effort for the Sunset Strip include facilitating 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. By allowing for a number of digital conversions along the Sunset Strip, by allowing existing billboards to make a number of minor modifications in structure, and by allowing for a limited number of new billboards implemented in a well-designed and visually integrative manner, the proposed project would support increased innovation and would allow the Sunset Strip to better support an updated, creative outdoor media environment. Therefore, although the appearance of Sunset Boulevard could change upon approval of the proposed project, these changes would support the planning and design goals for the project area and would be consistent with the vibrant, urban character of the project area. For these reasons, impacts related to visual character and quality resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Shade and Shadow

Less Than Significant Impact. The City of West Hollywood does not define a specific threshold for significant shade/shadow impacts; therefore, this analysis uses the City of Los Angeles shade and shadow threshold to determine significance for the purposes of this analysis, which is commonly accepted as a reasonable threshold for the region. Specifically, the L.A. CEQA Thresholds Guide states that "A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)" (City of Los Angeles 2006). Shade-sensitive uses generally include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses, such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors/panels.

Digital Conversions and Standard Modifications

There is the potential that an existing billboard adjacent to a shade-sensitive use would undergo a digital conversion or a standard modification as a result of the proposed project. Digital conversions alone would not have the potential to substantially alter the shade or shadow cast by an existing billboard structure, since conversion of an existing static sign face to a digital sign face would not alter the size of the billboard. Standard modifications involving changes in height, orientation, and/or location, or the addition of a second face, would have the potential to alter the shade/shadow produced by an existing billboard structure in either size, length, and/or location. However, billboard structures are small in massing relative to most other structures along the Sunset Strip. As such, the shadows cast by billboards are typically small and are subsumed within shadows created by nearby buildings and structures. While some existing billboards may

extend above adjacent buildings, the shadow cast by a typical billboard structure is long and narrow and rarely covers the entirety of a structure or a property. Additionally, many of the buildings adjacent to billboard structures are commercial in nature with limited outdoor space and shade sensitive uses. As such, minor changes in the height, orientation, and location of a billboard structure or the addition of second face would not represent the creation of a substantial new shadow that would adversely affect surrounding land uses. Rather, the existing long, narrow shadows produced by billboards may shift and/or slightly lengthen or shorten. These minor changes would not trigger the thresholds described above (i.e., a standard modification would not change an existing billboard to the extent that a shade-sensitive use that is not currently shaded by the billboard would become shaded for more than three or four hours by the modified billboard structure).

As noted above, the Sunset Strip is developed with buildings and signage that vary widely in size and height. Given this unique baseline setting, minor changes in the shape, size, or length of billboard shadows along the Sunset Strip would be negligible in the context of the range of shadows that are currently cast by the wide variety of buildings and signage along the Sunset Strip. For these reasons, changes in existing billboard structures attributable to the proposed project are not expected to produce substantial new shade and shadow in the project area such that a shade-sensitive use would be adversely affected. Impacts involving shade and shadow resulting from digital conversions and standard modifications would therefore be less than significant.

New Billboards Integrated into New Development or Facade Remodels

New billboards would have the potential to create new shade and shadow effects in the project area. However, provisions have been included in the proposed Sunset Strip Off-Site Signage Policy that would generally prevent new billboards from generating substantial shade and shadow effects. For example, new billboards must be integrated into the building face, preventing new billboards from protruding above or beyond a building facade. As such, new billboards that comply with the proposed regulations are not expected to result in substantial, adverse shade/shadow effects.

While the proposed Sunset Strip Off-Site Signage Policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential shade/shadow effects resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. The existing lighting conditions along Sunset Boulevard include a variety of light sources that contribute to a brightly illuminated outdoor urban environment. 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.

Additional lighting or lighting in new locations along the Sunset Strip could result in potential effects if new sources of light trespass were introduced and if the light trespass were to affect light-sensitive receptors such that daytime or nighttime views would become adversely affected. Light-sensitive receptors are generally considered residential properties, and also may include hotel, hospital or nursing home uses, where excessive light at night may impact the use of the property. Light trespass is measured in terms of illuminance in a unit of measurement called a “footcandle,” which is the illuminance on a one-square-foot surface coming from a uniform source of light.

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. To the north, the properties are typically situated well above the elevation of Sunset Boulevard, and in most locations, properties are well above the top elevation of illuminated signs. To the north of Sunset Boulevard, the ambient light levels at residential streets and properties are very low, so the light at these properties from signs on Sunset Boulevard may be more noticeable. 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 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.

The proposed project would change the existing lighting environment in the project area. Digital conversions would replace existing static illuminated signs with LED screens. Additionally, digital conversions may also involve reorientation of a billboard face from horizontal to vertical, which would change the surface area that is illuminated. Some billboards that are being converted to digital may also undergo one or more of the allowable standard modifications. Standard modifications (to either digital or static billboards) would not involve a substantial change in billboard illuminance light trespass; however, a reoriented billboard face, a billboard that undergoes a height or location adjustment, and the addition of a second face to a single-sided

billboard are changes that would have the potential to slightly alter the location or shape of the illuminated sign surface area, thereby resulting in slight alterations in where the light from the billboards falls. New billboards (static or digital) would involve new sources of lighting. Such changes in lighting could cause a light trespass or glare impacts under the following conditions:

- The sign light source (LED, metal halide lamps, or other technology) projects toward an adjacent property, and is close enough to create substantial light at the property line.
- The sign surface area is great enough to create substantial light at the property line.
- The sign surface is bright enough to create glare, which is a high contrast condition when the sign surface brightness is compared to the surrounding brightness.
- 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.

Under existing regulatory conditions, there are no quantitative standards for the amount of light or light trespass that off-site signs are allowed to produce. The City's existing regulations and design guidelines pertaining to light from signs are listed below:

Section 19.34.040: General Provisions for On-Site Signs

- B. **Illumination of Signs.** The illumination of signs, either from an internal or external source, shall be designed to avoid negative impacts on surrounding rights-of-way and properties. The following standards shall apply to all illuminated signs:
1. External light sources shall be directed and shielded to limit direct illumination of any object other than the sign;
 2. Sign lighting shall not be of an intensity or brightness that will create a nuisance for residential properties in a direct line of sight to the sign;
 6. Light sources shall utilize energy-efficient fixtures to the greatest extent possible.

Section 19.34.060: Creative Signs

- E. **Design Criteria.** In approving an application for a creative sign, the review authority shall ensure that a proposed sign meets the following design criteria:
4. Neighborhood Impacts. The sign shall be located and designed not to cause light and glare impacts on neighboring residential uses

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. Lighting should be provided from half-an-hour after sunset to half-an-hour before sunrise at all exits, entrances, loading areas, parking lots, plazas, and alleys. An average of one foot candle evenly distributed across properties is the suggested minimum. Up to two foot candles may be appropriate at entrances, exits and loading areas.
- 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.

Sections G-12.040 and G-34.250 contain non-mandatory guidelines for On-Site Signage and Buildings, and Sections 19.34.060 and 19.34.040 apply to on-site signs as well. The signs that would be modified and/or constructed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be off-site signs. (On-site signs advertise something that is sold or produced on the premises, whereas off-site signs identify a use, facility, service, or product that is not located, sold, or manufactured on the same premises as the sign.) As such, the existing lighting requirements for signs in the Municipal Code do not apply to the signage that would be modified and/or constructed pursuant to the proposed Sunset Strip Off-Site Signage Policy.

As such, the proposed Sunset Strip Off-Site Signage Policy includes new regulations that would provide quantitative standards to limit the amount of light trespass. The new lighting regulations would apply to digital conversions, standard modifications involving repositioning, relocating, or other changes in lighting, new billboards (digital and static), architectural lighting, temporary creative off-site signage installations, and tall wall signs that are modified pursuant to the proposed regulations. The proposed regulations were developed ~~for by~~ the City based on a scientific study of the lighting conditions along the Sunset Strip and of future digital signage along the Sunset Strip (see Appendix D) using state lighting standards as well as lighting design recommendations established by the Illuminating Engineering Society of North America (IESNA). 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. Compliance with the following standards from the proposed regulations would ensure that light and glare impacts caused by the proposed project would not adversely affect daytime or nighttime views:

- Sign illuminance (which is measured in footcandles) would not exceed 1.4 footcandles at any adjacent residentially zoned property line.

- Sign luminance (which is measured in candelas per meter squared) would be limited to 6,000 candelas per meter squared during the daytime and 300 candelas per meter squared in the evenings.
- Digital signs would reduce luminance during times of overcast weather to the required evening luminance levels.
- Transitions in illuminance of digital signs between daytime and nighttime and between sunny weather and overcast weather would occur at a smooth rate of change over the course of 20 minutes.

These regulations were established using a combination of local and state standards and existing City regulations. Pertinent standards that were used are described below, followed by an analysis of how the proposed regulations would ensure that digital billboards meet applicable regulations.

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 5.106.8, Light Pollution Reduction, sets forth requirements for all non-residential outdoor lighting. Lighting for outdoor signage may be exempt from these requirements in some cases. However, conservatively, the standards specified in CALGreen for non-residential outdoor lighting have been applied to the Sunset Strip Off-Site Signage Policy. The requirements set forth in Section 5.106.8 are as follows:

- The minimum requirements in the California Energy Code for Lighting Zones 1–4; 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; and
- Allowable BUG ratings not exceeding those shown in the CALGreen Code; or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

Lighting Zones (LZs) are defined by the CEC, with LZ1 applying to areas of low ambient lighting and LZ4 applying to areas of high ambient lighting. All urban areas are designated LZ3 as default under the California Energy Code. Within each Lighting Zone, there is a different limit on light trespass. For LZ3, light trespass is limited to 0.74 footcandles. The LZ4 light trespass footcandle value is 1.4 footcandles. However, as stated in California Energy Code Section 10-114, “Special districts within a default LZ3 may be designated as LZ4 by a local jurisdiction for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels.” Based on the existing conditions along Sunset Strip (a brightly illuminated international destination for nightlife and entertainment), the City has used the LZ4 standards as the basis for the lighting standards in the proposed Sunset Strip Off-Site Signage Policy. Under the LZ4 designation for Sunset Strip, the proposed lighting regulations would be in compliance with California Energy Code and CALGreen light trespass standards.

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, Section 21466.5, sets forth the following:

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 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.

Compliance with the sign brightness limits that are specified in the proposed Sunset Strip Off-Site Signage Policy would ensure that digital billboards have brightness levels that are well below the California Vehicle Code requirements, even assuming a worst-case, conservative scenario in which the billboards would be within the centerline of a driver's field of view and the angle noted above is 0. For this worst-case condition, the maximum allowable luminance would be 500 foot lamberts (fL). Therefore, the threshold for night luminance is a maximum 500 fL under the California Vehicle Code. Under the proposed Sunset Strip Off-Site Signage Policy, illuminated billboard sign faces are recommended to not exceed a maximum surface brightness of 300 candelas per meter squared during the evening and nighttime. Calculating the equivalent sign luminance by converting to English units from metric units, 300 candelas per meter squared equals 95.587.6 fL. The illuminated sign brightness would not exceed 95.587.6 fL, which is far less than the 500 fL maximum specified in the California Vehicle Code. Therefore, at night the digital signs would not exceed the 500 fL threshold and would not, therefore, introduce a new source of glare as defined by the California Vehicle Code, Article 3.

IESNA Recommended Practices

The 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. 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, establishes the zone designation for a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. This table is referenced by the California Energy Code relative to allowable energy use for outdoor lighting. In addition, the IESNA 10th Edition Lighting Handbook defines Recommended Light Trespass Limits 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 LZ3. IESNA Table 25.5 lists a pre-curfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for LZ3. As described above, the City will consider the Sunset Strip to be within LZ4 instead of LZ3. As defined by the IESNA, LZ4 is for “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 and/or continuous. After curfew, lighting may be extinguished or reduced in some areas as activity levels decline.” IESNA Table 25.5 lists a pre-curfew 15 Lux (1.4 footcandles) maximum at the location where trespass is under review for LZ4. Light trespass is considered a concern at the location of light-sensitive receptors. In the project area, these are considered to be residential uses. The proposed Sunset Strip Off-Site Signage Policy would limit light trespass at adjacent residentially zoned properties to 1.4 footcandles. As such, at the location where light trespass would be under review (i.e., at residentially zoned properties), new billboards, modified billboards, creative billboards, creative tall wall signs, and modified tall wall signs would be in compliance with the recommendations of the IESNA for light trespass in areas of high ambient lighting.

City of West Hollywood Municipal Code

The proposed Sunset Strip Off-Site Signage Policy would establish a light trespass limit onto residentially zoned properties of 1.4 footcandles. Digital billboard operators would be required to submit monitoring reports to confirm conformance with this requirement. While shielding requirements are not applicable to digital signs, the proposed Sunset Strip Off-Site Signage Policy limits the actual sign luminance that would be emitted by each digital sign and also requires monitoring reports to confirm conformance with the luminance limits. This would limit the potential for light spillover onto residential properties and public rights-of-way, in keeping with the intent of the City’s existing standards and guidelines for on-site signage and building lighting. As explained above, the lighting regulations and guidelines currently set forth in the City’s Municipal Code would not specifically apply to the billboards that would be modified or developed pursuant to the proposed Sunset Strip Off-Site Signage Policy. However, the lighting regulations that would be established for off-site signage in the proposed policy would be generally consistent with many of the existing regulations for on-site signs that are currently in the City’s Municipal Code. These existing regulations and guidelines establish protections for residential properties from sign lighting, and they also emphasize proper shielding of light sources and preventing spillover onto residential properties and public rights-of-way.

In summary, the proposed lighting regulations set forth in the Sunset Strip Off-Site Signage Policy have been developed to ensure that the light and glare produced by modified billboards, new billboards, and other types of off-site signage would comply with applicable state and local standards and guidelines. As demonstrated above, the proposed regulations would be in compliance with the LZ4 standards identified in the CALGreen Code, would be in compliance with glare standards established in the California Vehicle Code, would be consistent with IESNA recommendations, and would be consistent with the overall intent of existing City regulations and guidelines that are currently in place for on-site signs. As such, the proposed regulations would protect light- and glare-sensitive receptors from future digital billboards, modified billboards and tall wall signs, temporary creative off-site signage installations, and additional illuminated billboards along the Sunset Strip. The regulations would also protect pedestrians and drivers from the potentially adverse effects of installing digital signage along the Sunset Strip, as well as from new illuminated billboards that may be installed in association with new development or facade remodels. Upon compliance with the proposed regulations, modified billboards and new billboards are not expected to produce light or glare to the extent that daytime or nighttime views are adversely affected. As such, standard modifications and digital conversions are expected to have a less than significant impact relative to light and glare. Furthermore, so long as new digital billboards in new construction and facade remodels are designed in accordance with the proposed Sunset Strip Off-Site Signage Policy, they are also expected to have a less than significant impact relative to light and glare. For these reasons, impacts resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would ~~result in~~ be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to daytime and/or nighttime views from light and glare resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

References

- Caltrans (California Department of Transportation). 2011. California Scenic Highway Mapping System. Last updated September 7, 2011. Accessed September 30, 2014. http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.
- City of Los Angeles. 2006. "Aesthetics and Visual Resources" in *L.A. CEQA Thresholds Guide*. 2006. Accessed January 30, 2015. <http://environmentla.com/programs/Thresholds/A-Aesthetics%20and%20Visual%20Resources.pdf>.

3.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The project area and surrounding areas are characterized by features typical of an urban landscape. As shown on the Los Angeles County Important Farmland map, the project area does not include any sites mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2015). Implementation of the proposed project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist in the project area or in proximity to the project area. Furthermore, the properties along Sunset Strip are already graded and highly disturbed. Therefore, the proposed project would not convert Farmland to non-agricultural uses, and no impact would occur.

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

No Impact. The project area is located within the boundaries of the SSP and is zoned and designated as SSP, with the exception of the William S. Hart Park and Off-Leash Dog Park, which is designated PF (Public Facilities) (City of West Hollywood 2011). The SSP zoning district contains commercial and residential uses. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist in the project area or in the vicinity of the project area (California Department of Conservation 2016). For these reasons, implementation of the proposed project would not conflict with existing zoning for agricultural use, as none exist, nor would it conflict with a Williamson Act contract, as none exist. No impact to Williamson Act contract lands or land zoned for agricultural uses would occur.

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

No Impact. The project area is located within the boundaries of the SSP and is zoned and designated as SSP, with the exception of the William S. Hart Park and Off-Leash Dog Park, which is designated PF (Public Facilities). The SSP zoning district contains commercial and residential uses (City of West Hollywood 2011). The list of allowable land uses contained in the City's Zoning Ordinance for its commercial, residential, and PF zones does not include any timberland or forest land uses (City of West Hollywood Zoning Ordinance Section 19.10.030 and 19.06.030). For these reasons, no forest land, timberland, or Timberland Production areas are located within or adjacent to the project area. Therefore, the proposed project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The project would be implemented on existing developed sites that are surrounded by fully developed areas. No impact to forest land or timberland would occur.

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

No Impact. As characterized above, no forest land is located within the project area or in the vicinity of the project area, as the area is urbanized and developed with commercial, residential, and public facilities uses. No forest land would be converted or otherwise affected by the proposed project, and no impact would occur.

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

No Impact. As characterized above, no farmland or forest land is located in the project area or within the vicinity of the project area, as the area is urbanized and developed with commercial, residential, and public facilities uses. No farmland or forest land would be converted or otherwise affected by the proposed project, and no impact would occur.

References

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2013. Accessed December 9, 2016. <http://www.consrv.ca.gov/dlrp/lca/Pages/Index.aspx>.

City of West Hollywood. 2011. *City of West Hollywood Zoning Districts Map*. Accessed January 12, 2016. <http://www.weho.org/home/showdocument?id=5138>.

FMMP (Farmland Mapping and Monitoring Program). 2015. *Los Angeles County Important Farmland 2012*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. January 2015. Accessed March 7, 2016. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/>.

3.3 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. The project is located within the South Coast Air Basin (SCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP is the 2016 AQMP, which was adopted by the SCAQMD governing board on March 3, 2017 (SCAQMD 2017). The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2016). Because mobile sources are the principal contributor to the SCAB's air quality challenges, the SCAQMD has been and will continue to be closely engaged with CARB and the EPA, who have primary responsibility for these sources. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and other incentives that encourage the accelerated transition of vehicles, buildings, and industrial facilities to cleaner technologies in a manner that benefits not only air quality but also local businesses and the regional economy. Therefore, the evaluation of the project's potential to conflict with or obstruct implementation is based on the 2016 AQMP.

The 2016 AQMP is designed to meet applicable federal and state requirements for ozone (O₃) and particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (fine particulate matter; PM_{2.5}). While the 2012 AQMP focused on attainment of the 2006 24-hour PM_{2.5} standard, it has since been determined, that due to unexpected drought conditions, that it was impracticable to meet the standard by the original attainment year. Since that time, EPA has approved a re-classification to "serious" nonattainment for the 24-hour PM_{2.5} standard, which requires a new attainment demonstration with a new attainment deadline. The 2016 AQMP demonstrates how the region will achieve the 2012 annual PM_{2.5} NAAQS, 12.0 micrograms per cubic meter (µg/m³) as expeditiously as practicable, but no later than the statutory attainment deadline of 2021 for the moderate classification and 2025 for the serious classification. The 2016 AQMP also provides a preliminary evaluation of the most recent federal 8-hour ozone, which includes Ozone Measures necessary to attain the 2008 eight-hour ozone NAAQS, 75 parts per billion (ppb) by 2031.

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* (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

- 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.

To address the criterion regarding the project's potential to 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, a criteria air pollutant modeling analysis was performed to identify the project's impact on air quality. Results of this analysis are included in Appendix B. The California Emissions Estimator Model (CalEEMod) Version 2016.3.1 was used to model emissions for the project and analyzed for significance under Criterion 3.3(b) below. The project would generate minimal air pollutant emissions during short-term construction and long-term operational activities as discussed under Criterion 3.3(b).

In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP. Like the 2012 AQMP, the 2016 AQMP provides contingency and control measures, which are outlined to mitigate emissions, are based on existing and projected land use and development. The Southern California Association of Governments (SCAG) developed demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) for its 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) based on general plans for cities and counties in the SCAB. The 2016 AQMP relies on the land use and population projections provided in SCAG 2016 Regional Growth Forecast is used as a guide for developing regional plans and strategies mandated by federal and state governments, which is generally consistent with the local plans including the 2016 AQMP. Therefore, the 2016 AQMP can be considered consistent with local government plans.

The second criterion regarding the project's potential to exceed the assumptions in the 2016 AQMP or increments based on the year of project buildout and phase, is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth which were used in the development of the 2016 AQMP. The proposed project does not propose additional land for development nor would it induce additional population in the project area. Rather, the proposed project involves new regulations for modifying existing billboards along the Sunset Strip and for developing new billboards along the Sunset Strip. New development would continue to occur along Sunset Boulevard with or without the proposed signage regulations. Because the proposed project involves making modifications to existing billboards and developing new billboards, the project would not generate additional habitable floor area. As such, the proposed Sunset Strip Off-Site Signage Policy would not cause an increase in population in the region. Overall, impacts relating to the project's potential to conflict with or obstruct implementation of the 2016 AQMP would be less than significant. However, note that new development projects and facade remodels incorporating new billboards would be subject to further CEQA review, including an analysis of the project's consistency with the applicable AQMP. This analysis would encompass the whole of the project,

including any billboard(s) installed as part of the new development or the facade remodel. While such projects are not expected to conflict with the applicable AQMP that is in place at the time the project(s) are being proposed, this determination would ultimately be made as part of the future project-level CEQA analysis.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Implementation of the proposed Sunset Strip Off-Site Signage Policy could result in 3 digital conversions, 71 standard modifications, new billboards (including up to 17 new digital billboards) along the Sunset Strip, and periodic special events. Potential effects of these activities relative to violation of air quality standards are discussed below.

Digital Conversions and Standard Modifications of Existing Billboards

A quantitative analysis was conducted to determine whether construction and operation of existing billboards that have undergone standard modifications or digital conversions may result in emissions of criteria air pollutants from mobile, area, and energy sources that may cause exceedances of the NAAQS or CAAQS or contribute to existing nonattainment of ambient air quality standards. The following discussion identifies potential short- and long-term impacts that would result from the standard modifications and digital conversions that would be allowed by the proposed Sunset Strip Off-Site Signage Policy without further review under CEQA (an analysis that is quantifiable at this time).

Construction Emissions

Construction activities for standard modifications and digital conversions would result in a temporary addition of pollutants to the local airshed caused by fugitive dust emissions (as a result of pole location adjustments, which are the only activities that would require ground disturbance) and combustion pollutants from on-site construction equipment and on-road construction vehicles traveling to and from each billboard's location. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for fugitive dust, the prevailing weather conditions. Therefore, an increment of day-to-day variability exists.

Pollutant emissions associated with construction activity were quantified using CalEEMod. Default values provided by the program were used where detailed project information was not available. A detailed depiction of expected construction schedules for each digital conversion or standard modification—including information regarding phasing, equipment used during each phase, vendor trucks, and worker vehicles—is contained in the CalEEMod outputs, as provided in Appendix B.

Two scenarios of construction activity were modeled for this analysis which includes (1) Digital Conversion/Standard Modifications and (2) Standard Modifications Requiring Pole Location Adjustments. It is anticipated that construction activities would begin in 2017. Construction activities would consist of up to 3

digital conversions and 71 standard modifications between the time of project approval and 2032. The construction activity schedule, equipment mix, and number of vendor trucks and workers for the air emissions modeling of the project are shown in Table 3.3-1. For this analysis, it was assumed that each construction activity would last for a total of 2 days, resulting in a maximum of 26 days of construction per year. Furthermore, construction activities would involve approximately six construction workers per day (12 one-way worker trips), three vendor roundtrips per day (6 one-way vendor trips), and a total of four haul truck trips. It was assumed that a crane would operate for 4 hours per day during both days of construction. Several standard modifications and digital conversions could require additional work for pole location adjustments. The proposed project was estimated to result in a total of 15 pole location adjustments over the course of project implementation. Pole location adjustments would require one drill rig operating for up to 4 hours on the first day of construction. This construction scenario would involve approximately six construction workers per day (12 one-way worker trips), three vendor trips per day (6 one-way vendor trips), and a total of 12 haul truck trips. Approximately 50 cubic yards of soil would be exported for each pole location adjustment undertaken.

Table 3.3-1. Construction Schedule, Equipment, and On-Road Vehicles

Construction Type	On-Road Vehicles			Off-Road Equipment	
	<i>Worker Trips (one-way trips per day)</i>	<i>Vendor Trips (one-way trips per day)</i>	<i>Total One- Way Haul Trips</i>	<i>Type</i>	<i>Quantity</i>
Digital Conversion or Standard Modification	12	6	4	Crane	1
Pole Location Adjustment	0	0	6	Drill Rig	1
	12	6	6	Crane	1

Table 3.3-2 presents the estimated maximum daily construction emissions generated during construction of a typical digital conversion or standard modification, including a standard modification involving an adjustment in pole location. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix B.

Table 3.3-2. Estimated Maximum Daily Construction Emissions

Activity	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
Digital Conversion/Standard Modification	0.47	5.49	2.49	0.01	0.39	0.23
Modifications Requiring Pole Location Adjustments	0.72	10.41	4.09	0.02	0.60	0.34
Maximum Daily	0.72	10.41	4.09	0.02	0.60	0.34
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015 (thresholds).

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.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

See Appendix B for detailed results.

As shown in Table 3.3-2, daily construction emissions for each activity would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during any year that digital conversions or standard modifications are undertaken. While it is anticipated that construction activities would not occur concurrently, the maximum number of concurrent construction activities could be nine activities (with pole location adjustments) before the exceedance of the SCAQMD significance thresholds. Therefore, construction impacts of future standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Operational Emissions

Minimal operational activities would occur for digital billboards and billboards that have undergone standard modifications. Operation of digital billboards and billboards that have undergone standard modifications would not require employee or customer trips, only periodic vehicle trips required for LED bulb replacement, which would occur once every 5 years for digital signs. Minimal criteria air pollutants emissions would be generated during operational activities from the vehicle trips required for LED bulb replacement, resulting in a maximum increase of 3 round-trip truck trips (6 one-way truck trips) every 5 years over existing conditions. The periodic nature of operational activities occurring every 5 years would result in minimal operational impacts that would directly affect air quality.

As digital conversions are completed along the Sunset Strip, the electricity usage of billboards would incrementally increase. Standard modifications involving the addition of a second billboard face to a single-sided billboard would also result in minor increases in electricity use. (Other standard modifications are not expected to substantially alter electricity use relative to existing conditions.) Using assumptions regarding the number of second faces and the amount of electricity that is required by typical static and digital billboards,

annual electricity usage of billboards along the Sunset Strip would be 663,132 kilowatt-hours (kWh) once all allowable digital conversions and standard modifications are completed. This would represent an increase of approximately 144,540 kWh compared with the electricity usage of the existing 74 static billboard faces. 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. As further described in Section 3.7 of this IS/ND, the regulations that would be established by the proposed Sunset Strip Off-Site Signage Policy require that all digital billboard projects offset net energy increases with renewable energy credits and/or by providing alternative power sources on site. Compliance with this regulation would reduce the project's potential indirect contributions to criteria air pollutant emissions as a result of increased electricity usage.

With the exception of potential GHG effects associated with increased electricity demand in the project area, the operational impacts to air quality would be minimal given the scale and periodic nature of the expected operational activities resulting from existing billboards that have undergone standard modifications or digital conversions. As there would be minimal criteria air pollutant emissions associated with operation of existing billboards that have undergone standard modifications or digital conversions, the operational emissions are anticipated to be nominal. Implementation of the proposed digital conversions and standard modifications would not violate existing air quality standards, and impacts would be less than significant.

New Billboards Integrated into New Development or Facade Remodels

Construction

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. As with digital conversions and standard modifications, the construction of new billboards would have the potential to result in a temporary addition of pollutants to the local airshed caused by fugitive dust emissions (as a result of pole location adjustments, which are the only activities that would require ground disturbance) and combustion pollutants from on-site construction equipment and on-road construction vehicles traveling to and from each billboard's location. While the construction scenarios for future billboards are currently unknown, they would likely be similar to the scenarios described and analyzed above for billboard modifications (also see Section 2.5). As substantiated above, this level of activity is expected to result in less than significant impacts related to daily air quality emissions. As described above, multiple billboards or billboard modifications could be undertaken during the same day and would still fall below the SCAQMD daily construction emission thresholds. Therefore, construction impacts of future new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Operation

The operational scenarios of new billboards are also expected to be similar to those described above. New digital billboards would require periodic vehicle trips for LED bulb replacement, which would occur once every 5 years for digital signs. New static billboards would require periodic vehicle trips for copy changes. Minimal criteria air pollutant emissions would be generated during operational activities from the vehicle trips required for LED bulb replacement or copy changes. The 17 allowable new digital billboards would result in a maximum increase of 17 round-trip truck trips (34 one-way truck trips) every 5 years over existing conditions. As shown in Tables 2-1 and 2-2, if all 17 allowable new digital billboards were to be constructed, then only one new billboard is anticipated to be a static billboard. The new static billboard would result in approximately one round-trip truck trip per month associated with copy changes. The periodic nature of operational activities would result in minimal operational impacts that would directly affect air quality.

As new billboards are installed along the Sunset Strip, the electricity usage of the Sunset Strip billboards would incrementally increase. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use would occur at the site of the power plant, which is typically off site. As further described in Section 3.7 of this IS/ND, the regulations that would be established by the proposed Sunset Strip Off-Site Signage Policy require that all digital billboard projects offset net energy increases with renewable energy credits and/or by providing alternative power sources on site. Compliance with this regulation would reduce the project's potential indirect contributions to criteria air pollutant emissions as a result of increased electricity usage.

With the exception of potential GHG effects associated with increased electricity demand in the project area, the operational impacts to air quality would be minimal given the scale and periodic nature of the expected operational activities resulting from new billboards. As there would be minimal criteria air pollutant emissions associated with operation of new billboards, the operational emissions are anticipated to be nominal. Operation of new billboards pursuant to the proposed Sunset Strip Off-Site Signage Policy is not expected to violate existing air quality standards, and impacts would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential effects of such future projects related to violations of air quality standards would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Sunset Strip Billboard District – Special Events

The proposed Sunset Strip Billboard District would be associated with a biennial or annual event that is anticipated to last for several days (for example, it may occur over the course of a weekend). Such events have the potential to draw additional visitors to the project area during the event, leading to additional traffic in the area. This additional traffic could lead to a temporary and brief increase in emissions in the project vicinity during the special event. The specific nature of such future events is currently unknown. The events are anticipated to be targeted toward existing travelers and visitors to the Sunset Strip, but could potentially build in popularity over time. Because the nature and popularity of these events is unknown, the brief increases in air emissions that could be attributable to such events was not calculated. Due to the periodic and limited duration of these events, operational impacts to air quality would be less than significant.

- c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Less Than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. In considering cumulative impacts from the proposed 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. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

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 activities attributable to implementation of the proposed Sunset Strip Off-Site Signage Policy would generate VOC and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Table 3.3-2, construction emissions resulting from standard modifications and digital conversions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, PM₁₀, or PM_{2.5}. Construction emissions associated with the installation of new billboards are expected to be similar to those of modifications involving pole location adjustments. As such, construction emissions from new billboards are not expected to exceed the SCAQMD emission-based significance thresholds. Operation of existing billboards that have undergone standard modifications and digital conversions, as well as new billboards, would result in minimal emissions, as explained in Section 3.2(b). Therefore, construction activities associated with the proposed Sunset Strip Off-Site Signage Policy would not cause a cumulatively significant impact.

Regarding localized impacts, cumulative PM₁₀ and PM_{2.5} emissions would be reduced because excavation activities would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. As discussed under Criterion 3.3(d) below, standard modifications and digital conversions of existing billboards undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not result in maximum daily PM₁₀ and PM_{2.5} concentrations that would exceed SCAQMD localized significance thresholds (LSTs) during project construction activities. Construction emissions associated with the installation of new billboards are expected to be similar to those of modifications involving pole location adjustments. As such, installation of new billboards are not expected to result in maximum daily PM₁₀ and PM_{2.5} concentrations that would exceed SCAQMD LSTs. As such, construction activities associated with the proposed Sunset Strip Off-Site Signage Policy would not have a considerable contribution to the SCAB's nonattainment designation for PM₁₀ and PM_{2.5} and would not, therefore, cause a cumulatively significant impact.

In summary, because the estimated project-generated emissions do not exceed the SCAQMD project-specific impact thresholds during construction and operation, the proposed Sunset Strip Off-Site Signage Policy would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Thus, this impact would be less than significant.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The construction and operational scenarios of such future projects are too speculative at this time to evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to cumulatively considerable increases in emissions of nonattainment pollutants resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Localized project impacts associated with construction and operational emissions of criteria pollutants are assessed below.

Localized Significance Threshold Analysis

Sensitive receptors² that would potentially be affected by construction activity in the project area are residential uses located within the project area. Construction activities associated with standard modifications,

² Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The SCAQMD identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

digital conversions of existing billboards, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would result in temporary sources of on-site fugitive dust and construction equipment emissions due to limited excavation activity required for pole location adjustments. However, the specific billboards that would undergo an adjustment in pole location are currently unknown. As a conservative assessment, this analysis assumes the closest possible distance for residential sensitive receptors that is found within SCAQMD's Localized Significance Threshold (LST) analysis guidelines, which is a distance of approximately 82 feet (25 meters) from the proposed construction locations to a residence. Additionally, the SCAQMD LST values for a 1-acre site within Source-Receptor Area 2 (Northwest Coastal Los Angeles County) were used. Off-site emissions from vendor trucks and worker vehicle trips are not included in the LST analysis. The maximum daily on-site construction emissions generated during construction are presented in Table 3.3-3 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 2 to determine whether on-site construction emissions would result in potential LST impacts.

Table 3.3-3. Construction Localized Significance Thresholds Analysis

Pollutant	Project Construction Emissions	LST Criteria	Exceeds LST?
	Pounds per Day		
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 2008 (thresholds).

Notes: LST = localized significance threshold; NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter

To determine the LST criteria for the project, the LSTs for a 1-acre site with sensitive receptors located within an 82-foot (25-meter) distance from construction activity were used. Maximum on-site emissions were estimated for pole location adjustments.

As shown in Table 3.3-3, proposed construction activities associated with future standard modifications, digital conversions, and new billboards would not generate emissions in excess of site-specific LSTs; therefore, localized project construction impacts would be less than significant.

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." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, 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.

Standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would require minimal on-road vehicle trips during construction. Modifications to existing billboards would not increase daily vehicular trips during operations when compared to the operation of existing billboards. As described under Section 3.2(b), operational vehicular trips for new billboards would be minimal and infrequent. Accordingly, the proposed Sunset Strip Off-Site Signage Policy would not result in the generation of traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots.

As described in Section 3.3(b), the Sunset Cultural Billboard District special events may result in temporary and brief increases in traffic in the project area. However, the nature and popularity of these events is currently unknown. Such events would be limited in duration and would occur biennially or annually. Due to the limited duration and the periodic nature of these events, they are not expected to create a significant, adverse effect related to CO hotspots. 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 proposed Sunset Strip Off-Site Signage Policy would result in a less than significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. The nearest sensitive receptors to the project area are residences located along the Sunset Strip or adjacent to the Sunset Strip. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. “Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) effects.³ TACs that would potentially be emitted during construction activities associated with implementation of the proposed Sunset Strip Off-Site Signage Policy would be diesel particulate matter.

³ Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks during construction. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. Proposed construction activities for standard modifications, digital conversions, and installations of new billboards pursuant to the proposed Sunset Strip Off-Site Signage Policy would occur intermittently and would be brief; therefore, implementation of the proposed Sunset Strip Off-Site Signage Policy would not require extensive use of heavy-duty construction equipment or extensive use of diesel trucks. As described for the LST discussion, the project does not require an extensive amount of earthwork; therefore, PM₁₀ (representative of diesel particulate matter) exposure resulting from construction of digital conversions, standard modifications, and new billboards would be minimal. According to OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of the proposed construction activities would only constitute a small percentage of the total 30-year exposure period. While construction activities associated with digital conversions, standard modifications, and new billboards are assumed to occur through 2032, construction activities are expected to be limited to a maximum of 44 days per year. Additionally, construction activities would occur at a given location for approximately 2 days, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction activities associated with standard modifications, digital conversions, and new billboards would not be expected to result in concentrations causing significant health risks.

Operation of billboards that have undergone standard modifications or digital conversions and operation of new billboards would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators) or result in a substantial increase in diesel vehicles (i.e., delivery trucks) over existing baseline conditions.

Overall, implementation of the proposed Sunset Strip Off-Site Signage Policy would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project area and impacts would be less than significant.

Health Impacts of Criteria Air Pollutants

Construction and operation of standard modifications, digital conversions, and new billboards would generate criteria air pollutant emissions; however, the project would not exceed the SCAQMD mass-emission thresholds.

The SCAB is designated as nonattainment with respect to the O₃ NAAQS and CAAQS. Thus, existing O₃ levels in the SCAB are at unhealthy levels during certain periods. The health effects associated with O₃ are generally associated with reduced lung function. Because the proposed project involves construction and operational activities that would not result in O₃ precursor emissions (VOC or NO_x emissions) in exceedance

of the SCAQMD thresholds, the proposed Sunset Strip Off-Site Signage Policy is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

In addition to O₃, NO_x contributes to potential exceedances of the NAAQS and CAAQS for NO₂. The existing ambient NO₂ concentrations are below the NAAQS and CAAQS. Thus, construction and operation associated with standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy is not expected to result in exceedances of the NO₂ standards or contribute to the associated health effects, which are primarily associated with respiratory irritation. CO tends to be a localized impact associated with congested intersections. The associated CO hotspots were discussed previously as a less-than-significant impact. Thus, potential CO emissions resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy 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. According to the EPA, 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 (EPA 2016). As with O₃ and NO_x, future standard modifications, digital conversions, and new billboards would not generate emissions of PM₁₀ and PM_{2.5} that would exceed the SCAQMD's thresholds. Accordingly, PM₁₀ and PM_{2.5} emissions resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy are not expected to cause any increase in related regional health effects for this pollutant.

In summary, standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not result in a potentially significant contribution to regional concentrations of non-attainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The construction and operational scenarios of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to sensitive receptors resulting from the air emissions of such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

e) *Would the project create objectionable odors affecting a substantial number of people?*

Less Than Significant Impact. Odors are a form of air pollution that is most obvious to the public and can present problems for both the source and surrounding community. Although offensive odors seldom cause physical harm, they can be annoying and cause concern. As discussed below, construction and operation of the project would not create objectionable odors affecting a substantial number of people.

Odors would potentially be generated from vehicles and equipment exhaust emissions during construction activities associated with digital conversions, standard modifications, and new billboards. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Existing billboards that have undergone standard modifications or digital conversions and new billboards would not result in creation of a land use that is commonly associated with odors. Sources that could potentially emit odors during operational activities include vehicle exhaust resulting from motor vehicles traveling to each site in order to replace LED bulbs; however, this activity would occur once every 5 years. Due to the limited nature of these activities and the localization of such sources, impacts associated with odors during operation of billboards that have undergone standard modifications or digital conversions and new billboards would be less than significant.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The construction and operational scenarios of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential odors resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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3.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

No Impact. The Sunset Specific Plan area is developed with commercial buildings, residential buildings, and one park. Vegetation within the project area is generally sparse and is limited to ornamental vegetation consisting primarily of street trees and landscaping at the William S. Hart Park and Off-Leash Dog Park. The Hollywood Hills are located adjacent to and north of Sunset Boulevard. The portion of the Hollywood Hills near Sunset Boulevard is primarily developed with single-family residential uses but also contains scattered undeveloped areas between the residential lots.

Based on an electronic database review of the Hollywood and Beverly Hills quadrangles⁴ in the California Natural Diversity Database, several sensitive species have historically been sighted in the general area of the proposed project (CNDDDB 2017). However, based on the disturbed and developed condition of the project area, and the relative lack of suitable habitat, the potential for any known sensitive species to occur in the area is very low, as the project area is fully developed and sparsely vegetated. Furthermore, many of the sightings in the electronic database review were reported in the early 1900s and/or were reported in naturalized areas such as the Santa Monica Mountains, which are located over 5 miles from the project area.

Implementation of digital conversions and standard modifications and installation of new billboards pursuant to the proposed Sunset Strip Off-Site Signage Policy would involve limited to no ground disturbance. Activities would occur on fully developed parcels adjacent to Sunset Boulevard that are devoid of suitable habitat for sensitive species. Due to the highly developed nature of the project area and the types of activities that such future projects would entail, a substantial adverse effect on species identified as candidate, sensitive, or special status would not occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. While impacts to sensitive species are unlikely due to the existing conditions within the project area that are described above, the specific location along the Sunset Strip and the scope of construction for such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to sensitive species resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. No riparian or other sensitive habitats are known to occur in the project area or in the City (City of West Hollywood 2010). While ornamental vegetation is present within the project area, it is sparsely scattered and is situated in an urban environment. Therefore, it does not constitute a sensitive natural community. As such, no impact to sensitive natural communities from the proposed project would occur, as none exist in the project area.

⁴ Quadrangles are areas established by the U.S. Geological Survey as a way of categorizing and dividing topographical maps. Quadrangles cover an area measuring 7.5 minutes of latitude and 7.5 minutes of longitude. The western portion of the project area is within the Beverly Hills quadrangle, and the eastern portion of the project area is within the Hollywood quadrangle.

- c) *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The City of West Hollywood does not contain any federally protected wetlands (USFWS 2015). Therefore, no impact to federally protected wetlands would occur.

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

Less Than Significant Impact. There are no wetlands or water bodies within the proposed project area. Therefore, the proposed project would have no potential to affect the movement of migratory fish. As stated in the City's General Plan Environmental Impact Report, while some local movement of wildlife can be expected to occur throughout the City, the City is not recognized as an area that links migratory wildlife populations. Furthermore, the project area is a highly built-out corridor. The majority of the properties along the Sunset Strip are fully developed, and the Sunset Strip supports a high volume of vehicular and pedestrian traffic and is therefore characterized by generally high ambient levels of noise and light. For these reasons, the Sunset Strip is a generally unsuitable area for wildlife habitat, including wildlife corridors.

While the Sunset Strip is highly developed and is not expected to serve as a wildlife corridor, its sparsely scattered ornamental vegetation 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). In the unlikely event that tree trimming or tree removal is required, construction activities associated with digital conversions, standard modifications, and new billboard installations could directly or indirectly affect nesting birds. However, for any construction activities occurring during the nesting season (February 1–August 31) that would involve vegetation trimming or removal, the proposed regulations would require 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 the proposed regulations, the construction activities associated with standard modifications, digital conversions, and new billboards would not have an adverse effect on protected nesting birds. No operational impacts to nesting birds are assumed, since maintenance of billboards along the Sunset Strip would continue to occur in a manner consistent with current practices. Due to the highly developed nature of the project area and the types of activities that the proposed project would entail, combined with the nesting bird protection measures that have been included as part of the proposed regulations, impacts on the movement of native or resident species or on the use of native wildlife nursery sites resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodel projects. Nesting bird protection measures similar to those

that have been incorporated into the proposed regulations would likely be required for such future developments and facade remodel projects. However, the exact locations and scope of construction for such future projects are too speculative at this time to adequately evaluate their potential environmental effects with more certainty. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to native wildlife movement and/or nursery sites resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. The City's municipal code provides regulations governing the treatment of street trees and trees on other public lands, as well as requirements under the City of West Hollywood Heritage Tree Program. No trees in the project area have been designated as Heritage Trees by the City (City of West Hollywood 2014). However, the project area contains numerous street trees, some of which are located adjacent to existing billboards that would be allowed to undergo digital conversions and standard modifications. Street trees may also be located on properties that could be developed with a new billboard. Street trees are subject to protections established in the City's municipal code, which requires permits for removing and/or trimming street trees or other vegetation. However, the proposed Sunset Strip Off-Site Signage Policy would prohibit the maintenance, construction, or operation of an off-site sign from resulting in removal or alteration of trees or landscaping in nearby public parks or in the public right-of-way. As such, implementation of the proposed Sunset Strip Off-Site Signage Policy would not affect any street trees or vegetation protected under City policy and, therefore, would not have the potential to conflict with City policies protecting such trees and vegetation.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodel projects. While provisions have been included in the proposed policy that would prevent new billboards from resulting in removal or alteration of protected trees and landscaping, new developments or the facade remodels could potentially involve removal or trimming of street trees or vegetation. In the event that tree or vegetation removal or trimming is involved for such future projects, the applicant would be required per the municipal code to replace any street trees and vegetation permitted for removal with another tree or trees, of a type and quality to be determined by the City (Municipal Code Chapter 11.36). Upon compliance with the municipal code provisions, these future projects would not conflict with local policies protecting biological resources. Due to required compliance with the City's municipal code and upon compliance with the proposed regulations in the Sunset Strip Off-Site Signage Policy for removal and/or tree trimming of street trees and trees on public lands, the proposed project would not conflict with local policies protecting biological resources, and no impact would occur.

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

No Impact. The City's general plan does not designate any areas of the City as being within a habitat conservation plan (City of West Hollywood 2011). Furthermore, the City is not within any of the regional conservation plans designated by the state (CDFW 2014). Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat plan, as none apply to the project area. No impacts would occur.

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3.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
pursuant to §15064.5?				
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of ~~dedicated~~ <u>formal</u> cemeteries?	☐	☐	☒	☐

a) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

Less Than Significant Impact. The Sunset Strip contains numerous historic built environment resources. The proposed Sunset Strip Off-Site Signage Policy would involve modifications to existing traditional billboards, conversion of existing traditional billboards to digital billboards, and construction and operation of new billboards in association with new development or facade remodels.

Some existing billboards along the Sunset Strip are located on the site of a historical resource. Modifications to such existing billboards (pursuant to the proposed Sunset Strip Off-Site Signage Policy) have the potential to indirectly impact historical resources by obscuring significant character-defining features of the building or historic views of the Sunset Strip. In order to prevent any significant impacts to historical resources, the proposed Sunset Strip Off-Site Signage Policy sets forth specific protections. **Upon approval of the proposed Sunset Strip Off-Site Signage Policy, any off-site signage project located on or directly adjacent to historical resources (as defined in CEQA Guidelines Section 15064.5(a)) would be required to conform with the Secretary of the Interior's Standards for Rehabilitation (SOI Standards, Weeks and Grimmer 1995).**

Conformance with the SOI Standards would ensure that modifications to existing billboards and installation of new billboards do not obscure the important character-defining features of historical resources, including any significant historic street views. Proposed designs for new or modified off-site signage will 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. Additionally, if a standard modification, digital conversion, or new billboard would be located on or directly adjacent to properties containing historical resources, the billboard owner would be required to submit a Certificate of Appropriateness, which would be reviewed by the City's Historic Preservation Commission prior to approval. The requirement to submit a Certificate of Appropriateness for review by the City's Historic Preservation Commission would ensure that modifications to billboards or new billboards located on or adjacent to properties with designated cultural resources would be designed and constructed in conformance with the SOI standards.

Compliance with the proposed cultural resource protection measures (that would be adopted upon approval of the proposed Sunset Strip Off-Site Signage Policy) would reduce impacts associated with future standard modifications, digital conversions, and new billboards to a less than significant level. As such, impacts on historical resources resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to historical resources resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. A records search was conducted at the South Central Coastal Information Center (SCCIC) for the City of West Hollywood in support of the City's General Plan Environmental Impact Report. The records search included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California State Historic Resources Inventory, and the California Historical Landmarks and Points of Interest. The records search also included a list of designated historical resources within West Hollywood. No prehistoric or historic archaeological resources were identified in the records search results. All identified resources are historic buildings constructed between the early and middle 20th century (City of West Hollywood 2010). No prehistoric or historic archaeological resources were identified as a result of the records search. All identified resources are historic buildings constructed between the early and middle 20th century (City of West Hollywood 2010).

As described in the General Plan Environmental Impact Report, the City is located within an area that possesses a high potential to contain buried cultural resources, including historic and prehistoric artifacts and features. The City contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File search of the project area. The NAHC responded on November 15, 2016, and stated that the search "was completed with negative results however this area is sensitive for potential tribal cultural resources." The NAHC provided a list of six tribal contacts with traditional lands or cultural places located within the boundaries of the project area, who should be contacted for additional information regarding cultural resources within the project area. On November 28, 2016, the City sent letters to the six contacts on the list with a project description and a map showing the project area. (Copies of these letters are on file at the City's Community Development Department.) One response has been received to date: Andrew Salas,

Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation responded in a letter dated December 5, 2016, and stated that the project area is highly sensitive for cultural resources.

No known archaeological resources are located within the project area. However, there is the potential that previously undiscovered resources may be present below ground, especially at the depths that may be required to install new pole foundations for new billboards or billboard modifications involving pole location adjustments. 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 majority of the digital conversions and standard modifications undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not involve ground disturbance. Work would typically take place aboveground, since changes in the billboard pole foundation(s) would not be required for digital conversions or for structural modifications involving height, orientation, or the addition of a second face. As such, most digital conversions and standard modifications would not have the potential to adversely affect archaeological resources. However, modifications involving an adjustment in pole location would likely require new ground disturbance, since pole foundations typically require excavation of holes that are 35 to 45 feet in depth and 5 feet in width. Similarly, some new billboards may have their own poles or free-standing support structures; as such, there is the potential that new billboards could also result in ground disturbing activities, with excavation of holes that are 35 to 45 feet in depth. While the project area is highly developed and disturbed, excavation at these depths could result in uncovering of previously undisturbed soils. As such, the potential exists for uncovering a previously unknown archaeological resource while excavating new pole foundations. As such, for modifications requiring ground disturbance, the proposed regulations have set forth the requirement for a qualified archaeologist to assess the archaeological sensitivity of the site and the potential for effects on subsurface deposits to occur during excavation. The policy also includes measures to be implemented in the unlikely event that archaeological resources or human remains are encountered during excavation (see Appendix A). These policy requirements would ensure that cultural resources would be protected to the extent required by law. Upon compliance with the proposed regulations, impacts to archaeological resources resulting from digital conversions and standard modifications would be less than significant.

Regarding new billboards, it is anticipated that similar resource protection measures would likely be applied. New billboards would be required to be part of new development projects or facade remodels. Such projects could also result in ground disturbance with the potential to encounter previously unknown cultural resources. Facade remodels are unlikely to encounter buried archaeological resources, given the limited amount of earthwork anticipated for these projects. However, the location, design, and extent of earthwork for such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed.

Potential effects to the significance of an archaeological resource resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. The City is underlain with alluvial fan deposits. As stated in the City's General Plan Environmental Impact Report, a large number of fossils have been recovered from alluvial fan deposits similar to those that underlie the City (City of West Hollywood 2010). In the event that fossils and unique geologic features are uncovered during ground disturbing activities, they may be inadvertently destroyed, unless measures are taken to ensure that such resources are identified and properly handled and recovered. As described in Section 3.5(b), the majority of digital conversions and standard modifications would not generally involve ground-disturbing activities. Additionally, as described in Section 3.5(b), some new billboards may not involve ground disturbance, if they are adhered to building facades. As such, the majority of activities occurring as a result of implementing the proposed Sunset Strip Off-Site Signage Policy would not have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. However, modifications to existing billboards involving a change in pole location or new billboards requiring a new pole foundation would have the potential to involve minor amounts of ground disturbance as the hole(s) for new pole foundations are excavated. Due to the depth of typical billboard pole foundations, there is the potential that paleontological resources or unique geologic features would be encountered during excavation. While destruction of a paleontological resource or unique geologic feature is unlikely to occur, the proposed regulations include measures to ensure that any ground disturbance associated with changes in pole location would not result in destruction of a paleontological resource or unique geologic feature (see Appendix A). As such, upon compliance with the proposed regulations, impacts to paleontological resources and unique geologic features resulting from digital conversions, standard modifications would be less than significant.

Regarding new billboards, it is anticipated that similar resource protection measures would likely be applied. New billboards would be required to be part of new development projects or facade remodels. Such projects could also result in ground disturbance with the potential to encounter previously unknown paleontological resources. However, the location, design, and depth of excavation for such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to paleontological resources resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. As described under Section 3.5(b), the project area is considered sensitive for previously uncovered cultural resources, which include human remains. Previously undiscovered human remains have the potential to be uncovered during ground disturbance. If proper evaluation and protection of the human remains are not conducted, such remains could be disturbed, resulting in a potentially significant effect. However, as described in Section 3.5(b), most activities involved with standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not result in ground disturbance. Additionally, as described in Section 3.5(b), some new billboards may not involve ground disturbance, if they are adhered to building facades. For the activities involving ground disturbance (i.e., moving the location of an existing billboard pole or installing a new pole for a new billboard), the ground disturbance involved would be limited. Excavation of a hole for a billboard pole foundation would not be anticipated to result in discovery of human remains, due to the limited horizontal extent of excavation. In the unlikely event that human remains are unexpectedly encountered during construction activities for the modification of existing billboards or for new billboards, there are laws and required procedures that would preclude potentially significant effects to human remains. These laws include State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, which provide guidance with regard to the accidental discovery of human remains. Should remains be unearthed during any construction activities involved with implementation of the proposed Sunset Strip Off-Site Signage Policy, required compliance with these laws would reduce any potential impact to less than significant.

The policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects. These future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to the same laws and required procedures referenced above, which would be expected to preclude significant effects to human remains from occurring. However, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would still be subject to project-specific CEQA review at the time such projects are proposed.

Reference

City of West Hollywood. 2010. *Public Review Final Program Environmental Impact Report, City of West Hollywood General Plan and Climate Action Plan*. October 2010. Accessed December 12, 2016. <http://www.weho.org/city-hall/download-documents/-folder-626>.

3.6 Geology and Soils

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

a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

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

Less Than Significant Impact. There are numerous known earthquake faults in the vicinity of the project area (California Geological Survey 2014, City of West Hollywood 2010). Additionally, several portions of the project area are located within the City of West Hollywood Fault Precaution Zone, and the approximate trace of an active subsidiary splay of the Hollywood Fault potentially traverses several properties near the eastern boundary of the project area (City of West Hollywood 2010). As such, the proposed project would be implemented in an area where a known earthquake fault could potentially rupture. The proposed project entails changes to existing billboards, including digital conversions and modifications in billboard height, orientation, and/or pole location, and construction and operation of new billboards. In the unlikely event of fault rupture on a billboard site, the billboard could undergo structural damage. However, modifications to existing billboards and installation of new billboards would be required to be conducted in accordance with existing federal, state, and City laws and guidelines concerning seismic safety. Additionally, implementation of the proposed project would not change the use of any buildings resulting in an increase of building occupants who may be exposed to fault rupture. The proposed changes to existing billboard structures and new billboards would not substantially increase the risk of loss, injury, or death due to fault rupture along the Sunset Strip, relative to existing conditions. Upon compliance with seismic safety regulations, impacts related to fault rupture associated with implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects involving rupture of a known earthquake fault would be examined in accordance with CEQA as part of the required project-specific CEQA review.

ii) *Strong seismic ground shaking?*

Less Than Significant Impact. The project area is located within the seismically active Southern California region and, like all locations within the region, is subject to strong seismic ground shaking. In

the event of strong seismic ground shaking within the project area, billboard structures would have the potential to undergo seismic damage, just as buildings and other structures along Sunset Strip may undergo damage during a strong earthquake. Standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would entail changes to existing billboard structures; as such, the standard modifications and digital conversions would not increase the number of structures or building occupants in the project area that would potentially be subject to risks related to seismic-related ground shaking. New billboards would introduce new structures to the Sunset Strip that would potentially be subject to seismic-related ground shaking. However, modifications to existing billboards and construction and operation of new billboards would occur in accordance with existing federal, state, and City laws and guidelines concerning seismic safety, thereby ensuring maximum feasible stability of modified billboards and new billboards. As such, the proposed changes to existing billboard structures and installation of new billboards along the Sunset Strip would not substantially increase the risk of loss, injury, or death due to strong seismic ground shaking along the Sunset Strip, relative to existing conditions. Upon compliance with seismic safety regulations, impacts related to seismic ground shaking associated with implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects involving strong seismic ground shaking would be examined in accordance with CEQA as part of the required project-specific CEQA review.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. Areas identified as being susceptible to liquefaction have been identified within the project area (Division of Mines and Geology 1999, California Geological Survey 2014). In the event that seismic-related ground failure were to occur at the site of an existing billboard structure or at the site of a new billboard structure, the structure would have the potential to undergo damage, just as buildings and other structures along Sunset Strip may undergo damage from seismic-related ground failure. Standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip

Off-Site Signage Policy would entail changes to existing billboards only; as such, these activities would not increase the number of structures or building occupants in the project area that would potentially be subject to risks related to seismic-related ground failure. New billboards would introduce new structures to the Sunset Strip that would potentially be subject to seismic-related ground shaking. However, modifications to existing billboard structures and construction and operation of new billboards would occur in accordance with existing federal, state, and City laws and guidelines concerning seismic safety. As such, the proposed changes to existing billboard structures and installation of new billboards along the Sunset Strip would not substantially increase the risk of loss, injury, or death due to strong seismic ground shaking along the Sunset Strip, relative to existing conditions. Upon compliance with seismic safety regulations, impacts associated with associated with implementation of the proposed Sunset Strip Off-Site Signage Policy related to seismic-related ground failure would be less than significant.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects involving seismic-related ground failure would be examined in accordance with CEQA as part of the required project-specific CEQA review.

iv) Landslides?

No Impact. The project area is not located within an area identified as being susceptible to earthquake-induced landslides on maps prepared by the state (California Geological Survey 2014; Division of Mines and Geology 1999). As such, landslides are unlikely to occur in the project area. Therefore, no impact would occur.

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

No Impact. In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. As described in Section 3.5, modifications to existing billboards involving adjustments in pole location and construction of new billboards requiring new pole foundations would entail minor amounts of ground disturbance and would, therefore, have the potential to temporarily expose soils at billboard sites. However, once existing pole foundations are removed for any modifications requiring pole location adjustments, the holes would be backfilled and then repaved or re-landscaped, consistent with the existing ground covering on the billboard site. Following excavation of new holes for modifications requiring pole location adjustments or

new billboards, the poles would be installed and cemented in place. The process is expected to take approximately 2 days. As such, the project 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. Therefore, substantial soil erosion or loss of topsoil would not result. No impact would occur as result of the proposed Sunset Strip Off-Site Signage Policy.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. While impacts involving erosion are unlikely due to the urbanized nature of the project area and the regulatory requirements for stormwater management, the specific locations of such future projects and the scope of construction for future projects are too speculative at this time to determine with more certainty whether impacts could occur. These future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential for such projects to result in substantial erosion or loss of topsoil would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. As described above, portions of the project area could be susceptible to soils hazards, such as liquefaction. However, standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not increase the number of structures or building occupants exposed to soils hazards. New billboards would introduce new structures to the Sunset Strip that would potentially be subject to seismic-related ground shaking. However, all conversions, modifications, and new billboards would be subject to applicable City, state, and federal regulations related to geologic safety. For these reasons, the minor amounts of ground disturbance associated with standard modifications, digital conversions, and new billboards are not expected to result in hazards related to soil stability. Upon compliance with seismic safety regulations, impacts related to soil hazards associated with implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential for those projects to result in substantial adverse effects involving soil hazards would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water, and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. Portions of the project area and surrounding areas are underlain by quaternary alluvium consisting of loose to moderately dense sand, silt, and clay (Division of Mines and Geology 1998). While unlikely, substantial soil expansion could potentially undermine a billboard foundation, causing structural damage and a potential safety hazard. However, standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not increase the number of structures or building occupants potentially exposed to hazards associated with soil expansion. New billboards would introduce new structures to the Sunset Strip that would potentially be subject to seismic-related ground shaking. However, modified billboards and new billboards would be constructed and operated in accordance with existing federal, state, and City laws and guidelines concerning structural safety, thereby ensuring maximum feasible stability of modified billboards and new billboards. For modifications involving changes in pole location and for new billboards involving poles (or other ground-mounted supports), new pole foundations would be established. Removal of old pole foundations and the installation and design of new pole foundations would occur in accordance with applicable seismic design codes that address structural safety. Upon compliance with these regulations, impacts related to expansive soils associated with standard modifications, digital conversions, and new billboards would be less than significant.

While the policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential for such projects to create substantial risks to life or property due to expansive soils would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. No septic tanks or alternative wastewater disposal systems are proposed. The properties along Sunset Strip are served by a sewer system. Therefore, no impact associated with the use of alternative wastewater disposal systems would occur.

References

- California Geological Survey. 2014. *Earthquake Zones of Required Investigation – Hollywood Quadrangle*. November 6, 2014. Accessed December 12, 2016. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.
- Division of Mines and Geology. 1998. *Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California*. 1998. Accessed October 10, 2014. http://gmw.consrv.ca.gov/shmp/download/quad/HOLLYWOOD/reports/holly_eval.pdf.
- Division of Mines and Geology. 1999. *State of California Seismic Hazard Zones – Beverly Hills Quadrangle*. March 25, 1999. Accessed January 20, 2015. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.

3.7 Greenhouse Gas Emissions

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

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

Less Than Significant Impact. Greenhouse gases (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. If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. 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 CO₂. Thus, GHG gas emissions are typically measured in terms of pounds or metric tons (MT) of CO₂ equivalent (CO₂E).⁵

In October 2008, SCAQMD presented to the Governing Board the Draft Guidance Document – Interim CEQA GHG Significance Threshold (SCAQMD 2008). This document explored various approaches for establishing a significance threshold for GHG emissions. Among the concepts discussed, the document considered a “de minimis,” or screening, threshold to “identify small projects that would not likely contribute to significant cumulative GHG impacts” (SCAQMD 2008). As further explained in this document, “Projects with GHG emissions less than the screening level are considered to be small projects, that is, they would not likely be considered cumulatively considerable” (SCAQMD 2008). The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted Resolution 08-35, which established an interim 10,000 MT CO₂E per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The 10,000 MT CO₂E per year threshold was based upon the conclusion that the 10,000 MT CO₂E per year threshold was consistent with achieving an emission capture rate of 90% of all new or modified stationary source projects, which in turn uses Executive Order S-3-05 as the basis for deriving the screening level.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂E per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂E

⁵ The CO₂ equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons of CO₂E = (metric tons of a GHG) × (GWP of the GHG). This analysis assumes the GWP of CH₄ is 25 and the GWP of N₂O is 298 consistent with default values in CalEEMod 2016.

per year), commercial projects (1,400 MT CO₂E per year), and mixed-use projects (3,000 MT CO₂E per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂E per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂E per service population for project level analyses and 6.6 MT CO₂E per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2009). Although the SCAQMD has not formally adopted the thresholds described above and the City, as lead agency, has not adopted the recommended SCAQMD thresholds, for the purpose of this analysis, the 1,400 MT CO₂E per year operational threshold for commercial projects is used to analyze the significance of GHG impacts under CEQA.

Digital Conversions and Standard Modifications of Existing Billboards

Construction Emissions

Construction activities for standard modifications and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would result in GHG emissions, which are primarily associated with use of off-road construction equipment (i.e., crane operation), on-road hauling and vendor trucks, and worker vehicles. CalEEMod was used to calculate the annual GHG emissions based on the construction scenarios for standard modifications and digital conversions described in Section 2.5 of this document.

For the analysis of the potential GHG emissions impacts of standard modifications and digital conversions, it was assumed that there would be a total of 71 standard modifications and 3 digital billboard conversions with each activity totaling 2 days of construction. Each construction activity would require a total of six construction workers per day (12 one-way worker trips), three vendor roundtrips per day (6 one-way vendor trips), and a total of four haul truck trips. It was also conservatively assumed that a crane would be in operation for a total of 4 hours each day of construction. It was estimated that a total of 15 pole location adjustments would be required. In addition to the construction scenario noted previously, pole location adjustments would also require a drill

rig, which would operate for 4 hours during the first day of construction activity. Approximately 50 cubic yards of soil would be excavated for each pole location adjustment. This construction scenario would involve approximately six construction workers per day (12 one-way worker trips), three vendor trips per day (6 one-way vendor trips), and a total of 12 haul truck trips. Approximately 50 cubic yards of soil would be exported for each pole location adjustment undertaken. The SCAQMD recommends that “construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies” (SCAQMD 2008). Thus, the total construction GHG emissions were calculated and amortized over 30 years, for comparison with the GHG significance threshold of 1,400 MT CO₂E. The determination of significance, therefore, is addressed in the operational emissions discussion below.

Table 3.7-1 presents total construction-related GHG emissions for standard modifications and digital conversions over the anticipated 16-year period during which the modifications would be constructed. The table presents the anticipated GHG emissions from on-site (off-road equipment) and off-site emission sources (hauling and vendor trucks and worker vehicles).

Table 3.7-1. Estimated Annual Construction Greenhouse Gas Emissions

Activity	CO ₂	CH ₄	N ₂ O	CO ₂ E
	<i>metric tons per year</i>			
Digital Conversion or Standard Modification without Pole Location Adjustment (59)	42.08	0.00	0.00	42.24
Digital Conversion or Standard Modification Requiring Pole Location Adjustment (15)	18.75	0.00	0.00	18.82
Total	60.83	0.00	0.00	61.06

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂E = carbon dioxide equivalent
See Appendix B for detailed results.

As shown in Table 3.7-1, the estimated total GHG emissions during construction of future standard modifications and digital conversions would be approximately 61 MT CO₂E. The total GHG emissions for the 59 modifications without pole location adjustments was an estimated 43 MT CO₂E, and the 15 modifications requiring pole location adjustments was an estimated 19 MT CO₂E, resulting in amortized emissions of 2 MT CO₂E over the operational life of the project (typically a 30-year period). As with project-generated construction air quality pollutant emissions, GHG emissions generated for each construction activity would be short-term in nature, lasting 2 days with a maximum of 26 days of construction in a given year. All standard modifications and digital conversions would be completed by 2032.

Operational Emissions

Minimal operational activities would occur after construction activities for standard modifications and digital conversions are completed. Operation of existing billboards that have undergone standard modifications and/or digital conversions would require only periodic vehicle trips required for LED bulb replacement, which would occur once every 5 years for digital billboards (3 billboard faces). Minimal GHG emissions would be generated during operational activities from the vehicle trips required for LED bulb replacement, resulting in a maximum increase of 3 round-trip truck trips (6 one-way truck trips) every 5 years. The periodic operational activity occurring every 5 years would result in less annual GHG emissions compared to the analyzed construction scenario that assumes multiple worker vehicle, vendor truck trips and haul trucks, and equipment operation. Furthermore, the operational scenario would not change substantially over existing conditions, since existing billboards along the Sunset Strip currently require periodic maintenance and would continue to require similar levels of maintenance under the proposed project.

The primary source of operational GHG emissions would be attributed to electricity consumption of billboards that have undergone digital conversions. Using assumptions regarding the number of second faces that would be allowed and the amount of electricity that is required by typical static and digital billboards, annual electricity usage of billboards along the Sunset Strip would be 663,132 kilowatt-hours (kWh) once all allowable digital conversions and standard modifications are completed. This would represent an increase of approximately 144,540 kWh compared with the total combined electricity usage of the existing billboards. This GHG emissions calculation takes into account the procurement of renewable energy by Southern California Edison to meet the required 20% renewable portfolio standard (RPS) by 2016 and 50% RPS by 2030. The existing billboards estimated annual GHG emissions total approximately 167 MT CO₂E. Once all allowable digital conversions and standard modifications are complete, billboards along the Sunset Strip would generate approximately 134 MT CO₂E, representing a decrease relative to existing conditions. The calculated decrease in GHG emissions is largely attributable to the increasing stringency of state standards for procurement of renewable energy that would occur during the anticipated implementation period for the proposed policy. Project-generated construction GHG emissions amortized over 30 years plus net operational emissions (billboards that have undergone digital conversions and standard modifications minus existing billboard operations) would result in a decrease of GHG emissions of 31 MT CO₂E over existing conditions (Appendix B). As such, operation of billboards that have undergone digital conversions and standard modifications would not exceed the proposed SCAQMD threshold of 1,400 MT CO₂E per year for commercial projects and would not result in a substantial source of long-term GHG emissions. Potential GHG impacts would be less than significant. Furthermore, the proposed Sunset Strip Off-Site Policy would require that all conversions to digital billboards off set all new energy usage through renewable energy sources (see Section 3.7(b) for details).

New Billboards Integrated into New Development or Facade Remodels

Under the proposed regulations, new billboards would be allowed if integrated into new development or facade remodels and upon compliance with the proposed Sunset Strip Off-Site Signage Policy. The construction and operation of new billboards would have the potential to generate greenhouse gas emissions. The primary source of operational GHG emissions would be attributed to electricity consumption of new digital billboards. However, provisions have been included in the proposed Sunset Strip Off-Site Signage Policy to prevent digital billboards from resulting in increased GHG emissions. The proposed policy would require digital billboards to use renewable energy sources, through purchase of renewable energy certificates and/or installation of on-site renewable energy sources. **As such, new billboards that comply with the proposed regulations are not expected to result in generation of GHGs in excess of significance thresholds or to the extent that a substantial adverse impact on the environment would result. Impacts of new billboards are expected to be less than significant.**

While the proposed Sunset Strip Off-Site Signage Policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the construction and operational scenarios of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to greenhouse gas emissions resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Sunset Strip Billboard District – Special Events

The proposed Sunset Strip Billboard District would be associated with a biennial or annual event that is anticipated to last for several days (for example, it may occur over the course of a weekend). Such events have the potential to draw additional visitors to the project area during the event, leading to additional traffic in the area. This additional traffic could lead to a temporary and brief increase in emissions in the project vicinity during the special event; however, the specific nature of such future events is currently unknown. Because the popularity of these events is unknown, and due to the brief and infrequent nature of these events, the increases in GHG emissions that could be attributable to such events would not have a substantial effect on the project's GHG emissions. As such, the special events were not included in the GHG calculations.

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

Less Than Significant Impact. The City adopted its Climate Action Plan (CAP) on September 6, 2011, concurrent with the adoption of the City's 2035 General Plan (City of West Hollywood 2011). The City's CAP includes strategies and performance indicators to reduce GHG emissions from municipal and communitywide activities within the City. The City's CAP strategies address seven major GHG sources and

recommend actions to achieve GHG reductions through the following strategies: community leadership and engagement, land use and community design, transportation and mobility, energy use and efficiency, water use and efficiency, waste reduction and recycling, and green space. For each strategy, the City's CAP recommends measures and actions that translate the CAP's vision into on-the-ground action. Measures define the direction that the City will take to accomplish its GHG reduction goals, while actions define the specific steps that City staff and decision-makers will take over time. According to the CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project. Overall, the goal of the City's CAP is to reduce the City's communitywide GHG emissions by 20% to 25% below 2008 emission levels by 2035.

The proposed project involves digital conversions and other modifications to existing billboards and development of new billboards pursuant to the proposed Sunset Strip Off-Site Signage Policy, which would not conflict with the goals, measures, and actions of the CAP. The measures for the community leadership and engagement, the land use and community design, and the green space goals are focused on community actions, balance of land use mix, and sustainable landscapes. The proposed off-site signage regulations would not conflict with these measures and would not hinder the City from implementing these measures. The existing billboards that have undergone digital conversions or standard modifications and new billboards that are constructed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not use water or generate substantial amounts of waste and would not conflict with the associated water efficiency and waste reduction and recycling goals and measures. Although digital conversions, standard modifications, and new billboards would result in a minor increase in vehicle trips, the proposed project would not conflict with transportation and mobility measures, which are focused on providing enhanced pedestrian and bicycle network infrastructure and transit system improvements to encourage alternative modes of transportation and to reduce vehicle congestion. The CAP's energy measures strive to reduce the City's per capita energy use through residential and commercial programs and incentives and also focus on green building design and requirements for new building construction.

While the proposed project would result in a net increase in electricity consumed due to new digital billboards and converted digital billboards, the additional electricity consumed by the proposed project would be offset through compliance with the energy efficiency measures in the proposed Sunset Strip Off-Site Signage Policy. The following measure from the proposed Sunset Strip Off-Site Signage Policy would apply to both new digital billboards and converted digital billboards:

Renewable Energy Usage: Digital Billboards shall utilize renewable energy sources. Applications for digital billboards shall demonstrate that all additional energy use created by the digital technology meets renewable energy usage and neutral carbon fuel usage through one of the following options:

- a. Purchase of renewable energy certificates to offset energy use;

- b. On-site renewable energy that achieve zero carbon emissions for the additional energy usage for the new sign operations; or
- c. A combination of the above to offset new carbon emissions.
- d. Digital signs as part of new development of a Significant Facade Remodel may offset the new energy usage through demonstrated energy savings as part of new buildings systems or improvements to existing building systems.

Upon compliance with this requirement, energy used by digital billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would, therefore, not conflict with the energy goals established in the CAP. Based on these considerations, digital conversions, standard modifications, and new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not conflict with the City's adopted CAP.

Regarding consistency with Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the State on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014). As provided in impact criterion 3.7(a), the digital conversions and standard modifications would not exceed the SCAQMD significance threshold of 1,400 MT CO₂E. Additionally, all converted digital billboards and potential new digital billboards would be required to offset their net increase in energy usage through renewable energy sources. Therefore, conflicts with the state's trajectory toward future GHG reductions would not occur as a result of implementing the Sunset Strip Off-Site Signage Policy. With respect to future GHG targets under Senate Bill 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the Assembly Bill 32 horizon year of 2020, to meet the reduction targets in 2030 and in 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the preceding considerations, implementation of the proposed Sunset Strip Off-Site Signage Policy would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, impacts related to conflicts with an applicable plans adopted for the purpose of reducing greenhouse gases emissions would be less than significant.

As described above, additional project-by-project analysis would be required for new billboards and the associated new developments and facade remodels, at which time such projects as whole (i.e., the new development plus the new billboard or the facade remodel plus the new billboards) would be evaluated for their consistency with applicable plans adopted for the purpose of reducing greenhouse gases emissions.

References

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3.8 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

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

Less Than Significant Impact. Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings would be used during digital conversions, standard modifications, and construction of new billboards in the project area. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Once each digital conversion, standard modification, and new billboard installation has been completed, fuels and other petroleum products would no longer remain on the billboard sites.

Operation of digital billboards, billboards that have undergone standard modifications, and new static billboards would involve few changes in the routine transport, use, or disposal of hazardous materials in the project area. Operation of billboards that have undergone standard modifications would not generally require any additional materials, whether hazardous or non-hazardous, beyond those that are currently used to operate such billboards. New static billboards would have operational scenarios similar to those of existing

static billboards. The advertising copy would be changed periodically (generally a maximum of one time per month). Operational copy changes may also involve small amounts of commonly used hazardous substances, such as architectural coatings, adhesive material, and gasoline or diesel fuel. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Digital billboards would require a minor change in operational scenario relative to existing conditions. The LED bulbs for digital billboards would need to be replaced approximately once every 5 years. During these periodic maintenance events, the used bulbs would be transported and disposed of in accordance with applicable regulations. Use of LED bulbs in accordance with applicable handling and disposal requirements would not pose a significant risk to the public or environment. Impacts related to hazards caused by the routine transport, use, or disposal of hazardous materials resulting from the proposed Sunset Strip Off-Site Signage Policy would therefore be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to hazards caused by the routine transport, use, or disposal of hazardous materials resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. As discussed under Section 3.8(a), construction activities for digital conversions, standard modifications, and new billboards attributable to the proposed project would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered acutely hazardous and are used routinely throughout urban environments for construction projects and small-scale structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. **For these reasons, future digital conversions, standard modifications, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to release hazardous materials into the environment that would pose a threat to human health or the environment.**

Operation of digital billboards, billboards that have undergone standard modifications, and new static billboards would involve few changes in the use of hazardous materials in the project area. As described

under Section 3.8(a), digital billboards would involve operation of numerous LED bulbs within or on the billboard face. LED bulbs contain trace amounts of hazardous materials but are not currently regulated as a hazardous material. LED bulbs used for billboards in the project area would be required to be transported, installed, and disposed in accordance with the most recent regulations concerning treatment of LED bulbs. Operational copy changes for new static billboards may involve small amounts of commonly used hazardous substances, such as architectural coatings, adhesive material, and gasoline or diesel fuel. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. For these reasons, future digital billboards, billboards that have undergone standard modifications, and new static billboards are not anticipated to release hazardous materials into the environment that would pose a threat to human health or the environment. Therefore, impacts resulting from the proposed Sunset Strip Off-Site Signage Policy related to release of hazardous materials would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the release of hazardous materials resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. The West Hollywood Elementary School (970 North Hammond Street), West Hollywood College Preparatory School (1317 Crescent Height Boulevard), and Pacific Hills School (8628 Holloway Drive) are both located within one-quarter mile of the project area. As discussed in Section 3.8(a), construction activities associated with digital conversions, standard modifications, and new billboards would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These substances would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to nearby schools.

As described in Sections 3.8(a) and 3.8(b), operation of digital billboards, billboards that have undergone standard modifications, and new static billboards would involve few changes in the use of hazardous materials in the project area. Most billboards that have undergone standard modifications would continue to operate in the same manner with or without the project (i.e., modifying the height, orientation, and pole

location of an existing billboard or adding a second face would not have a substantial effect on the materials involved with billboard operations). The proposed project would increase the use of LED bulbs in the project area. As described under Section 3.8(b), LED bulbs are not considered a hazardous waste or material. They would be required to be transported, installed, and disposed in accordance with the most recent regulations concerning treatment of LED bulbs. Use of additional LED bulbs along the Sunset Strip for their intended purposes and in accordance with regulations is not expected to pose a hazard to nearby schools. Operational copy changes for new static billboards may involve small amounts of commonly used hazardous substances, such as architectural coatings, adhesive material, and gasoline or diesel fuel. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to nearby schools. Impacts related to the use of hazardous materials near schools resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential for such projects to emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Most digital conversions and standard modifications, as well as some new billboards, would not involve ground disturbance. This would ensure that no hazardous materials are unearthed or otherwise encountered. However, adjustments in pole location and installing new ground-mounted structural support for new billboards could entail minor amounts of ground disturbance. For each new pole, the excavation area for the foundation is assumed to be approximately 5 feet in diameter and 35 to 45 feet in depth. In the event that such ground disturbance were to occur in a location where soil contamination is present, hazardous materials could potentially be released during excavation. Unearthing of contaminated material may create a hazard to the public or the environment if the materials are not handled properly.

There are few properties within or adjacent to the project area that are identified on regulatory databases compiled pursuant to Government Code Section 65962.5. No properties within or near the project area

have been listed as a National Priority List Superfund Site by the U.S. Environmental Protection Agency, and no properties within or near the project area are on the Cortese list (U.S. EPA 2016a, 2016b; DTSC 2011). 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. The majority of the listed sites are leaking underground storage tanks, mostly associated with automotive uses. All of the listed sites (with one exception) have reached a "case closed" status, indicating that the leak, spill, cleanup, and/or investigation has been addressed (DTSC 2016; SWRCB 2016a). One remaining open case is located within the project area: a leaking underground storage tank cleanup site at 8873 Sunset Boulevard, which has a status of "open." The leak was associated with a former gasoline station at the site. The site has already undergone remediation under the oversight of the State Water Resources Control Board and Los Angeles County and is currently being monitored (SWRCB 2016b). There are no billboards on this site; as such, no ground disturbance associated with potential future billboard modifications would take place on this site. Because remediation has been completed and the site is being monitored, the previous leak is not anticipated to cause a significant hazard on nearby sites in the project area. In the unlikely event that construction workers were to encounter contaminated soils during removal of an existing billboard foundation and/or excavation for a new pole foundation, the hazardous 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 a release of hazardous materials into the environment. As such, while the project area contains hazardous materials sites that are on lists compiled pursuant to Government Code Section 65962.5, digital conversions, standard modifications, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to create a significant hazard to the public or to the environment pertaining to these sites, due to the minor and infrequent ground disturbance that would result, the status of the listings in the project area, and required compliance with laws concerning hazardous materials. As such, impacts resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. For the same reasons described above, it is not anticipated that the development of such future projects would occur on a hazardous materials site. However, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects with more certainty. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to hazardous materials sites resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. The nearest airports to the project area are the Hollywood-Burbank Airport, located approximately 7 miles north of the project area, and the Santa Monica Municipal Airport, located approximately 6 miles southwest of the project area (Caltrans 2012). The proposed project area is located well outside of the airport influence area of these airports (County of Los Angeles 2003). As such, the project area is not located within a 2-mile radius of any public airport, and no airport land use plans apply to the site. Therefore, the proposed project would not create an airplane safety hazard for people residing or working in the project area, and no impact would occur.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The project area is not located within the vicinity of a private airstrip (Airnav.com 2016). Therefore, no impact would occur.

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

No Impact. The City has an emergency plan (the West Hollywood Emergency Plan) that is an all-hazards preparedness, emergency evacuation, response, and recovery plan. It addresses hazards such as fires, earthquakes, floods, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents (City of West Hollywood 2011). The proposed project would be required to be consistent with this plan. In addition to the City's emergency plan, the Los Angeles County Department of Public Works maintains maps of the disaster routes in Los Angeles County. On the map that depicts the City of West Hollywood, the disaster routes that are nearest to the project area are Crescent Heights Boulevard and Santa Monica Boulevard (Los Angeles County Department of Public Works 2014). At its closest orientation to the project area, Crescent Heights Boulevard is a north-south roadway located approximately 0.14 mile east of the eastern project area boundary. At its closest orientation to the project area, Santa Monica Boulevard is an east-west roadway located approximately 0.30 mile south of the project area. The proposed project would not affect these roadways, as they are located outside of the project area. As explained in Section 3.16, the proposed project is not expected to be associated with increased traffic volumes such that Sunset Boulevard or surrounding roadways would be affected.

Construction activities associated with future digital conversions, standard modifications, and new billboards could involve small, localized, temporary sidewalk closures along Sunset Boulevard during construction activities. However, these closures would not impede emergency access routes or implementation of

evacuation plans, as they would be site-specific, would be limited to a small portion of the sidewalk, and are not anticipated to last for more than 2 days at a time. Additionally, an encroachment permit would be required, which would include provisions for appropriate emergency access and detour signage as necessary.

The biennial or annual special event that may be associated with the Sunset Strip Billboard District would have the potential to briefly and temporarily draw additional visitors to the project area. However, such events would proceed in accordance with the City's special events permitting process and would therefore be subject to conditions of approval, including traffic control and safety measures. In the unlikely event that an emergency were to occur at the time of the Sunset Strip Billboard District special event, City and County emergency response and evacuation protocol would proceed as planned. For these reasons, the proposed Sunset Strip Off-Site Signage Policy is not expected to interfere with emergency response or evacuation plans, and no impact would occur.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential effects of such future projects related to implementation of emergency response or evacuation plans would be examined in accordance with CEQA as part of the required project-specific CEQA review.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The nearest wildland areas are located at the base of the Hollywood Hills, which begin on the north side of Sunset Boulevard, adjacent to and north of the project area. Due to the project area's proximity to the Hollywood Hills, portions of the project area near its eastern boundary are located within the City's Moderate Wildland Fire Hazard zone, as designated on the City's Wildland Fire Hazards map (City of West Hollywood 2011). Although small segments of the project area are within this zone, the hills directly north of the project area are developed with residential uses. Furthermore, the project area is highly urbanized and is surrounded on all sides by development. In the unlikely event of a wildland fire emergency in the project area, the Los Angeles County Fire Department, specifically Fire Station 7 (864 North San Vicente Boulevard) and Fire Station 8 (7643 Santa Monica Boulevard), both located within the City, would provide fire protection services.

Digital conversions and standard modifications would not change existing conditions such that additional people or structures would be exposed to significant risk of loss, injury, or death caused by a wildland fire in the Hollywood Hills. The number of engineered structures along the Sunset Strip would increase if new

billboards are constructed; however the new structures would be located on developed properties and would not pose an increased safety risk relative to wildland fires. As such, new billboards installed along Sunset Strip pursuant to the proposed Sunset Strip Off-Site Signage Policy would not lead to a substantial increase in loss, injury, or death along the Sunset Strip in the unlikely event of a wildland fire disaster.

The presence of digital billboards would entail the operation of more LED bulbs within the project area, when compared to existing conditions. 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. As such, digital billboards are not expected to increase the potential for fires to occur in the project area. For these reasons, no impact related to wildland fire would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

The proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects. For the same reasons described above, it is not anticipated that the development of such future projects would lead to a wildland fire hazard along the Sunset Strip. However, the location, design, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects with more certainty. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. The potential effects of such future projects related to exposure of people or structures to wildland fire would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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3.9 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a) *Would the project violate any water quality standards or waste discharge requirements?*

Less Than Significant Impact. The proposed project is not expected to violate any water quality standards or waste discharge requirements. The project would generally involve conversion of existing static sign faces to digital sign faces and minor structural modifications to existing billboards. The project would also involve new billboards developed in association with new development projects or facade remodels. Construction activities for the conversions, structural modifications, and new billboards are anticipated to last for approximately 2 days per sign face. Construction activities for digital conversions and standard modifications

would not typically involve ground disturbance. In infrequent cases, a standard modification may entail an adjustment in pole location requiring removal of existing billboard pole foundation(s) from the ground and excavation of a new pole foundation. Some new billboards would also involve excavation of a new foundation for a pole or other ground-mounted support structure. (Holes for billboard pole foundations are typically 5 feet wide and 35 to 45 feet deep.)

Water quality impacts could occur if the use of construction equipment at the billboard sites resulted in spilled or leaked petroleum products. In the event of a storm, such chemicals would have the potential to enter stormwater runoff from the site and would potentially contribute to pollutants in stormwater runoff. However, standard site management practices and typical equipment maintenance would generally preclude leaks and spills of a magnitude that would adversely affect stormwater runoff. The duration of construction would be limited (the proposed project is expected to result in a maximum of 44 days of construction activity per year, which are expected to be spread throughout the year). Furthermore, construction equipment needs are limited (see Section 2.5 for details). The potential for construction to affect water quality due to runoff of construction-related chemicals is unlikely, and any potential effects would be minimal to negligible due to the limited duration and activities involved with the proposed construction activities. Furthermore, the City's municipal code prohibits discharges to the stormdrain system of any fuel, chemical wastes, or other materials that have potential adverse impacts on water quality (Section 15.56.060). The municipal code also requires implementation of best management practices. As stated in Section 15.56.070, "best management practices 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."

Water quality impacts can also occur if land disturbance activities result in erosion or sedimentation downstream. As described above, ground disturbance involved with the proposed project would consist of removal of existing billboard pole foundations and excavation of new foundations for relocated billboards and new billboards. These activities would occur infrequently, and the amount of ground disturbance involved would be limited. Furthermore, the project area is fully developed, and most properties are fully paved and/or built out with structures. Once a billboard foundation for a relocated billboard has been removed, it would be immediately filled and covered with pavement or landscaping, consistent with the surrounding ground covering of the site. Once the foundation has been excavated for a relocated billboard or a new billboard, the pole or other support structure would be installed and cemented into place. Excavated soils would be hauled to a landfill and no exposed soils would remain on site. This process would take approximately 1 to 2 days. As such, a limited amount of soil would be exposed during the brief construction period associated with pole relocation and/or excavation activities. Furthermore, in accordance with the City's municipal code, best management practices are required to be implemented in areas exposed to storm water. The municipal code requires the removal and lawful disposal of materials that have the potential to adversely affect water quality (Section 15.56.070). For these reasons, construction activities associated with

implementation of the proposed Sunset Strip Off-Site Signage Policy would result in less than significant effects relative to water quality standards and waste discharge requirements.

Operation of the proposed digital billboards, new static billboards, and billboards that have undergone minor structural modifications would not affect water quality or result in a violation of waste discharge requirements. Proper operation and maintenance of billboards would continue to ensure that such structures do not contribute pollutants to stormwater runoff. For these reasons, operational activities associated with implementation of the proposed Sunset Strip Off-Site Signage Policy would not result in impacts related to violation of water quality standards and/or waste discharge requirements.

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. However, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to water quality resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

No Impact. Digital conversions and standard modifications would involve minor structural changes in existing billboards along the Sunset Strip. New billboards would involve minor construction activities that would occur periodically along the Sunset Strip. Neither the construction nor operational processes associated with digital conversions, standard modifications, or new billboards are expected to require substantial amounts of water use or result in any groundwater extraction. As such, standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not substantially deplete groundwater supplies. Groundwater recharge rates would not be affected. Digital conversions and standard modifications of existing billboards would not substantially alter the amount of impermeable surfaces along Sunset Boulevard. New billboards would have the potential to add impermeable surfaces associated with pole foundations or other ground-mounted structure supports; however, any areas of impermeable surfaces would be minor, and much of the project area is already impermeable. As such, no impacts to groundwater supply or recharge activities would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to groundwater resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

Less Than Significant Impact. The project area does not contain any streams or rivers having the potential to be altered by the proposed project. Future standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would result in limited ground disturbance. As discussed under 3.9(a), all construction activities would be required to comply with the City's water quality best management practices. No ground disturbance would occur during operational activities associated with digital billboards, new static billboards, or existing billboards that have undergone standard modifications. As such, the proposed project would not have the potential to result in substantial erosion or siltation on or off site. Impacts related to erosion and siltation resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and size of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to erosion and siltation resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- d) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

No Impact. The proposed project area does not contain any streams or rivers having the potential to be altered by the proposed project. As explained in Section 3.9(b), future standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not substantially alter the amount of impervious surfaces in the project area. Therefore, these activities

would not increase the rate or amount of surface runoff through conversion of existing pervious surfaces to impervious surfaces. Further, standard modifications, digital conversions, and new billboards would involve minimal ground-disturbing activities and, therefore, would not have the potential to substantially alter the existing drainage pattern of the project area. Any changes in drainage patterns would be temporary and highly localized and would therefore not have the potential to lead to flooding. For these reasons, no impact would result from the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and size of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to flooding resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. As explained in Section 3.9(b), standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not require water use, nor would they increase the amount of impervious surfaces in the project area such that the rate and/or amount of stormwater runoff is increased. As such, these activities would not adversely affect the capacity of stormwater drainage systems.

As explained in Section 3.9(a), the potential sources of stormwater pollutants associated with future standard modifications, digital conversions, and new billboards would be limited to construction-related chemicals such as petroleum products used for construction equipment. However, the duration of construction and the amount of equipment and materials that would be required are limited. Additionally, compliance with City municipal code requirements would minimize the potential for stormwater contamination. Operational activities would not create a source of polluted runoff. For these reasons, no impact would occur relative to stormwater volumes or pollution resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and size of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed.

Potential effects related to stormwater runoff and stormwater pollutants resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

f) Would the project otherwise substantially degrade water quality?

No Impact. As described in Sections 3.9(a) through 3.9(e), implementation of the proposed Sunset Strip Off-Site Signage Policy would not result in the use or release of contaminants to an extent that water quality would be degraded. No impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location, design, and size of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to water quality resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. No area of the City is mapped within a 100-year flood hazard zone (City of West Hollywood 2011). Accordingly, no impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed in Section 3.9(g), no area of the City is mapped within a 100-year flood hazard zone. As such, no impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. Franklin Canyon Reservoir is located approximately 1.3 miles northwest of the western project area boundary. However, as shown in the Dam Inundation Hazard Areas map in the City's general plan, the project area is not within a dam inundation hazard area (City of West Hollywood 2011). As such, no impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. Seiches are oscillations generated in enclosed bodies of water, usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. As discussed in Section 3.9(i), the Franklin Canyon Reservoir is located approximately 1.3 miles northwest of the western project area boundary. However, the distance and geographic boundaries between the project area and this body of water eliminates the risk of a seiche affecting the project area.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project area is located approximately 8 miles northeast of the Pacific Ocean at an elevation of approximately 400 feet above sea level. As such, the project area would not be susceptible to inundation by tsunami.

As discussed in Sections 3.6(a)(iv) and 3.9(i), the project is not in an area identified as being susceptible to landslides or flooding. As such, the project area is not likely to be susceptible to mudslides. Therefore, implementation of the proposed Sunset Strip Off-Site Signage Policy would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

Reference

City of West Hollywood. 2011. *City of West Hollywood General Plan 2035*. Accessed December 14, 2016.
<http://www.weho.org/city-hall/download-documents/-folder-155>.

3.10 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

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

No Impact. The proposed project would involve changes to existing billboards and would allow for a limited number of new billboards along the Sunset Strip. Such changes would consist of converting existing static billboard faces to digital billboard faces and would include minor structural modifications to existing billboards. The addition of new billboards integrated into new development and facade remodels would be consistent with the existing and planned land uses within the SSP area. The project would not involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood, which would have the potential to physically divide an established community. For these reasons, the proposed Sunset Strip Off-Site Signage Policy would not physically divide an established community, and no impact would result.

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?*

No Impact. Land use plans and policies applicable to the project area are set forth in the City's General Plan, the SSP, and the City's Zoning Ordinance. The proposed project consists of amendments to the SSP and the Zoning Ordinance. As discussed in Chapter 2 of this document, the proposed amendments would change existing regulations relative to digital signage and new off-site signage and would allow existing billboards to undergo minor structural modifications. While the proposed project itself consists of changes in land use policy, the new policy language must be consistent with the City's overall land use goals for the Sunset Strip. As such, the proposed new regulations are analyzed below for their consistency with key General Plan and SSP policies.

General Plan Consistency

The Land Use and Urban Form Element of the General Plan sets forth goals and policies for Sunset Boulevard and for signage in the City as a whole. Relevant goals and policies are listed in Table 3.10-1, along with a description of how the proposed project would be consistent with each goal and policy.

Table 3.10-1. General Plan Consistency Analysis

General Plan Goals and Policies	Analysis
<i>Commercial Sub-Areas – Sunset Boulevard</i>	
Goal LU-15: Maintain Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine for the City.	Consistent. The proposed project would further this goal by facilitating creativity and innovation in existing billboards and new billboards. Digital signage and the proposed Sunset Strip Billboard District would contribute to the vibrancy and uniqueness of Sunset Boulevard and would help maintain Sunset Boulevard as an internationally renowned location for entertainment, nightlife, and

Table 3.10-1. General Plan Consistency Analysis

General Plan Goals and Policies	Analysis
	artistic signage. Furthermore, as described in Chapter 2, new billboards, all digital billboards, and modified tall wall signs would require Development Agreements that would include provisions for public benefits, thereby expanding the Sunset Strip's ability to generate economic benefits for the City.
Policy LU-15.1: Continue to promote a great diversity of uses on Sunset Boulevard including entertainment and related uses to support the community's vision.	Consistent. The Sunset Strip has historically been renowned for interesting and artistic signage. The signs served as one of the many forms of entertainment available to travelers along Sunset Strip and/or to patrons of the restaurants and clubs. However, the signage available along Sunset Strip is no longer as distinct relative to other urban areas. The proposed project would promote a greater diversity in billboard media along the Sunset Strip, helping to reestablish the Sunset Strip as a destination for interesting and artistic signage and reinvigorating a form of entertainment along the Sunset Strip that has grown less unique in recent years. In addition, the creation of the Sunset Strip Billboard District enhances the public arts presence of Sunset Boulevard and creates new opportunities for creativity that supports the Citywide vision. The proposed project supports the overall vision for Sunset Boulevard that is expressed in the General Plan, as set forth in Goal LU-15. By reinvigorating the signage environment along Sunset Strip, the proposed project would help the area maintain its reputation as a destination for entertainment, as the proposed project would help facilitate a signage and public art environment that is distinguished and distinct from other urban centers and corridors in the Los Angeles area.
Policy LU-15.3: Maintain the identity of Sunset Boulevard as an eclectic urban environment with varied building heights and architectural styles.	Consistent. Allowing for a limited number of digital billboards on the Sunset Strip would increase the variation and creativity of the area's existing billboard inventory. The proposed project as a whole would help reestablish the Sunset Strip as a destination for innovative signage, thereby maintaining the area as an eclectic urban environment with signage that is distinct from other major urban corridors in the region.
LU-15.4: Require high density development identified in the Sunset Specific Plan to support the economic development goals of the City.	Consistent. While the project does not propose or entitle any development projects, it sets forth regulations that support vitality of the SSP environment, allowing new billboards only as part of new development projects that meet certain density requirements. (As explained in Section 2.4 of this IS/ND, the environmental effects of any new development projects and facade remodels would be addressed in future CEQA analyses on a project-by-project basis.) Furthermore, development agreements would be established for any new billboards that are installed as part of new development or facade remodels. Development agreements for these new signs would include public benefits that would support the economic goals of the City.

Table 3.10-1. General Plan Consistency Analysis

General Plan Goals and Policies	Analysis
LU-15.7 Maintain the Sunset Specific Plan and update as appropriate.	Consistent. The proposed project is consistent with the overall goals and intent for the project area established in the Sunset Specific Plan (see the consistency analysis below under the “Sunset Specific Plan” subheading). However, the proposed project also amends Sunset Specific Plan to encourage modernization of the signage environment and to update the plan to reflect changes in technology that have occurred since the time of plan adoption in 1996.
<i>Signage</i>	
Goal LU-16: Maximize the iconic urban design value and visual creativity of signage in West Hollywood.	Consistent. The proposed project updates existing policy for off-site signage along the Sunset Strip to allow for a limited number of digital conversions of existing billboards, structural modifications to existing billboards, and new billboards in association with new development of certain sizes and facade remodels. Allowing for digital signage, updates to existing billboard structures, and new billboards would encourage creative changes in the existing signage environment along the Sunset Strip. Furthermore, creation of the Sunset Strip Billboard District would establish coordinated arts programming in the project area, which would create a unique urban design element that is not currently present along the Sunset Strip and would help maximize the potential for innovative urban design practices and visual creativity.
LU-16.1: Consider aesthetics, size, location, lighting, and siting in the evaluation of off-site signage.	Consistent. The proposed project updates existing regulations for off-site signage along the Sunset Strip. Consistent with this policy, the proposed regulations include protections for public viewsheds, limitations in the location and number of new billboards and digital billboards, limitations in the size of digital billboards and new billboards, and new lighting standards.
LU-16.2: Design and locate off-site signage to minimize its impact on: adjacent properties, the public right of way, cultural resources, creation of shade and shadow, and potential conflict with the development of adjacent properties.	Consistent. 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. The proposed regulations also establish protections for pedestrian walkways and encourage billboards that support the pedestrian experience. Such regulations would help minimize the effects of new billboards on the public right of way. The proposed regulations also include protections for historical resources. 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.

Table 3.10-1. General Plan Consistency Analysis

General Plan Goals and Policies	Analysis
LU-16.3: Consider impacts to surrounding neighborhoods when evaluating off-site signage.	Consistent. While the proposed regulations allow for new billboards and digital billboards that are not currently present along the Sunset Strip, the regulations establish limitations on the number, location, and distribution of such signs along the Sunset Strip. The regulations also establish limitations on the amount of light trespass that can be created by digital, new, and modified billboards. These regulations would help protect surrounding neighborhoods from potential effects such as light trespass and effects in the visual character and quality of the project area. Additionally, this IS/ND evaluates the environmental impacts of implementing the proposed Sunset Strip Off-Site Signage Policy. This document has concluded that no significant, adverse environmental impacts would occur from the proposed policy. (Note that future new development projects and facade remodels, including any associated new billboards, would be subject to project-specific review under CEQA at the time such projects are proposed. See Section 2.4 for details.)
LU-16.4: Design offsite signage in new developments in concert with the architectural lighting, landscape, and public art program of the development.	Consistent. The proposed project would establish regulations for new billboards that would require such signage to be incorporated into new development of a certain size or facade remodels. Proposed design standards for new billboards include provisions to incorporate new billboards into the design of the new building. Furthermore, all new billboards would be required to become part of the Sunset Strip Billboard District, thereby ensuring that new billboards would support and participate in the public arts program that would be associated with the Sunset Strip Billboard District.
LU-16.5: As appropriate, allow new offsite signage on the Sunset Strip and in the Eastside Redevelopment Area where there is a public benefit, or in other areas where it is replacing an existing sign.	Consistent. The proposed regulations would allow for new billboards along the Sunset Strip. The project would establish regulations for new billboards, ensuring that the number, location, and design of new signs supports high-quality urban design along the Sunset Strip. All new billboards would be required to become part of the Sunset Strip Billboard District and would also require a Development Agreement, thereby ensuring that the new billboards would support the public arts program that is proposed for the project area and ensuring that public benefits would be provided to the City.
LU-16.6: As appropriate, consider both the direct economic value of the project and the indirect economic value of the project to the economy as a whole when evaluating the approval of offsite signage as part of a new development project.	Consistent. While the proposed project would not entitle any new off-site signage, it would establish regulations requiring new billboards to become part of the Sunset Strip Billboard District and to be processed under a Development Agreement. These aspects of the proposed project would result in both direct and indirect economic benefits in the event that new billboards are constructed along the Sunset Strip. For example, participation in the Sunset Strip Billboard District would invigorate the project area, potentially

Table 3.10-1. General Plan Consistency Analysis

General Plan Goals and Policies	Analysis
	attracting additional notoriety, business interest, and visitors to Sunset Strip. Additionally, establishment of Development Agreements for new billboards would result in economic benefits to the City.
LU-16.8: Carefully integrate offsite signage into new development so that the building and not the sign is the primary use of the land.	Consistent. The proposed project would establish regulations for new billboards to be installed in conjunction with new development or facade remodels. New billboards would only be allowed for new developments of a high density or for facade remodels on existing buildings with high densities; as such, the regulations would ensure that new billboards would not be the primary use of parcels along the Sunset Strip. For example, new billboards integrated into new development would only be allowed in conjunction with projects meeting 75% to 90% of allowable FAR. As such, the proposed project would ensure that sites with new billboards would be developed so that the on-site building(s) would be the primary use of the parcel(s), not just a vessel for off-site signage. The proposed regulations also include urban design standards that would require thoughtful integration of new billboards into new development or facade remodels. For example, the square footage of new off-site signage would be limited per development project, and the design of new billboards must be consistent with the architecture of the building and enhance the overall building design. As such, the proposed regulations would ensure that new off-site signage would be integrated into new development such that the new building(s) remain the primary use of the land.
LU-16.9: Require an offsetting public benefit when a new development includes an offsite sign.	Consistent. The proposed project would establish regulations requiring new off-site signage to be processed under a Development Agreement. As required by the proposed regulations, the Development Agreements would establish public benefits consisting of, at a minimum, revenue to the City and site improvements to enhance the pedestrian environment. New off-site signage would also be required to participate in the Sunset Strip Billboard District, which would provide for coordinated arts programming and arts events along the Sunset Strip. The Sunset Strip Billboard District would create a public benefit to the City by helping to enhance creativity in the City and by establishing a unique, cohesive urban design element along the Sunset Strip that may add to the notoriety of the area as a destination for entertainment and innovative signage.

Source: City of West Hollywood 2011.

Sunset Specific Plan Consistency

Goals and requirements for billboards are contained in Part 2, Section 1 in the SSP, in a chapter titled “Billboards and Art Advertising.” The proposed project includes amendments to this chapter of the SSP. These amendments are described in Section 2.3 of this document. Table 3.10-2 includes the goals set forth for billboards and art advertising and analyzes the proposed project’s consistency with these goals. Due to the proposed project’s relationship to the visual environment of Sunset Boulevard, Table 3.10-2 also evaluates the proposed project’s consistency with relevant goals from the “Urban Design” chapter of the SSP.

Table 3.10-2. Sunset Specific Plan Consistency Analysis

Specific Plan Goals	Analysis
<i>Goals – Billboard and Art Advertising</i>	
I. Encourage maintenance and location of existing and proposed billboards.	Consistent. The proposed project would allow for modifications to existing billboards and digital conversion of existing billboards. Regulations for new billboards in association with new development projects of specified sizes are also provided. The provisions for modifications of existing billboards would support the goal of encouraging maintenance of existing billboards, as it would allow for updates to existing billboard structures and adjustments in height to resolve existing obstructions. These allowable modifications would encourage existing billboard operators to update and improve the appearance of billboard structures and to reorient existing billboards that may currently face existing sightline issues such as an obstruction due to intervening landscaping or buildings. Existing billboards would be allowed to undergo minor adjustments in location, upon City review and approval. However, the proposed regulations would set forth policies ensuring that adjustments in billboard location do not adversely affect existing sightlines, viewsheds, and adjacent properties. The proposed regulations would limit the locations of new billboards such that new signs are only established in conjunction with new development of certain densities or facade remodels on buildings of certain densities. This policy would prevent proliferation of off-site signage, thereby supporting the standards for high-quality urban design established for the Sunset Strip in the General Plan and in the SSP while allowing for an updated and enhanced signage environment, consistent with General Plan goals and policies that encourage a vibrant Sunset Strip. This policy would also encourage high-quality development projects that maximize the development potential and creativity for parcels along the Sunset Strip, also in a manner supporting the General Plan and SSP goals. As such, while the proposed project would change the regulations for where new off-site signage can be located, these new regulations would help foster the development of off-site signage and new development in a manner that is consistent with existing goals and policies for the design of the

Table 3.10-2. Sunset Specific Plan Consistency Analysis

Specific Plan Goals	Analysis
	Sunset Strip. As explained in Section 2.4 of this IS/ND, the environmental effects of new development projects and the associated new billboards would be addressed in future CEQA analyses on a project-by-project basis.
II. Legalize existing billboards, and allow for creative billboards which will enhance the excitement of the Sunset Strip without detracting from existing visual aesthetics or interfering with views.	Consistent. As stated in Section 2.2 of this document, one of the purposes of the proposed project is to encourage creativity in off-site signage. Refer to Section 2.2 for additional details on how the proposed project would support creativity in off-site signage. The proposed project also includes provisions that would protect sightlines, viewsheds, and views to historic properties along the Sunset Strip. The proposed project is not anticipated to cause an adverse aesthetic impact or an adverse impact to existing views. Refer to Section 3.1 of this document for a further discussion of aesthetics.
III. Encourage continued use of original artwork/signage at businesses which involve the entertainment industry.	Consistent. Signs advertising a business or a service that is provided at the same site where the sign is located are considered on-site signs. The proposed regulations pertain to off-site signs. For this reason, implementation of the proposed project would not hinder the continued use of original artwork/signage at entertainment industry businesses.
IV. Allow for artwork to be incorporated into existing and proposed structures in order to enhance the visual quality of the street and reduce the number of blank walls.	Consistent. The proposed project would encourage enhanced visual quality and excitement along the Sunset Strip by establishing the Sunset Strip Billboard District. Digital billboards, modified billboards, modified tall wall signs, and new billboards would be required to be part of the Sunset Strip Billboard District and would be subject to the associated arts programming requirements, thereby fostering increased display of artwork along the Sunset Strip.
<i>Goals – Urban Design</i>	
VI. Protect and enhance significant public views to the Los Angeles Basin and to the hills above Sunset as well as along street corridors and within open spaces.	Consistent. The proposed project would allow for modifications to existing billboards and digital conversion of existing billboards. It would also allow for new billboards in association with new development of specified densities and facade remodel projects. For existing billboards that are repositioned, the proposed regulations would require sightline and viewshed studies. The studies must demonstrate that the repositioned billboards do not additionally impede public views. The proposed regulations would also limit the height of repositioned billboards to be consistent with the existing billboard height or the maximum height as specified in the SSP. Billboards with sightlines that are obstructed by City street trees or existing buildings may apply for approval for a height increase of up to 14 feet above the SSP height limit. These proposed regulations would protect existing views by minimizing potential impacts of future repositioned billboards. New billboards

Table 3.10-2. Sunset Specific Plan Consistency Analysis

Specific Plan Goals	Analysis
	that are part of facade remodels projects would be required to comply with the sightline and viewshed requirements described above. New billboards that are part of new development would be subject to design requirements for integration of the billboard face into the building facade, which would generally preclude such billboards from obstructing views. See Section 3.1(a) for details.

Source: City of West Hollywood 1996.

Zoning Ordinance Consistency

The proposed project consists of revisions to Section 19.34.080 of the Zoning Ordinance and involves moving existing Zoning Ordinance language relevant to Sunset Strip signage into the SSP.

Section 19.34.080 of the Zoning Ordinance currently allows for temporary creative billboards, temporary creative tall wall signs, new standard billboards at the locations identified in the SSP as sites for new billboards, replacement billboards, and the addition of second billboard faces. Additionally, large screen video signs are allowed in conjunction with new construction of 5,000 square feet or more in certain geographic zones of the Sunset Strip. Tall wall signs are allowed with a conditional use permit. While the proposed project would update regulations for off-site signage, it would remain generally consistent with the spirit and intent of the existing Zoning Ordinance regulations.

Under the proposed project, creative billboards and tall wall signs would continue to be allowed along the Sunset Strip and would be subject to the same regulations, with the exception of the lighting regulations. Under the proposed project, the lighting regulations would be more stringent than those currently in place for temporary creative installations on billboards and tall wall signs. Under the proposed project, new standard billboards would continue to be allowed along the Sunset Strip in certain instances. The previous regulations specified certain sites where new billboards would be allowed and also required that new billboards on these sites be associated with new construction of at least 10,000 square feet or a substantial remodel. In contrast, the proposed regulations do not provide specific sites where new billboards are allowed. Rather, they provide additional requirements for the types and sizes of development that can incorporate a new billboard and also divide the Sunset Strip into Billboard Zones to dictate distribution of signage along the Sunset Strip. While the approach for allowing new billboards would change, the general intent of limiting the number of new billboards and only allowing new billboards in association with developments that further the urban design goals for the Sunset Strip would remain the same. The proposed Sunset Strip Off-Site Signage Policy would include additional urban design standards to further encourage best design practices. Under the proposed regulations, there may be additional sites that could be developed with a new billboard that would not have been allowed to have a new billboard under the current regulations. However, the new regulations would

include additional lighting and design standards, whereas the existing regulations do not set forth design requirements or lighting restrictions. As such, while the new regulations could lead to additional sites that are developed with billboards, the billboards would be subject to a set of more stringent standards, which would reduce the potential for new billboards to have an adverse effect on the environment.

In contrast to existing regulations, the proposed Sunset Strip Off-Site Signage Policy would also change the policy for digital billboards along the Sunset Strip. While digital imagery is currently allowed under the regulations for “large screen video signs,” the proposed policy may allow for additional locations to be developed with a digital billboard. However, the proposed policy would place a limit on the total number of digital billboards that can be developed along the Sunset Strip and would also implement more specific and stringent regulations relative to lighting and energy use, which would reduce the potential for digital billboards to have an adverse effect on the environment.

In summary, the proposed Sunset Strip Off-Site Signage Policy may allow for additional billboard development and additional changes to existing billboards relative to what is currently allowed by the Zoning Ordinance. Conversely, the proposed Sunset Strip Off-Site Signage Policy would also provide new regulations for billboard design and operations that are not currently contained in the Zoning Ordinance. As such, the proposed Sunset Strip Off-Site Signage Policy would provide additional environmental protections relative to the existing Zoning Ordinance regulations while simultaneously allowing for continued billboard development in a manner that is consistent with the land use goals and overall vision for the Sunset Strip. While the proposed Sunset Strip Off-Site Signage Policy provides regulations that differ from the existing Zoning Ordinance regulations in some cases, these divergences are not anticipated to lead to adverse environmental impacts, since the proposed Sunset Strip Off-Site Signage Policy is more protective than the current Zoning Ordinance regulations. Furthermore, the overall intent of the proposed Sunset Strip Off-Site Signage Policy remains consistent with intent of the existing Zoning Ordinance policies in that billboards are both encouraged and regulated along the Sunset Strip in order to preserve and enhance the Sunset Strip’s famous signage environment without adversely affecting the environment.

As described above, the proposed project would be consistent with the applicable goals and policies of the SSP. No impact to applicable land use plans, policies, and regulations would occur.

c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact. As discussed in Section 3.4(f), there are no adopted habitat conservation plans or natural community conservation plans applicable to the City. Therefore, the proposed project would not conflict with any such plans, and no impact would occur as a result from the proposed project.

References

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

City of West Hollywood. 2011. *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed January 16, 2017. <http://www.weho.org/city-hall/download-documents/-folder-155>.

3.11 Mineral Resources

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

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

No Impact. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells within the project area (DOGGR 2017). The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the City within Mineral Resource Zone 1 for aggregate resources. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (Division of Mines and Geology 1994). Because the project area is not mapped as or known to contain an important mineral resource, the proposed project would not have the potential to cause a loss in availability of a known mineral resource that would be of value to the region and the residents of the state. The project area is developed primarily with entertainment uses, restaurants, shops and offices. As such, the project area does not support mineral extraction activities, nor would it be expected to support such activities in the future. Nevertheless, the proposed project involves signage along the Sunset Strip and would not involve land use changes that would affect availability of mineral resources. As such, no impact would occur.

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

No Impact. The project area is not delineated as a locally important mineral resource recovery site in the General Plan (City of West Hollywood 2011). Furthermore, as discussed in Section 3.11(a), no active oil wells exist within the project area, and the City has been mapped within an area where no significant mineral deposits are present or are likely to be present. The proposed project involves signage along the Sunset Strip and would not involve land use changes that would affect availability of mineral resources. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

References

City of West Hollywood. 2011. *City of West Hollywood General Plan 2035*. Accessed January 20, 2015.

<http://www.weho.org/city-hall/download-documents/-folder-155>.

Division of Mines and Geology. 1994. *Generalized Mineral Land Classification Map of Los Angeles County – South Half – Aggregate Resources Only*. [map]. 1:100,000. USGS 7.5 Minute Topographic Quadrangles. Prepared by Russell V. Miller. 1994. Accessed January 13, 2017. <http://www.quake.ca.gov/gmaps/WH/smaramaps.htm>.

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

3.12 Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact.

Construction

The City of West Hollywood does not have quantitative construction noise standards. Rather, it prohibits construction on weekday nights, on Saturdays (interior construction is permissible during the day), and on Sundays and holidays. The proposed regulations would allow for minor, short-term construction activities at various billboard sites and for new billboards along the Sunset Strip.

Short-term construction activities attributable to standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would create intermittent elevated noise levels at and near the project area due to construction equipment, delivery of materials, construction worker trips, and construction personnel that would be necessary to complete the digital conversions, standard modifications, or installation of new billboards. Although the construction schedules, locations, and specific pieces of equipment for future digital conversions, standard modifications, and installation of new billboards are currently unknown, typical construction scenarios for these activities have been developed for the purposes of this CEQA analysis (see Section 2.5 for more details). The discussion below summarizes the anticipated construction processes and provides estimated noise levels that could be experienced by sensitive receptors located along and adjacent to the project area.

Approximately 2 days of construction are anticipated for each digital conversion, standard modification, or billboard installation. Construction would generally involve the following types of equipment: construction trucks (delivery trucks, vendor trucks, haul trucks, etc.) and cranes. For excavation of a billboard foundation, additional pieces of equipment would be involved: a drill rig, a cement truck, and additional haul trucks. (Table 3.12-1 shows the sound levels typically produced by the construction equipment that would be associated with standard modifications, digital conversions, or installation of new billboards.)

Table 3.12-1. Construction Equipment Noise Emission Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Crane, mobile	83
Truck	88
Drill rig	77

Source: FHA 2008, FTA 2006

By comparison to the noise levels shown in Table 3.12-1, the project area is characterized by existing ambient noise levels of 65 to 70 dB (City of West Hollywood 2011). Due to the existing high ambient noise environment along Sunset Strip, the intermittent and isolated nature of the construction activities that would occur in association with standard modifications, digital conversions, and installations of new billboards, and the fact that these activities would not involve heavy construction equipment (i.e., large bulldozers or scrapers), construction activities associated with the proposed Sunset Strip Off-Site Signage Policy would not be expected to cause adverse exposure of persons to excessive noise levels. However, noise is considered of particular concern when increases in noise level are experienced by noise-sensitive receptors. The City's General Plan defines noise-sensitive receptors as land uses such as residences, schools, hospitals, religious facilities, theaters, concert halls, libraries, offices, and parks (City of West Hollywood 2011). The project area is primarily developed with commercial land uses. However, there are residences within and near the project area, some of which are located as close as 50 feet of existing billboard sites. The project area also contains one park (the William S. Hart Park and Off-Leash Dog Park), and there is one billboard structure adjacent to this park. Due to the commercial nature of the project area, there are also numerous offices along the Sunset Strip. As such, construction activities associated with the proposed project would have the potential to affect these noise-sensitive receptors. As described above, construction for each digital conversion, standard modification, or new billboard installation would be temporary, lasting for approximately 2 days. Additionally, due to the minimal construction duration per site, the size of the overall project area, and the length of the project implementation period (which would extend from the time of project approval to approximately 2032), it is not expected that multiple construction projects associated with digital conversions, or standard modifications, or new billboard installations would occur simultaneously within the same area. Furthermore, construction would consist primarily of low-intensity activities and would not require the use of heavy construction equipment. Trucks are anticipated to be the most noise-intensive piece of equipment required, and the City's Municipal Code contains policies that limit noise produced by construction trucks. As stated in

Section 9.08.050, “the motors and engines for construction related vehicles and equipment shall not be left idling and shall be turned off when not in use.” This requirement would ensure that trucks are turned off upon arrival at the site of a digital conversion, a standard modification, or a billboard installation and would therefore reduce the amount of noise produced by the project during the temporary, intermittent construction activity.

Several truck trips and worker vehicle trips would be required for each digital conversion, standard modification, and new billboard installation, and the addition of new vehicle trips in an area has the potential to increase traffic noise levels over existing conditions. However, the project area is highly urbanized and is characterized by high existing traffic volumes. The occasional and brief addition of several truck trips and worker vehicle trips to the project area would not create a noticeable or substantial increase in noise along the Sunset Strip.

Construction activities attributable to standard modifications, digital conversions, and new billboard installations would also be required to comply with the City’s Noise Ordinance, which 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). In the event that Sunday construction is necessary, City Manager approval and an extended hours construction permit would be required. Due to the minor and intermittent nature of the construction noise associated with standard modifications, digital conversions, and new billboard installations, the high levels of existing ambient noise in the project area, and required compliance with the City’s Noise Ordinance, impacts of construction activities associated with the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed Sunset Strip Off-Site Signage Policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the construction scenarios, locations, and sizes of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to construction noise resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Operation

Operational noise in excess of established standards may occur when a project generates traffic to the extent that traffic-related noise on nearby roadways increases. Effects may also occur if a project involves on-site uses that generate noise in excess of standards, such as outdoor events, outdoor stationary equipment, amplified music, etc.

Operation of digital billboards, and billboards that have undergone standard modifications, and new billboards would not result in daily operational vehicle trips. As such, operation would not cause substantial increases in traffic noise on nearby roadways. For digital billboards, the LED bulbs would need to be replaced

approximately once every 5 years during operation. This process would generally require one roundtrip truck trip and several maintenance personnel per sign. The activities and vehicle trips associated with these maintenance activities would not differ substantially from the activities or vehicle trips required to maintain existing static, externally illuminated billboards, which require periodic copy changes and bulb replacements. New static billboards would require advertising copy changes, just as existing static billboards do. Copy changes generally occur one time per month and involve one roundtrip truck trip. As such, no substantial increases in noise would result from routine maintenance activities associated with digital billboards, billboards that have undergone standard modifications, or new billboards (static or digital).

Digital billboards along the Sunset Strip installed under the proposed regulations would not be allowed to have audio components, and the operation of digital billboards and billboards that have undergone standard modifications would not involve on-site equipment that would produce substantial amounts of noise. However, audio components may be allowed in association with special events and subject to City approval. Events with audio components would be infrequent, as special events would occur annually or biennially. As stated in the City's Noise Ordinance, outdoor gatherings, public dances, shows, and sporting events are exempt from the City's Noise Ordinance given that such events are conducted pursuant to a permit issued by the City Manager. As such, special events associated with the proposed project along the Sunset Strip, provided that a permit is obtained from the City Manager, would not be in violation of City noise standards. Furthermore, such events are expected to occur infrequently and would occur within the project area, which is already characterized by a high level of traffic and entertainment activity under existing conditions. Because maintenance activities for billboards along the Sunset Strip would not substantially change relative to existing conditions, and because infrequent special events would only occur under a permit from the City Manager, operational impacts resulting from future potential special events, new and modified billboards, and digital conversions would be less than significant.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The location, size, design, and operational scenarios for such future projects are too speculative at this time to determine whether potential operational noise effects could occur. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. As such, the potential effects of such projects relative to operational noise would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. Digital conversions, standard

modifications, and installation of new billboards would not require the use of heavy construction equipment (e.g., large bulldozers, pile drivers, etc.) typically associated with substantial levels of groundborne vibration. Ground-disturbing activities would be limited to modifications involving adjustments in pole location or new billboards requiring new pole foundations or other ground-mounted support structures. For these activities, a truck-mounted drill rig would be used to establish a new billboard foundation for billboards undergoing an adjustment in pole location. It is expected that the drill rig would be required for approximately four hours on the first day of the construction process. Small-sized drill rigs of the type used for this project are not considered to be heavy pieces of equipment typically associated with substantial levels of groundbourne vibration. As such, even during the infrequent ground disturbances that would be associated with the proposed project, a substantial vibration impact would not be anticipated. Operation of digital billboards, billboards that have undergone standard modifications, and new billboards would not involve any pieces of equipment or activities that would produce excessive groundborne vibration or groundborne noise levels. For these reasons, impacts resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The location, size, design, and operational scenarios of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects relative to vibration resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact would occur if the proposed project would cause a substantial permanent increase in noise levels above existing ambient levels. The proposed project would result in brief, intermittent construction activities along the Sunset Strip associated with the proposed digital conversions, standard modifications, and new billboard installations. The proposed project would also be associated with temporary, periodic special events resulting in increased noise levels along the Sunset Strip due to additional visitors, vehicle traffic, and/or audio components that may be associated with the special event. However, daily operation of digital billboards, new static billboards, and existing billboards that have undergone standard modifications would not be associated with any substantial permanent increase in ambient noise levels over existing conditions along the Sunset Strip. Therefore, impacts associated with potential future special events, digital conversions, standard modifications, and new billboards would be less than significant.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The location, size, design, and construction and operational scenarios for new billboards and the associated new development or facade remodels are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects relative to permanent increases in noise resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. As discussed in Section 3.12(a), the proposed project would be associated with temporary, intermittent increases in noise in the project area due to construction activities and minor maintenance activities associated with the proposed digital conversions, standard modifications, and new billboards. However, as described in Section 3.12(a), these activities would be minor and would not involve heavy construction equipment. Furthermore, the project area is characterized by high existing ambient noise levels, since it is a major thoroughfare for vehicle traffic and is also an international destination for entertainment and nightlife. As such, periodic construction activities and maintenance activities that are low in intensity, short in duration, and that take place within the permitted daytime hours are not expected to cause a substantial temporary or periodic increase in ambient noise levels relative to existing conditions.

As discussed in Section 3.12(a), operation of the proposed project would be associated with periodic events that may result in increased noise due to an audio component and/or temporary increases in visitors in the project area. However, the Sunset Strip is characterized as an area with high traffic volumes, numerous entertainment venues, and nightlife. The area is a major attraction for both residents of the Los Angeles area and for tourists. Sensitive receptors located along and adjacent to the Sunset Strip are currently subject to ambient noise levels associated with an overall high level of daily activity, as well as periodic and intermittent increases in noise levels associated with entertainment events and increased volumes of visitors occurring at different times throughout the year. As such, the introduction of new periodic events to the project area would not cause a substantial change in the noise environment along and adjacent to the Sunset Strip. Furthermore, any special events would occur only in coordination with the City and would require a permit from the City Manager if exceedances of the City's noise standards are expected. Such special events would also be subject to Chapter 19.54 of the City's municipal code, which requires permits for special events. The permits must be approved by the Director of Human Services, and the Director may impose conditions of approval that address nuisance factors, including noise and operating days and hours (Section 19.54.070). As such, if the special event is expected to result in substantial increased noise levels with the potential to adversely affect sensitive receptors, the City would be able to impose conditions of approval for the special

event to ensure that substantial impacts would not occur as a result of the special event. For these reasons, impacts resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

New billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. The location, size, design, and construction and operational scenarios of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects resulting from such future projects relative to temporary or periodic increases in noise would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. As discussed in Section 3.8(e), the project area is not located within 2 miles of a public airport, and the project area is not within an airport land use plan. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from aircraft use. No impact would occur.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. As discussed previously in Section 3.8(f), the project area is not located within the vicinity of a private airstrip. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels related to aircraft use. No impact would occur.

References

- City of West Hollywood. 2011. *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed January 16, 2017. <http://www.weho.org/city-hall/download-documents/-folder-155>.
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3.13 Population and Housing

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

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

No Impact. Implementation of the proposed Sunset Strip Off-Site Signage Policy would involve digital conversions of existing billboards, minor structural modifications to existing billboards, and construction and operation of new billboards along the Sunset Strip. As such, the proposed Sunset Strip Off-Site Signage Policy would not include construction or operation of any new residential or commercial land uses and, therefore, would not result in a direct population increase from construction of new homes or businesses, as none would result. No extension of roads or other infrastructure that could potentially induce population growth would be required for future digital conversions, standard modifications, or new billboards. During the minor construction activities that would be required for digital conversions, standard modifications, and new billboards, several construction personnel (approximately six) would be required for approximately 2 days per activity. Due to the minimal number of workers required and the routine, temporary nature of the construction processes, the need for these workers would be accommodated within the existing and future labor market in the City and the surrounding Los Angeles metropolitan area. As such, implementation of the proposed Sunset Strip Off-Site Signage Policy would not generate employment growth to the extent that population growth would result in the City or the region. Therefore, indirect population growth would not occur, and no impacts involving population growth would result from the proposed regulations.

New billboards would only be allowed in association with future facade remodel projects or new development projects. However, the size and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to population and housing resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. Implementation of the proposed Sunset Strip Off-Site Signage Policy would involve digital conversions of existing billboards, minor structural modifications to existing billboards, and construction and operation of new billboards along the Sunset Strip. These activities would not involve land use changes and would not displace any existing housing. Placement of new billboards on a particular site or modifications to existing billboards would not result in or require a land use change at the site of the new or modified billboard. No impact to housing would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

New billboards would only be allowed in association with future facade remodel projects or new development projects. The majority of the Sunset Strip is developed with commercial land uses, so there are few instances where existing housing could potentially be displaced by new development or facade remodels. It is unlikely that substantial numbers of existing housing would be affected; however, the location and design of such future projects are too speculative at this time to adequately evaluate potential environmental effects related to housing displacement. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to population and housing resulting from such future projects would be examined if necessary in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. Implementation of the proposed Sunset Strip Off-Site Signage Policy would involve digital conversions of existing billboards, minor structural modifications to existing billboards, and construction and operation of new billboards along the Sunset Strip. Placement of new billboards on a particular site or modifications to existing billboards would not result in or require a land use change at the site of the new or modified billboard. As such, these activities would not involve land use changes and would therefore not displace any existing residents of the area. Construction of replacement housing would not be necessary. No impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

New billboards would only be allowed in association with future facade remodel projects or new development projects. The majority of the Sunset Strip is developed with commercial land uses, so there are few instances where existing housing could potentially be displaced by new development or facade remodels. It is unlikely that substantial numbers of people would be affected; however, the location and design of such future projects are too speculative at this time to adequately evaluate potential environmental effects related to displacement of people. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to population and housing resulting from such future projects would be examined if necessary in accordance with CEQA as part of the required project-specific CEQA review.

3.14 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

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

Fire Protection

No Impact. Fire services in the City are provided by the Los Angeles County Fire Department. Two Los Angeles County Fire Department stations are located within the City: Fire Station 7, located approximately 0.5 mile south of the project area at 864 North San Vicente Boulevard and Fire Station 8, located approximately 1 mile east of the project area at 7643 Santa Monica Boulevard (City of West Hollywood 2011).

Implementation of the proposed Sunset Strip Off-Site Signage Policy would involve digital conversions of existing billboards, minor structural modifications to existing billboards, and construction and operation of new billboards along the Sunset Strip. The addition of digital billboards to the Sunset Strip, structural modifications to existing billboards, and new billboards (static and digital) would not change the use of any existing buildings resulting in additional occupants and would not result in new buildings requiring fire protection services. As described in Section 3.13, the digital conversions, structural modifications to existing billboards, and new billboards would not generate population growth resulting in an increase of people requiring fire protection services in the project area. Furthermore, the proposed project area is a highly urbanized corridor. The addition of digital billboards, structural modifications to existing billboards, and new billboards (static and digital) would not cause an intensification of uses over existing conditions such that additional fire services would be required.

The presence of digital billboards would entail the operation of more LED bulbs within the project area, when compared to existing conditions. As with other light fixtures, LED bulbs do not pose an increased risk of fire relative to other lighting sources when they are used for their intended purposes and when operated and installed in accordance with standard procedures. Furthermore, digital signs are typically equipped with a small air conditioning unit to ensure that the signs do not overheat. As such, the increase in use of LED technology in the project area that would result from the proposed project would not cause a fire hazard such that new or expanded fire facilities would be required.

During the proposed Sunset Strip Billboard District special events, increased emergency personnel may be required, depending on the nature and popularity of the event. Under existing conditions, the City hosts numerous special events throughout the year that draw additional visitors into the City, such as the City's Halloween festivities and the Pride Parade. The Sunset Strip Billboard District special events are anticipated to be of a smaller scale when compared to these large-scale events. However, due to the periodic occurrence of large-scale special events in the City, the City staff, local fire stations, and emergency response personnel are equipped to support such events and are experienced with coordinating any necessary emergency personnel support. In the event that increased demand for fire protection services were to occur during Sunset Strip Billboard District special events, this demand would only occur for several days on an annual or biennial basis. New fire facilities would not be required to support such events. For these reasons and the reasons described above, the proposed Sunset Strip Off-Site Signage Policy would not result in the need for construction or expansion of fire facilities, and no impact would occur.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are

proposed. Potential effects related to the need for new or expanded fire facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Police Protection

No Impact. The Los Angeles County Sheriff's Department contracts with the City to provide police protection. The City is served by the West Hollywood Sheriff's Station, located at 720 North San Vicente Boulevard, approximately 0.5 mile south of the project area. As described above under "Fire Protection," the proposed project would not result in population growth, additional building occupants, or additional buildings. Placement of digital signs on existing billboards, minor structural modifications to existing billboards, and construction and operation of new billboards would not cause an intensification of uses over existing conditions such that additional police services would be required.

The periodic special events that would take place in association with the proposed Sunset Strip Billboard District may require a temporary increase in police presence in the project area to facilitate pedestrian and traffic safety. However, under existing conditions, the City hosts numerous special events throughout the year that draw additional visitors into the City, such as the City's Halloween festivities and the Pride Parade. While the Sunset Strip Billboard District special events are anticipated to be of a smaller scale when compared to these large-scale events, the City and the West Hollywood Sheriff's Station are equipped to support such events and are experienced with coordinating the law enforcement that is necessary to ensure safety during these events. Furthermore, the West Hollywood Sheriff's Station has a Deputy Sheriff Reserve Program. The Reserve Deputy Sheriffs have full peace officer powers while on duty and help supplement the station's fulltime deputies for a variety of duties, including patrolling for special events (LASD 2016). Additionally, as part of the required special events permit, the City may impose conditions of approval requiring the provision of security and safety measures (Municipal Code Section 19.54.070). Such security and safety measures, if determined to be necessary, would reduce the need for police protection services during the special events. For these reasons, the proposed Sunset Strip Off-Site Signage Policy would not create the need for new or expanded police protection facilities, and no impact would occur.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the need for new or expanded police facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Schools

No Impact. The City is served by the Los Angeles Unified School District. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to require a new school. As described in Section 3.13, digital conversions, minor modifications to existing billboards, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not generate population growth. Therefore, no new students would be generated as result of implementing the proposed Sunset Strip Off-Site Signage Policy, and no increase in demand for local schools would result. As such, no impact to schools would occur resulting from the proposed policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the need for new or expanded school facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Parks

No Impact. The City contains six municipal parks totaling 15.31 acres. The proposed project area includes the William S. Hart Park and Off-Leash Dog Park. This park is located at 8341 de Longpre Avenue and has a frontage on Sunset Boulevard. Residential development typically has the greatest potential to result in impacts to parks, since new residences generate a permanent increase in population. Implementation of the proposed Sunset Strip Off-Site Signage Policy would not include development of any residential or commercial uses and would not generate any new permanent residents or employees who would substantially increase the demand for local and regional park facilities.

There is one existing billboard that is located adjacent to the William S. Hart Park and Off-Leash Dog Park. The billboard is situated in the corner of the property to the east of the park (8300 Sunset Boulevard) and is adjacent to the northeast corner of the park. In the event that this billboard were to undergo either a digital conversion or a standard modification, some construction activity could potentially take place near or within the park. However, these activities would be minor and would only be expected to last for approximately 2 days. As such, even if a small portion of the park were to be temporarily inaccessible while the billboard at 8300 Sunset Boulevard is being modified, the interruption in service would be temporary, and no new or expanded park facilities would be required. For these reasons, the proposed Sunset Strip Off-Site Signage Policy would result in no impact involving a need for new or expanded park facilities.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the need for new or expanded park facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Other Public Facilities

No Impact. The proposed standard modifications, digital conversions of existing billboards, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not include development of residential or commercial uses and would not increase the demand for other public facilities, such as library services or City administrative services. As such, no impact to other public facilities would occur resulting from the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the need for new or expanded public facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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<http://www.wehosherriff.com/index.asp>.

3.15 Recreation

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

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

No Impact. As described in Sections 3.13 and 3.14, future digital conversions, standard modifications, and new billboards would not generate new permanent residents that would increase the use of existing parks and recreational facilities. Additionally, short-term impacts to local recreational facilities would not occur due to the limited number of construction personnel and the short duration of the construction process for digital conversions, standard modifications, and new billboards. As described in Section 3.14, there is one existing billboard that is located adjacent to the William S. Hart Park and Off-Leash Dog Park on the Sunset Strip. Construction at this billboard site has the potential to temporarily affect the adjacent portion of the park. However, any disruptions in park use would be temporary (approximately 2 days), and the park would be returned to the conditions that existed prior to construction at the adjacent billboard site.

The periodic special events that would take place within the project area in association with the proposed Sunset Strip Billboard District may result in temporary increases in visitors to the Sunset Strip. During special events that draw additional visitors to the area, the park could undergo an increase in use. However, the City currently supports numerous special events throughout the year, and the increase in visitors to the park would be temporary. Regular maintenance of the park and the presence of law enforcement officers during special events would prevent deterioration of the William S. Hart Park and Off-Leash Dog Park during special events to the extent possible. For these reasons, the proposed Sunset Strip Off-Site Signage Policy would not cause an increase in the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur resulting from the proposed policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to recreational facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. The proposed standard modifications, digital conversions of existing billboards, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not include development of any residential uses and would not generate new permanent residents that would increase the demand for recreational facilities. Therefore, no impact would occur as a result of the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to the need for new recreational facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

3.16 Transportation and Traffic

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Less Than Significant Impact. Measures of effectiveness for the performance of the circulation system in the City are established by the City for intersections and streets. The criteria used by the City for determining whether a proposed project would have a significant effect on an intersection is based on existing-plus-project level of service and on increased vehicle delay measured in seconds. The criteria for streets are based on percent increase in average daily trips. Measures of effectiveness for several selected intersections are also established in the Los Angeles County Metropolitan Transportation Authority's 2010 Congestion Management Program (CMP). Two intersections in the City are monitored as indicators of the performance of the CMP Highway and Roadway System: the intersection of Santa Monica Boulevard and Doheny Drive (located approximately 0.5 mile south of the project area) and the intersection of Santa Monica Boulevard and La Cienega Boulevard (located approximately 0.3 mile south of the project area) (Metro 2010). The CMP criteria established for intersections is based on level of service and/or increases in traffic demand measured using a volume-to-capacity ratio.

While there are no quantitative measures of performance that have been established for the pedestrian, bicycle, or mass transit circulation networks, the goals, policies, and specific strategies for these modes of transportation are established in the mobility element of the City's General Plan (City of West Hollywood 2011a) and in the West Hollywood Bicycle and Pedestrian Mobility Plan (City of West Hollywood 2003). Goals set forth in the mobility element include developing a world-class mass transit system, maintaining and enhancing a pedestrian-oriented City, and creating a comprehensive bicycle network throughout the City. Similarly, the West Hollywood Bicycle and Pedestrian Mobility Plan sets forth goals, objectives, policy actions, and design guidelines to improve and facilitate bicycle and pedestrian transportation. The project's consistency with these plans and policies is further addressed in Section 3.16(f).

Construction

The construction processes that would be required for future digital conversions, standard modifications, and new billboards would generate additional, albeit minimal, vehicle trips in the project vicinity. Although it is not possible to determine the specific distribution or timing of these activities, it is anticipated that the locations of digital conversions, standard modifications, and new billboards would be scattered along the 1.6-mile length of the Sunset Strip. Similarly, it is anticipated that construction events for digital conversions, standard modifications, and new billboards would be scattered throughout a given year. The construction activities would generally equate to approximately 10 one-way vehicle trips per digital conversion, standard modification, or new billboard installation in the morning on both days of construction and the same number in the evening. (Note that for modifications involving an adjustment in pole location or for new billboards requiring a foundation, several additional trips may be required in association with concrete pouring, delivery of the drill rig, and export of the excavated soils, for an anticipated total of 12 roundtrip vehicle trips per day of construction.) The construction trips would likely occur outside of the AM and PM peak traffic hours and would not significantly change roadway volumes. Intermittent and temporary increases in traffic in the project area on the order of 10 to 12 roundtrip vehicle trips would be a negligible increase in traffic. These increases would occur for 2 days at a time for each conversion, modification, or new billboard installation. Over the course of a year, given a reasonable worst-case assumption of 3 digital conversions, 10 standard modifications, and 9 new billboards this minor to negligible increase in construction-related traffic would occur for a total of 44 days, which would be spread throughout the year. As such, these additional trips would be temporary and intermittent and would not cause intersection levels of service to decline, would not lead to an increase in average daily trips, and would not substantially alter the volume-to-capacity ratios of nearby intersections. Construction impacts resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

Operation

The operation and maintenance of digital billboards, new billboards, and modified billboards would not result in daily operational vehicle trips to the billboard sites. For existing billboards that have converted to digital or for new digital billboards, the LED bulbs would need to be replaced approximately once every 5 years. This process would generally require one roundtrip truck trip and several maintenance personnel. The activities and vehicle trips associated with these maintenance activities would not differ substantially from the typical activities required to maintain existing billboards. In fact, the need for copy changes would be eliminated for existing billboards that convert to digital, thereby eliminating a typical existing maintenance activity and the associated vehicle trips currently required to change the copy on those billboards. As such, no substantial increases in traffic would result from routine maintenance activities associated with the billboards that convert to digital. Maintenance requirements and processes for existing billboards that remain static, externally illuminated billboards are not expected to change in any way as a result of the proposed project. New static billboards would require advertising copy changes, just as the existing static billboards do. Advertising copy changes typically require one roundtrip truck trip approximately one time per month. As such, no permanent increases in daily traffic volumes would occur as a result of digital conversions, standard modifications, or new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy. Impacts would be less than significant.

Sunset Strip Billboard District – Special Events

Periodically, a special event of not more than 4 days would be held in the project area in association with the proposed Sunset Strip Billboard District. Some of these special events may temporarily result in additional visitors to the project area and, therefore, may generate additional traffic in the project area. Under current conditions in the City, a variety of special events take place throughout the year, and the City has existing regulations and protocols that minimize traffic issues associated with a sudden and brief increase in visitors to the City. For example, Chapter 19.54 of the Municipal Code (Temporary Use and Special Event Permits) requires a special events permit for allowable special events. Allowable special events include outdoor entertainment and assembly events and/or outdoor display and exhibit events. Special events permits in the City are reviewed and approved by the City's Human Services Director, who may impose reasonable and necessary design, locational, and operational conditions on the event. Such conditions may include the provision of security and safety measures and may regulate the operating hours and days of the event. Conditions of approval may also regulate any nuisance factors associated with the event and may require that adequate temporary parking be provided to accommodate vehicle traffic generated by the special event. Additionally, any use of the public right-of-way requires approval from the Director of Transportation and Public Works. The requirement for a special events permit and the ability of the Human Services Director to impose conditions of approval on the event would reduce the potential for special events to adversely affect traffic conditions in the City. The City does not have any other plans, ordinances, or policies that establish traffic regulations during special events. As such, any special events that occur in association

with the proposed Sunset Strip Billboard District would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the circulation system, so long as a special events permit is obtained from the Human Services Director and so long as the specified conditions of approval are implemented. Furthermore, the proposed special events would take place infrequently (on the order of once per year or once every two years). Although the proposed special events would likely increase level of service impacts and vehicle delays at nearby intersections, these impacts would occur infrequently (i.e., up to one time per year) and would be temporary (lasting several days). Furthermore, traffic would be regulated and controlled to the extent feasible in accordance with the conditions of approval for the special events permits. Impacts associated with future special events are anticipated to be less than significant.

New Development or Facade Remodels

The proposed policy would allow for the construction of new billboards along the Sunset Strip only in association with future facade remodel projects or new development projects. The design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential traffic effects resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Summary

Construction activities associated with digital conversions, standard modifications, and new billboards would create minor to negligible increases in traffic in the project area. Due to the minor, intermittent, and temporary nature of construction 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 would not result. The daily operations of existing billboards that have undergone digital conversion or other modifications and daily operations of new billboards would not involve a substantial increase in daily traffic volumes in the project area. While the proposed special events could result in an exceedance of the City's standards for the effectiveness of its circulation system, such exceedances would occur once every two years or once per year and would last several days. Intersection level of service, vehicle delay at intersections, and average daily trips along City roadways would not permanently change as a result of the special events associated with the Sunset Strip Billboard District. Additionally, this temporary increase in traffic would be regulated by the City as part of the required special events permit, which would create a mechanism to control and/or reduce traffic associated with a special event. For these reasons, implementation of the proposed Sunset Strip Off-Site Signage Policy would not conflict with the City's standards for the effectiveness of its circulation system. Impacts resulting from the proposed policy would therefore be less than significant.

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less Than Significant Impact. The applicable CMP for the project area and the surrounding metropolitan area is the Los Angeles County Metropolitan Transportation Authority's 2010 CMP. This program monitors and sets performance indicators for a transportation network of numerous highway segments, freeways, and key roadway intersections throughout Los Angeles County (called the CMP Highway and Roadway System). Santa Monica Boulevard is located within the CMP Highway and Roadway System. At its closest orientation to the project area, Santa Monica Boulevard is an east-west roadway located approximately 0.3 mile south of the project area. There are also two intersections in the City that are monitored as indicators of the performance of the CMP Highway and Roadway System: the intersection of Santa Monica Boulevard and Doheny Drive (located approximately 0.5 mile south of the project area) and the intersection of Santa Monica Boulevard and La Cienega Boulevard (located approximately 0.3 mile south of the project area). The nearest CMP mainline freeway monitoring locations are the I-10 east of Overland Avenue and the I-10 east of La Brea Avenue (Metro 2010). The I-10 is located approximately 4.5 miles south of the project area. A project's effects to the CMP system must be analyzed in detail if the project is projected to add 50 or more vehicle trips during the AM or PM weekday peak hours to CMP arterial monitoring intersections or if the project is projected to add 150 or more trips in either direction during the AM or PM weekday peak hours at CMP mainline freeway monitoring locations.

Construction

As explained in Section 3.16(a), construction activities associated with standard modifications, digital conversions, and new billboards pursuant to the proposed Sunset Strip Off-Site Signage Policy are anticipated to result in minimal additional vehicle trips in the project area. The anticipated 2-day construction process for each digital conversion, standard modification, or billboard installation would result in approximately 10 to 12 roundtrip vehicle trips per day of construction, equating to approximately 10 to 12 one-way trips in the morning hours and 10 to 12 one-way trips in the evening hours. This number of trips falls well below the threshold for CMP intersections of 50 or more trips and below the threshold for CMP freeway segments of 150 or more trips. Additionally, these trips are expected to occur outside of the AM and PM peak hours. Each construction event would be temporary, extending for approximately 2 days. Although it is not possible to determine the specific distribution or timing of the construction events, it is anticipated that the locations of digital conversions, standard modifications, and new billboards would be scattered along the 1.6-mile Sunset Strip. Similarly, it is anticipated that construction events would be scattered throughout the year and would not occur simultaneously. As such, potential construction-related effects to CMP intersections would be temporary, would generally occur outside of AM and PM peak hours, and would fall below the thresholds established by the CMP. Impacts would be less than significant.

Operation

As explained in Section 3.16(a), operation of new billboards and modified existing billboards would result in minimal to no increases in vehicle trips. As such, operation of new billboards, billboards that have undergone digital conversions, billboards that have undergone standard modifications pursuant to the proposed Sunset Strip Off-Site Signage Policy would not exceed the thresholds established by the CMP. Impacts would be less than significant.

Sunset Strip Billboard District – Special Events

During special events held in association with the proposed Sunset Strip Billboard District, it is reasonably foreseeable that 50 or more vehicle trips would be added to the CMP intersections of Santa Monica Boulevard/Doheny Drive and Santa Monica Boulevard/La Cienega Boulevard. However, these additional trips would be temporary and would terminate as soon as the event is over. The special events would occur once per year or once every two years and would last for a maximum of 4 days. Because the events are expected to be entertainment events, any additional trips are expected to occur outside of the AM and PM peak hours. Furthermore, in the event that the City anticipates an adverse increase in traffic in association with the special event, the Human Services Director would be able to impose conditions of approval on the project that involve traffic control and/or traffic reduction measures. The nearest mainline freeway monitoring locations are along the I-10, approximately 4.5 south of the Sunset Strip. A special event along the Sunset Strip is not anticipated to adversely affect the operations of the I-10 freeway, which is subject to high traffic volumes under current conditions and supports traffic associated with a wide variety of special events, which commonly occur throughout the Los Angeles metropolitan area. Impacts associated with future special events are anticipated to be less than significant.

New Development or Facade Remodels

The proposed policy would allow for the construction of new billboards along the Sunset Strip only in association with future facade remodel projects or new development projects. The design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential traffic effects resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

Summary

For the reasons described above, the standard modifications, digital conversions, and new billboards, that would be allowed by the proposed Sunset Strip Off-Site Signage Policy would produce minimal to no traffic during construction or operational activities. Occasional special events associated with the proposed Sunset

Strip Billboard District may produce traffic volumes that exceed performance measures established in the CMP. However, these events would occur periodically and temporarily, would be outside of the AM and PM peak hours, and would not differ substantially from the traffic volumes associated with other special events that are held in the City or those that are held regularly throughout the greater Los Angeles metropolitan area. The City would be able to impose conditions of approval on the special events permit to ensure compliance with applicable traffic policies. As such, impacts resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. An increase in air traffic levels is generally caused by residential development that creates population growth to the extent that the use of airports increases. The proposed Sunset Strip Off-Site Signage Policy would not involve residential development; therefore, an increase in air traffic levels would not occur.

Air traffic safety risks are generally associated with increased heights in the vicinity of airports, to an extent that air traffic patterns would need to change or to the extent that a hazard is created. The proposed project area is located approximately 6 to 7 miles from the nearest airports (the Hollywood-Burbank Airport and the Santa Monica Municipal Airport). Under the proposed regulations, certain existing billboards would be allowed to extend in height by a maximum of 14 feet. The Sunset Strip is characterized by buildings and billboards having a wide variety of heights, with buildings ranging from single story to multi story structures, some of which are over 190 feet in height. The Federal Aviation Administration (FAA) has established a 200-foot height standard to determine whether markings and/or lighting is required for temporary and permanent structures (FAA 2007). It is not anticipated that new or modified billboards would exceed 200 feet in height. Due to the minor height extensions that would be allowed and the existing height variations in the project area, standard modifications, digital conversions, and new billboards are not expected to introduce an airport safety hazard. No impact would occur resulting from the proposed Sunset Strip Off-Site Signage Policy.

While the proposed Sunset Strip Off-Site Signage Policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the design, size, and land use mix of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related air traffic patterns resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Digital conversions, standard modifications of existing billboards, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not involve changes to existing land uses or public roadways resulting in new design features, curves, or intersections that could potentially be dangerous. New billboards would be incorporated into new buildings or facade remodel projects. Such projects would be subject to Section 19.28.130(D) of the City's Zoning Ordinance, which sets forth visibility considerations, requiring that buildings be designed not to interfere with motorists' views of the sidewalk and pedestrians' views of vehicles. Some construction activities attributable to digital conversions, standard modifications, or new billboards may involve temporary, localized sidewalk closures at or adjacent to the site of a billboard. Sidewalk closures, especially along a roadway with high volumes of both vehicular and pedestrian traffic, has the potential to result in safety hazards if pedestrians try to navigate around the closure by entering one of the traffic lanes. An encroachment permit would be required for any digital conversions, standard modifications, or new billboard installations requiring sidewalk closure. Appropriate detour signage would be provided in accordance with the safety requirements of the encroachment permit. Due to the temporary nature of the future sidewalk closures attributable to the proposed project and the construction requirements to facilitate safe pedestrian movement around the closure, potential impacts related to increased hazards during construction activities associated with digital conversions, standard modifications, and new billboards would be less than significant.

Operation of digital billboards and new billboards would introduce new visual elements to the Sunset Strip. Under existing conditions, the project area has two properties with digital signs. Upon approval of the proposed regulations, a maximum of 3 existing billboards would be allowed to convert from static to digital signs, and up to 17 future billboards constructed in conjunction with new development of a certain size or facade remodels could also be digital. The buildout year for the project is 2032; as such, by that year, the Sunset Strip may support up to 24 additional digital billboards (this includes the 4 "in-progress" digital billboards discussed in Section 2.4). Digital billboards, new billboards, and modified billboards would also be part of the Sunset Strip Billboard District, which would require coordinated arts programming and would involve an annual or biennial special event in which the digital billboards are used for creative, artistic purposes. The changes to the existing signage environment that would be allowed by the proposed Sunset Strip Off-Site Signage Policy would alter the visual environment that is observed by drivers along the Sunset Strip. However, for the reasons outlined below, implementation of the proposed policy is not anticipated to substantially increase roadway hazards.

First, under existing conditions the Sunset Strip is a vibrant corridor with numerous existing billboards, on-site signs, entertainment venues, pedestrians, and an overall high ambient lighting level. As such, additional

digital imagery, new off-site signs, and periodic arts programming on the Sunset Strip would be consistent with the area's overall character. Changes to the existing signage environment along the 1.6-mile Sunset Strip that may occur as a result of the proposed policy would not be substantially different from the existing visual environment that is currently encountered by drivers along the Sunset Strip. While the project would be associated with new visual elements, these elements would be integrated into the existing visual context and are not anticipated to result in a substantial change relative to existing conditions such that new roadways hazards would result.

Second, the proposed Sunset Strip Off-Site Signage Policy would establish limits on the geographic distribution of digital billboards (see Table 2-2). This aspect of the proposed policy would ensure that digital billboards do not proliferate or cluster along the Sunset Strip. As shown in Table 3.16-1, the allowable digital billboards would be dispersed evenly across the 1.6-mile Sunset Strip, with no more than 4 digital billboards allowed in a particular geographic zone. These geographical limitations, coupled with the restrictions on signage operations discussed below, would reduce the potential for distracted driving along the Sunset Strip as a result of the proposed policy.

Table 3.16-1. Allowable Digital Faces Per Geographic Zone (Excluding Digital Conversions)

Billboard Zone	Maximum Allowable New Digital Billboard Faces
<i>West Region</i>	
Zone 1	3
Zone 2	3
Zone 3	4
<i>Central Region</i>	
Zone 4	0
<i>East Region</i>	
Zone 5	3
Zone 6	2
Zone 7	2
Total	17

Third, the proposed Sunset Strip Off-Site Signage Policy incorporates numerous restrictions on the operations of digital billboards to reduce the potential for such signs to contribute to distracted driving. For example, the proposed regulations would prohibit digital billboards from incorporating driver interaction features. Visual intensive aspects of digital imagery such as motion, animation, and moving patterns would be subject to a variety of restrictions that would reduce their potentially distracting effects. For example, motion or animated content would be required to avoid rapidly changing images and would be prohibited during late nighttime hours. Flashing images that rapidly change direction, oscillate, flash, or reverse in contrast would be prohibited.

For digital images that would be static, the proposed policy specifies a minimum refresh rate, to ensure that static images do not rapidly cycle, thereby reducing potentially distracting qualities of static digital images.

The proposed regulations also include standards for illuminance, message hold time, sign size, operational timeframe, and placement and spacing of digital billboards. For example, the proposed regulations specify light trespass thresholds and maximum allowable sign brightness. The regulations would require monitoring and reporting so that compliance with the lighting requirements is verified throughout the life of each digital billboard. The proposed regulations also require digital billboards to be equipped with photocells that monitor the ambient light environment and adjust billboard lighting conditions to minimize contrast between digital screens and ambient lighting conditions. Incorporation of photocells would ensure that the brightness of each billboard would be regulated in real time, such that compliance with the proposed lighting regulations are met as the ambient light environment changes. For example, the photocells would ensure that brightness is reduced to code-compliant levels during overcast weather and as the sun rises and sets.

The lighting requirements set forth in the proposed regulations are also consistent with Chapter 2, Article 3 of the California Vehicle Code, which stipulates limits to the location of light sources that may cause glare and impair the vision of drivers. This regulation states that “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.” The regulation provides numeric thresholds for when a light source is considered to “impair the vision of drivers.” Using these numeric thresholds, the City has calculated the luminance for digital billboards that would fall below the levels that are considered by the state to impair drivers’ vision (see Section 3.1(d) for additional details regarding the proposed lighting regulations). Under worst-case conditions, the maximum allowable luminance per the Vehicle Code was determined to be 500 foot-lamberts. The proposed regulations would, therefore, limit the surface brightness of digital billboards to 300 candelas per square meter at night, which equates to ~~95.5~~87.6 foot-lamberts. The required maximum brightness for digital billboards along the Sunset Strip falls well below the threshold established in the Vehicle Code for “vision impairing” brightness and glare. The proposed regulations are, therefore, consistent with and more stringent than state standards that are established to protect drivers from safety hazards due to light and glare along highways. The photocells that regulate the brightness of digital billboards based on ambient light requirements, in combination with the monitoring requirements for the light levels of digital billboards, would ensure that standards are met.

Fourth, the proposed policy would support pedestrian-oriented design along the Sunset Strip. As such, throughout the implementation of the policy, the Sunset Strip is anticipated to become more pedestrian friendly. Examples of pedestrian-friendly provisions include the requirement for digital, new, and modified off-site signage to include site improvements that enhance the quality and comfort of the pedestrian experience on the Sunset Strip. The proposed regulations would also require any new development that includes a new billboard to have pedestrian-oriented amenities. Similarly, facade remodels that include a new billboard must create

pedestrian and streetscape improvements or equivalent contributions to the pedestrian environment. These incremental improvements to the pedestrian environment are expected to foster increased pedestrian safety along the Sunset Strip over time.

In conclusion, while implementation of the proposed Sunset Strip Off-Site Signage Policy would alter the visual environment along the Sunset Strip, the policy sets forth numerous requirements that would prevent its implementation from resulting in increased roadway hazards. Given the existing visual conditions along the roadway, the proposed restrictions on the potentially distracting qualities of digital imagery, the proposed lighting limitations, and the anticipated incremental improvements in pedestrian safety, the proposed policy is not anticipated to substantially increase roadway safety hazards in the project area. As explained in detail above, the lighting restrictions set forth in the proposed regulations are more stringent than state requirements established to prevent light sources from affecting drivers' vision. Additional standards, above and beyond state regulations, have been included in the proposed regulations to limit the aspects of digital imagery that may be particularly distracting to drivers. Upon required compliance with the proposed regulations, potential roadway safety hazards associated with the proposed project would be less than significant.

The proposed policy would allow for the construction of new billboards along the Sunset Strip only in association with future facade remodel projects or new development projects. As described above, such projects would be subject to Section 19.28.130(D) of the City's Zoning Ordinance, which sets forth requirements for visibility considerations. Compliance with this section of the Zoning Ordinance would reduce the potential for such future projects to cause a roadway hazard. However, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects with more certainty. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to increased roadway hazards resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

e) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. Inadequate emergency access may occur if emergency access is obstructed by the project or if new driveways, roadways, or fire truck turnaround areas are insufficient to accommodate the necessary emergency equipment. New billboards, digital conversions, and standard modifications installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not involve construction of new driveways, roadways, or fire truck turnaround areas. However, construction activities associated with new billboard installations, digital conversions, and standard modifications may involve sidewalk closures, which could potentially preclude emergency personnel from accessing areas adjacent to the closure. However, such sidewalk closures would be temporary and localized and are not anticipated to last for more than 1 or 2 days at a time. During a sidewalk closure, appropriate emergency access and detour signage would be provided in accordance with encroachment permit requirements. Once the construction activity is complete, full sidewalk

access would be reestablished. Permanent obstructions to existing sidewalks, driveways, or roadways would not result from the construction or operation of billboards that have undergone digital conversions or standard modifications or from new billboards.

Special events that are proposed as part of the Sunset Strip Billboard District may temporarily affect traffic patterns in the project area due to a brief increase in visitors. Special events causing a high volume of vehicular and/or pedestrian traffic have the potential to temporarily affect emergency access to areas within and adjacent to the special event. As such, the special events associated with the proposed project could temporarily impede emergency access to the project area and adjacent streets. However, as explained in Section 3.16(a), any future special events would be subject to Chapter 19.54 of the City's Municipal Code, which requires the Human Services Director to approve permits for special events. Such permits are required to include conditions of approval. If determined necessary based on the nature and expected popularity of the event, the conditions of approval would specify traffic management plans and provisions for emergency scenarios. A variety of large-scale special events already take place within the City each year. As such, City staff and the emergency personnel that serve the City are equipped to provide emergency services and to ensure that adequate emergency access is maintained during events that temporarily draw additional visitors to the City. For these reasons, Sunset Strip Billboard District special events, digital conversions, standard modifications, and new billboards would not adversely affect emergency access along the Sunset Strip. Impacts resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for new billboards in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to emergency access resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. As previously discussed in Section 3.16(a), goals, policies, and specific strategies for public transit, bicycle, and pedestrian facilities are established in the mobility element of the City's General Plan (City of West Hollywood 2011a) and in the West Hollywood Bicycle and Pedestrian Mobility Plan (City of West Hollywood 2003). Goals set forth in the mobility element include developing a world-class mass transit system, maintaining and enhancing a pedestrian-oriented City, and creating a comprehensive bicycle network throughout the City. The West Hollywood Bicycle and Pedestrian Mobility Plan set forth goals, objectives, policy actions, and design guidelines to improve and facilitate bicycle and pedestrian transportation. The project's consistency with policies for pedestrian circulation, bicycle transportation, and public transit are described below.

Pedestrian Circulation. One of the goals for the pedestrian environment established in the West Hollywood Bicycle and Pedestrian Mobility Plan is to enhance pedestrian safety. Some construction activities attributable to the proposed project may involve temporary, localized sidewalk closures at or adjacent to the site of the sign. Such closures could potentially affect the flow of pedestrian traffic or pedestrian safety. In order to minimize potential affects to pedestrian safety and to facilitate the flow of pedestrian traffic, appropriate detour signage would be provided in accordance with City requirements. An encroachment permit would also be required for any sidewalk closures, which would include requirements for appropriate emergency access and detour signage as necessary. As such, while sidewalk closures could result in brief inconveniences to pedestrians, they would not substantially affect the movement of pedestrian traffic or conflict with the City's goals of enhancing pedestrian transportation and pedestrian safety. Consistent with the City's goals for enhancing pedestrian circulation, the proposed project sets forth provisions that would result in gradual improvements in the pedestrian environment along Sunset Boulevard. The Development Agreements for new billboards (digital and static) and digital conversions would be required to include provision of site improvements to enhance the quality and comfort of the pedestrian experience on the Sunset Strip. Additionally, the urban design policies for new billboards that would be established by the proposed regulations include standards to preserve and enhance the pedestrian orientation of Sunset Boulevard. New development incorporating new billboards would be required to include pedestrian-oriented amenities and ground-floor activating uses. Facade remodels incorporating new billboards would be required to create pedestrian and streetscape improvements or provide an equivalent contribution on Sunset Boulevard. Examples of such improvements include wider sidewalks, new publically accessible open space such as a view terrace, a pocket park, or a public seating area.

As such, the proposed project includes policies that support the City's existing goals of enhancing pedestrian transportation and is, therefore, consistent with plans and policies for pedestrian circulation.

Bicycle Circulation. No designated bicycle paths are within the project area (City of West Hollywood 2015). However, the City's Bicycle Task Force included a bicycle route along Sunset Boulevard in its 2011 recommendations to the City Council (City of West Hollywood 2011b). While the 2011 recommendations have not been officially adopted, they show that a bicycle route may be contemplated for the project area in the future. Construction activities for digital conversions, standard modifications, and new billboards would be limited to the billboard sites and immediately adjacent areas and, therefore, would not adversely affect bicycle travel along Sunset Boulevard. The project area is a highly urbanized, developed corridor, and the additional activities attributable to digital conversions, standard modifications, and new billboards would not cause an intensification of traffic over existing conditions such that future bicycle travel would be adversely affected. As such, the proposed project would not interfere with the City's goals and policies to improve and facilitate bicycle transportation.

Public Transit. Metro bus 2/302 lines operate on Sunset Boulevard, and there are approximately five bus stops within the project area (MTA 2015). Future digital conversions, standard modifications, or new

billboards may be located at sites located near these bus stops. However, each construction event is anticipated to take approximately 2 days and is not anticipated to involve activities that would obstruct operation of the bus system. In the event that a bus stop would become temporarily affected by construction activities, Metro requires that the Metro Bus Operations Control Special Events Coordinator be contacted regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. The same protocol would be used if any special events associated with the Sunset Strip Billboard District were anticipated to temporarily interrupt bus service along Sunset Boulevard. Upon proper notification of Metro for any potential interruptions in bus service, the proposed project would not result in affects to public transit along the Sunset Strip. While the proposed project would not specifically develop or encourage public transit use, it would not impede the City's implementation of its goals and policies to develop and encourage public transit use.

In summary, neither construction nor operational activities associated with digital conversions, standard modifications, or new billboards would 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. For these reasons, the potential impacts resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

The proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects. As explained above, the proposed policy requires new development and facade improvements that incorporate new billboards to also include pedestrian improvements. As such, upon compliance with the proposed policy, it is anticipated that future facade remodel projects and new development projects incorporating new billboards would help implement some of the City's policies for pedestrian transportation and would not conflict with or hinder implementation of City policies for other forms of alternative transportation, such as transit and bicycling. However, the location and design of future projects consisting of new development or facade remodels and a new billboard are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Any potential effects to alternative transportation facilities or policies resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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3.17 Tribal Cultural Resources

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

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

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

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

Less Than Significant Impact. As described under Section 3.5, a records search was conducted at the SCCIC for the City of West Hollywood in support of the City's General Plan Environmental Impact Report. No tribal cultural resources were identified as a result of the records search.

In a Sacred Lands File results letter dated November 15, 2016, the NAHC stated that the search "was completed with negative results however this area is sensitive for potential tribal cultural resources." However, no specific tribal cultural resources were identified. In addition, Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation, stated that the project area is highly sensitive for the presence of cultural resources. However, he was not aware of any specific tribal cultural resources within the project area.

No tribal cultural resources were identified by the records search or California Native American tribes as part of the City's Assembly Bill (AB) 52 notification and consultation process (see Section 3.17(b) below for a description of this process). Therefore, impacts to tribal cultural resources resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. These future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. As such, these future projects would also be subject to AB 52 requirements on a project-by-project basis pursuant to CEQA. Because no tribal cultural resources have been identified in the project area to date, no significant impacts are anticipated to result from future development along the Sunset Strip. However, project-specific CEQA review and AB 52 compliance would ensure that any potential impacts are identified in the event that a previously unknown tribal cultural resources is identified.

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

Less Than Significant Impact. There are no resources in the project area that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. Further, no specific tribal cultural resources were identified in the project area by the NAHC, California Native American tribes, or by the City as part of the AB 52 notification and consultation process.

To date, the City has not received any formal requests from California Native American Tribes to be notified of CEQA projects for the purposes of AB 52. In an effort to proactively reach out to tribes with a cultural affiliation to the project site, the City requested a tribal consultation list from the NAHC. On November 15, 2016, the NAHC provided the City with a list of six tribes with traditional lands or cultural places located within the boundaries of the project site. On November 28, 2016, the City of West Hollywood mailed notification letters to all six contacts provided by the NAHC. To date, the City has received one response/request for consultation. Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation responded via email and stated that he considers the project site highly sensitive for cultural resources and requested that one of his tribe's certified Native American monitors be on site during all ground disturbing activities. The City responded to Mr. Salas' email and offered to set up a meeting to discuss the project and to get more specific information concerning Mr. Salas' monitoring request. To date, the City has received no response from Mr. Salas regarding the project or a potential meeting. As such, the consultation process has concluded. It should be noted that the proposed regulations have set forth the requirement for a qualified archaeologist to assess the archaeological sensitivity and the potential to affect subsurface

deposits during excavation of pole foundations for existing billboards that are relocated. In the event that the archaeologist determines that excavation would occur in a location that is potentially sensitive, the archaeologist may recommend archaeological monitoring, Native American monitoring, and/or further study of the site. The policy also includes measures to be implemented in the unlikely event that archaeological resources are encountered during excavation (see Appendix A). These policy requirements would ensure that cultural resources would be protected to the extent required by law. Impacts resulting from the proposed Sunset Strip Off-Site Signage Policy are considered less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. These future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. As such, these future projects would also be subject to AB 52 requirements on a project-by-project basis pursuant to CEQA. Because no tribal cultural resources have been identified in the project area to date, no significant impacts are anticipated to result from future development along the Sunset Strip. However, project-specific CEQA review and AB 52 compliance would ensure that any potential impacts are identified in the event that a previously unknown tribal cultural resources is identified.

3.18 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

No Impact. Construction and operation of new billboards and modified billboards pursuant to the proposed regulations would not discharge wastewater. Therefore, no impact would occur as a result of implementing the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to wastewater requirements resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

No Impact. New billboards and modified billboards constructed pursuant to the proposed regulations would not increase the amount of water used or wastewater generated within the project area, as no changes to existing land uses would occur. Thus, no new or expanded water or wastewater treatment facilities would be required as a result of implementing the proposed Sunset Strip Off-Site Signage Policy, and no impact would occur.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to water and wastewater facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

No Impact. As described in Section 3.9(e), new billboards and modified billboards would not increase the amount of stormwater generated within the project area. Therefore, no new or expanded stormwater drainage facilities would be required, and no impact would occur as a result of implementing the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to stormwater drainage facilities resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

No Impact. New billboards and modified billboards constructed pursuant to the proposed regulations would not require the use of potable water. Therefore, no additional water supplies would be needed, and no impact to water supply would occur as a result of implementing the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to water supply resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. No new structures or land uses that would generate wastewater would be constructed or operated as part of future digital conversions, standard modifications, or new billboards. Therefore, new billboards, standard modifications, and digital conversions undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would not result in new demands for wastewater treatment. No impact to wastewater treatment capacity would occur as a result of implementing the proposed Sunset Strip Off-Site Signage Policy.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to wastewater generation resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Less Than Significant Impact. Construction activities associated with digital conversions, standard modifications, and new billboards may generate minor amounts of solid waste. Some construction processes would involve removal and disposal of portions of an existing billboard structure. For modifications involving an adjustment in pole location or new billboards requiring a new foundation, minor amounts of soil would be exported from the billboard site. Future 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 future digital conversions, standard modifications, and new billboard 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. The operation of future new billboards and modified billboards is not anticipated to generate substantial amounts of solid waste. Digital billboards would require periodic replacement of LED bulbs. It is anticipated that the bulbs on such signs would require replacement approximately once every 5 years. As with existing billboard operations, any static billboards would require periodic copy changes. The copy would either be stored, recycled, or disposed of at an appropriate facility. The increase in LED bulb waste that would occur due to the proposed project would be minor, due to the long lifespan of the LED bulbs. Furthermore, conversion of several existing billboards along Sunset Strip to digital would in fact reduce waste associated with copy changes, since digital signs do not require copy changes.

Special events held along the Sunset Strip in association with the proposed Sunset Strip Billboard District would have the potential to briefly increase the amount of solid waste produced in the project area, if the special event were to draw additional visitors and vendors. However, as described in Section 3.16(a), future special events would be required to comply with Chapter 19.54 of the City's Municipal Code, which requires the Human Services Director to review and approve a special events permit. As stated in Section 19.54.050, a special events permit application must include the following provisions related to solid waste: provisions for recycling any cans, glass, paper, or plastic that maybe generated; information and guidance to ensure recycling of these materials; a program to ensure prohibition of the use of polystyrene cups, packing, plates, etc., by the vendors and attendees; and, a plan indicating efforts to reduce, reuse, or recycle the waste to be generated. Compliance with this section of the municipal code would ensure that solid waste generation is reduced to the extent feasible during special events. Due to required compliance with the municipal code and due to the periodic and brief nature of the proposed special events (biennial or annual, with each lasting approximately 10 days), the special events held in association with the Sunset Strip Billboard District would not generate solid waste to the extent that regional landfills would not be able to accommodate the solid waste that is generated. Impacts related to landfill capacity resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

While the proposed policy would allow for the construction of new billboards along the Sunset Strip in association with future facade remodel projects or new development projects, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to solid waste generation resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

No Impact. The proposed project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Construction waste associated with digital conversions, standard modifications, and new billboard installations would be recycled or disposed of in accordance with existing regulations, including the City's requirement to recycle 80% of all construction materials. During operation of such billboards, spent LED bulbs and used advertising copy would be transported to an appropriate waste facility in accordance with applicable regulations. Advertising copy may also be recycled or stored. Special events with the potential to generate solid waste would be subject to existing regulations, including the conditions of approval for special events permits, which must include provisions for solid waste management and reduction. As such, all waste materials associated with standard modifications, digital conversions, new billboards, and special events undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy would be handled and disposed of in accordance with existing local, state, and federal regulations. No impact would occur resulting from the proposed Sunset Strip Off-Site Signage Policy.

The proposed policy would allow for the construction of new billboards along the Sunset Strip only in association with future facade remodel projects or new development projects. The construction and operation of such future projects would not be expected to violate statutes and regulations related to solid waste. Nevertheless, the location and design of such future projects are too speculative at this time to adequately evaluate their potential environmental effects with more certainty. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects related to solid waste would be examined in accordance with CEQA as part of the required project-specific CEQA review.

3.19 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed in Section 3.4, Biological Resources, the project area is located in a completely 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 proposed digital conversions, standard modifications, new billboards, and Sunset Strip Billboard District special events would be conducted in the highly urbanized environment of the 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 digital conversions, standard modifications, or new billboards, the birds would be protected in accordance with the proposed regulations. Specifically, the regulations require 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 digital conversions, standard modifications, and special events would therefore be less than significant.

As discussed in Section 3.5, Cultural Resources, there are no known archaeological resources in the project area. Some modifications to existing billboards that would be allowed by the proposed project would involve minor changes in the location of existing billboard pole foundations. These adjustments in pole location would involve minor amounts of ground disturbance along the Sunset Strip. **However, in accordance with the proposed regulations, modifications involving ground disturbance would be reviewed by an archaeologist to determine the sensitivity of the site. The archaeologist can recommend archaeological and/or Native American monitoring, additional study, or testing, if warranted.** In the event that cultural resources were to be unexpectedly uncovered during excavation for relocated pole foundations, the significance of the find would be evaluated by an archaeologist, and all construction work near the find would stop to ensure proper protection and evaluation of the resource in accordance with state and federal laws that prohibit destruction of archeological resources. As such, the proposed project is not anticipated to destroy any previously unknown archaeological resources that may be present below the surface and that could serve as important examples of California history or prehistory. While there are historic structures present along the Sunset Strip that could potentially serve as important examples of California history, the digital conversions, standard modifications, new billboards, and Sunset Strip Billboard District special events would not result in demolition of such structures and would not eliminate any such resources. **Furthermore, as explained in Section 3.5(a), protections for historical resources have been established in the proposed policy to prevent new or modified billboards from obstructing historic street views or from obscuring character-defining features of historical resources. Impacts to cultural resources resulting from implementation of the proposed Sunset Strip Off-Site Signage Policy would therefore be less than significant.**

Any new billboards developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would be required to be part of new development or facade remodels. As explained in Section 3.4(d), nesting bird protection measures similar to those that have been incorporated into the proposed regulations would likely be required for such future developments and facade remodel projects. Due to the absence of sensitive or native habitat along the Sunset Strip, nesting bird measures are expected to ensure that significant effects to biological resources would not occur as a result of such future projects. Nevertheless, as described throughout this document, the location, size, and construction and operational scenarios of such future projects are too

speculative at this time to adequately evaluate their potential environmental effects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. Potential effects to biological and cultural resources resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.

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

Less Than Significant Impact. Implementation of the proposed project would incrementally increase the variety of advertisements along the Sunset Strip by allowing for 3 existing static billboards to convert to digital signs and by streamlining the process by which the remaining billboards may undergo structural modifications. The proposed project also would establish the Sunset Strip Billboard District, which would be associated with coordinated arts programming among the digital billboards and special events that incorporate Sunset Strip signage. This IS/ND evaluates the environmental effects of the activities that could result from the proposed Sunset Strip Off-Site Signage policy, which consist of 3 digital conversions, 71 standard modifications, creation of the Sunset Strip Billboard District, special events, and new billboards including up to 17 new digital billboards. Relative to current regulations governing new off-site signage along the Sunset Strip, these new regulations may encourage new billboards to be constructed when new development projects or facade remodels are undertaken. The Sunset Strip is a world-famous destination and is visited by tourists as well as residents of the City and the Los Angeles area as a place for entertainment, work, and hotel accommodations. Development projects (particularly those with high density and those that maximize available land) would continue to occur with or without the proposed project.

Existing billboards are distributed throughout the project area. As such, it is expected that digital conversions, standard modifications, and new billboards would be distributed along the Sunset Strip. Due to the length of the Sunset Strip (approximately 1.6 miles) and due to the number and distribution of existing billboards, it is not anticipated that the incremental increase in construction or operational activities attributable to digital conversions, standard modifications, and new billboards would result in a substantial change in the existing conditions along Sunset Boulevard. In the context of the Sunset Strip as a whole, these changes would be minor and would occur in a manner that is consistent with the City’s goals and policies for the Sunset Strip, as substantiated in Section 3.10 of this document. The construction and operational requirements for billboards are not anticipated to combine with future development projects in the area to produce a cumulatively significant effect, due to the minimal activities required to install, modify, and maintain a billboard. Regarding potential aesthetic and land use effects, the proposed Sunset Strip Off-Site Signage Policy includes regulations that would foster best urban design practices and that would prevent potentially significant light trespass,

glare, and obstruction of significant public views as identified in the SSP. As such, the proposed Sunset Strip Off-Site Signage Policy would not result in cumulatively considerable environmental effects.

Under the proposed project, new billboards would be allowed if integrated into new development or facade remodels and upon compliance with the proposed Sunset Strip Off-Site Signage Policy. While the proposed project may incentivize new development projects or facade remodels by allowing such projects to incorporate a new billboard, the proposed Sunset Strip Off-Site Signage Policy would not change land use or zoning designations such that the amount of potential development along the Sunset Strip would be increased or decreased. The City's Final Program Environmental Impact Report for the General Plan (October 2010) analyzes buildout of the Sunset Strip pursuant to the current land use and zoning designations through the General Plan buildout out year, which is 2035. As such, the potential for additional development to occur along the Sunset Strip pursuant to the land use and zoning designations that are currently in place has been analyzed programmatically pursuant to CEQA in the General Plan Final Environmental Impact Report. The proposed project would not increase the development potential along the Sunset Strip. New development and facade remodels could occur along the Sunset Strip with or without the proposed project. Nevertheless, new development and facade remodels would have the potential to result in cumulatively significant effects in the project area, depending on the locations, sizes, and timing of such future potential projects. As such, these future projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. When and if such projects are proposed, details regarding the size and location of such projects will enable an analysis of potential environmental effects to be conducted, including an analysis of cumulatively considerable effects, if any.

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

Less Than Significant Impact. As discussed in Section 3.1, Aesthetics, the proposed project would have the potential to result in additional lighting and glare within the project area. However, any lighting and glare produced by digital billboards, modified billboards, and new billboards would be minimized by the regulations set forth by the proposed Sunset Strip Off-Site Signage Policy. The level of brightness that digital billboards would be allowed to produce falls well below the state standards for brightness levels that are considered vision impairing for drivers. The light produced by digital billboards would be monitored, and compliance with the proposed regulations would be verified throughout the lifetime of each digital billboard. Upon compliance with the proposed regulations, light and glare produced by billboards that are either modified or developed pursuant to the proposed Sunset Strip Off-Site Signage Policy would not cause a substantial adverse effect on human beings.

As discussed in Section 3.16, 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 3.16, provisions have been included in the proposed Sunset Strip Off-Site Signage Policy to control and limit aspects of digital imagery that could contribute to driver distraction and potentially result in roadway safety impacts. For example, compliance with the sign brightness limits that are specified in the proposed Sunset Strip Off-Site Signage Policy would ensure that digital billboards have brightness levels that are well below the California Vehicle Code requirements. The proposed regulations also include provisions to improve the pedestrian environment along the Sunset Strip, which would help foster increased pedestrian safety along the Sunset Strip. Due to these measures, the proposed project would not create a substantial, adverse effect to human beings related to roadway hazards.

All new billboards and modified billboards would be subject to varying levels of review and approval by the City. The City would be able to prohibit implementation of any digital billboards, modified static billboards, and new static billboards that are inconsistent with the safety provisions contained in the proposed regulations or that may otherwise adversely affect human beings. Impacts to human beings resulting from the proposed project would be less than significant.

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4 REPORT PREPARERS

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5 RESPONSE TO COMMENTS RECEIVED

This section of the Final IS/ND includes a copy of each comment letter provided during the public review period of the IS/ND. The comment letters received have each been assigned a letter (e.g., A, B, C). The issues within each comment letter are bracketed and numbered (e.g., A-1, A-2). Comment letters are followed by responses, which are lettered and numbered to correspond with the bracketed comments.

The City's responses to comments on the IS/ND represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to CEQA Guidelines Section 15074(b), decision makers will consider the proposed IS/ND together with the comments received during the public review process.

5.1 Summary of Comments Received on the IS/ND

Table 5-1. Comments Received on the IS/ND

Comment Letter Designation	Commenter	Date
A	George M. Yin, Kaufman Legal Group	April 7, 2017
B	Jacqueline Saint Anne	April 9, 2017
C	Robert Silton	April 10, 2017
D	Scott Luecke	April 12, 2017
E	Jillian Sorkin, Jillian Sorkin Photography	April 17, 2017
F	Selene Ting	April 19, 2017
G	Hollace Brown	April 24, 2017
H	Henning Nopper, General Manager, Andaz West Hollywood	April 20, 2017
I	Elyse Eisenberg	April 22, 2017
J	Sara Risher	April 24, 2017
K	Mary Reardon	April 23, 2017
L	Don Behrstock	April 24, 2017
M	Genevieve Morrill, President and CEO, West Hollywood Chamber of Commerce	April 25, 2017
N	Ryan Gohlich, Beverly Hills Community Development	April 27, 2017
O	Jose Villanueva, Carmel & Naccasha, LLP	April 27, 2017
P	Layne Lawson, Clear Channel Outdoor	April 27, 2017
Q	Claudia Lewis	April 27, 2017
R	Truman & Elliot LLP for Wolverines Owner LLC	April 27, 2017
S	Bijan Chadorchi	May 5, 2017
T	Christopher Shane	unknown
U	Anonymous	unknown
V	Aaron Green, President, The Afriat Consulting Group	May 15, 2017

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Comment Letter A

KAUFMAN LEGAL GROUP
A PROFESSIONAL CORPORATION

April 7, 2017

VIA U.S. MAIL AND E-MAIL

Ms. Sarah Lejune
Contract Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069
E-mail: slejeune@weho.org

Re: **SUNSET STRIP OFFSITE SIGNAGE DRAFT POLICY**
SUGGESTION – RELOCATION AGREEMENT
ORDINANCE/POLICY
Our File No.: ACE1187.001

Dear Ms. Lejune:

On behalf of our client, Ace Outdoor Advertising, (“Ace”) we write to follow up a recent conversation that you had with Ace on the issue of “relocation agreements.” In essence, we respectfully request that your team consider having the City of West Hollywood (“City”) adopt a relocation agreement ordinance/policy that will facilitate the moving of particular billboards as part of the City’s newly proposed signage framework.

As the City has experienced on multiple occasions, certain members of the outdoor advertising community have sought to undermine the City’s thoughtful actions (and unanimous City Council approvals) with respect to certain billboard approvals through the use of the referendum process. We believe that adopting a relocation agreement ordinance/policy and using such “relocation agreements” – as currently defined and allowed under State law – would help to protect the integrity of the City’s policies concerning billboards and would help insulate the City’s actions from unwarranted interference by deep-pocketed special interests.

As you know, courts hold that referenda may be used only to undo “legislative acts” of local legislative bodies such as city councils, but not administrative, adjudicative, or quasi-adjudicative actions. (*See American Fed. of Labor v. Eu* (1984) 36 Cal. 3d 687, 708; *Marblehead v. City of San Clemente* (1991) 226 Cal. App. 3d 1504, 1509.) Under the “commonly stated test for determining whether a particular action is a legislative or administrative act . . . [t]he power to be exercised *is legislative in nature if it prescribes a new policy or plan; whereas, it is administrative in its nature if it merely pursues a plan already adopted by the legislative body itself, or some power superior to it.*” (*Worthington v. City Council* (2005) 130 Cal. App. 4th 1132, 1140-41 (emphasis added).)

777 S. Figueroa Street, Suite 4050 Los Angeles, CA 90017 main 213.452.6565 fax 213.452.6575 www.kaufmanlegalgroup.com
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April 7, 2017
Page 2

It is our view that an individual relocation agreement executed pursuant to a City relocation agreement ordinance/policy would not be subject to a referendum because it would not be a “legislative” action that creates new policies and rules that apply to future situations. Rather, it would be an “administrative” action that applies existing rules to specific facts and situations. (*See Worthington* 130 Cal. App. 4th at 1141 (holding an act is “administrative in its nature if it merely pursues a plan already adopted...”).) Indeed, the first source of existing rules can be found in California Business and Professions Code section 5412 *et seq.* This law was originally enacted by the Legislature specifically to facilitate the moving of outdoor signage by mutual agreement and without having to go through the onerous eminent domain process. Section 5412 expressly states:

It is a policy of this state to encourage local entities and display owners to enter into relocation agreements which allow local entities to continue development in a planned manner without expenditure of public funds while allowing the continued maintenance of private investment and a medium of public communication. Cities, counties, cities and counties, and all other local entities are specifically empowered to enter into relocation agreements on whatever terms are agreeable to the display owner and the city, county, city and county, or other local entity, and to adopt ordinances or resolutions providing for relocation of displays.

Thus, Section 5412 already lays out the policy, authorization, and the means for “cities, counties, cities and counties, and all other local entities” to be “specifically empowered” to enter into “relocation agreements” on whatever terms are agreeable to billboard owners and the local governments. In addition, if the City were to adopt its own relocation ordinance/policy provisions (as authorized by Section 5412), as many other cities have done, there would be a second source of existing rules for relocation agreements in the City. Such an ordinance/program could set forth specific provisions prescribing the procedure whereby the City may enter into relocation agreements (in line with the authority set forth in Section 5412).

Consequently, it is our view that the use and approval of a relocation agreement pursuant to Business and Professions Code section 5412, and/or a City relocation ordinance/policy, would not constitute a “legislative act” by the City Council. Rather, it would be a contractual arrangement made pursuant to a policy that was created previously by the Legislature (and the City, if the City adopts a relocation agreement ordinance/policy). Hence, City approval of a relocation agreement would not enact any “new” policy or plan; rather, it would merely be an action done in accordance with pre-existing policies previously codified into law. There is therefore strong legal support for the view that the approval of a relocation agreement pursuant to already existing laws would be purely an administrative act. And, since courts have long held that the power of referendum applies only to “legislative” acts, the negotiation and approval of relocation agreement would be shielded from the referendum process.

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

April 7, 2017
Page 3

In keeping with the City's desire to eliminate nonconforming signage, add to the visual diversity and vibrancy of Sunset Boulevard, and to avoid the expense/uncertainty of eminent domain actions or further referenda, we respectfully suggest ordinance/policy provisions for relocation agreements be included in the City's final recommendations on signage to be studied and adopted by the City Council.

Very truly yours,



George M. Yin

GMY:vcc

CC: Paul Arevalo, City Manager (parevalo@weho.org)
Mike Jenkins, City Attorney (mjenkins@localgovlaw.com)
Stephanie DeWolfe, Assistant City Manager (sdewolfe@weho.org)
Bianca Siegl, Long Range Mobility Planning Manager (bsiegl@weho.org)
Andrew Bilanzich, Ace Outdoor Advertising (andrew@ace-outdoor.com)

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Response to Comment Letter A

Kaufman Legal Group
George M. Yin
April 7, 2017

A-1 This comment provides a suggestion to the City that it adopt a “relocation agreement ordinance/policy” that would facilitate moving of particular billboards as part of the proposed policy.

This suggestion submitted by Kaufman Legal Group does not pertain to the adequacy of the environmental analysis in the IS/ND. However, it is noted that the proposed policy would allow for relocation of existing billboards on the same site. Relocation of any pole structures would be subject to inclusion in the Sunset Strip Billboard District and approval of an Administrative Permit (see Section 2.3 of the IS/ND and Appendix A). The IS/ND addresses sign relocation as a potential standard modification that could be implemented for existing billboards through this policy (subject to the requirements in the policy such as a sightline study and maximum illuminance and luminance levels). The environmental effects of these potential sign relocations are addressed throughout the IS/ND. The suggestions of the Kaufman Legal Group will be provided to decision makers for their review and consideration as part of the Final IS/ND.

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Comment Letter B

From: Jacqueline Saint Anne [mailto:jsaintanne@yahoo.com]
Sent: Sunday, April 09, 2017 10:38 AM
To: Sarah Lejeune
Subject: intent to adopt a negative declaration

Aesthetics aside:

The amount of light pollution created by the lighted digital billboards is very disturbing. It shines up into the hills and down onto the residential areas off the strip.

The light from the digital billboards also distracts and blinds drivers, particularly when there is a lot of white used in the image.

Please do not increase the number of these billboards on the strip.

Jacqueline Saint Anne
Costume Designer
www.jsaintanne.com

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I B-2
I B-3

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Response to Comment Letter B

Jacqueline Saint Anne

April 9, 2017

B-1 This comment expresses concerns regarding the potential for digital billboards to create light pollution. The commenter states that light pollution created by digital billboards shines up into the hills and down onto the residential areas off of the Sunset Strip.

The potential for the proposed project to result in light and glare effects is discussed in Section 3.1(d) of this IS/ND. The analysis concluded that the impacts of the proposed project would be less than significant in the category of light and glare. A lighting study was undertaken for the project area, which evaluates the existing and unique conditions on the Sunset Strip, includes a literature review of available information and regulations pertaining to digital billboards, and includes recommendations for the City for light and glare regulations on the Sunset Strip specifically (Appendix D). The light and glare regulations included in the proposed policy would avoid potentially significant impacts by limiting the amount of light that can be produced by digital billboards. It should also be noted that the proposed regulations were formulated in accordance with state standards that are supported by the Illuminating Engineering Society of North America and the International Dark Sky Association.

B-2 This comment expresses concern regarding the potential for digital billboards to distract and blind drivers. The commenter states that these issues are of particular concern when there is “a lot of white used in a digital image.”

The potential for the proposed project to result in issues involving roadway hazards are addressed in Section 3.16(d) of the IS/ND. The proposed policy includes numerous regulations that would reduce the potential for future digital billboards to result in driver distraction or to affect the ability of drivers to see the roadway. The regulations in the policy were developed with technical expertise from Francis Krahe & Associates (lighting design consultants) and Fehr and Peers (traffic engineering firm). Their technical reports have been included as part of this Final IS/ND as Appendix D and Appendix E to provide additional technical background in support of the analysis in Section 3.16(d) and in support of these responses to comments. The analysis in the IS/ND concluded that the impacts related to roadway hazards would be less than significant.

Relative to white imagery, the monitoring reports that would be required for digital billboards must include luminance and illuminance measurements of the billboard when the sign is on, when the sign is off, and when the sign is all white. As such, compliance with the proposed policy would ensure that the sign would remain in compliance with the lighting standards even under a worst-case scenario of an all-

white display. In addition, the proposed policy requires a fade rate between sequences, so that a white background would not be in immediate visual contrast to a dark background from a different sequence.

B-3 This comment consists of a request that the City not increase the number of digital billboards on the Sunset Strip.

This comment does not provide specific comments related to the environmental analysis in the IS/ND. As described in Section 2.4, the policy would allow for up to 3 digital conversions of existing billboards; however, the policy would not entitle any new billboards on the Sunset Strip. Rather, the proposed project consists of regulations for new billboards and allows for new billboards in association with new development and/or facade remodels on existing buildings along the Sunset Strip. New development projects, facade remodels, and any associated new billboards would be subject to project-specific review under CEQA and would require approval from the City in order to proceed. Nevertheless, the commenter's general opposition to additional digital billboards on the Sunset Strip will be included as part of this Final IS/ND for review and consideration by decision makers.

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

Comment Letter C

From: Robert Silton [mailto:robsmessage@aol.com]
Sent: Monday, April 10, 2017 10:46 AM
To: Sarah Lejeune
Subject: Sunset Strip Off-Site Signage Policy

As a resident of West Hollywood, I would like to state my strong opposition to the proposed Sunset Strip Off Site Signage Policy that proposes electronic billboards on the Sunset Strip area. My view is that the City of West Hollywood City Council is moving in the wrong direction by allowing and promoting increased development in this area including the addition of more electronic billboards that will further degrade the quality of our city life. I will check each City Council member's vote on this proposal and if they vote in favor, I will cast my next vote for City Council Members for someone else.

Robert Silton
9255 Doheny Rd., apt 1902
West Hollywood CA 90069

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Response to Comment Letter C

Robert Siltan

April 10, 2017

C-1 This commenter states their opposition to the proposed project. The commenter believes that the City should not allow for and/or promote increased development in the area, including digital billboards. The commenter states that they will not support City Council members who vote in favor of the proposed project.

This comment expresses general opposition to the proposed project and no specific comments related to the environmental analysis in the IS/ND are provided. The commenter's general opposition to the proposed project will be included in the Final IS/ND for review and consideration by decision makers.

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Comment Letter D

From: Scott Luecke [mailto:slueckela@gmail.com]
Sent: Wednesday, April 12, 2017 12:16 PM
To: Sarah Lejeune
Subject: Sunset Signage

I am responding to the public notice for the subject proposal.

I do not agree with the study findings which states
there are no significant impact on the neighborhood.

I live at 1435 Havenhurst Dr and have been negatively impacted by the
existing billboards, let alone new ones.

Here are some of my concerns.

1. View Obstruction.

Current billboards block and obscure views of landmarks
such as the Argyle and Chateau Marmont as well as views
for residential home owners.

2. Light Pollution.

Ambient light from existing billboards flood my home at night.
New billboards will only add to the problem.

3. Land Use.

Existing Billboards are over scaled and overpower the neighborhood.
Giant supports dwarf neighboring buildings.

4. Aesthetics

Billboards blight the neighborhood and detract from the
quality of life of the residents.

Additional billboards will only exacerbate the above listed problems.

I am not interested in living next to a West Coast version of Times Square.

Please stop selling out our beautiful neighborhood to the highest
bidder. It only benefits corporations who market to visitors to our neighborhood.
It is crass consumerism and political corruption at it's worst.

Scott Luecke

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D-5

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Response to Comment Letter D

Scott Luecke
April 12, 2017

- D-1** The commenter does not agree with the findings that the proposed project would not result in a significant impact on the neighborhood. The commenter states that they live near the Sunset Strip and are already affected by existing billboards. The commenter presents more specific concerns in Comments D-2 through D-6, which are addressed in the subsequent responses.

This IS/ND was prepared pursuant to CEQA and evaluates the effects of the proposed project on the environment. Effects relative to the surrounding neighborhoods were evaluated under CEQA. For example, Section 3.1 of the IS/ND evaluates the potential for the proposed project to affect scenic vistas and to cause significant light and glare effects. Section 3.3(d) addresses air quality effects on nearby sensitive receptors, and Section 3.12 addresses potential noise effects on nearby sensitive receptors. As such, effects to surrounding neighborhoods have been addressed throughout the IS/ND. See Response O-6 and O-21 for more details regarding how the IS/ND addresses potential environmental effects to the areas surrounding the Sunset Strip. Each of the commenter's specific concerns are addressed individually in the responses below.

- D-2** This comment states that existing billboards block and obscure views of landmarks such as the Argyle and Chateau Marmont, as well as views for residential home owners.

For the purposes of the environmental analysis in this IS/ND, the existing billboards are considered part of the existing baseline environmental conditions of the Sunset Strip.

However, the potential for the proposed Sunset Strip Off-Site Signage Policy to affect scenic vistas is evaluated in this IS/ND (refer to Section 3.1(a)). The potential for the proposed project to affect visual character and quality of the project site (i.e., the Sunset Strip) and its surroundings are also evaluated in this IS/ND (Section 3.1(c)). The environmental analysis in the IS/ND concluded that the effects of the project in these categories would be below a level of significance. The analysis in the IS/ND cites specific aspects of the proposed Sunset Strip Off-Site Signage Policy that would minimize the potential for future billboard projects to adversely affect scenic vistas, visual character, and visual quality. These include a requirement for sightline studies for any new billboards, digital conversion of existing billboards, and modifications to existing billboards involving changes in height, size, location, and orientation, as well as the addition of a second face. The sightline study must demonstrate that sightlines to nearby outdoor advertising facilities, designated local, state and national cultural resources, and public viewsheds identified for view protection and enhancement in the Sunset Specific Plan are not additionally impeded by a billboard project. Photo simulations, plan views identifying primary site lines, and 3D massing

studies would be required components of the sightline study. See Section 3.1 of the IS/ND and Appendix A for more details on sightline study requirements.

While there may be pre-existing view obstructions along the Sunset Strip, the proposed policy would not substantially exacerbate these issues, as described and substantiated in Section 3.1 of the IS/ND. The required sightline studies would ensure that public viewsheds identified for view protection and enhancement in the Sunset Specific Plan are maintained and that cultural resources are not substantially obstructed by the allowable billboard conversions or modifications. Furthermore, the proposed policy contains a variety of protections for cultural resources. For example, all off-site signs located on or directly adjacent to a property containing a cultural resource (as defined in CEQA Guidelines Section 15064.5(a)) shall conform with the *Secretary of Interior's Standards for Rehabilitation* to ensure compatibility of scale, size, and proportion to historical resources, so as not to adversely impact the integrity of the resource or its setting.

It should be noted that effects to private views are not considered impacts to the environment generally under CEQA (see Response O-21). Rather, this is a policy consideration for the decision makers. The commenter's concerns about view obstruction will be included in this Final IS/ND for review and consideration by decision makers.

D-3 This comment states that ambient light from existing billboards floods the commenter's home during the night. The commenter expresses a concern that new billboards may contribute to this issue.

As stated in Response D-2, existing billboards and existing lighting conditions are considered part of the existing baseline environmental conditions of the Sunset Strip for the purposes of the environmental analysis in this IS/ND. The potential for the proposed project to cause significant light and glare impacts is evaluated in Section 3.1(d) in the IS/ND. The analysis in the IS/ND concluded that the impacts of the proposed project would be less than significant. Also see Response B-1, which discusses light trespass concerns.

It should also be noted that the proposed Sunset Strip Off-Site Signage Policy sets forth lighting standards for billboards that are more specific and more stringent when compared to the existing regulations (see Response O-3 for details). The new standards would be applied to any temporary, new, or modified off-site signage.

D-4 This comment states that existing billboards are over-scaled and overpower the neighborhood. The commenter states that billboard support structures dwarf neighboring buildings.

As described in the responses above, existing billboards and their support structures are considered part of the existing baseline environmental conditions of the Sunset Strip for the purposes of the environmental analysis in this IS/ND. The potential for the proposed policy to affect the visual character

and quality of the Sunset Strip and surrounding areas is evaluated in Section 3.1(c) of the IS/ND. The analysis concluded that effects would be less than significant. As with potential effects related to scenic vistas and lighting, the analysis cites specific aspects of the proposed Sunset Strip Off-Site Signage Policy that would minimize the potential for future billboards projects to adversely degrade the existing visual character and quality of the Sunset Strip. Examples include restrictions on the extent to which existing billboards can be raised in height, requirements for sightline studies, and design specifications (see Section 3.1(c) and Appendix A for details).

D-5 This comment states that billboards cause blight and detract from the quality of life of the residents.

Effects to surrounding neighborhoods, particularly in the categories of aesthetics, air quality, land use and planning, noise, and transportation and traffic, are addressed in Sections 3.1, 3.3, 3.10, 3.12, and 3.16 of the IS/ND respectively. Impacts were determined to be below a level of significance. Also refer to Response O-6 for details regarding how the IS/ND addresses effects to the areas surrounding the Sunset Strip. The proposed policy includes numerous measures that would reduce the potential for future billboard projects to lead to visual blight and/or to negatively affect quality of life. Examples include requirements to integrate billboard structures into the building face and site design, requirements for the design of a billboard to be consistent with the architecture of the associated building, requirements for pedestrian-oriented design, lighting regulations, size limitations, etc. (see Appendix A for details). Nevertheless, the commenter's concerns regarding blight and quality of life will be included in this Final IS/ND for review and consideration by decision makers.

D-6 This comment states that additional billboards along the Sunset Strip would exacerbate the issues mentioned throughout the letter (i.e., view obstructions, light pollution, land use issues involving billboard sizes and support structures, blight, and quality of life).

The issues listed by the commenter in this letter have been addressed in Responses D-2 through D-5. As discussed, the analysis in the IS/ND determined that the effects of the proposed policy would be below a level of significance in the categories of aesthetics (including scenic vistas, visual character/quality, and light/glare), land use and planning, and a variety of environmental effects on surrounding residential areas (aesthetics, air quality, noise, and traffic). It should also be noted that any additional billboards installed along the Sunset Strip would be subject to project-by-project review under CEQA. See Section 2.4 of the IS/ND for details. The commenter's concerns regarding the proposed project will be included in this Final IS/ND for review and consideration by decisions makers.

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Comment Letter E

From: jillian sorkin [mailto:jilliansorkinphotography@gmail.com]
Sent: Monday, April 17, 2017 3:50 PM
To: Sarah Lejeune
Subject: Public Comment

To whom it may concern,

I have been a resident of the Sunset Strip for the last 15 years. I have lived on Larrabee and currently reside at 1137 Horn Ave. I just opened the public notice concerning plans for a new project location — specifically 17 digital billboards across the strip. I am strongly opposed to this project. Residents and tourists have reached our capacity with visual bombardment and stimulation along with the distraction of cell phones. Not to mention, our air quality is already problematic along with the constant construction that we are accustomed to living with. As a therapist, I realize change is inevitable however, there is also beauty in preserving our cultural landscape. Not only are the digital billboards an eyesore but extremely dangerous while people are maneuvering the streets of West Hollywood. I hope this letter will be taken into account when considering this project.

If you have any questions, please feel free to call me at 310-951-2499~

All my best,
Jillian Sorkin

Jillian Sorkin Photography
www.JillianSorkin.com

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Response to Comment Letter E

Jillian Sorkin Photography

Jillian Sorkin

April 17, 2017

E-1 This comment expresses general opposition to the proposed project and cites concerns related to visual impacts, air quality, cultural resources, and roadway hazards.

The potential for the proposed project to result in aesthetic effects is discussed in Section 3.1 of the IS/ND. The extent to which a project causes “visual bombardment and stimulation” are not CEQA thresholds of significance. However, the CEQA thresholds of significance for aesthetics include adverse effects to visual character and quality. The analysis in Section 3.1 determined that the proposed project would have the potential to alter the visual character of the project area. However, for the reasons cited in Section 3.1(c), the proposed project would not substantially degrade visual character or quality, and impacts were determined to be less than significant. The regulations in the proposed policy pertaining to lighting and digital imagery were designed with assistance from a professional lighting design consultant and from a traffic engineering firm. The lighting and traffic experts evaluated the existing and unique conditions on Sunset Strip, conducted a literature review of available information and regulations pertaining to digital billboards, and subsequently developed site-specific recommendations for the City. Their recommendations were developed with the intent of reducing the effects of future billboard projects on light/glare and roadway safety. As such, while “bombardment and stimulation” are not specifically addressed under CEQA, the proposed policy sets forth numerous regulations that would reduce potential visual effects related to light and glare and the overall visual character of the Sunset Strip.

The proposed project’s effects relative to air quality are addressed in Section 3.3 of the IS/ND. Impacts were determined to be less than significant. Note that future billboard projects would have relatively limited construction needs, with construction generally lasting 2 days and requiring approximately 6 construction workers (see Section 2.5 of the IS/ND for more construction details).

Relative to preserving the “cultural landscape” identified by the commenter, the proposed policy includes numerous protection measures for cultural resources. See Section 3.5(a) of the IS/ND for details. See also Response D-2, which discusses views of cultural resources. Additionally, with the understanding that permitting additional off-site signage on the Sunset Strip has the potential to alter the visual characteristics of the Sunset Strip, the City developed a policy that considered the land use implications of permitting these limited changes to the existing urban design condition of the Sunset Strip as a unique place that celebrates off-site signage.

The IS/ND also addresses the potential for the proposed policy to lead to roadway hazards. This topic is discussed in Section 3.16(d) of the IS/ND. As described above, the City worked with a lighting design consultant and a traffic engineering firm to develop regulations for digital imagery that minimize the potentially distracting aspects of digital imagery. The analysis in the IS/ND determined that effects would be less than significant. Also see Response B-2, which addresses concerns regarding roadway safety.

This comment letter does not provide specific comments related to the adequacy of the environmental analysis in the IS/ND; however, as explained above, many of the concerns expressed in the letter are addressed in this IS/ND and were considered by the City during preparation of the proposed policy. This comment will be included as part of the Final IS/ND for review and consideration by decision makers.

Comment Letter F

From: S Ting [mailto:selene.ting@gmail.com]
Sent: Wednesday, April 19, 2017 12:13 PM
To: Sarah Lejeune
Subject: More billboards

Dear Sarah,

I am writing to protest the plan to erect as many as 18 new billboards on the Strip. I am appalled that there are plans to make these digital. I feel that the signs will only add to distracted driving, light pollution, and traffic. There is already so much congestion on Sunset - and adding more signs will slow things down even more. At this point, there is more square footage devoted to billboards, than to actual drivable roadway. Whoever thought of this is only thinking of the revenue and kickbacks. This awful plan only serves to make the city less livable for it's residents, and will further drive residents out. If this is what the city wants - to make Sunset a gigantic entertainment complex, the city should pay to move residents out.

Selene Ting
1131 Alta Loma Rd.,
Apt. 410
West Hollywood, CA 90069

F-1

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Response to Comment Letter F

Selene Ting
April 19, 2017

F-1 This comment expresses general opposition to installation of new billboards on the Sunset Strip, particularly digital billboards. The commenter cites specific concerns, consisting of distracted driving, light pollution, and traffic congestion. The commenter also states that the proposed project would make the City “less livable for residents” and expresses a concern that the project would cause residents to move away.

This comment does not provide specific comments related to the environmental analysis in the IS/ND. However, many of the issues presented by this commenter are discussed in the IS/ND and are also addressed in the responses above. For concerns regarding light trespass, see Response B-1; for concerns regarding distracted driving, see Response B-2. For concerns regarding quality of life, see Response D-5. Traffic and congestion are discussed in Section 3.16 of the IS/ND. The environmental analysis concluded that the proposed policy would result in impacts below a level of significance in the category of transportation and traffic. As described in Response B-2, the proposed policy includes a variety of regulations that limit the aspects of digital imagery that may cause driver distraction. As such, the proposed project is not expected to cause traffic to slow as drivers observe signs or to contribute substantially to congestion.

The environmental impacts of the proposed Sunset Strip Off-Site Policy were determined to be less than significant. The proposed project would not result in significant adverse impacts to residential sensitive receptors, as substantiated in the IS/ND (see also Responses D-5, O-6, and O-21), nor would it displace housing in the City. As such, adverse effects to residents and displacement of residents are not expected outcomes of the proposed project. However, this commenter’s concerns regarding effects to the City’s residents will be included in this Final IS/ND for review and consideration by decision makers.

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Comment Letter G

From: Hollace Brown [mailto:aceNgreatneck@hotmail.com]
Sent: Monday, April 24, 2017 4:46 PM
To: Sarah Lejeune
Cc: elyse.eisenberg@gmail.com
Subject: Billboards & Signage on Sunset Strip

Dear Miss Lejeune,

Following up on the recent meeting about signage and billboard policy, please consider this idea:

Establishment of Anti-Graffiti, Anti-Poster Patrol (on Foot). Paid for by the hotels on Sunset Blvd. There has been a sharp increase in graffiti and poster blight in recent years. A glaring case in point is the once-elegant, historic stucco obelisk at Queens Road and Sunset Boulevard which was erected in 1924: it has been defaced and ruined. For at least forty years, the words "Queens Road" appeared on all four sides but (mysteriously) up until around five years ago, someone painted over the beautiful peach obelisk, covering up the words. And immediately graffiti, posters and bills were plastered on -- just like they are plastered on other surfaces in West Hollywood.

Respectfully,
Hollace Brown

G-1

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Response to Comment Letter G

Hollace Brown

April 24, 2017

G-1 This comment provides a suggestion for the City to establish an “Anti-Graffiti, Anti-Poster Patrol.” The commenter describes examples of graffiti and posters along the Sunset Strip.

The proposed project and this IS/ND do not pertain to graffiti or posters along the Sunset Strip. Instead, the proposed project would amend the City’s Zoning Ordinance and the SSP to revise regulations for digital billboards and new off-site signage along the Sunset Strip. However, the commenter’s recommendation comment will be included in the Final IS/ND for review and consideration by decision makers.

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8401 West Sunset Boulevard, West Hollywood, CA 90069
T +1 323 656 1234 F +1 323 650 7024 westhollywood.andaz.com

April 20, 2017

Ref.: Sunset Strip Off-Site Signage Policy

We are in receipt of the public notice of the intent to adopt a negative declaration for the Sunset Strip Off-Site Signage Policy.

The current project description and especially the summary of impacts DOES NOT provide sufficient information about the scope and details of the proposed changes. It also does not address the current concerns many businesses and local residents have with some of the existing digital signage.

As the impact to businesses and local residents could be substantial, we would request a lot more data and analysis as well as discussion of details of the proposed plan. The statement that "...the project would not result in any significant impacts..." might not be correct (and certainly does not apply to current impact of existing signs).

Especially in our case, Andaz West Hollywood has for a long time felt a large negative impact due to the existing digital signage currently in place across from the hotel. Until existing concerns are resolved and clear policies can be demonstrated that address BOTH new and existing situations, we would not support any of these proposed changes.

Thank you for allowing me to comment. I will be happy to provide additional information.

Sincerely,

Henning Nopper
General Manager
Andaz West Hollywood

E-mail: henning.nopper@andaz.com
Phone: 323-785-6005

H-1

H-2

West Hollywood

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Response to Comment Letter H

Andaz West Hollywood
Henning Nopper, General Manager
April 20, 2017

H-1 This comment states that the project description and the summary of impacts in the *Notice of Intent to Adopt a Negative Declaration for the Sunset Strip Off-Site Signage Policy* does not provide sufficient information about the scope of details of the proposed project. The comment also states that the notice did not address the current concerns of businesses and residents with respect to existing digital signage.

It should be noted that a “Notice of Intent to Adopt a Negative Declaration” is not intended to be an exhaustive source of information regarding a proposed project. Rather, CEQA requires a Notice of Intent to specify the following: a brief description of the proposed project and its location; the starting and ending date of the comment period; the date, time, and place of any scheduled public meetings or hearings if known at the time of notice; locations where copies of the proposed negative declaration are available for review; the presence of hazardous wastes sites in the project area; and, any other information specifically required by statute or regulation for a particular project or type of project (CEQA Guidelines Section 15072(g)). The *Notice of Intent to Adopt a Negative Declaration for the Sunset Strip Off-Site Signage Policy* that was issued by the City meets these CEQA requirements. The IS/ND for the proposed project (rather than the notice of intent to adopt the IS/ND) includes a more extensive project description and an analysis of the potential environmental impacts of the project pursuant to CEQA. This IS/ND also contains an appendix with the proposed text of the Sunset Strip Off-Site Signage Policy (Appendix A). The IS/ND and the associated appendices were available at the locations listed in the Notice of Intent, which consisted of the City’s webpage, the West Hollywood Library, and the City’s Community Development Department. As part of the Final IS/ND, two additional appendices have been attached: a lighting memorandum prepared by Francis Krahe and Associates and a traffic report prepared by Fehr and Peers. These firms were retained by the City for assistance with developing regulations that would minimize light and glare effects of future billboard projects and that would minimize potentially distracting aspects of digital imagery for drivers on Sunset Boulevard. The IS/ND contains substantial evidence that the proposed project would not result in significant impacts on the environment.

Regarding existing digital signage, the IS/ND considers existing signs on the Sunset Strip as part of the existing baseline environmental conditions against which the project is evaluated for its environmental effect. For this reason, the environmental effects associated with existing signage were not analyzed in this IS/ND. Nevertheless, the commenter’s concerns regarding existing digital signs will be included as part of this IS/ND for review and consideration by decision makers.

H-2 This comment states that the Andaz West Hollywood hotel has been negatively affected by the existing digital signage that is in place across from the hotel.

As described above, existing billboards along the Sunset Strip, including the large screen video signs, were considered as part of baseline environmental conditions for the purposes of the CEQA analysis in this IS/ND. The proposed project sets forth clear policies for the regulation of future digital signage along the Sunset Strip, including maximum required illuminance and luminance levels that vary based on ambient lighting conditions, maximum refresh rates, minimum fade rate, and restrictions on animated content and moving patterns. Additionally, as discussed in Response to Comment O-3, the proposed regulations are more stringent than previous standards used to evaluate light and glare impacts associated with billboard projects in the City. Per the proposed policy, existing large screen video signs would be allowed to join the Sunset Strip Billboard District, subject to a Development Agreement that would require the sign to meet the digital billboard standards set forth in the proposed policy. Applicable standards would include those described above, such as the proposed maximum illuminance and luminance levels, fade rates, and restrictions on animated content and moving patterns.

This comment does not contain information regarding the types of effects that may be occurring at the Andaz. However, the commenter's general opposition to the project and their concerns regarding existing digital signage will be included in this IS/ND for review and consideration by decision makers.

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

Comment Letter I

From: Elyse Eisenberg [mailto:elyse.eisenberg@gmail.com]
Sent: Saturday, April 22, 2017 7:49 PM
To: WeHo Heights NA, Elyse Eisenberg
Subject: Summary of 4/18 WeHo Billboard / Signage Policy presentation / Comments & Recommendations 4

<Please note that comments on the Signage/Billboard Policy should be sent to Sarah Lejeune at slejeune@weho.org. >
Sarah – please include this email in all agenda packets.

Hi All,

Good turnout / room filled. About 25 people from all over WeHo, the hills above Sunset, a couple people representing billboard companies and WeHo staff - Long Range Planning execs Bianca Siegl, Rachel Dimond and presenter Sarah Lejeune.

Fine presentation by Sarah of history of Strip billboards, current and proposed Strip signage policy. Discussion of well-known issues with digital displays – glare, dimming, frequency of changes, max square footage. Tall walls will not be digital. Space for public art, which is also current policy.

Public comment – Don't think it's out of turn to say that the residential attendees were unanimously opposed to an increase in billboards and vehemently opposed to digital billboards. Support for billboards appears to come exclusively from those who stand to profit, including the city and artists whose work might be used.

Comments were along the lines of “we don't want to be Vegas”, increased driving hazards, and concerns about digital display distractions adding to traffic crawl. One attendee had authored a study on the dangers of digital billboards to driving safety.

The proposed new total (24) digital billboards within fifteen years was considered beyond excessive given that we have not yet reached the four (4) allowed in the last 20 years under the existing policy.

Staff noted that the city now receives revenue from billboards through Development Agreements. Pre these agreements (and no revenue to the city), there was greater regulation of billboards. The city's position is that the additional revenue generated by the billboards is a public benefit.

Summary:

While this is just a first proposal for an updated signage policy, the unfortunate reality is that the city will increase billboards along the Strip regardless of public opposition.

However, we have an opportunity to weigh in on the public benefit. While I recommend that interested parties submit their own comments, these are mine.

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

EDE Comments:

NUMBER OF BILLBOARDS - Recognizing the city is likely to approve the full twenty (20) billboards proposed anyway, I would request that digital billboards be limited to a total of eight (8), whether new or conversions. This would double the current number of digital billboards. I think this is a reasonable compromise and the city would still get their twenty new billboards.

PUBLIC BENEFITS - This city has always been a leader in its support for many commendable causes including and not limited to Seniors, Disabled, the LGBTQ community, disenfranchised communities and others. It has generously supported the arts and many other worthwhile causes. The revenues to support these ventures come from the city's economy and are budgeted accordingly.

How about supporting citizens just because we are residents and neighbors? Revenues generated by Development Agreements for the Sunset Strip projects should directly benefit the Strip and its residential areas. The following are some areas where these revenues could and should be directed:

TRAFFIC SIGNAL TIMING – TOP PRIORITY!!! If a congested city like NYC can manage to get Madison Ave, Fifth Ave and Broadway to flow from one end of the city to the other during Rush Hour, then we should be able to figure out how to get our 1.6 miles of the Strip to work. Why can't the lights be synchronized and coordinated with Beverly Hills on the West and LA on the East so they flow like dominos and a car could drive non-stop from one end of the city to the other? As soon as we cross the borders on each end of the Strip, the traffic immediately eases up, so the long-time canard by city officials of it being pass-through traffic simply doesn't hold up. The posted speed limit is 35 mph. That should take 2:45 min. At 25 mph, 3:50 min. We can and should do better than the all-too-often 30-45+ min.

VALET PARKING STANDS – If the city isn't going to invest in Municipal Parking lots every couple of blocks along Sunset as Beverly Hills, Santa Monica and Culver City did to great success in reviving their downtown areas and encouraging an active social scene – Culver City being an especially noteworthy recent success, then perhaps they will consider Valet Parking Stands on every block, the way Abbot Kinney has very successfully done -

<http://www.abbotkinneyblvd.com/visit-3/>. Our Sunset Strip BID and Chamber of Commerce could do a better job promoting the restaurants and clubs along the Strip the same way. No matter what the city says about the future being fewer cars, the future hasn't yet arrived. Too many people aren't coming to the Strip because of lack of adequate parking, too expensive parking, and congestion. Not to mention the non-stop construction. If they want the Strip to be a walking area, this concept of dropping the car off at one valet stand and picking it up at another is a great idea. We are very supportive of a revitalization of the Strip as a restaurant and club row the way it used to be. We don't believe that monster hotels on every block will achieve this goal, and is in fact antithetical to this goal. Another thing to note about all the other cities' successes is the low-scale of their walking areas, not surrounded by intimidating hi-rise sterile towers.

THE STRIP PICKUP – Santa Monica Blvd has one. Where's ours? Back in 1996, the SSP said that there would be a bus that makes the rounds from one end of the Strip to the other to support the nightlife- walking crowd. We need one for the same reason SMB does.

STREETSCAPE – It was only ten years ago when the city upgraded Sunset, an oxymoron if there ever was one. While \$26M was spent exquisitely upgrading SMB, only \$5M was spent on Sunset – arguably one of the most famous boulevards in the country. And most of that was spent on just resurfacing the street with half the money coming from Obama's TARP funds. It's time the city devoted as much attention to the Strip as it does to SMB, besides looking at it as just a piggy bank.

Does anyone remember when Sunset Blvd from Doheny to Sunset Plaza was filled with beautiful 50' green leafy trees? A lush boulevard as far as the eye could see. Now a distant memory as we look at a sun-baked bleak stretch of desolate roadway filled with the mostly dead or bare, scraggly trees that replaced them. Who thought deciduous (winter-dormant) trees in our S. California climate were a good idea? None of the replacement trees that have survived

have grown three feet in the past ten years. It is time to refurbish this landscaping with better-suited trees. We would like to have meaningful input which we did not have last time – and not for lack of trying.

SIDEWALK POWERWASHING – Quarterly please. From Doheny to Sunset Plaza.

WEHO HEIGHTS NEIGHBORHOOD SPECIFIC

STREETLIGHTS – More lighting on all five streets. Sherbourne is the worst.

TRAFFIC CALMING – Ideas please?

DOG POOP STATIONS – More please

NEIGHBORHOOD WATCH GROUPS – There are 17 such groups in the city. We sponsor the National Night Out block parties, neighborhood Annual Meetings, host websites, and other activities. These events are usually supported by individual volunteers or homeowner associations with occasional contributions from nearby businesses, depending on the event. Some neighborhoods are larger than others. Our WeHo Heights NA represents 1,000+ homes and is one of - if not the - the largest in the city. It adds up.

We would like to see a line-item added to the Annual Budget for “Neighborhood Watch Group Entertainment Expenses” in the amount of \$50,000 (~\$3,000/neighborhood). Groups could submit expenses on an annual or semi-annual basis to the Neighborhood Watch Coordinator for reimbursement up to a maximum ceiling depending on neighborhood size. Any funds not used would be put towards the next year’s budget. We can worry about inflation at a later date. This would be a much fairer system than the burden of these good-will functions falling on condo associations, homeowners and individuals.

Lastly, when is FREE WIFI FOR ALL coming to WeHo? Over 70 cities in the US already offer free Wifi, including seven in CA. Santa Monica has it. We heard that it was in the works here.

That’s it for now.

I-5
Cont.

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Response to Comment Letter I

Elyse Eisenberg
April 22, 2017

- I-1** This comment summarizes the attendees of a community meeting and a presentation at the meeting.
- This comment is informational and introductory in nature. No response is needed.
- I-2** This comment provides notes and observations regarding a community meeting that was held by the City. The commenter reports that specific concerns expressed included increased driving hazards and slowed traffic due to distraction. The commenter further states that 24 allowable new billboards within the planning horizon for the proposed policy (approximately 15 years) seemed excessive.
- See Response B-2 for concerns regarding driver distraction. See Response F-1 for concerns regarding congestion and slowed traffic.
- This response contains some incorrect statements regarding the number of new billboards. The number of allowable new billboards is not specified by the proposed policy; however, the City anticipates the addition of approximately 18 new billboard faces, 17 of which can be digital. The amount of billboards that would actually be constructed is unknown. Currently, off-site signage on the Sunset Strip is governed by the 1996 Sunset Specific Plan (SSP) and the Zoning Ordinance. However, billboard technologies and development patterns on the Sunset Strip have changed since 1996. Additionally, the City has an updated General Plan (the *West Hollywood General Plan 2035*), adopted in 2011. The General Plan directs the City to “maximize the iconic urban design value and visual creativity of signage in West Hollywood,” to “maintain the Sunset Specific Plan and update as appropriate,” and to “continue to promote a great diversity of uses on Sunset Boulevard, including entertainment and related uses, to support the community’s vision,” among other goals and policies that support the City’s study of off-site signage and its drafting of the proposed Sunset Strip Off-Site Signage Policy.
- In addition to the policy considerations discussed above, the City has studied off-site signage along the Sunset Strip. This off-site signage study helped inform the proposed balance of off-site signage along the Sunset Strip and has been added to Appendix A as part of this Final IS/ND.
- I-3** This comment states that the commenter is providing recommendations for the public benefits that would be associated with billboards and encourages other community members to provide recommendations as well.

The commenter's recommendations will be included in the Final IS/ND for review and consideration by decision makers. Recommendations for public benefits do not pertain to the adequacy of the environmental analysis in the IS/ND.

- I-4** This comment provides a recommendation that the number of allowable digital billboards be limited to a total of 8 digital billboards, which would include both new digital billboards and digital conversions. This policy recommendation will be included in the Final IS/ND for review and consideration by decision makers.
- I-5** This comment consists of a list of specific policy recommendations related to public benefits. As stated above, these recommendations for public benefits do not pertain to the adequacy of the environmental analysis in the IS/ND. However, these recommendations will be included as part of the Final IS/ND for review and consideration by decision makers.

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

Comment Letter J

From: Sara Risher [mailto:sara@chickflicksinc.com]
Sent: Monday, April 24, 2017 1:22 PM
To: Sarah Lejeune
Subject: Fwd: Summary of 4/18 WeHo Billboard / Signage Policy presentation / Comments & Recommendations 7

Begin forwarded message:

From: Sara Risher <sara@chickflicksinc.com>
Subject: Re: Summary of 4/18 WeHo Billboard / Signage Policy presentation / Comments & Recommendations 7
Date: April 24, 2017 at 12:09:08 AM PDT
To: elyse.eisenberg@gmail.com

This is a great report, Elyse. I'm sorry I couldn't make it there for the meeting. All of your notes and observations and recommendations are right on! It's absolutely horrific what they are doing to our neighborhood. Its totally becoming the Vegas strip, with all the tall hotels and flashing signs. I'm becoming embarrassed by the commercialization of it all. Whose pocket is all this development money really going into??!

J-1

Sent from my iPad

On Apr 22, 2017, at 9:27 PM, Elyse Eisenberg <elyse.eisenberg@gmail.com> wrote:

<Please note that comments on the Signage/Billboard Policy should be sent to Sarah Lejeune at slejeune@weho.org. >
Sarah – please include this email in all agenda packets.

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

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Response to Comment Letter J

Sara Risher
April 24, 2017

- J-1** This comment expresses agreement with the recommendations and comments contained in Comment Letter I. The commenter further expresses concerns regarding neighborhood effects, aesthetics, and commercialization. For concerns regarding neighborhood effects, see Response D-5, O-6, and O-21. For concerns regarding aesthetic effects, see Response B-1 and D-2. The proposed project is consistent with policy direction provided in the City's General Plan and in the Sunset Specific Plan (see Section 3.10(b) of the IS/ND). Nevertheless, the commenter's concerns regarding commercialization, neighborhood effects, and aesthetics will be included in the Final IS/ND for review and consideration by decision makers.

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

Comment Letter K

From: marytreardon@juno.com [mailto:marytreardon@juno.com]
Sent: Sunday, April 23, 2017 1:02 PM
To: Sarah Lejeune
Cc: elyse.eisenberg@gmail.com
Subject: Fw: Summary of 4/18 WeHo Billboard / Signage Policy presentation / Comments & Recommendations 5

Dear Sarah,

I have been a resident of West Hollywood for 37 years, well before it actually became West Hollywood. I am writing to you to express my extreme disapproval of the proposed signage and billboard initiative.

Please do not conflate the anticipated revenue from these soulless projects with public benefit. Just reading that takes my breath away. As residents we have watched the charming and lovely city we love and care about be destroyed by "development" that our City Hall has enabled, at the cost of our quality of life. How ironic that we can no longer see the sunset from Sunset Blvd. Our once expansive views are blocked by the hideous "Soviet bloc" development on Sunset. Traffic prevents us from both getting home and leaving it. We are creating a microcosm of climate change in our city.

Edison can't even keep the power from failing on Larrabee Street on hot days and nights; how do The City and our public utilities propose to provide the huge resources of energy to fuel these buildings and signs on the Strip? With what we know about the irreversible damage from climate change, it's rather obscene for the "Progressive City" to flaunt its greed and carelessness.

The City is sabotaging the very nature of West Hollywood with its misguided policies and relationships with commercial and residential developers and signage companies. What is being created is a city for a transient population of business workers, tourists and nightclubbers, who have no real vested interest in West Hollywood. I question the commitment and motives of everyone at City Hall at this point.

Just as the Resistance movement is growing in this country, it is gathering momentum in West Hollywood.

We trust that you will do the right thing for the city and its residents, for the present and for the future, but we will not trust blindly.

Many thanks for giving us the forum to voice our opinions.

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

----- Forwarded Message -----

K-1
K-2
K-3

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

From: "Elyse Eisenberg" <elyse.eisenberg@gmail.com>
To: "WeHo Heights NA, Elyse Eisenberg" <wehoheights@gmail.com>
Subject: Summary of 4/18 WeHo Billboard / Signage Policy presentation / Comments & Recommendations 5
Date: Sat, 22 Apr 2017 20:15:09 -0700

<Please note that comments on the Signage/Billboard Policy should be sent to Sarah Lejeune at slejeune@weho.org. >

Sarah – please include this email in all agenda packets.

Hi All,

Good turnout / room filled. About 25 people from all over WeHo, the hills above Sunset, a couple people representing billboard companies and WeHo staff - Long Range Planning execs Bianca Siegl, Rachel Dimond and presenter Sarah Lejeune.

Fine presentation by Sarah of history of Strip billboards, current and proposed Strip signage policy. Discussion of well-known issues with digital displays – glare, dimming, frequency of changes, max square footage. Tall walls will not be digital. Space for public art, which is also current policy.

Public comment – Don't think it's out of turn to say that the residential attendees were unanimously opposed to an increase in billboards and vehemently opposed to digital billboards. Support for billboards appears to come exclusively from those who stand to profit, including the city and artists whose work might be used.

Comments were along the lines of "we don't want to be Vegas", increased driving hazards, and concerns about digital display distractions adding to traffic crawl. One attendee had authored a study on the dangers of digital billboards to driving safety.

The proposed new total (24) digital billboards within fifteen years was considered beyond excessive given that we have not yet reached the four (4) allowed in the last 20 years under the existing policy.

Staff noted that the city now receives revenue from billboards through Development Agreements. Pre these agreements (and no revenue to the city), there was greater regulation of billboards. The city's position is that the additional revenue generated by the billboards is a public benefit.

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

Summary:

While this is just a first proposal for an updated signage policy, the unfortunate reality is that the city will increase billboards along the Strip regardless of public opposition.

However, we have an opportunity to weigh in on the public benefit. While I recommend that interested parties submit their own comments, these are mine.

EDE Comments:

NUMBER OF BILLBOARDS - Recognizing the city is likely to approve the full twenty (20) billboards proposed anyway, I would request that digital billboards be limited to a total of eight (8), whether new or conversions. This would double the current number of digital billboards. I think this is a reasonable compromise and the city would still get their twenty new billboards.

PUBLIC BENEFITS - This city has always been a leader in its support for many commendable causes including and not limited to Seniors, Disabled, the LGBTQ community, disenfranchised communities and others. It has generously supported the arts and many other worthwhile causes. The revenues to support these ventures come from the city's economy and are budgeted accordingly.

How about supporting citizens just because we are residents and neighbors? Revenues generated by Development Agreements for the Sunset Strip projects should directly benefit the Strip and its residential areas. The following are some areas where these revenues could and should be directed:

TRAFFIC SIGNAL TIMING – TOP PRIORITY!!! If a congested city like NYC can manage to get Madison Ave, Fifth Ave and Broadway to flow from one end of the city to the other during Rush Hour, then we should be able to figure out how to get our 1.6 miles of the Strip to work. Why can't the lights be synchronized and coordinated with Beverly Hills on the West and LA on the East so they flow like dominos and a car could drive non-stop from one end of the city to the other? As soon as we cross the borders on each end of the Strip, the traffic immediately eases up, so the long-time canard by city officials of it being pass-through traffic simply doesn't hold up. The posted speed limit is 35 mph. That should take 2:45 min. At 25 mph, 3:50 min. We can and should do better than the all-too-often 30-45+ min.

VALET PARKING STANDS – If the city isn't going to invest in Municipal Parking lots every couple of blocks along Sunset as Beverly Hills, Santa Monica and Culver City did to great success in reviving their downtown areas and encouraging an active social scene – Culver City being an especially noteworthy recent success, then perhaps they will consider Valet Parking Stands on every block, the way Abbot Kinney has very successfully done - <http://www.abbotkinneyblvd.com/visit-1/> . Our Sunset Strip BID and Chamber of Commerce could do a better job promoting the restaurants and clubs along the Strip the same way. No matter what the city says about

the future being fewer cars, the future hasn't yet arrived. Too many people aren't coming to the Strip because of lack of adequate parking, too expensive parking, and congestion. Not to mention the non-stop construction. If they want the Strip to be a walking area, this concept of dropping the car off at one valet stand and picking it up at another is a great idea. We are very supportive of a revitalization of the Strip as a restaurant and club row the way it used to be. We don't believe that monster hotels on every block will achieve this goal, and is in fact antithetical to this goal. Another thing to note about all the other cities' successes is the low-scale of their walking areas, not surrounded by intimidating hi-rise sterile towers.

THE STRIP PICKUP – Santa Monica Blvd has one. Where's ours? Back in 1996, the SSP said that there would be a bus that makes the rounds from one end of the Strip to the other to support the nightlife-walking crowd. We need one for the same reason SMB does.

STREETSCAPE – It was only ten years ago when the city upgraded Sunset, an oxymoron if there ever was one. While \$26M was spent exquisitely upgrading SMB, only \$5M was spent on Sunset – arguably one of the most famous boulevards in the country. And most of that was spent on just resurfacing the street with half the money coming from Obama's TARP funds. It's time the city devoted as much attention to the Strip as it does to SMB, besides looking at it as just a piggy bank.

Does anyone remember when Sunset Blvd from Doheny to Sunset Plaza was filled with beautiful 50' green leafy trees? A lush boulevard as far as the eye could see. Now a distant memory as we look at a sun-baked bleak stretch of desolate roadway filled with the mostly dead or bare, scraggly trees that replaced them. Who thought deciduous (winter-dormant) trees in our S. California climate were a good idea? None of the replacement trees that have survived have grown three feet in the past ten years. It is time to refurbish this landscaping with better-suited trees. We would like to have meaningful input which we did not have last time – and not for lack of trying.

SIDEWALK POWERWASHING – Quarterly please. From Doheny to Sunset Plaza.

WEHO HEIGHTS NEIGHBORHOOD SPECIFIC

STREETLIGHTS – More lighting on all five streets. Sherbourne is the worst.

TRAFFIC CALMING – Ideas please?

DOG POOP STATIONS – More please

NEIGHBORHOOD WATCH GROUPS – There are 17 such groups in the city. We sponsor the National Night Out block parties, neighborhood Annual Meetings, host websites, and other activities. These events are usually supported by individual volunteers or homeowner associations with occasional contributions from nearby

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

businesses, depending on the event. Some neighborhoods are larger than others. Our WeHo Heights NA represents 1,000+ homes and is one of - if not the - the largest in the city. It adds up.

We would like to see a line-item added to the Annual Budget for "Neighborhood Watch Group Entertainment Expenses" in the amount of \$50,000 (~\$3,000/neighborhood). Groups could submit expenses on an annual or semi-annual basis to the Neighborhood Watch Coordinator for reimbursement up to a maximum ceiling depending on neighborhood size. Any funds not used would be put towards the next year's budget. We can worry about inflation at a later date. This would be a much fairer system than the burden of these good-will functions falling on condo associations, homeowners and individuals.

Lastly, when is FREE WIFI FOR ALL coming to WeHo? Over 70 cities in the US already offer free Wifi, including seven in CA. Santa Monica has it. We heard that it was in the works here.

That's it for now.

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Response to Comment Letter K

Mary Reardon
April 23, 2017

K-1 This comment expresses general opposition to the proposed project. The commenter describes their perspective of existing conditions in the area and expresses concerns regarding their loss of views, negative effects on quality of life, and traffic issues. The commenter also states that the City should not conflate the revenue from billboards with public benefits.

This comment does not contain specific concerns regarding the proposed project or the adequacy of the environmental analysis in the IS/ND. No response is necessary. The commenter's general opposition to the project, their concerns regarding the existing conditions in the area and changes that have occurred in the past, as well as their concerns regarding public benefits will be included as part of the Final IS/ND for review and consideration by decision makers.

K-2 This comment expresses concern that public utilities will not be able to supply new development and billboards along the Sunset Strip with energy. The commenter also expresses concerns related to climate change.

Design and construction of new billboards and buildings along the Sunset Strip would involve coordination with the public utility regarding the availability of service. Regional energy infrastructure is beyond the scope of this proposed policy. Section 3.7 of the IS/ND addresses the potential effects of the proposed policy relative to climate change. As explained in Section 3.7 of the IS/ND and in the proposed policy, the City would require all digital billboards to offset their increase in energy use with renewable energy. Potential impacts related to greenhouse gas emissions were evaluated in the IS/ND and were determined to be less than significant.

K-3 This comment a general concern regarding City policy, developers, and signage companies.

This comment does not specifically address the proposed project or the adequacy of the environmental analysis in the IS/ND. However, these comments regarding policy direction, developers, and signage companies will be included in the Final IS/ND for review and consideration by decision makers.

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Comment Letter L

From: traderdb@aol.com [mailto:traderdb@aol.com]
Sent: Monday, April 24, 2017 5:39 PM
To: Sarah Lejeune
Subject: re public notice on Sunset Strip Off-sight Sinage

West Hollywood Development Department,

Adding more Off-site signage to the ongoing commercialization of The Sunset Strip is very distressing..

The phrasing "public art, new technology, attract and welcome visitors" belies the further deterioration of the historically famous sophistication of the Strip.

The garish results would add to the light pollution and traffic distraction and does not, in any way encourage the quality of visitors that the local businesses need.

My neighbors and I feel there has already been a significant "negative impact" on the area...

Please do not add to it.

Don Behrstock
1394 Miller Dr.
L A 90069

L-1
L-2

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Response to Comment Letter L

Don Behrstock

April 24, 2017

- L-1** This comment expresses concern regarding new off-site signage on Sunset Strip. The commenter further states that using the phrases “public art,” “new “technology,” and “attract and welcome visitors” do not recognize the deterioration that could occur. The commenter also references the “historically famous sophistication of the Sunset Strip.”

The commenter’s concerns regarding new off-site signage along the Sunset Strip will be included in this Final IS/ND for review and consideration by decision makers. The proposed policy has a public art component with requirements for arts programming (see Appendix A). The off-site signage on the Sunset Strip is currently governed by the 1996 Sunset Specific Plan (SSP) and the Zoning Ordinance. The proposed project would update and modernize the City’s signage policy for the Sunset Strip. As described in Section 2.2 of the IS/ND, one of the goals for the proposed project is to create a framework to better address new sign proposals and new technology.

While the City has recognized a need for the proposed policy, it also formulated the proposed policy with consideration of light trespass, roadway hazards, and climate change, among other environmental effects. The City obtained studies and recommendations for lighting regulations and regulations that would limit the aspects of digital imagery that contribute to driver distraction (see Appendix D and Appendix E). The City also conducted a complete environmental analysis of the proposed policy, contained in this IS/ND. While the analysis in the IS/ND identifies that some changes would occur in the project area, impacts on the environment were determined to be below a level of significance under CEQA. Regarding the “historically famous sophistication of the Sunset Strip,” this issue is not specifically addressed under CEQA. However, CEQA does require evaluation of effects to historic resources (see Section 3.5(a) in the IS/ND). As explained in that section, impacts were determined be less than significant. See also Response D-2, which discusses view obstruction of landmarks, and Response D-5, which discusses issues related to quality of life.

- L-2** This comment expresses concerns regarding light pollution and traffic distraction. The commenter also states that the project would not encourage the “quality of visitors that the local businesses need” and states that a significant negative impact has already occurred in the area.

See Response B-1 for concerns regarding light trespass and Response B-2 for concerns regarding driver distraction. The “quality of visitors” along the Sunset Strip is not an issue that is addressed under CEQA and no further response is required. (See Section CEQA Guidelines, Section 15131, which provides that economic or social effects shall not be treated as significance effects on the environment.)

The commenter does not note any specific “significance negative impacts” that the neighborhood is already experiencing. However, as noted in the response to Comment Letters D and H, the existing conditions along Sunset Strip are considered as part of the baseline environmental conditions against which the potential effects of the proposed project were analyzed. See Response D-5 and O-6 for a discussion of the potential effects of the proposed project on the surrounding neighborhood and for information regarding how those effects were addressed in the IS/ND. The commenter’s opposition to the project and their concerns related to light pollution, driver distraction, type of visitor, and existing negative effects to the neighborhood will be included in the Final IS/ND for review and consideration by decision makers.

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

Comment Letter M



April 25, 2017

Sarah Lejeune
Contract Senior Planner, Long Range Planning and Mobility
Community Development Department
City of West Hollywood
8300 Santa Monica Blvd
West Hollywood, CA 90046

Dear Sarah,

Thank you for taking the time to meet with our Governmental Affairs Committee (GAC) to present the proposed new off-site signage policy for Sunset Boulevard. We are excited to be able to showcase new and exciting creative regions of the globe and appreciate you working with us to ensure that the Sunset Strip remains at the forefront of innovation.

On behalf of our GAC members, I wanted to express some concerns that we had as a group with respect to the negative declaration, and to share comments, concerns and suggested alternatives. These queries were collected from companies that serve on our West Hollywood Billboard Committee, an ad hoc task force to our GAC who share an interest as key stakeholders in this industry. These include all billboard operators in West Hollywood, tall wall property owners, and consultants who represent hotels, private clubs and commercial properties.

The following is a summary of concerns, comments and questions agreed by consensus from all entities present. Note that they do not include any individual company's concerns independent of the committee.

Public Art Component: This is a worthy cause and would be a cool feature for our City, however we need a better understanding of how it would work in practice. For instance:

- What is the timeframe?
- Why 25% and not for instance, 10%?
- The high percent of advertising space is a major concern and devalues the signage.
- How would 25% of Traditional billboards work?
- A central operating control for the digital signs belonging to multiple businesses is cause for concern among multiple competing businesses. Aside from competing issues, such a mechanism raises security concerns and would make digital signs vulnerable to hacking.

The Lottery: We need to understand the process. To date, there has been no explanation of how this will work, other than that the lottery process will be conducted over several years between now and 2032. We need to have the details of the lottery system to determine the legality of such a process.

- Where did the limit of 20 derive from?
- Is 20 in fact the right number for Sunset Strip?

Page | 1

M-1

Tall Walls: A delightful and wonderful addition to Sunset Strip landscape.

- Why are no new tall walls envisioned or permitted?
- What is this decision based on?

Illumination: The document has a couple of different illumination standards. We recommend using the OAAA guidelines for digital light illumination which is .3 foot candles over ambient light measured by set distances.

- Why 20 minutes for timing of light? Should be automatic to account for changing ambient light conditions.
- Why is the refresh rate 16 seconds in lieu of the normal 8-second standard in digital advertising? This will not only reduce the value of advertising, thereby restricting revenue to cultural resources, but is not an industry norm and will require complex fine-tuning.

No Standard Sizes: Changing the size and structure of a billboard does not, in and of itself, make a billboard more creative. It is the advertising which can be innovative or horrid whether on standard or customized structures.

- Why does the city not want standard sizes? The industry can still be creative using standard sizes.
- Do conversions need to abide by vertical and non-standard sizes?
- Why is only vertical permitted in the draft proposal?

Other:

- What is the difference between animation and live action?
- Why only 1 conversion to digital per region?
- Is the Operation Fee the same as the Negotiated Community Benefits in each Development Agreement? If not, what is envisioned for the Operation Fee?
- Incorporate text which allows the relocation of existing signage without triggering a new approval process.

Thank you for your time and we look forward to hearing from you.
Best regards,



Genevieve Morrill
President and CEO

Cc: City Council members
Paul Arevalo, City Manager
City Planning staff
WHCC Billboard Committee
WHCC Chair, Keith Kaplan

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Response to Comment Letter M

West Hollywood Chamber of Commerce
Genevieve Morrill, President and CEO
April 25, 2017

M-1 This comment consists of questions and concerns on the proposed policy that are being posed to the City by a group of billboard operators, tall wall property owners, and consultants representing hotels, clubs, and commercial properties.

The questions and concerns listed in this comment pertain to the details of the public art component of the proposed project, to the selection processes that would be used to select billboard applications, and to tall wall signs. These aspects of the proposed project are characterized generally in Chapter 2.0 of this IS/ND. However, the specific requirements and logistics of the public art components and the selection process, and the prohibition from adding new tall wall signs to the Sunset Strip do not pertain to the adequacy of the environmental analysis in the IS/ND. This questions and concerns, however, will be included in the Final IS/ND for review and consideration by decision makers.

M-2 This comment recommends a different lighting standard for digital billboards. It also questions the requirements for digital billboard lighting to gradually change over the course of 20 minutes, stating that changing in lighting should be automatic. This comment also questions the required refresh rate of 16 seconds, stating that 8 seconds is the standard and that the longer refresh rate would reduce the value of advertising.

The lighting standards in the proposed policy have been evaluated for their effectiveness in reducing light trespass to light-sensitive receptors and in minimizing the aspects of digital imagery that may be distracting to drivers. Section 3.1(d) of the IS/ND and Section 3.16(d) of the IS/ND evaluate the effectiveness of these standards at reducing these potential effects. As described in Sections 3.1(d) and 3.16(d), effects were determined to be less than significant, upon implementation of the proposed lighting standards. Appendices D and E have been added as part of the Final IS/ND to further explain and substantiate the standards that have been included in the proposed policy to regulate digital imagery. The policy recommendations provided by the commenter would not be necessary to reduce or avoid a significant environmental effect, since none were identified for the proposed project. Nonetheless, the commenter's suggestions will be included as part of this Final IS/ND for review and consideration by decision makers.

M-3 This comment consists of concerns regarding the requirements for non-standard billboard sizes and poses an additional list of questions and suggestions related to the proposed policy.

The concerns and suggestions contained in this comment do not pertain to the adequacy of the environmental analysis in the IS/ND. These questions and suggestions, however, will be included in the Final IS/ND for review and consideration by decision makers.

Comment Letter N



April 27, 2017

Sarah Lejeune
Community Development Department
City of West Hollywood
8300 Santa Monica Blvd
West Hollywood, CA 90069-6219

RE: Notice of Intent to Adopt a Negative Declaration

Dear Ms. Lejeune:

Thank you for the opportunity to comment on the Notice of Intent to Adopt a Negative Declaration for the proposed Sunset Strip Off-Site Signage Policy (Project). It is our understanding that the Project area consists of the portion of Sunset Boulevard extending west to east from Sunset Hills Road to Havenhurst Drive in the City of West Hollywood and the Project would amend the zoning code and Sunset Specific Plan to allow new billboards in the project area and could include 18 new sign faces, 17 of which could be digital signs.

Due to the Project's close proximity to the City of Beverly Hills boundary, there is a potential that the City of Beverly Hills and its residents could experience negative impacts as a result of the installation of new billboards. Billboards (specifically digital billboards) allowed in Zone 1 of the West Region of the project area have a potential to cause light and glare impacts to properties in the City of Beverly Hills.

The Initial Study indicates that nine potential new billboards could be allowed in the West Region of the project area and three potential new digital billboard faces could be allowed in Zone 1 of the West Region of the project area. The City of Beverly Hills is concerned about potential light and glare impacts from converted and new digital billboards that face residential properties located in the City of Beverly Hills, especially any billboards that would be allowed in the portion of the project area bounded by the

N-1

Department of Community Development, 455 N. Rexford Drive, Beverly Hills, California 90210 p (310) 285-1141 f (310) 858-9166 BeverlyHills.org

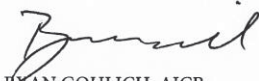
Sunset Strip Off-Site Signage Policy
April 27, 2017
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western project boundary, Phyllis Street, Corey Avenue, and Doheny Road, as this area is immediately adjacent to residential properties. Therefore, the City of Beverly Hills is requesting that no digital billboards be allowed to face residential areas in the City of Beverly Hills and no digital billboards be allowed west of Corey Avenue in order to minimize the potential light and glare impacts on residential properties.

Thank you again for this opportunity to provide input on the environmental review of the Project. Please continue to provide the City of Beverly Hills with notifications regarding the environmental or entitlement review of any billboards that are proposed in the Western portion of the project area.

If you have any questions regarding this letter, please feel free to contact Timothea Tway, Senior Planner, at (310) 285-1122 or by email at ttway@beverlyhills.org.

Sincerely,



RYAN GOHLICH, AICP
Assistant Director/City Planner
Community Development Department

cc: Mahdi Aluzri, City Manager, City of Beverly Hills
George Chavez, Assistant City Manager, City of Beverly Hills
Susan Healy Keene, AICP, Director of Community Development, City of Beverly Hills

Department of Community Development, 455 N. Rexford Drive, Beverly Hills, California 90210 p (310) 285-1141 f (310) 858-9166 BeverlyHills.org

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Response to Comment Letter N

Beverly Hills Community Development

Ryan Gohlich

April 27, 2017

N-1 This comment expresses concerns regarding light trespass and glare impacts on residential properties in the City of Beverly Hills. The commenter has specific concerns regarding digital billboards that would be allowed in the portion of the project area bound by the western project boundary, Phyllis Street, Cory Avenue, and Doheny Road. The City of Beverly Hills requests that no digital billboards be allowed to face residential areas in the City of Beverly Hills and that no digital billboards be allowed west of Cory Avenue.

First, it is noted that the area of Sunset Boulevard that is bound by Phyllis Street, Cory Avenue, and Doheny Road is surrounded to the north and southeast by properties within the City of West Hollywood. As such, it is unlikely that future digital billboards would be located adjacent to residential properties within the City of Beverly Hills. Furthermore, none of the existing billboard sites located near the City's border with Beverly Hills (namely, 9255 Sunset Boulevard, 9200 Sunset Boulevard, and/or 9229 Sunset Boulevard) currently contain cultural resources eligible for historic designation; as such, these sites would not be eligible for a digital conversion based on the current list of potentially eligible resources (see Response O-6 for details). Therefore, under current conditions, any digital billboards in the area bounded by the City's western boundary, Cory Avenue, Phyllis Street, and Doheny Road would be subject to further review under CEQA. During project-specific CEQA review, the City of Beverly Hills would be able to submit any specific concerns to the City of West Hollywood regarding billboard design, orientation, and proposed lighting levels.

It should be noted that under existing conditions, billboards along the Sunset Strip are generally oriented so that they face westbound or eastbound travelers along Sunset Boulevard, and digital billboards would be prohibited from directly facing onto Sunset Boulevard. As such, it is unlikely that a future digital billboard at the properties of 9255 Sunset Boulevard, 9200 Sunset Boulevard, or 9229 Sunset Boulevard would be oriented towards residential properties within the City of Beverly Hills. Furthermore, the proposed policy includes lighting regulations that would minimize light trespass and glare impacts on residential sensitive receptors. The light and glare impacts of the proposed policy were determined to be below a level of significance (see Section 3.1(d) of the IS/ND). While impacts on residential receptors were determined to be less than significant, the City of Beverly Hills' request to prohibit digital billboards west of Cory Avenue and to prohibit digital billboards from facing residential areas in the City of Beverly Hills will be included in this Final IS/ND for review and consideration by decision makers.

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

Comment Letter O



TIMOTHY J. CARMEL¹
ZIYAD I. NACCASHA²
MICHAEL M. MCMAHON
DAVID H. HIRSCH
MARA J. MAMET
HEATHER K. WHITHAM
EMILIE K. ELLIOTT
DALLAS K. MOSIER
BRIAN J. STACK

OF COUNSEL
ALICIA M. GAMEZ

¹ ALSO ADMITTED IN NEVADA
² ALSO ADMITTED IN ILLINOIS

April 27, 2017

Via Email Only

tcarmel@carnaclaw.com

City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, California 90069
Attn: Sarah Lejeune

RE: Sunset Strip Off-Site Signage Policy Negative Declaration

Dear Ms. Lejeune:

This letter is submitted on behalf of Jose Villanueva in response to the Initial Study/Negative Declaration (the "ND") prepared for the City of West Hollywood's (the "City") proposed Sunset Strip Off-Site Signage Policy (the "Policy"). There are numerous deficiencies in the ND's analysis of the Policy and how the ND may be used for specific sign proposals in the future. In addition, the City's preparation of a Negative Declaration for the Policy is wholly inconsistent with past City representations that a comprehensive Environmental Impact Report ("EIR") was required and would be prepared for the Policy. In fact, the City has routinely prepared Mitigated Negative Declarations for **single non-digital** billboard proposals, thereby acknowledging that individual billboards have the potential to cause significant environmental impacts unless mitigation is implemented. Inexplicably, the City's adoption of the Policy would facilitate **dozens** of new digital signs throughout the City, and yet **absolutely no mitigation** is required under the ND.

As demonstrated below, through the ND, the City is improperly attempting to preemptively avoid any further analysis of project-specific impacts from future billboard modifications ("Modifications") or the conversion of traditional billboards to digital billboards on sites with designated cultural resources ("Digital Conversions"). In addition, substantial evidence supports a "fair argument" that the Policy may have significant impacts on the environment in the areas of aesthetics and traffic. Therefore, pursuant to the California Environmental Quality Act, Public Resources Code Sections 21000 *et seq.* ("CEQA"), the preparation of an environmental impact report ("EIR") is required in order to adequately analyze the Policy's potentially significant adverse environmental effects. Finally, the ND impermissibly defers the analysis of new billboards that would be permitted under the Policy, including 17 new digital sign faces that will be integrated into new development or façade remodels. The City's failure to evaluate the entirety of potential impacts under the Policy constitutes illegal piecemeal review. These issues are discussed in detail below.

O-1

O-2

O-3

O-4

SAN LUIS OBISPO OFFICE: 1410 MARSH STREET • SAN LUIS OBISPO, CA 93401 • TEL: 805.546.8785 • FAX: 805.546.8015
PASO ROBLES OFFICE: 1908 SPRING STREET • PASO ROBLES, CA 93446 • TEL: 805.226.4148 • FAX: 805.226.4147
WEBSITE ADDRESS: WWW.CARNACLAW.COM

City of West Hollywood
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April 27, 2017

CARMEL & NACCASHA LLP

I. The Negative Declaration Attempts to Preempt Further Analysis of Billboard Modifications and Digital Conversions

The City has presented conflicting information to the public regarding the scope of project-specific CEQA review under the Policy. The ND repeatedly states that no further CEQA review would be required for Digital Conversions or Modifications, including those that would allow for increased sign area, increased sign height, and on-site relocation of existing billboards. (ND at pp. 20-21.) However, the April 24, 2017 Staff Report to the Historic Preservation Commission regarding such Digital Conversions *directly contradicts the ND* and states that “[e]ach individual project involving a cultural resource will be subject to additional environmental review, as is contemplated in the IS/ND for the Sunset Billboard Policy Project.” (Staff Report at p. 3.) The City must clarify its intent. See *Laurel Heights Improvement Ass’n. v. Regents of Univ. of California* (1988) 47 Cal.3d 376, 392 (holding that CEQA is a statute of accountability, and the decisionmakers and the public must be adequately informed of the environmental impacts of a proposed project).

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Notwithstanding this fundamental inconsistency, it appears that the City intends to allow Digital Conversions and Modifications to rely on the ND for subsequent City discretionary approvals and thereby avoid project-specific environmental analysis. However, the ND broadly defines the project area as the 1.6 mile Sunset Strip and does not evaluate any specific Digital Conversions and Modifications. Public Resources Code Section 21060.5 states that for purposes of CEQA review, the “environment” includes the “physical conditions which exist within the area which will be affected by a proposed project....” When assessing the potential significant impacts of a particular billboard, especially with respect to some aesthetic, traffic, and land use consistency issues, the use of such a broad project area will necessarily understate the significant impacts of such a project on its immediate surroundings. Here, there is no basis to conclude that for all subsequent Digital Conversion or Modification allowed under the Policy that the “area affected by the proposed project” should include areas beyond the immediate vicinity of the sign, such as the larger Sunset Strip, because such areas are generally not affected.

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In the absence of any illustrative analysis for a Digital Conversion or Modification project proposal that can be evaluated based on its specific design, location, size, and other features, which the ND fails to even attempt, the ND cannot reach a definitive conclusion regarding the potential environmental impacts of the Digital Conversions and Modifications that could occur under the Policy. In addition, to the extent that the City intends to “tier” the CEQA review for any future approvals of Digital Conversions, Modifications or any other signage, such programmatic tiering is not authorized under CEQA. Instead, tiering is only authorized where an EIR, not an ND, was prepared for the underlying policy document. CEQA Guidelines Section 15152. Therefore, any such reliance on the ND by a future project would be impermissible. As explained below, the ND suffers from this fatal flaw, insofar as it attempts to evaluate the Policy’s impacts without considering any specific signage project or its unique geographical context.

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II. The ND's Conclusions Concerning the Policy's Environmental Impacts Are Not Supported by Substantial Evidence

A fundamental objective of CEQA is for the public and decision-makers to be adequately informed of the significant environmental impacts of a project. *See Laurel Heights Improvement Ass'n., supra*, 47 Cal.3d at 390, 392. CEQA must be interpreted broadly to afford the fullest possible protection to the environment. *Id.* Here, the ND fails to appropriately evaluate potentially significant impacts of the Policy because the "analyses" are not supported by substantial evidence, in violation of CEQA.

In adopting the ND, the City's determination that the Policy will not have any significant environmental impacts must be supported by substantial evidence. *Center for Sierra Nevada Conservation v. County of El Dorado* (2012) 202 Cal.App.4th 1156, 1170. If there is substantial evidence of a potentially significant environmental impact, contrary evidence is not adequate to support a decision to dispense with an EIR. *See Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 777. A lead agency's decision to prepare an ND, as opposed to an EIR, is reviewed under the fair argument test. *See Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332. The fair argument standard is a low threshold for requiring the preparation of an EIR, and "any substantial evidence supporting a fair argument that a project may have a significant effect" on the environment requires the preparation of an EIR. *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 113.

As discussed below, the ND lacks substantial evidence to support its conclusions regarding the Policy's potentially significant impact on the environment.

a. The Policy May Cause Significant Aesthetic Impacts

The ND concludes that under the Policy, Digital Conversions and Modifications will not have significant aesthetic impacts. However, the ND's analysis of the Policy's aesthetic impacts primarily consists of conclusory, unsubstantiated statements, inappropriate assumptions, and leaps in logic. By way of example:

- The ND claims that the Policy will not have a substantial adverse effect on scenic vistas on the grounds that "new billboards and modifications to existing billboards undertaken pursuant to the proposed [Policy] are not anticipated to substantially alter existing public views." (ND at p. 33.)
- With respect to degradation of the existing visual character or quality of the "project site" and its surroundings, the ND asserts—without any basis—that Digital Conversions "would not substantially degrade the visual character or quality of the project area." (ND at p. 36.)
- The ND further asserts that Digital Conversions "alone would not have the potential to substantially alter the shade or shadow cast by an existing billboard structure, since conversion of an existing static sign to a digital sign face would not alter the size of the billboard." (ND at p. 38.)

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- With regard to creating a new source of substantial light or glare that would adversely affect day or nighttime views in the area, the ND alleges that in light of proposed lighting regulations set forth in the Policy, “modified billboards and new billboards are not expected to produce light or glare to the extent that daytime or nighttime views are adversely affected.” (ND at p. 46.)

However, without any information regarding the location, design and characteristics of future Modifications or Digital Conversions, there is no basis to preemptively reach these conclusions that Digital Conversions and Modifications will not have a significant impact. Moreover, the fact that there are existing billboards located throughout the Sunset Strip does not mean that new signage – especially digital signage – won’t substantially degrade the visual character or quality of the project area or produce significant light or glare. In the past, the City revoked the permit for video signage (pursuant to Resolution No. 05-3266) at the former Tower Records on the grounds that the signage caused significant glare and other aesthetic impacts on nearby properties, including the disruption of employees at nearby offices, thereby constituting a nuisance. (See Exhibit A.) As part of the revocation proceedings, sixteen members of the public provided testimony regarding the impacts of the video displays. This is substantial evidence that notwithstanding existing billboards on the Sunset Strip, new digital signage does cause significant adverse aesthetic impacts.

In addition, the ND concedes that in the 1.6 mile project area “there are residences within and near the project area, some of which are located as close as 50 feet of existing billboard sites. The project area also contains one park (the William S. Hart Park and Off-Leash Dog Park), and there is one billboard structure adjacent to this park. Due to the commercial nature of the project area, there are also numerous offices along the Sunset Strip.” (ND at pp. 118.) There is no analysis whatsoever concerning how Digital Conversions or Modifications would impact these sensitive uses. Yet, it appears that under the ND, the City contemplates approval of increased sign area, height or relocation of signage near residences or a park without further CEQA review. This defies logic.

Moreover, the ND’s reliance on future billboard projects’ compliance with regulations related to lighting and view obstructions is inadequate for the purpose of environmental review. It is settled CEQA case law that mere conformance with code provisions is an insufficient basis for an impact determination where there is other evidence pointing to a likely impact. Given the ND’s conclusory analysis, the public has not been informed about the true ramifications of the Policy’s aesthetic impacts. In addition, any future reliance on the ND for Modifications or Digital Conversions would be improper.

b. The Policy May Cause Significant Traffic Impacts

The ND also lacks substantial evidence for its conclusion that the Policy would not have significant traffic impacts resulting from increased hazards due to a design feature. The ND’s deficits in this respect are as follows:

- The ND asserts that the Policy “is *not anticipated* to substantially increase roadway hazards” because “the Sunset Strip is a vibrant corridor with numerous existing billboards, onsite signs, entertainment venues, pedestrians, and an overall high ambient lighting level” and “additional digital imagery, new off-site

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signs, and periodic arts programming on the Sunset Strip would be consistent with the area's overall character." (ND at pp. 139-140.)

- The ND further states that new visual elements "would be integrated into the existing visual context and are not anticipated to result in a substantial change relative to existing conditions such that new roadway hazards would result." (ND at p. 140.)

It is not sufficient under CEQA to simply state that the Sunset Strip already contains billboards, that billboards contribute to the vibrant character of the Sunset Strip, and that any Digital Conversion or Modification, irrespective of context or design, would simply do the same. This reasoning fails to acknowledge that the project area currently has only two digital signs and the Policy would facilitate an increase in the total number of digital signs on Sunset Boulevard to 24. (See ND at p. 140.) This is a dramatic change in the area's overall visual character. The Policy will allow an expansion of digital billboards that is entirely inconsistent with the existing physical environment. Moreover, the fact that there may be substantial pre-existing signage over the 1.6 mile project area is not a proper basis to conclude that the Policy's impacts would be less than significant.

Moreover, the overall visual character of the 1.6 mile project area is not the sole issue in evaluating whether a particular Digital Conversion or Modification will have a significant traffic impact resulting from increased hazards due to a design feature. For example, the ND fails to describe the extent of vehicular and pedestrian traffic on and across Sunset Boulevard, including significant pedestrian activity at unsignalized crosswalks.

These and other specific site characteristics must be considered in order to reach any conclusion regarding traffic hazards caused by new signage allowed under the Policy. The nature of digital signage is such that roadway hazards can only be properly analyzed in the context of project-specific information that accounts for, among other factors, the specific roadway and streetscape infrastructure and sightlines, location of traffic signals, and pedestrian and vehicular traffic in the immediate vicinity of a proposed digital billboard. Without analyzing a definite signage proposal for a specific site, the ND's conclusions regarding traffic hazards are meaningless.

By substantially expanding digital signage on the Sunset Strip, the Policy will have a significant impact on traffic safety by increasing the risks of distracted driving. There is scholarship showing that some billboards can contribute to distracted driving and increase the potential for accidents. For example, an article in the *Proceedings of the Institution of Civil Engineers, Municipal Engineer* concluded (1) that the adverse effects of billboards are real and situational, and (2) that too much visual clutter can interfere with drivers and lead to accidents.¹ Digital signs have been shown to be dangerous if they confuse and distract drivers, causing them to focus on the billboards rather than the road. A study by the National Highway Traffic Safety Administration and the Virginia Tech Transportation Institute found that approximately 80 percent of automobile crashes and 65 percent near-crashes involve driver inattention. Drivers are often already distracted by their cell phones, putting themselves and

¹ See "Driver Distraction by Advertising: Genuine Risk or Urban Myth?" in *Proceedings of the Institution of Civil Engineers, Municipal Engineer* (Vol. 156, Issue 3, September 2003).

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others in danger. The proliferation of digital billboards could increase the number of accidents and deaths caused by driver inattention even more. Moreover, studies have also found that the risk of an accident increases when drivers are distracted for more than two seconds.

Attached as Exhibit B are multiple expert studies and articles providing substantial evidence relative to the aforementioned concerns. The ND fails to adequately evaluate the extent to which the Policy will increase the risk of driver distraction caused by an increased number of digital signs.

In sum, the ND simply (and wrongfully) assumes that “while the implementation of the [Policy] would alter the visual environment along the Sunset Strip, the [P]olicy sets forth numerous requirements that would prevent its implementation from resulting in increased roadway hazards.” (ND at p. 143.) The point bears repetition: without knowing the specific billboard design, location, and operating characteristics of a proposed billboard, there is simply no basis for concluding that whole categories of signage would not cause hazards, including those arising from driver distraction. *See, e.g., Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 730 (holding that personal observation testimony about dangerous road conditions constituted substantial evidence in support of a fair argument concerning potentially significant traffic impacts).

III. The Negative Declaration Fails to Evaluate The Totality of Impacts Facilitated by the Policy

The adoption of the Policy is a project under CEQA. CEQA Guidelines § 15378 (a)(1); *See also Black Property Owners Assn. v. City of Berkeley* (1994) 22 Cal.App.4th 974, 985. CEQA requires the analysis of the “whole of an action,” which, here, includes development or other activities that will result from the Policy. CEQA Guidelines §§ 15378 (a), (c). CEQA Guidelines § 15378 (a)(1). Therefore, under CEQA, the City must evaluate the general, City-wide environmental impacts of the Policy and all signage that could be developed pursuant to the Policy. Only then can the public be adequately informed of the wholesale environmental degradation that could be caused by the massive influx of digital signage into the City. The ND is entirely devoid of any analysis of the impacts of new billboards installed in connection with new developments or façade remodels (including up to 17 new digital billboards) or the deleterious cumulative effects of all of the potential new signage and other development that will occur under the Policy.

For example, the Policy encourages the *development of high rise projects throughout the Sunset Strip* by establishing favorable treatment – through lucrative off-site signage rights-to fund high-density towers. Specifically, signs that are integrated into new development are only permitted if the subject development achieves *at least 90 percent of the allowable floor area ratio (“FAR”)* on the south side of the Sunset Strip and *at least 75 percent of the allowable FAR* on the north side of the Sunset Strip. Accordingly, the Policy has the potential to radically reshape the City’s skyline, which would have a broad range of reasonably foreseeable cumulative environmental impacts, including traffic, air quality, greenhouse gas emissions, land use, public services, etc. Yet, the ND lacks any discussion or analysis of the cumulative effects of the expansive high-density development that will be occur as a result of the Policy. This fatal flaw renders the ND fundamentally inadequate.

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In addition, in its discussion of the Policy's aesthetics impacts, the ND gives absolutely no attention to the adverse visual impacts on Hollywood Hills residents that will be caused by the cumulative addition of 20 digital signs and 71 Modifications in a concentrated 1.6 mile area. Instead, the substantial illumination of the nighttime sky that will inevitably result from this massive expansion in signage is simply ignored in the ND.

O-21

The ND also fails to evaluate certain cumulative air quality and energy impacts resulting from the proliferation and concentration of digital billboards that will be constructed under the Policy. For example, according to a study by the National Oceanic and Atmospheric Administration (NOAA) and the Cooperative Institute for Research in Environmental Sciences (CIRES) at the University of Colorado, excess light during nighttime hours contributes to air pollution. Artificial light, such as the light emitted from digital billboards, interferes with the Earth's natural process of cleaning the air at night. Every night, a special form of nitrogen oxide helps clean the air by breaking down fumes emitted by human activity that would otherwise become smog and ozone. The study concluded that city lights slow cleaning of the nighttime sky by up to 7% and increase ozone pollution the following day by up to 5%. Since the Policy could cause a dramatic increase in the number of digital signs in the City, this specific impact of electronic billboard proliferation on air quality requires further analysis. (See Exhibit C, which includes multiple expert studies and articles providing substantial evidence relative to these concerns.)

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Rather than adequately evaluating the cumulative effects of the totality of signage and high-density real estate projects that will be developed under the Policy, the ND defers analysis of the impacts of the 17 new digital billboards that will be installed in connection with new developments or façade remodels until such signage is subject to project-specific review. This occurs throughout the ND, including its analysis of the following impacts, among others:

Aesthetics – Substantial Adverse Effect on a Scenic Vista:

"[F]uture projects (i.e., the façade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. *Potential effects to scenic vistas resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.*" (ND at p. 32.)

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Aesthetics – Substantial Degradation of the Existing Visual Character or Quality of the Site and its Surroundings:

"[F]uture projects (i.e., the façade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. *Potential effects to visual character and quality resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.*" (ND at p. 37.)

"[F]uture projects (i.e., the façade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. *Potential shade/shadow effects resulting from such future projects*

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would be examined in accordance with CEQA as part of the required project-specific CEQA review.” (ND at p. 39.)

Aesthetics – Creation of a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area:

“[F]uture projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. **Potential effects to daytime and/or nighttime views from light and glare resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.”** (ND at p. 46.)

Transportation and Traffic – Substantial Increase in Hazards Due to a Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment):

“[F]uture projects (i.e., the facade remodels, new developments, and any associated billboards) would be subject to project-specific CEQA review at the time such projects are proposed. **Potential effects related to increased roadway hazards resulting from such future projects would be examined in accordance with CEQA as part of the required project-specific CEQA review.”** (ND at p. 143.)

As shown above, the ND fails to even attempt to evaluate the totality of impacts that will cumulatively be caused by the Policy, including facilitating the development of high-density towers throughout the Sunset Strip. Instead, the ND contemplates deferring the performance of CEQA review on a project-by-project basis. This prevents disclosure of the impacts of the Policy as a whole, and is entirely inconsistent with CEQA’s fundamental purposes of accountability and environmental protection.

IV. Conclusion

As demonstrated above, the ND prepared for the Policy is woefully deficient in numerous respects, and substantial evidence supports a fair argument that the Policy may have significant impacts on the environment. These deficiencies can only be addressed through the preparation of an EIR. Furthermore, we formally object to the use of the ND by future Digital Conversion or Modification projects as a way to avoid project-specific environmental review. Finally, by deferring all CEQA review of new billboards installed in connection with new developments or facade remodels under the Policy, the City is engaging in impermissible project segmentation that fails to evaluate the impacts of the Policy as a whole.

Sincerely,

CARMEL & NACCASHA LLP



Timothy J. Carmel

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Enclosures

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Response to Comment Letter O

Carmel & Naccasha, LLP

Jose Villanueva

April 27, 2017

Note: This comment letter included several exhibits. The exhibits are included in Appendix F of this Final IS/ND.

O-1 This comment states that the law firm of Carmel and Naccasha, LLP is submitting comments on the IS/ND for the proposed project on behalf of Jose Villanueva (hereinafter referred to as “commenter”). The commenter states that there are deficiencies in the analysis of the proposed Sunset Strip Off-Site Signage Policy and issues regarding how the IS/ND may be used for specific signage applications in the future. These concerns are expressed in greater detail in Comments O-2 through O-24.

The responses below summarize and discuss the concerns identified by the commenter and describe how the determinations provided in the IS/ND are supported by substantial evidence, including data, facts, and expert opinion. The evidence in the IS/ND shows that the project would have no significant effect on the environment. Additionally, evidence presented in the IS/ND, the CEQA Statute and Guidelines, and CEQA case law demonstrate that the IS/ND that was prepared by the City for the proposed project is an appropriate and allowable method for analyzing the proposed project under CEQA. The commenter has not provided substantial evidence of a fair argument such that an Environmental Impact Report (EIR) would be required. The impacts from the proposed policy that can be determined at this time have been properly analyzed in the IS/ND—future signs that require additional review under CEQA will be reviewed as required under the law.

O-2 The commenter states that the City previously indicated that an EIR would be prepared for the proposed project, and that the City’s preparation of an IS/ND is, therefore, inconsistent with their previous statements.

The City’s vision for the proposed policy is to enhance the unique traditions of Sunset Boulevard to integrate off-site advertising, entertainment, and public art, in a richly historic setting, resulting in a one-of-a kind built environment. This has been a long-standing vision for the City, as the original off-site signage rules are over twenty years old and do not reflect modern signage technologies. The scope and details of the subject policy were developed based on City staff recommendations and input from the public, key stakeholders, and industry professionals and experts. The proposed policy has been crafted to contain regulations that, by their very nature, avoid and minimize potential impacts related to construction and operation of future billboard projects. As such, the policy that is currently being set forth for review and consideration by decision makers includes regulations formulated with assistance from industry professionals that would limit effects of new and modified billboards and digital billboards, such as light trespass.

Once the City completed this iterative process of drafting the policy, an Initial Study was prepared, in accordance with Section 15002(k), Section 15063, and Section 15081 of the CEQA Guidelines. The purpose of the Initial Study is to determine whether or not the proposed project would result in a potentially significant impact on the environment. The data, facts, and expert testimony contained in the Initial Study prepared for the project and in this response letter demonstrate that the proposed project would not have a significant effect on the environment. Per CEQA Guidelines Section 15064(f)(3), the conclusions of the Initial Study required that a Negative Declaration (ND) be prepared. Once the City completed an Initial Study for the project, as required by Section 15063 of the CEQA Guidelines and in a manner consistent with Section 15064 of the CEQA Guidelines, no indication was made that an EIR was necessary. While the City had previously assumed that an EIR would be prepared, those prior representations were based on a broader project description that has since been refined and reduced in scale. Upon preparing the Initial Study, the City determined that an EIR was not required. It is the findings of the Initial Study for a project, not prior representations from the City based on outdated project descriptions, that determine whether or not an EIR is required. The commenter provides no evidence that the City planned to prepare an EIR once the City completed the Initial Study for this project as described in the project description.

O-3 The commenter states that the City has routinely prepared Mitigated Negative Declarations (MNDs) for single non-digital billboard proposals. The commenter states that the City has acknowledged that “individual billboards have the potential to cause significant environmental impacts unless mitigation is implemented.” The commenter then states that it is “inexplicable” that the City would adopt the proposed Sunset Strip Off-Site Signage Policy without requiring mitigation, even though the policy may result in “dozens of new digital signs throughout the City.”

First, this comment contains incorrect information regarding the potential permutations of the policy. The proposed Sunset Strip Off-Site Signage Policy applies to the Sunset Specific Plan area only—not to the City as a whole. As such, under the proposed project, digital billboards can only be installed along the Sunset Strip, which is a 1.6-mile segment of roadway extending along the City’s northern boundary. Currently, there are 74 billboard faces and 15 tall wall signs along the Sunset Strip. The proposed project would allow for up to 3 existing billboard faces to be converted to digital sign faces, without further CEQA review (as long as the conversions are designed in a manner consistent with the proposed policy, which includes limits on environmental factors such as light and glare levels.) Any other application for a digital billboard would be required to undergo independent CEQA review as outlined in Section 2.4, Methodology for Environmental Analysis, of this IS/ND.

As indicated by the commenter, the City has prepared MNDs for single non-digital billboard projects. An example is the 9015 Sunset Boulevard Billboard Project IS/MND (released for public review in October 2015). Prior to developing the proposed Sunset Strip Off-Site Signage Policy, the City was processing billboard applications as individual projects that were typically evaluated under CEQA in IS/MNDs. One

reason for this is that those applications were being reviewed against standards that are over two decades old. Since the sign standards have not been comprehensively updated in over twenty years, other environmental documents for off-site signs in the area may have included conditions of approval or project design features to avoid or reduce potential effects to a point where clearly no significant effects would occur (see 14 CCR 15070(b)). However, the City is currently in the process of updating the manner in which off-site signage applications are processed, and the purpose of this project is to create a uniform set of regulations by which off-site sign applications can be reviewed based on the most recent science and industry standards. As such, the environmental review and mitigation for previous off-site signs cannot be compared with the environmental review of the proposed policy, nor should it be used to inform the environmental analysis for the proposed policy.

Currently, signage on the Sunset Strip is governed by the 1996 Sunset Specific Plan (SSP) and the Zoning Ordinance. The provisions in the SSP and the Zoning Ordinance address location, number, maintenance, design, and allowable changes that can be made to off-site signage. However, billboard technologies and development patterns on the Sunset Strip have changed since 1996. Additionally, the City has an updated General Plan (the *West Hollywood General Plan 2035*), adopted in 2011. The General Plan directs the City to “maximize the iconic urban design value and visual creativity of signage in West Hollywood,” to “maintain the Sunset Specific Plan and update as appropriate,” and to “continue to promote a great diversity of uses on Sunset Boulevard, including entertainment and related uses, to support the community’s vision,” among other goals and policies that support the City’s study of off-site signage and its drafting of the proposed Sunset Strip Off-Site Signage Policy.

Notably, in 2012 the City Council directed staff to stop processing new billboard applications while the Community Development Department analyzed, updated, and modernized the City’s signage policy for the Sunset Strip (except for a few applications that were already in process). That decision indicates a policy shift in the City’s approach to off-site signage applications. Contrary to the statements made by this commenter, the City’s comprehensive off-site signage policy efforts would result in a more consistent and environmentally protective approach to Sunset Strip off-site signage.

As demonstrated above, while the City has applied mitigation measures to single billboard projects in the past, the City did so in the absence of comprehensive, modernized policies to address the potential effects of billboards. The regulations that have been set forth in the proposed Sunset Strip Off-Site Signage Policy are in fact more stringent than the requirements that were previously applied by the City in its previous project-specific billboard MNDs. An example is provided below:

The 9015 Sunset Boulevard Billboard Project IS/MND contained the following statement:

The City of West Hollywood does not define a specific threshold for light trespass; therefore, the City of Los Angeles light trespass thresholds are used to determine significance for purposes of this analysis. Specifically,

Section 14.4.4(E) of the City of Los Angeles Municipal Code states that “no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.”

Upon adoption of the proposed Sunset Strip Off-Site Signage Policy, the following requirement would be put into place:

Sign illuminance (foot candles) to not exceed 1.4 foot candles at any adjacent residential zoned property line.

This regulation would apply to any temporary, new, or modified off-site signage. As such, the lighting requirements under which off-site signage would be installed along the Sunset Strip would increase in their protectiveness of the environment under the proposed project.

O-4 This comment provides three specific concerns regarding the IS/ND, which are summarized as follows: (1) the City is using the IS/ND to avoid analysis of project-specific impacts from digital conversions and standard billboard modifications, (2) there is a fair argument that the proposed Sunset Strip Off-Site Signage Policy would have significant impacts on the environment in the categories of aesthetics and traffic and that the project should therefore be evaluated in an EIR instead of an ND, and (3) the ND defers the analysis of new billboards, thereby causing piecemeal environmental review of the project.

This paragraph is introductory in nature. The commenter expands on each of these three issues throughout the remainder of the letter. The responses below summarize and discuss these concerns and describe how the determinations provided in the IS/ND are supported by substantial evidence, including data, facts, and expert opinion. The evidence in the IS/ND shows that the project would have no significant effect on the environment, and the responses below demonstrate that no fair argument has been presented to indicate that an EIR must be prepared. Additionally, evidence from both the IS/ND, the CEQA Statute and Guidelines, and CEQA case law demonstrate in the forthcoming responses that the IS/ND is an appropriate and allowable method for analyzing the proposed project under CEQA.

O-5 This comment states that the City has presented conflicting information to the public regarding the scope of project-specific CEQA review under the proposed policy. As stated in the IS/ND and in this comment, no further CEQA review would be required for standard billboard modifications or digital conversions. However, the commenter states that the City indicated in its staff report for a Historic Preservation Commission meeting that each individual project involving a cultural resource would be subject to additional environmental review, as is contemplated in the IS/ND.

The statement made by City staff to the Historic Preservation Commission regarding environmental review of individual projects involving a cultural resource was not clearly communicated. The statement was intended to indicate that any standard modifications, digital conversions, or new billboards that

would be located on or directly adjacent to properties containing a cultural resource would require a Certificate of Appropriateness in order to proceed. The intent of this specific sentence in the staff report was to convey that future projects would be reviewed on a project-by-project basis relative to the City's historic resources standards. The sentence was written for the purposes of the Historic Preservation Commission and was, therefore, focused on the issue of historic resources and the requirement for future projects to obtain a Certificate of Appropriateness, as necessary.

This IS/ND concludes that future digital conversions and standard modifications that comply with the standards in the proposed policy would not require additional environmental review because this document demonstrates with substantial evidence that the standards in the policy itself prevent significant adverse environmental impacts. When a developer brings forth an application for a digital conversion or standard modification, City planning staff would review the application for compliance with the proposed policy. If the project complies and does not require additional CEQA review for any other reason under the law, then City staff would rely on and refer to this IS/ND for CEQA compliance. The City has an affirmative duty to comply with CEQA, should additional review be required under state law. The City is not attempting to avoid that obligation.

O-6 This comment states that the City intends to rely on the environmental analysis in the IS/ND for its discretionary approval of digital conversions and modifications. This is an accurate statement, and this intent is clearly described, disclosed, and substantiated in Section 2.4 of the IS/ND. More information regarding the approach to the environmental review of digital conversions and standard modifications is provided in Response O-5. The commenter further states that the City's analysis of digital conversions and modifications in the IS/ND has resulted in avoidance of project-specific environmental analysis. The comment states that the project area defined and analyzed in the IS/ND is too broad, that no specific digital conversions or modifications are evaluated in the document, and that the effects of the project on the surrounding environment have been understated by defining the project area too broadly.

First, it should be noted that standard modifications and digital conversions pertain to existing billboards along the Sunset Strip. As such, these aspects of the proposed policy would not involve new billboard faces. Further, digital conversions would only be allowed on a maximum of three properties along the Sunset Strip. While standard modifications could be implemented on any existing billboard, such changes would be limited in scope by the policies set forth in the proposed regulations.

Second, the IS/ND does not avoid project-specific environmental analysis, nor does it have deficiencies relative to its analysis of the project area and the surroundings. Rather, the IS/ND provides specific information regarding the scope of digital conversions and standard modifications; it clearly defines the project area as the Sunset Specific Plan area, which is appropriate since the project is a specific plan amendment; it characterizes surrounding areas and considers these surrounding areas in its environmental analysis; it characterizes the locations of existing billboard sites that could undergo digital conversions or

modifications; it discloses site-specific effects that may arise throughout implementation of the policy; and, it describes aspects of the policy that would address these site-specific issues. Evidence that the IS/ND accomplishes this list of items relative to project area and site-specific analysis is provided in the following paragraphs.

(1) The IS/ND provides specific information regarding the scope of digital conversions and standard modifications. As described in Section 2.4, this IS/ND analyzes 3 digital conversions and 71 standard modifications. Section 2.5 and 2.6 of the IS/ND provide detailed descriptions of the construction and operational scenarios that would be associated with a digital conversion and a standard modification.

(2) The IS/ND clearly defines the project area as the Sunset Specific Plan area. As quoted by the commenter, CEQA defines “environment” as the “the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance” (Public Resources Code Section 21060.5). The project location and setting is thoroughly described in Section 2.1 of the IS/ND, consistent with CEQA Guidelines Section 15071(b). The proposed policy applies to the 1.6-mile Sunset Strip; as such, the project area is defined as “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 known as the Sunset Strip.) Section 2.1 also characterizes the topography of the Sunset Strip and the land uses that are found along the Sunset Strip. The 1.6-mile Sunset Strip is an appropriate definition of the project area for the purposes of the proposed Sunset Strip Off-Site Signage Policy, since it is the area that would be regulated by the policy. This approach to defining the project area is supported by the fact that the entirety of the Sunset Strip is within a specific plan area, and the proposed project is a specific plan amendment. Furthermore, as described in Section 2.1, the majority of parcels along the Sunset Strip have uniform zoning and General Plan designations. 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. 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.

(3) The IS/ND characterizes surrounding areas and considers these areas in the environmental analysis. Simply defining the Sunset Strip as the “project area” does not provide evidence that the environment surrounding the defined project area was ignored in the analysis. Contrary to the assertions in Comment O-6, the IS/ND considers the whole of the Sunset Strip, as well as the land uses surrounding the Sunset Strip. Section 2.1 of the IS/ND characterizes land uses surrounding the Sunset Strip. As stated in this section, 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 commenter asserts that the IS/ND understates impacts on the project area’s immediate surroundings, particularly in the categories of

aesthetics, traffic, and land use consistency. However, the IS/ND does not ignore surrounding areas in the environmental analysis for the proposed project. On the contrary, the affected environment that is discussed and evaluated in the IS/ND is consistent with Section 15360 of the CEQA Guidelines, which states that “the area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project.” Below are excerpts from the IS/ND demonstrating that the analysis considers the areas surrounding the Sunset Strip by disclosing and analyzing potential impacts to surrounding areas. Underlining is used to highlight the portions of each excerpt that address surrounding areas. The excerpts are organized by IS/ND section. Because the commenter references specific concerns related to aesthetics, traffic, and land use, these sections are the primary focus of the excerpts.

Section 3.1(c). Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

- Minor changes in design without changing location, position, or dimension of billboards would not be highly noticeable to viewers in the project area or vicinity of the 1.6 miles Sunset Strip with an existing inventory of 89 off-site sign faces.
- Changes in the heights of numerous billboards along the Sunset Strip may represent a noticeable change in the visual environment. For example, a billboard that is raised by 14 feet may become visible from properties or nearby roadways where it was previously obstructed by other development or landscaping.
- Given the existing variations in the height of structures along Sunset Strip, as well as the proposed restrictions in billboard height modifications, extensions in the height of existing billboards by a maximum of 14 feet or lowering of billboards to meet Sunset Specific Plan requirements would not represent a substantial change in the visual character of the project area or the surroundings such that the existing visual character or quality is degraded.
- The modifications to existing billboards that may occur under the proposed project would not represent substantial degradation in the existing visual character or quality of the Sunset Strip or its surroundings.
- Across the 1.6-mile Sunset Strip, the proposed conversion of up to 3 existing billboard faces from static to digital would change the existing visual character of the Sunset Strip and its surroundings.
- For the reasons described above, new billboards and modifications to existing billboards undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to represent substantial changes in the existing visual conditions of the Sunset Strip or the surrounding areas such that the visual character or quality of these areas would be substantially degraded.
- As such, minor changes in the height, orientation, and location of a billboard structure or the addition of second face would not represent the creation of a substantial new shadow that would adversely affect surrounding land uses.

Section 3.1(d). 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.

- Consistency with General Plan Policy LU-16.3: These regulations would help protect surrounding neighborhoods from potential effects such as light trespass and effects in the visual character and quality of the project area.
- Consistency with Specific Plan Goals for Billboard and Art Advertising: The proposed regulations would set forth policies ensuring that adjustments in billboard location do not adversely affect existing sightlines, viewsheds, and adjacent properties.

Section 3.12(a). Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- Short-term construction activities attributable to standard modifications, digital conversions, and new billboards installed pursuant to the proposed Sunset Strip Off-Site Signage Policy would create intermittent elevated noise levels at and near the project area...
- The discussion below summarizes the anticipated construction processes and provides estimated noise levels that could be experienced by sensitive receptors located along and adjacent to the project area.
- ...there are residences within and near the project area, some of which are located as close as 50 feet of existing billboard sites.
- ...operation would not cause substantial increases in traffic noise on nearby roadways.

Section 3.12(d). Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- Sensitive receptors located along and adjacent to the Sunset Strip are currently subject to ambient noise levels associated with an overall high level of daily activity, as well as periodic and intermittent increases in noise levels associated with entertainment events and increased volumes of visitors occurring at different times throughout the year. As such, the introduction of new periodic events to the project area would not cause a substantial change in the noise environment along and adjacent to the Sunset Strip.

Section 3.16(a). Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

- Two intersections in the City are monitored as indicators of the performance of the CMP Highway and Roadway System: the intersection of Santa Monica Boulevard and Doheny Drive

(located approximately 0.5 mile south of the project area) and the intersection of Santa Monica Boulevard and La Cienega Boulevard (located approximately 0.3 mile south of the project area).

- ... these additional trips would be temporary and intermittent and would not cause intersection levels of service to decline, would not lead to an increase in average daily trips, and would not substantially alter the volume-to-capacity ratios of nearby intersections.

Section 3.16(b). Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- During special events held in association with the proposed Sunset Strip Billboard District, it is reasonably foreseeable that 50 or more vehicle trips would be added to the CMP intersections of Santa Monica Boulevard/Doheny Drive and Santa Monica Boulevard/La Cienega Boulevard.
- A special event along the Sunset Strip is not anticipated to adversely affect the operations of the I-10 freeway, which is subject to high traffic volumes under current conditions and supports traffic associated with a wide variety of special events, which commonly occur throughout the Los Angeles metropolitan area.

Section 3.16(e). Would the project result in inadequate emergency access?

- Special events causing a high volume of vehicular and/or pedestrian traffic have the potential to temporarily affect emergency access to areas within and adjacent to the special event. As such, the special events associated with the proposed project could temporarily impede emergency access to the project area and adjacent streets.

As demonstrated by the excerpts above, the IS/ND addresses both the project area and its immediate surroundings in accordance with the CEQA Guidelines.

(4) This IS/ND characterizes the locations of existing billboard sites that could undergo digital conversions or modifications. Despite the general uniformity of the Sunset Strip and the fact that the proposed project consists of a policy that applies to the whole of the Sunset Strip, the specific locations of billboards that could undergo digital conversions and standard modifications are characterized in Section 2.1 and in Table 2-1 in the IS/ND. Furthermore, in response to this comment, additional information has been added as part of this IS/ND to provided more detail regarding the locations of where digital conversions and standard modifications may occur along the Sunset Strip. A billboard inventory has been added to Appendix A as part of the Final IS/ND that shows the specific locations, sizes, and existing appearance of the billboards along the Sunset Strip, as they existed at the time that the proposed policy and this IS/ND were written (see Appendix A). These existing billboards would be allowed to undergo standard modifications. Of the sites shown in Appendix A, the properties that would

be eligible to apply for a digital conversion are only those that currently contain billboards as well as cultural resources eligible for historic designation. Of these billboards, only 3 billboards would ultimately be allowed to convert. Note that eligibility for historic designation is a fluid category and this list is subject to change. For example, new properties can become eligible over time and other properties can be denied designation and removed from the list (another reason why it is not meaningful to speculate which billboard properties would convert to digital under the policy). Below is a list of these sites as they exist to date:

- 8300 Sunset Boulevard (The Standard Hotel): The existing billboard is situated between the west facade of the hotel and the William S. Hart Park and Off-Leash Dog Park. The billboard faces west on Sunset Boulevard (i.e., it is viewed by eastbound drivers). To the south, the nearest residential property is approximately 200 feet from this sign; to the north, the nearest residential property is approximately 200 feet from this sign.
- 8351 Sunset Boulevard (Carney's Restaurant): The existing billboard is situated near the western property boundary between Carney's Restaurant and Enterprise Rent-a-Car. The billboard faces east on Sunset Boulevard (i.e., it is viewed by westbound drivers). To the south, the nearest residential property is approximately 340 feet from this sign; to the north, the nearest residential property is approximately 85 feet from this sign.
- 8585 Sunset Boulevard (Mel's Drive-In): The existing billboard is located above the western side of Mel's Drive-In structure. The billboard is two sided, with one side facing east and the other facing west. To the south, the nearest residential property is approximately 350 feet from this sign; to the north, the nearest residential property is approximately 50 feet from this sign.
- 8720 Sunset Boulevard (Tocaya Organica): The existing billboard is located above the western side of the building facade, adjacent to Sunset Towers. The billboard faces east on Sunset Boulevard (i.e., it is viewed by westbound drivers). To the south, the nearest residential property is approximately 300 feet from this sign. To the north, the nearest residential property is approximately 230 feet from this sign.
- 8776 Sunset Boulevard (State Social House): The existing billboard is a two-sided billboard. To the south, the nearest residential property is approximately 160 feet from this sign. To the north, the nearest residential property is approximately 330 feet from this sign.
- 8901 Sunset Boulevard (Whiskey a Go-Go): The existing billboard is a V-shaped billboard with two faces. One face is oriented to the southeast and is visible to westbound travelers on Sunset Boulevard. The other face is oriented to the west and is visible to eastbound travelers on Sunset Boulevard. To the south, the nearest residential property is approximately 190 feet from this sign. To the north, the nearest residential property is approximately 70 feet from this sign.

- 9015 Sunset Boulevard (The Rainbow Bar and Grill & The Roxy Theatre): The existing billboard on this property is a legally non-conforming double-sided roof-mounted sign. The sign has two faces and is mounted to the roof of the Rainbow Bar and Grill structure. One side of the sign faces east and the other faces west. This property also has a pending application for removal of this roof sign and installation of a two-sided, pole-mounted billboard. The new billboard would be positioned generally in front of the Rainbow Bar and Grill structure, instead of on the roof. To the south, the nearest residential property is approximately 270 feet from the existing and proposed billboard locations at 9015 Sunset Boulevard. To the north, the nearest residential property is approximately 100 feet from the existing and proposed billboard locations.
- 9101 Sunset Boulevard (Gil Turner's): The existing billboard is a single-sided billboard facing southeast (i.e., visible to westbound travelers along Sunset Boulevard). To the south, the nearest residential property is approximately 220 feet from this sign. To the north, the nearest residential property is approximately 90 feet from this sign.
- 9157 Sunset Boulevard: The existing billboard is a single-sided billboard facing south/southwest. To the south, the nearest residential property is approximately 200 feet from this sign. To the north, the nearest residential property is approximately 80 feet from this sign.

(5) The IS/ND discloses site-specific effects that may arise throughout implementation of the policy and describes aspects of the policy that would address these site-specific issues. While the Sunset Strip is a unique geographical area relative to its surroundings, the individual billboard sites located along the Sunset Strip have similar characteristics in many environmental categories, including ambient noise, ambient lighting, existing land uses, proximity to historic built environment resources, quality and availability of public views of and through the sites, traffic conditions, pedestrian activity, etc. As such, the environmental characteristics and potential impacts at existing billboard sites along the Sunset Strip are generally similar in nature. A key difference among Sunset Strip sites, however, is the distance between a billboard or a billboard site and the nearest sensitive receptor. As characterized in Section 3.1(d), 3.3(d), and 3.12(a) of the IS/ND, the sensitive receptors along the Sunset Strip and adjacent to the Sunset Strip are residences. For the purposes of light and glare, it was determined that residential properties within close proximity to the Sunset Strip generally range from 250 feet to 300 feet away from existing billboards. For the purposes of air quality effects to sensitive receptors, the analysis assumed the closest possible distance for residential sensitive receptors that is found within SCAQMD's Localized Significance Threshold analysis guidelines, which is a distance of approximately 82 feet (25 meters). (There are a variety of localized significance thresholds that can be applied to a project, depending on the distance between the project and the nearest sensitive receptor. As such, the thresholds of significance for the shortest distance between construction and the sensitive receptor (i.e., the most conservative thresholds) were chosen for the proposed project, due to the proximity of residential uses.) For the purposes of the noise analysis, a distance of 50 feet was used, since nearby residences could be located as close as 50 feet to the property line of a

given billboard site. (During construction associated with a digital conversion or standard modification, there is the potential that construction equipment could be situated near the property line of a billboard site). This distance was determined through a desktop review of the project area. As such, the analyses in the IS/ND that evaluate effects to sensitive receptors rely on the worst-case (i.e., closest) distance between an existing billboard and the nearest residential sensitive receptor.

While the policy is written for the Sunset Strip as a whole, it has also been written with numerous site-specific regulations. For example, no matter where a sign is located within a particular billboard site, it cannot create light trespass in excess of 1.4 footcandles onto an adjacent residentially zoned property. Ways to ensure compliance include situating the sign farther away from the residentially zoned property, reducing the sign area, and/or reducing sign luminance. Additionally, the policy contains protections for sites with trees, sites with historic resources, sites with previously uncovered and unknown archaeological resources, and sites that are within or near a public viewshed identified for protection and enhancement in the Sunset Specific Plan. In addition, the policy has verification measures to ensure that site-specific significant impacts do not occur. As such, while some sites may be more sensitive than others for a given environmental resource, the proposed policy has set forth specific regulations to ensure that site-specific impacts are minimized and avoided.

The City has developed the proposed policy to standardize the manner in which signage proposals are reviewed and regulated, in order to ensure both streamlined review and increased environmental protection. It should also be noted that this comment letter is devoid of specific examples where the IS/ND fails to address project-specific issues or where it fails to address issues related to the surrounding environment. It is also devoid of any evidence that specific digital conversions and standard modifications would result in potentially significant impacts. Public Resources Code section 21082.2 states that: “argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence.” In this comment, the commenter speculates that the analysis in the IS/ND understates potential impacts but does not substantiate this claim.

O-7 This comment states that the IS/ND lacks illustrative analysis for digital conversions and standard modifications and that it fails to evaluate future digital conversions and standard modifications on the basis of their specific designs, locations, sizes, and other features.

The IS/ND analyzes digital conversion and standard modifications to the extent that information is currently available on such future projects. The location of potential digital conversions and standard modifications throughout the Sunset Strip are characterized generally in Section 2.1 and in Table 2-1 of the IS/ND (see Response O-6 for further details regarding the locations of potential digital conversions and standard modifications). Specific construction scenarios are provided for these aspects of the proposed projects, including specific details such as expected number of construction days, number of

construction workers, equipment pieces, amount of excavation, and truck trips (see Section 2.5 of the IS/ND). Maintenance and operational scenarios are also characterized (see Section 2.6 of the IS/ND). These scenarios allowed for project-specific and quantitative air quality analysis, traffic analysis, and greenhouse gas emissions analysis to be conducted in the IS/ND. Regarding the issue of the specific design and size of future digital conversions and standard modifications, such changes would be made to existing billboards along the Sunset Strip. The amount of change relative to existing conditions would be regulated by the proposed policy. As such, the range of potential sizes and designs for such projects are limited. The IS/ND analysis was conducted based on the allowable changes in design, size, and height, which are specifically characterized in Section 2.3 of the IS/ND. This comment provides no specific instances or examples from the IS/ND of analysis that is deficient pursuant to CEQA.

O-8 This comment purports that the City may tier CEQA review of future off-site sign projects from the IS/ND. The comment states that such tiering would not be allowed under CEQA.

The IS/ND does not state that future off-site signage proposals would tier off of this IS/ND, nor has the City indicated that tiering will be used to evaluate future off-site signage. Tiering is defined in the CEQA Guidelines as “using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project” (Section 15152(a)). Future off-site signage applications would not tier off of this document, because it would be inappropriate under CEQA to tier off of an ND (i.e., only EIRs can be used as the starting point for a tiered environmental analysis). Instead, this IS/ND analyzes a proposed policy, which allows for changes to existing billboards and allows for new billboards in conjunction with new development or facade remodels on existing buildings. The allowable changes to existing billboards are explicitly outlined in the proposed policy, which sets forth site-specific requirements and restrictions on such changes. The policy also contains verification measures to ensure that such site-specific requirements are implemented. As such, this IS/ND constitutes environmental analysis for these potential changes to existing billboards. As described throughout the IS/ND, compliance with the proposed policy and its verification requirements would ensure that the environmental impacts of changes to existing billboards would be below a level of significance. These determinations have been supported by substantial evidence, including scientific studies on the project area’s unique lighting and traffic conditions (see Appendices D and E), as well as thorough descriptions of the project’s geographical context. These scientific studies were used to draft the policies. As substantiated by the analysis in this IS/ND, no further environmental analysis is necessary for the three future digital conversions and the standard modifications that comply with the proposed policy that has been analyzed in this IS/ND. Simply stated, this document confirms that compliance with the standards and verification mechanisms for modifications and conversions in the policy will ensure that there will be no adverse environmental impacts, no matter the location.

As stated in Section 2.4, new development projects or facade remodels, including those that integrate new billboards, would be required to undergo separate project-specific CEQA analysis for the new sign in the context of and together with the development project. This is because the nature of future development projects and facade remodels, including the design, location, size, and land use mix of such projects, is currently unknown and is therefore considered highly speculative. The proposed policy would limit the number of new digital billboards installed in association with new development and facade remodels and also contains provisions restricting the number of new digital signs per geographic area on the Sunset Strip. Additionally, the policy specifies certain design and density standards that must be met by proposed developments or facade remodels that incorporate new billboards. As such, the eligible properties along the Sunset Strip are limited. It is impossible to know at this time whether the enactment of the proposed policy will in fact result in new development and/or facade remodels and what the scope of such potential developments or remodels would be. New development is occurring on the Sunset Strip and has been occurring on the Sunset Strip for decades. The types of development applications and the rate at which developers submit such applications are subject to a wide variety of fluctuating factors, including market trends, political climate, economic conditions, demographics, etc. Furthermore, the City's General Plan and the associated General Plan EIR have already contemplated development on the Sunset Strip consistent with the land use and zoning designations that are currently in place. The land use designations, zoning designations, and allowable development intensity along the Sunset Strip would not change upon approval of the proposed project, which is an amendment to only the sign standards in the Specific Plan. Specific development projects throughout the City (including those on the Sunset Strip) would be subject to project-specific CEQA review (City of West Hollywood 2010). As stated in Section 2.4 of this IS/ND, because CEQA requires evaluation of the whole of an action, the CEQA analysis for such future projects would also need to include any associated new off-site signage that is part of each project. New billboards are discussed and analyzed throughout the IS/ND to the degree that information is available on such future projects. While the proposed policy would specifically regulate certain aspects of new billboards, such as the amount of light that they produce and the visual contrast of digital images, other aspects of their design, such as height above the sidewalk and orientation towards the roadway, are not specifically provided for in the policy. As such, these aspects are considered speculative until specific proposals are brought forth before the City. CEQA Guidelines Section 15187, Environmental Review of New Rules and Regulations, provides that "the environmental analysis shall take into account a reasonable range of environmental, economic, and technical factors, population and geographic areas, and specific sites. The agency may utilize numerical ranges and averages where specific data is not available, but is not required to, nor should it, engage in speculation or conjecture." As such, pursuant to CEQA Guidelines Section 15187(d), the City is not required to (and should not) speculate on the scope of such future projects (i.e., new development, facade remodels, and the associated new billboards) and/or the manner in which billboards would be incorporated into these projects.

- O-9** This comment states that the analysis in the IS/ND is not supported by substantial evidence. The commenter also discusses the fair argument test in this comment, which holds that “any substantial evidence supporting a fair argument that a project may have a significant effect” on the environment requires preparation of an EIR.” However, the arguments made by the commenter do not constitute a fair argument that the project could create a potentially significant environmental impact, as these arguments are speculative and not supported by substantial evidence.

The Initial Study evaluates the proposed project’s environmental impacts under CEQA and demonstrates that no substantial evidence of a potentially significant impact exists. Section 15064 of the CEQA Guidelines provides requirements for determining the significance of the environmental effects caused by the project. It addresses certain nuances involved in significance determinations such as consideration of the environmental setting, consideration of public views, consideration of public controversy, and what constitutes substantial evidence of a significant impact. Relevant requirements from this section of the CEQA Guidelines are listed below, followed by an explanation of how the environmental analysis conducted for the proposed project complies with these requirements:

Section 15064(b). *“The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.”*

For the purposes of drafting the proposed policy, public input was gathered, and studies conducted regarding the conditions of the Sunset Strip. Staff worked closely with a consultant team of land use and signage experts to evaluate the urban design of the Sunset Strip, as well as its economic and geographic characteristics. The consultant team consisted of Selbert Perkins, Standard Vision, Francis Krahe and Associates, and Fehr and Peers Transportation Consultants. Selbert Perkins is an international design firm specializing in large-scale urban design projects, graphics, and signage (see Appendix A for more information on this firm). Standard Vision is an advertising firm specializing in creative lighting and artistic, architectural LED installations. Francis Krahe and Associates are lighting design experts with experience in evaluating nighttime illumination, authoring lighting ordinances and regulations, and designing the lighting plans for large-scale commercial and institutional projects (see Appendix D for more information on this firm). Fehr and Peers Transportation Consultants specialize in transportation planning and engineering, multimodal safety plans and programs, land use and transportation analyses, and traffic/transportation impact analyses (see Appendix E for more information on this firm). The City worked closely with this team of experts to develop the draft policy. Studies were prepared that characterized the existing and unique conditions on the Sunset Strip, including study area traffic conditions, lighting conditions, and the location, number, and size of existing off-site sign faces (see

Appendices A, D, and E). These studies also included literature reviews of available information and regulations pertaining to digital billboards and provided site-specific recommendations for the City based on the relevant data and facts that were gathered.

During this process, the project team also conducted outreach efforts to help develop the framework for the policy. Throughout this process, the City posted project updates and information on its webpage (www.weho.org/sunsetsigns) to ensure that interested individuals and parties could remain apprised of the project as it evolved over time. Once the policy was drafted, an additional set of meetings was held by the City to gather feedback on the draft policy from property owners, billboard operators, and community members. Specifically, meetings were held with the West Hollywood Chamber of Commerce, the City's Arts and Cultural Affairs Commission – Art on the Outside Subcommittee, the City's Long Range Planning Projects Subcommittee, the Historic Preservation Commission, the Sunset Strip Business Improvement District, and the West Hollywood Heights Neighborhood Association. Additionally, an open public meeting was held to gather feedback. Meetings for the Arts and Cultural Affairs Commission, the Long Range Planning Projects Subcommittee, and the Historic Preservation Commission were publicly posted on the City's website and in all other required locations.

Once the policy was drafted and a project description had been crafted, the City began the CEQA Initial Study effort. As part of this effort, the City and its consultant team collected data regarding the existing environment in the project area and its surroundings. Information about the closest residential sensitive receptors, the range of heights of existing structures, and the existing visual conditions was obtained for the purposes of developing a baseline condition upon which to evaluate the proposed project's aesthetic impacts. The inventory of the existing off-site signage on the Sunset Strip was consulted during this process. This inventory, which was prepared by Selbert Perkins and used during the drafting of the policy, includes the locations, heights, and sizes of each Sunset Strip billboard (see Appendix A). Factual information was gathered and provided regarding the existing land use controls applied to the project area and used for the purposes of the land use consistency analysis. The lighting study and traffic studies that were prepared evaluate the effectiveness of the regulations to minimize light, glare, and the potentially distracting aspects of digital imagery (see Appendix D and E). As such, in accordance with Section 15064(b), the City has evaluated the significance of the impacts of the project based on scientific and factual data, to the extent possible. This evaluation considered the setting of the project, which is a highly urbanized area within the City that is unique in having iconic and artistic billboards, signs, and advertisements. If this project were to be proposed in an area with low ambient lighting levels or in an area without a longstanding tradition of having creative and unique signs, the impact determinations provided by the City may have been different from those provided for an updated off-site signage policy along the Sunset Strip.

Section 15064(c). *“In determining whether an effect will be adverse or beneficial, the Lead Agency shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency. Before requiring the preparation of an EIR, the Lead Agency must still determine whether environmental change itself might be substantial.”*

This letter expresses concerns held by an individual (Jose Villanueva) regarding potentially significant impacts of the proposed project. As required under CEQA, the City has considered his views in determining whether effects would be adverse. However, as indicated in Section 15064(c), the views of the public alone do not determine whether an impact is considered adverse. As stated in Section 15064(c), the lead agency must still determine whether environmental changes identified by the public would be substantial changes. As described throughout the IS/ND for the proposed project, changes to the environment *would* occur due to the Sunset Strip Off-Site Signage Policy. However, the City has determined that these changes would not be substantial or adverse under CEQA. This determination has been supported with substantial evidence.

Section 15064(f)(4). *“The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment.”*

As suggested by the comment letters shown in this Final IS/ND, some members of the public have concerns regarding the environmental effects of the proposed project, while others hold that the project is too environmentally protective. However, neither this comment letter nor the divergent views expressed in the other comments letters necessitate preparation of an EIR. As described throughout the IS/ND for the proposed project, changes to the environment would occur due to the Sunset Strip Off-Site Signage Policy. However, the City has determined that these changes would not be substantial or adverse under CEQA. This determination has been supported with substantial evidence. The concerns expressed in this letter and in the other comment letters that the City received have not been supported with substantial evidence.

Section 15064(f)(5). *“Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts.”*

The letter expresses concerns of one member of the public, including concerns related to technical areas such as lighting, air quality, land use, and traffic. However, the commenter fails to support the arguments presented in the letter with substantial evidence. As demonstrated in the detailed responses below, the comments included in this letter do not rise to the level of substantial evidence supporting a fair argument that the proposed project may have a significant adverse impact.

Section 15064(g). *“After application of the principles set forth above in Section 15064(f), and in marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.”*

While the letter presents a variety of disagreements, it does not present expert opinions with regard to aesthetic resources, land use impacts, or traffic. For example, as described in Responses O-15, O-16, and O-17, the commenter states that the proposed project would have significant traffic safety impacts due to driver distraction; however, no specific facts tying aspects of the proposed project to driver distraction risks identified in expert studies are provided to substantiate this claim; references to outdated and largely unrelated studies that don't take into account the existing conditions present along the Sunset Strip are not substantial evidence. (See Response O-17, which summarizes the studies referenced by the commenter and explains why they do not support a fair argument that the proposed project could have a potentially significant effect on the environment.) In contrast, the Initial Study supported its conclusions on each issue area with substantial evidence, including a driver distraction study commissioned by the City for digital signs within the City of West Hollywood (see Appendix E). Despite the commenter's letter, an ND is still the appropriate level of environmental documentation under CEQA.

O-10 This comment states that the aesthetics analysis in the IS/ND consists of “conclusory, unsubstantiated statements, inappropriate assumptions, and leaps in logic.” The commenter then goes on to list quotes from the IS/ND in an effort to illustrate this claim.

It should be noted that the commenter has extracted sentences from the analysis that were used for the purpose of introducing, concluding, and/or summarizing comprehensive and substantiated arguments that were made in the aesthetics analysis of the IS/ND. Below, one of the excerpts provided by the commenter is shown with the surrounding sentences from the IS/ND. The portion of the IS/ND text that was excerpted by the commenter is presented in underlined text below.

Summary

There are no officially designated scenic vistas in the City (City of West Hollywood 2010). Nevertheless, new billboards and modifications to existing billboards undertaken pursuant to the proposed Sunset Strip Off-Site Signage Policy are not anticipated to substantially alter existing public views of the Hollywood Hills and the Los Angeles Basin for the reasons provided above. The proposed regulations have been designed to prevent changes in billboard height, location, and orientation that would interfere with public viewsheds. Additionally, design standards have been included in the policy to prevent new billboards from obstructing public views. For these reasons, effects on scenic vistas resulting from the proposed Sunset Strip Off-Site Signage Policy would be less than significant.

As shown in the excerpt above, the commenter removed a sentence from a summary of a larger argument. The larger argument contains the elements that the commenter claims are missing, such as analysis and substantial evidence. As shown throughout Section 3.1(a), the IS/ND provides a more comprehensive discussion of scenic vistas and other aesthetic issues, as required by CEQA. To the extent that information is known about the potential effects of implementing the proposed policy, it was provided in the IS/ND. For example, the aesthetic analysis in the IS/ND discusses view corridors, view terraces, and view portals that are designated in the Sunset Specific Plan; it describes the location and orientation of existing billboards and the extent to which the proposed policy will allow changes in such billboards; it characterizes the existing development on the Sunset Strip; it characterizes the heights of existing buildings; it characterizes the Sunset Strip and surrounding areas; and it discusses the relationship between the area's topography and the potential for changes to existing billboards, as well as new billboards, to affect views. The analysis also cites specific aspects of the proposed policy that would minimize aesthetic impacts. However, it is currently unknown which billboard owners would apply for a digital conversion and/or standard modification. As such, it is currently unknown which particular billboard sites along the Sunset Strip would undergo a digital conversion or standard modification. To formulate a conservative analysis, the IS/ND analyzes a reasonable worst-case scenario in which all 3 allowable digital conversions would occur and the remaining existing billboards would undergo a standard modification. However, the exact locations of future digital conversions and standard modifications are currently unknown; as such, site-specific information is not available and/or would be highly speculative. As the locations are unknown, conservative provisions have been incorporated into the policy to address site-specific impacts such as light trespass onto residential properties, obstruction of public viewsheds, and obstruction of views to designated cultural resources. These provisions take into account the unique visual resources and topography of the Sunset Strip. The arguments in the aesthetics analysis of the IS/ND are not, therefore, conclusory, unsubstantiated, or inappropriate, nor does this analysis contain "leaps in logic."

- O-11** This comment states that the existence of billboards along the Sunset Strip does not mean that new signage would not substantially degrade the visual character or quality of the project area or produce significant light and glare.

The analysis in the IS/ND does not rely solely on the existing conditions of the Sunset Strip to substantiate its conclusions. Rather, the IS/ND appropriately considers the baseline existing conditions of the Sunset Strip together with the effects that would be caused by the proposed project on these existing baseline conditions. This comment does not provide any substantial evidence or specific information to support the commenter's suggestions that the project may result in substantial degradation in visual character/quality or that it may result in significant light and glare. In contrast, the IS/ND supported each of its conclusions relative to visual character/quality and light and glare with substantial evidence (see Section 3.1).

- O-12** This comment states that the City revoked a permit for video signage at the former Tower Records on the grounds that the video signage would cause glare and other aesthetic impacts on nearby properties, including nearby offices. The commenter claims that this previous permit revocation constitutes substantial evidence that new digital signage would cause significant adverse aesthetic impacts.

The revocation of the Tower Records video signage permit does not provide substantial evidence that the proposed project would have a significant adverse aesthetic impact. As shown in Exhibit A in this comment letter, the Tower Records video signage permit was revoked in 2005. The City Council proceedings shown in Exhibit A do not contain any statements that the Tower Records sign would have resulted in significant impacts under CEQA. Rather, the grounds for the revocation appear to be nuisance issues. Public nuisances do not equate to significant impacts under CEQA; rather, there are specific thresholds under CEQA that identify when a significant impact to the environment would occur.

Furthermore, the Tower Records proposal for video signage was not subject to the proposed policy. The light and glare regulations in the proposed policy were designed based on a scientific study of the lighting conditions along the Sunset Strip and of future digital signage along the Sunset Strip (see Appendix D). In 2005, this study had not yet been conducted, and the proposed policy had not been drafted. The proposed policy, the associated light and glare study, and the evidence presented in the IS/ND demonstrate that significant effects relative to light and glare would not result from future digital signs that are designed pursuant to the proposed policy. The proposed policy also regulates other aesthetic effects of new billboards along the Sunset Strip, including size and design. As such, the permit revocation of the Tower Records video signage and the public testimony regarding the video displays have no bearing on the proposed policy that is currently being proposed by the City, since the Tower Records video signage was not designed in compliance with the currently proposed Sunset Strip Off-Site Signage Policy. As noted in Response O-3, the light trespass regulations that are included in the proposed Sunset Strip Off-Site Signage Policy are more stringent than the CEQA thresholds applied to any previous billboard projects in the City.

The Tower Records revocation is further irrelevant because it is over 12 years old and outside the scope of the record for this policy. Not only was that sign not subject to the proposed Sunset Strip Off-Site Signage Policy, but the digital technology has changed over the past 12 years since that project. Additionally, the resolution revoking the sign approval says that the sign approval was revoked because the sign violated multiple conditions of approval and was not built as approved. The driver distraction issues noted in the revocation are related to the sign having constantly moving images that change every two seconds or faster. The proposed policy includes multiple conditions to avoid this type of visual distraction. These conditions have been drafted and supported by experts and include standards that address the timing of image transitions. Thus, the Tower Records sign is not relevant to the environmental analysis in this ND.

O-13 This comment includes a quotation from the IS/ND, where the analysis incorporates a description of noise-sensitive receptors. Note that the quote provided in this comment is from the noise analysis of the IS/ND, even though the arguments in this section of the comment letter pertain to aesthetics. Commercial uses, such as offices, are not considered sensitive receptors in the categories of air quality and light/glare analysis. The commenter states that the IS/ND contains “no analysis whatsoever” regarding the potential for digital conversions and standard modifications to affect sensitive uses. The commenter goes on to say that the proposed policy would allow for increased sign area, height, or relocation of signage near residences and/or the William S. Hart Park and Off-Leash Dog Park without further CEQA review.

The commenter quotes an instance in the IS/ND where noise-sensitive receptors are described and then goes on to say that the IS/ND fails to include any analysis of how future digital conversions or standard modifications would affect sensitive receptors, including residential uses and the William S. Hart Park and Off-Leash Dog Park. The effects of digital conversions and standard modifications on such sensitive receptors are analyzed throughout the IS/ND. In fact, the IS/ND describes and discloses the existence of these sensitive receptors in order to analyze the project’s potential effects on such receptors. The analysis provided throughout the IS/ND substantiates that impacts to sensitive receptors would be less than significant. See in particular Sections 3.1(d), 3.3(d), and 3.12(a) of the IS/ND and Response O-6 for more information regarding the analysis of sensitive receptors. Section 3.1(d) discusses light trespass effects on sensitive receptors. Section 3.3(d) discusses exposure of sensitive receptors to air pollution. Section 3.12(a) discusses noise effects on sensitive receptors. Response O-6 describes in greater detail how potential impacts to sensitive receptors and surrounding land uses were analyzed in the IS/ND. This comment provides no substantiated evidence or specific instances where a digital conversion or standard modification would result in a potentially significant impact on the environment. Rather, the comment simply quotes the IS/ND’s characterization of noise-sensitive receptors, out of context, and then states that the IS/ND contains no analysis of effects on such receptors but fails to provide any evidence for this statement.

O-14 This comment states that the IS/ND’s reliance on compliance with regulations related to lighting and view obstructions is inadequate for the purpose of environmental review. “It is settled CEQA case law,” asserts the commenter, that “mere conformance with code provisions is an insufficient basis for an impact determination where there is other evidence pointing to a likely impact.”

This comment provides no specific case law citations to substantiate the above claim. Further, neither this comment nor the letter as a whole provides substantial evidence supporting a fair argument that a significant impact would occur as a result of the proposed project. No specific evidence or relevant substantiation is provided to support the commenter’s claims that significant impacts would result.

The proposed project consists of revisions to the City's off-site signage policies, and the code provisions related to light and view obstructions that are referenced in the IS/ND are code provisions that are currently being proposed. As such, it would have been inappropriate not to discuss and rely on these provisions, since they are being evaluated in this IS/ND for their potential effects on the environment, as well as their effectiveness for reducing potential effects on the environment. The City relied on expert and industry opinions to inform the code provisions in the proposed Sunset Strip Off-Site Signage Policy.

As discussed in Section 3.1 of the IS/ND, the proposed regulations pertaining to view obstruction, which address the Sunset Strip's unique visual resources and topography, help reduce the project's potential effects below a level of significance. Similarly, the proposed regulations pertaining to light and glare help reduce the project's potential effects below a level of significance. Furthermore, the proposed regulations contain verification measures that would ensure that the regulations are implemented for each future billboard project.

As discussed in Response O-9, the proposed policy has been crafted and informed by experts to contain regulations that, by their very nature, avoid and minimize potential impacts related to construction and operation of future billboard projects (i.e., the policy is self-mitigating). The analysis in the IS/ND confirms that no potentially significant environmental impacts would occur as a result of policy implementation and that no mitigation is necessary. As discussed in Response O-8, the aspects of the policy that are too speculative to evaluate at this time would be subject to additional CEQA analysis on a case-by-case basis.

O-15 This comment states that the proposed project may cause significant impacts in the category of traffic, due to increased hazards associated with a design feature. The commenter excerpts several sentences from the IS/ND out of context in an attempt to demonstrate that the IS/ND lacks discussion, analysis, or substantial evidence. More specifically, the commenter provides the following reasons for why the IS/ND's discussion of traffic hazards is insufficient: (1) the project area currently has only two digital signs and the policy would facilitate an increase in the number of digital signs on Sunset Boulevard to 24 digital sign faces, which is a "dramatic change in the area's overall visual character;" (2) this expansion of digital billboards is entirely inconsistent with the existing physical environment; (3) pre-existing signage in the project area does not provide evidence that impacts would be less than significant; (4) the IS/ND fails to describe the extent of vehicular and pedestrian traffic on and across Sunset Boulevard, including significant pedestrian activity at unsignalized crosswalks. Responses to each of these points is provided below.

(1) The IS/ND Considers the Potential Change in Visual Character. Contrary to the statements made in this comment, the roadway hazards analysis in the IS/ND considers the potential for the proposed project to change the visual character of the Sunset Strip and also considers the two properties with existing digital signs as part of the existing baseline conditions. In fact, the discussion of roadway hazards in the IS/ND opens with the following passage:

Operation of digital billboards and new billboards would introduce new visual elements to the Sunset Strip. Under existing conditions, the project area has two properties with digital signs. Upon approval of the proposed regulations, a maximum of 3 existing billboards would be allowed to convert from static to digital signs, and up to 17 future billboards constructed in conjunction with new development of a certain size or facade remodels could also be digital. The buildout year for the project is 2032; as such, by that year, the Sunset Strip may support up to 24 additional digital billboards.... The changes to the existing signage environment that would be allowed by the proposed Sunset Strip Off-Site Signage Policy would alter the visual environment that is observed by drivers along the Sunset Strip.

As demonstrated above, the IS/ND discloses the existing conditions and the effects of the project on these existing conditions, including the potential for implementation of the proposed policy to change visual character. The development scenario analyzed in the IS/ND is clearly characterized in Section 2.4, Methodology for Environmental Analysis. The effects, however, were determined to be less than significant (see Section 3.16(d) of the IS/ND).

(2) Inconsistency with Existing Physical Environment. The commenter states that the increase in digital billboards allowed under the proposed policy would be inconsistent with the existing physical environment. Their statement is not supported by any evidence, nor does the commenter support or explain why inconsistency with the existing physical environment would cause a substantial increase in roadway hazards along the Sunset Strip. As characterized in Section 2.3 of the IS/ND, the Sunset Strip currently has 89 billboard and tall wall faces. Off-site advertising is already ubiquitous along the Sunset Strip, with an average of one off-site sign face per every 100 feet of roadway. The presence of additional digital signage along the Sunset Strip would change the visual environment, as clearly disclosed throughout the IS/ND. The IS/ND does not ignore this physical change. The Sunset Strip already has unique driving conditions, which may be affected by the introduction of digital imagery to the roadway environment. For this reason, the City commissioned a study of traffic conditions along the Sunset Strip from a traffic engineering firm (Fehr and Peers) to examine the relationship between traffic safety and digital signs. Subsequent to conducting a literature review of available information on the relationship between digital imagery and roadway hazards, Fehr and Peers recommended standards for incorporating digital imagery into the urban design of the Sunset Strip in a manner that would avoid and minimize adverse effects on roadway safety. In addition, the lighting study commissioned by the City by lighting expert Frances Krahe and Associates included recommendations for lighting regulations that would protect drivers' vision. The proposed policy contains numerous restrictions on digital imagery that were formulated using the findings of the traffic study and the lighting study, such as maximum luminance and illuminance levels, fade rates, refresh rates, limits on motion, etc. See Appendices D and E for details. The analysis in Section 3.16(d) of the IS/ND, which addresses roadway hazards, concludes that compliance with the proposed policy would ensure that impacts from digital imagery relative to roadway hazards would be less than significant.

(3) Existing Conditions do not Provide Basis for a Less Than Significant Impact. While the IS/ND characterizes the existing billboard environment and overall visual environment along the Sunset Strip, the analysis does not rely on the nature of the existing conditions to substantiate its conclusions. Instead, the analysis discloses the potential for the project to change these existing conditions using specific evidence from the proposed policy, the billboard inventory, the traffic study, and the lighting study. The analysis specifically describes how the policy would address the potential for various types of digital imagery to cause roadway hazards. The specific restrictions and operational requirements that have been set forth by the policy are further substantiated in Appendices D and E, which have been added as part of the Final IS/ND to demonstrate the scientific and location-specific basis for the requirements that are being set forth in the policy relative to digital imagery.

(4) Failure to Disclose Extent of Vehicular and Pedestrian Traffic. The IS/ND frequently characterizes the Sunset Strip as an area with a high volume of vehicular and pedestrian traffic. These existing traffic conditions were also taken into account during studies of the conditions on Sunset Strip, which informed the creation of the proposed policy, especially with respect to digital imagery. Below is additional information regarding pedestrian traffic and crosswalks:

The Sunset Strip has 89 off-site signs, approximately 20 north-south oriented striped crosswalks, approximately 10 signalized intersections, and approximately 4 unsignalized crosswalks. There are significant numbers of existing billboards on the Sunset Strip and there is no evidence that the number of collisions are greater on the Sunset Strip than on other streets where billboards are prohibited. As such, the presence of off-site signs of a variety of shapes and heights in conjunction with signalized intersections and unsignalized crosswalks does not appear to correlate with an increase in traffic safety hazards.

O-16 This comment states that due to the nature of digital signage, roadway hazards can only be analyzed in the context of project-specific information. This project-specific information, the commenter states, should include specific roadway and streetscape infrastructure and sightlines, location of traffic signals, and pedestrian and vehicular traffic in the immediate vicinity of a proposed digital billboard. Without analyzing a definite signage proposal for a specific site, the commenter states, the IS/ND's conclusions regarding traffic hazards are "meaningless."

This comment requests site-specific analysis for the potential roadway hazards that could be caused by specific digital signs that could be installed along the Sunset Strip pursuant to the proposed policy. The commenter states that information regarding streetscape infrastructure, location of traffic signals, and pedestrian and vehicular traffic in the immediate vicinity of a specific sign is necessary in order to arrive at an impact conclusion. However, the commenter does not provide any evidence to support these claims that such information is necessary in order to reach an impact conclusion. The commenter also does not provide evidence that a future digital billboard would create a significant roadway hazard when paired with any particular roadway segment, streetscape infrastructure, sightline, or traffic signal along the

Sunset Strip. The commenter provides no description of actual pedestrian or vehicular conditions along the Sunset Strip. As such, no substantial evidence is provided to support the claim that these issues must be analyzed for each individual billboard in order to provide meaningful analysis and conclusions.

As described and substantiated in Response O-6, the Sunset Strip is a cohesive planning unit that is governed under a Specific Plan. While each location along the roadway may have different characteristics, the topography, land uses, traffic patterns, traffic infrastructure, and driving conditions are generally consistent along the Sunset Strip. As described in Section 2.1 of the IS/ND, the Sunset Strip is characterized by rolling topography with frequent curves and supports a high level of automobile and pedestrian activity. As described in Response O-6, analysis of the proposed project's effects on the Sunset Strip as a whole is appropriate. However, as further described in Response O-6, the proposed policy also considers and addresses site-specific issues that may arise. Below is a list of how individual digital billboard proposals would be addressed relative to their potential to cause roadway hazards:

- The proposed off-site signage regulations include detailed design and operational requirements related to orientation, size, luminance levels, refresh rates, fade rates, control systems, moving patterns, and animated content. The lighting requirements set forth in the proposed regulations are consistent with Chapter 2, Article 3 of the California Vehicle Code, which stipulates limits to the location of light sources that may cause glare and impair the vision of drivers.
- Sightline studies are required for digital conversions, new billboards incorporated into facade remodels, and standard modifications that involve additional area, increased height, and/or relocation on site. The Director of Community Development may deny projects with sightline and viewshed analyses that are insufficient, improperly documented, or that reveal increased impediments to sightlines and identified public viewsheds.
- Only three digital conversions are possible under the policy. These would occur on an existing billboard. As such, they would represent a change in an existing visual element rather than an entirely new visual element on the Sunset Strip. See Response O-6 for a list of specific sites where digital conversions could occur.
- All other digital billboards would undergo further CEQA review as part of the underlying development or facade remodel project. As necessary, this would include site-specific analyses for the particular development site along the Sunset Strip. Billboards would be required to comply with the design requirements in the policy, which include requirements to integrate the billboard structure into the building face.

In summary, consideration of the whole of the Sunset Strip in the analysis of potential roadway hazards is appropriate for the purpose of examining the proposed Sunset Strip Off-Site Signage Policy under CEQA. The policy applies to the whole of a specific plan area (i.e., the Sunset Strip). While each site

along the Sunset Strip may differ in terms of roadway curvature, proximity to a traffic signal, and proximity to a crosswalk, the overall roadway characteristics of the Sunset Strip are uniform and, therefore, warrant a comprehensive analysis. Additionally, as listed above, the policy includes a host of safety-related design and operational controls, developed in accordance with the California Vehicle Code and expert input, that would apply to all digital billboards along the Sunset Strip, regardless of location. As such, an analysis of the effects of digital signage on the Sunset Strip as a whole is an appropriate level of analysis for CEQA review of the proposed Sunset Strip Off-Site Signage Policy and is not meaningless analysis. The identification of a specific location would be speculative at this stage, and speculative information is not meaningful information for the public.

- O-17** This comment states that the policy would have a significant impact on traffic safety by increasing the risks of distracted driving. The commenter states that there are studies showing that some billboards can contribute to distracted driving and increase the potential for accidents. The commenter cites two studies (*Driver Distraction by Advertising: Genuine Risk or Urban Myth?* and *The Impact of Driver Inattention on Near-Crash/Crash Risk*). The commenter states that the studies have found that risk of an accident increases when drivers are distracted for more than 2 seconds. The commenter concludes by stating that the IS/ND “fails to adequately evaluate the extent to which the policy will increase the risk of driver distraction caused by an increased number of digital signs.”

The City commissioned a report to examine the relationship between traffic safety and digital or animated signage. The report, prepared by Fehr and Peers, summarizes and applies the available research on digital signage and traffic safety to the context of the Sunset Strip specifically. Fehr and Peers reviewed and synthesized information and findings from both academic and industry-sponsored studies (academic studies largely support the idea that digital billboard signage in general is distracting, and industry studies or reports primarily support the idea that academic research is inconclusive and causality cannot be proven). Fehr and Peers concluded that the literature did not present compelling evidence on 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 found to be 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. (Appendix E).

The commenter cites an article from the *Proceedings of the Institution of Civil Engineers, Municipal Engineer*, called “Driver Distraction by Advertising: Genuine Risk or Urban Myth?” written by Brendan Wallace (Research Fellow, Centre for Applied Social Psychology in Glasgow) that summarizes studies on signage

(non-digital) that were conducted between the 1950s and the 1970s.⁶ The merits and limitations of these studies are highlighted by the author of the article, who comes to the following conclusions:

- a. The effect is real. However, it is situation-specific. Many billboards and signs may have no measurable impact on road safety, but there is overwhelming evidence that, at least in some situations, signs and billboards can be a threat to road safety.
- b. Almost all studies agree that too much ‘visual clutter’ at or near intersections and junctions can interfere with drivers’ visual search strategies and lead to accidents.
- c. It is probable (although it has not yet been proven), that drivers can be distracted by ‘phototaxis’: isolated, illuminated signs and billboards by the side of the road in an information-poor (‘boring’) driving environment. More research is needed to discover the real risk of this phenomenon.
- d. Despite the risks to drivers the whole subject is under researched. But both technology and theory have moved on since the 1970s. Virtual reality technology has progressed to the point that convincing representations of the driving experience are far easier to create, thus dealing with the charge of lack of ‘ecological validity’. Moreover, there now exists a large body of research on visual processing that helps to create a new framework for visual perception. It is vitally important that new research is undertaken to integrate the theory and practice, and broaden the field such that other variables (type of car, personality of driver, type of road, light conditions) can be taken into account in terms of creating a predictive model of driver distraction.

As demonstrated above and in Appendix E, evidence of a distinct relationship between digital billboards and traffic safety is not conclusive. The commenter additionally cites a study titled *The Impact of Driver Inattention on Near-Crash/Crash Risk: An Analysis Using the 100-Car Naturalistic Driving Study Data*. The study was performed by the Virginia Tech Transportation Institute and sponsored by the National Highway Traffic Safety Administration. The study found that approximately 80% of the automobile crashes and 65% of the near-crashes that occurred during the study involved driver inattention. The study found that the most common distraction was the use of cell phones by the study participants. The study also found that the most dangerous contributing factor leading to crashes was fatigue. The study was conducted in northern Virginia and Washington, D.C. The study is included in Exhibit B of this comment letter. Fehr and Peers included this study in their literature review and cited it in their report (Appendix E). Exhibit B in this comment letter also includes a report titled *A Critical, Comprehensive Review of Two Studies Recently Released by the Outdoor Advertising Association of America*, which was prepared for the Maryland State Highway Association by Jerry Wachtel in 2007. This report was also reviewed by Fehr and Peers, among several other reports prepared by Wachtel.

⁶ <http://cogprints.org/3307/1/driverdistractionarticle.pdf>.

Subsequent to Wachtel's 2007 report, Exhibit B of the comment letter includes four articles. One is dated 2010 and is from the *New York Times*, the second is dated 2006 and is from the *Fort Worth Star-Telegram (Texas)*, the third is dated 2009 and is from the *St. Louis Post-Dispatch (Missouri)*, the fourth has no date and is from the *Toronto Public Space Initiative*. The *New York Times* article describes and quotes supporters and critics of digital billboards, and summarizes their respective positions on the merits and dangers of digital billboards. The article quotes the director of a nonprofit group called "Scenic Michigan" and concludes with a paragraph about how the Michigan House of Representatives passed legislation banning motorists from texting. The second article, from the *Fort Worth Star-Telegram (Texas)* also summarizes arguments made by different stakeholders in Texas regarding digital billboards. The article quotes a board member of Scenic America, a state representative, and Texas Transportation Commissioners, among other interested individuals and organizations. The third article, from the *St. Louis Post-Dispatch (Missouri)*, takes a similar tone. It quotes the director of Scenic Missouri and a billboard industry representative. The article concludes by stating that Lake Saint Louis, Columbia, and Kansas City have approved ordinances prohibiting digital billboards. The fourth article, from the *Toronto Public Space Initiative* (now called the "Toronto Public Space Committee") explains that the organization is opposing billboard proposals brought forth before the Toronto City Council.

The articles and studies cited by the commenter do not contain substantial evidence that digital billboards along the Sunset Strip, regulated in accordance with the proposed standards for lighting and safety designed for the ambient light and traffic speeds on Sunset Boulevard, would result in significant roadway hazards.

As stated in Section 15064(b) of the CEQA Guidelines, "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." Based on the results of the traffic and lighting studies commissioned for the project, as well as state and national standards, the City formulated a set of policies that address the issue of driver distraction on the Sunset Strip. These regulations were drafted based on expert opinion supported by facts, and they apply specifically to the area that is being addressed by the policy. As provided in the CEQA Guidelines Section 15384, substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. While the commenter does provide a variety of studies and articles on the subject of driver distraction, the studies do not address the specific conditions along Sunset Strip and do not present expert opinion regarding the Sunset Strip and the proposed policy and, therefore, do not constitute substantial evidence in support of a fair argument that the project would have a significant impact on the environment. Furthermore, the studies provided by the commenter have been examined by the City and its traffic consultant. The traffic consultant, the lighting consultant, and the City used

knowledge of the project area, a comprehensive literature review, and knowledge of existing and accepted state and national standards to formulate the proposed policy. As stated in Section 3.16(d), effects related to roadway hazards were determined be less than significant given the proposed regulations that limit the potentially distracting aspects of digital imagery.

- O-18** This comment summarizes the above concerns regarding a lack of site-specific analysis in the IS/ND. As described in Responses O-6, O-16, and O-17, the IS/ND analyzes effects on the Sunset Strip as a whole. Simultaneously, the policy takes into account site-specific concerns. Responses O-16 and O-17 substantiate that the analysis provided in the IS/ND is sufficient and complies with CEQA. This IS/ND does not purport that whole categories signage would not cause hazards; rather, it states that hazards caused by 3 digital conversions along the Sunset Strip would not be significant upon compliance with the proposed regulations, which were specifically designed using scientific evidence and expert opinion to minimize the potentially distracting effects of digital imagery.

This comment references a case (*Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 730), which holds that “personal observation testimony about dangerous road conditions constitutes substantial evidence in support of a fair argument concerning potentially significant traffic impacts. However, the commenter does not provide any personal observations or testimony regarding dangerous road conditions.

- O-19** This comment claims that the IS/ND does not analyze the “whole of the action.” More specifically, the commenter states that the City does not analyze the City-wide environmental effects of the proposed project and does not disclose the “wholesale environmental degradation that could be caused by the massive influx of digital signage into the City.” The commenter states that the IS/ND lacks analysis regarding the impacts of new billboards and other development that could occur under the proposed project.

The IS/ND thoroughly analyzes the whole of the proposed Sunset Strip Off-Site Signage Policy. The potential, maximum development scenario that could occur under the proposed policy is characterized in Section 2.3 of the IS/ND. Subsequently, Section 2.4 describes how this scenario will be analyzed under CEQA. As carefully explained and disclosed in the IS/ND, the details of future projects (i.e., new development, facade remodels, and the billboards that would be incorporated into these future potential projects) are too speculative to meaningfully analyze at this time. As described in Section 3.19, future development along the Sunset Strip has already been evaluated programmatically in the City’s General Plan EIR. While the General Plan EIR did not include the potential for such projects to incorporate digital billboards, the new digital billboards have been analyzed in this IS/ND. When sufficient information becomes available, the whole of each future project (the development plus any associated billboard(s)) will be analyzed under CEQA on a project-by-project basis. As such, the City is not ignoring or avoiding analysis of the effects of signage that would be developed under the proposed policy, nor is it avoiding analysis of development along the Sunset Strip by way of an IS/ND.

It should also be noted that this comment includes several incorrect statements regarding the proposed project. First, the commenter indicates that the project may have “City-wide” effects. As described in Response O-6, the proposed policy would apply to the Sunset Strip, which is governed under the Sunset Specific Plan. While some effects may occur to areas immediately surrounding the Sunset Strip, such effects would generally be limited, for the reasons described in Response O-6 and throughout the analysis in the IS/ND. Therefore, the effects of the proposed policy would not be City wide. Second, the comment indicates that the project would cause a “massive influx of digital signage into the City.” As described in both the IS/ND and the proposed Sunset Strip Off-Site Signage Policy, this would not be the case. The project only applies to the Sunset Strip, which is a 1.6-mile corridor extending across the northern portion of the City. The proposed policy does not increase new digital signage opportunities elsewhere in the City. The proposed policy would allow for 3 potential digital conversions of existing billboards, if those conversions comply with the proposed policy. The proposed policy would allow for an additional 17 digital sign faces, in association with future development projects or facade remodels. Installation of digital signs along the Sunset Strip would be phased over time via the City’s selection process (see Section 2.3 of the IS/ND for details). As such, new digital billboards would only appear on the Sunset Strip, their implementation would be gradual, and their number, size, and distribution would be limited by the proposed policy.

O-20 This comment states that the policy encourages development of high-rise structures by establishing favorable treatment for projects of at least 90% FAR and 75% FAR. The comment states that the potential for these projects to occur and to cause cumulative environmental impacts was not analyzed in the IS/ND.

Firstly, the policy encourages development that is entirely consistent with the goals and policies for the project area as provided in the General Plan (see Table 3.10-1 in the IS/ND). As such, the policy implements and supports aspects of the General Plan. General Plan implementation has already been analyzed pursuant to CEQA in the City’s General Plan EIR. Accordingly, the IS/ND focuses on the changes to the Sunset Strip development scenario that could occur under the proposed project, including 3 digital conversions and 71 standard modifications. Aside from the potential for such projects to include billboards, there is currently no additional information available on such future projects that was not known at the time of the General Plan EIR. As such, additional cumulative and/or programmatic analysis of such projects would be meaningless and speculative at this time.

This comment concludes by stating that the expansive high-density development will occur as a result of the proposed Sunset Strip Off-Site Signage Policy. This policy does not propose high-density development, nor does it propose any changes to permitted density or height limits. The commenter’s substantiation for this claim appears to be a sentence at the beginning of this comment, which reads as follows: the policy “encourages the development of high rise projects throughout the Sunset Strip by

establishing favorable treatment—through lucrative off-site signage rights—to fund high-density towers.” The CEQA Guidelines, Section 15064(d), states that a lead agency shall consider direct physical changes in the environment which may be caused by a project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project in evaluating the significance of a project’s environmental effect. However, as further provided in CEQA Guidelines Section 15064(d)(3), “an indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.” The commenter sets forth no evidence that the allowance of a sign pursuant to the proposed policy would specifically cause a development project to occur. There are numerous high-density projects on the Sunset Strip that have already occurred without the policy. Examples include the Sunset Time Project (a hotel and residential complex with an FAR of 2.51, approved in 2010); the Sunset/Doheny Hotel Project (a hotel, residential, and commercial project with an FAR of 4.28, approved in 2010); and Sunset La Cienega (a hotel, residential, and commercial project with an FAR of 3.25 on one parcel and 2.71 on a second parcel, approved in 1999). The policy does not expand development envelopes or allow for development types or intensities that are not currently allowable. The commenter provides no further substantiation that allowing billboards to be part of development will in fact cause such development or that the development will be high-density. As demonstrated by current and past development on the Sunset Strip and throughout the Los Angeles region, the area remains a highly desirable place for development to occur. Furthermore, it is in fact the City’s intent to facilitate such development, as indicated and allowed through General Plan policies and zoning designations that have already been adopted and evaluated under CEQA. For the reasons described above, it is not reasonably foreseeable that approving the Sunset Strip Off-Site Signage Policy would cause high-density development. While such development may in fact occur along the Sunset Strip, it is speculative that the proposed policy would cause this development.

O-21 This comment states that the IS/ND does not analyze potential visual effects to Hollywood Hills residents. However, effects on private views are not generally considered impacts on the environment under CEQA. This is supported by numerous CEQA cases, including *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, *supra*, 116 Cal.App.4th at p. 402; *Mira Mar Mobile Community v. City of Oceanside*, *supra*, 119 Cal.App.4th at pp. 492-493; and *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 734 [3 Cal. Rptr. 2d 488]. The IS/ND addresses effects from public streets within and surrounding the project area and determined that effects would be less than significant (see Section 3.1(a) for details).

Relative to illumination and nighttime lighting, the IS/ND considers residential properties to be sensitive receptors. The proposed policy restricts the increase of lighting that can occur at residentially zoned property lines as a result of digital billboards and provides verification and monitoring procedures to ensure that these standards are met over time (see Section 3.1(d) for details). Additionally, for any

standard modification that involves changing the lighting of an existing traditional billboard, compliance with the proposed lighting standards would also be required. The proposed standards for both digital billboards and traditional billboards were formulated based on expert opinion and industry standards.

O-22 This comment states that the IS/ND does not evaluate cumulative air quality and energy impacts resulting from digital billboards. This comment incorporates Exhibit C from the letter, which contains several articles pertaining to energy use and relationship between nighttime lighting and ozone.

The article titled *Illuminating the Issues: Digital Signage and Philadelphia's Green Future* is in fact cited in the IS/ND in order to characterize the amount of energy that is consumed by digital billboards. As explained in Section 3.7 of the IS/ND and in the proposed project, the City would require all digital billboards to offset their increase in energy use with renewable energy. As such, new billboards that comply with the proposed regulations are not expected to result in generation of GHGs in excess of significance thresholds or to the extent that a substantial adverse impact on the environment would result.

The potential for light from digital billboards to affect the breakdown of chemicals that form smog and ozone was not discussed in the IS/ND. The evidence provided of this effect in Exhibit C is not conclusive, nor is it linked in any way to billboards or to the proposed project. A passage from one of the articles is included below. Aspects that are relevant to this response are bolded.

*"Every night, chemicals from vehicle exhaust and other human created sources are broken down and prevented from becoming smog, ozone, or other irritants by a form of nitrogen oxide called the nitrate radical. Sunlight destroys the natural occurring nitrate radical, **so this process occurs only in hours of darkness.** Measurements taken **over Los Angeles by aircraft** show that light pollution from cities is suppressing the radical. Though the lights are 10,000 times dimmer than the Sun, the study's first results indicate that city lights can slow down the nighttime cleansing by up to 7% and they can increase the starting chemicals for ozone pollution the next day by up to 5%."*

The presence or absence of digital billboards on a 1.6-mile segment of roadway in the Los Angeles metropolitan area in a fully built out urban environment will not affect whether the night sky over the region ever enters "hours of darkness" that are referenced in the quote above. Furthermore, the proposed policy limits the amount of light that can be produced by digital billboards during the nighttime in accordance with state standards that are supported by the Illuminating Engineering Society of North America and the International Dark Sky Association.

The last article included in Exhibit C is from the Illinois Coalition for Responsible Outdoor Lighting. It summarizes issues surrounding digital billboards (namely, lighting, light trespass, and distraction) and provides recommendations to limit lighting, light trespass, and distraction. The commenter, however,

does not link the coalition's discussions or recommendations to the proposed project or to the conditions on the Sunset Strip.

The IS/ND sufficiently analyzes the air quality and greenhouse gas effects of the proposed project and concluded that impacts would be less than significant. The analysis included specific construction and operational scenarios for digital conversions and standard modifications. The potential effects of future billboards as part of a development project or facade remodel were determined to be speculative at this time (see Response O-23).

O-23 This comment states that the IS/ND defers analysis of the impacts of the 17 new digital billboards that will be installed in connection with new developments or facade remodels until such signage is subject to project-specific review. This comment suggests that the IS/ND does not adequately evaluate the cumulative effects of the proposed signage and high-density real estate projects. The comment goes on to provide excerpts from the IS/ND where the analysis explains that future project-specific CEQA review would address the impacts of future projects (the facade remodels, new developments, and any associated billboards).

Firstly, the IS/ND does not defer analysis of new signage, new developments, and/or facade remodels. As described in Response O-20, buildout along the Sunset Strip has already been analyzed at the programmatic level in the General Plan EIR. Where specific aspects of future digital billboards are known, these aspects are described and analyzed in the IS/ND. However, certain aspects of such future billboards are currently unknown, such as the manner in which such billboards would be designed into building facades, the angle of the billboards, the size, the height, the location, the surrounding heights and massing of the building on which it is mounted, etc. As stated in Section 15145 of the CEQA Guidelines, "If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." For many threshold questions addressed in the IS/ND, the City found that impacts from new billboards and any associated facade remodels and/or new development projects were too speculative for evaluation at this time. In compliance with Section 15145, the City noted this conclusion for each threshold question where it reached this determination. As provided for in Section 15145, this approach is permissible pursuant to CEQA.

The subject billboard policies and the future private development applications that may implement these policies are not one single project that must be studied together under CEQA. The details of the development projects/facade remodels that will incorporate new signage are largely dependent on the developer's application, and no applications for these developments are currently on file. Essentially, the commenter is asking the City to wait to begin environmental review of the proposed policy until all possible applications for development/facade remodels with billboards have been received and study both the policy and the projects together. This argument defeats the entire objective of this project, which is to set new policies and standards for billboards on the Sunset Strip, which will then be used by future applicants to design their projects. At the time of this writing, the new development/facade

remodel proposals have not come to fruition and any impacts from those projects are not reasonably foreseeable. The projects themselves are already permitted under the existing General Plan, SSP, and Zoning Ordinance and thus any future development on the Sunset Strip does not result *from* this proposed policy. That development is already permitted and those development patterns have already been studied in the General Plan EIR. Stated differently, any future development projects or remodels are not a reasonable foreseeable consequence of the policy. In fact, the Sunset Strip has seen significant development over the past few years. Following the economic recession, the City has processed applications for such varying uses as hotels, mixed-use projects, an arts club, office space, condominiums, apartments, live-work units, retail, restaurants, galleries and bars. Each project has varying amount of subterranean parking and heights that range from single-story buildings to multi-story towers. The types and densities of developments vary widely, and there is no single development pattern along the Sunset Strip upon which the City could rely for further study at this time. Given the high real estate values along the Sunset Strip and the fast-changing real estate market, it would be impossible (and highly speculative) to guess the types of development projects that will be proposed in the future. (See Response O-20 for examples of recent development projects along the Sunset Strip).

The City anticipates the addition of 18 new billboard faces during implementation of the policy, which would be integrated into new buildings or remodeled buildings. Of these 18 anticipated new billboard faces, 17 would be allowed to be digital signs. The proposed policy allows for up to 7 opportunities to integrate digital billboards into facade remodel projects and up to 10 opportunities to integrate new digital billboards into facade remodel projects. As such, the proposed policy places a limit on the number of new development projects and facade remodels that can incorporate new digital signage. The number and distribution of new digital signs was intentionally established by the City to complement the experience of pedestrians and drivers on Sunset Boulevard in accordance with the existing urban typology of Sunset Strip's distinct geographical regions. In summary, "Where future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences." *Aptos Council v. Cty. of Santa Cruz* (2017) 10 Cal. App. 5th 266, 295. The suggested environmental impacts are simply not reasonably foreseeable at this time, and evaluation of the impacts would be wholly speculative. See *Id.* at 296.

O-24 This comment summarizes the arguments made throughout the letter: (1) substantial evidence supports a fair argument that the proposed project may have a significant impact on the environment and an EIR should be prepared; (2) future digital conversions and standard modifications should not rely on the IS/ND for project-specific CEQA review; (3) the City has segmented the project by deferring CEQA review of new billboards installed in connection with new developments or facade remodels.

The City has provided responses to each of these concerns in the responses above. The commenter does not provide substantial evidence of a fair argument that the proposed project may have a significant

impact on the environment. Rather, the commenter simply states throughout the letter that the project may result in significant impacts in the categories of aesthetics, traffic, and land use, and air quality, but does not provide substantial evidence, as it is defined in Section 15384 of the CEQA Guidelines:

(a) “Substantial evidence” as used in [the CEQA Guidelines] means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

(b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

While the commenter provides a variety of scientific articles on the subjects of driver distraction, digital billboard energy use, and nighttime lighting, the studies are largely unrelated to billboards on the Sunset Strip, as they do not take into account the existing conditions present along the Sunset Strip and they do not evaluate or take into account the proposed policy. Rather, the body of work presented by the commenter consists of inconclusive studies, outdated articles from webpages that present a variety of opinions regarding digital billboards, and studies that do not pertain to the environment of the Sunset Strip. This information does not constitute “substantial evidence” as defined in Section 15384 of the CEQA Guidelines. In contrast, the proposed policy and the findings in the IS/ND are supported by substantial evidence, including a light and glare study commissioned specifically for digital imagery on the Sunset Strip, qualitative studies regarding air quality effects and greenhouse gas emissions, and a report regarding digital imagery and driver distraction on the Sunset Strip. As such, an ND is still the appropriate level of environmental documentation for the proposed project under CEQA.

Responses O-4 through O-8 characterize the nature and extent of the analysis that the IS/ND provides for digital conversions and standard modifications. These responses substantiate that the City has provided environmental review of future digital conversions and standard modifications that complies with CEQA. No further analysis is necessary for future digital conversions and standard modifications that comply with the proposed policy. Lastly, the City has not engaged in segmentation. Rather, in compliance with Section 15145 of the CEQA Guidelines, the City discloses aspects of the analysis that are too speculative for evaluation at this time (see Response O-23 for details).

Reference

City of West Hollywood. 2010. *Public Review Final Program Environmental Impact Report, City of West Hollywood General Plan and Climate Action Plan, Volume I*. October 2010. Accessed December 12, 2016.
<http://www.weho.org/city-hall/download-documents/-folder-626>.

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*Public Affairs Department
Southern California Division*

April 27, 2017

VIA U.S. MAIL AND E-MAIL

Ms. Sarah Lejeune
Contract Senior Planner, Long Range Planning and Mobility
Community Development Department
City of West Hollywood
8300 Santa Monica Blvd
West Hollywood, CA 90046
E-mail: slejeune@weho.org

Re: SUNSET STRIP OFFSITE SIGNAGE POLICY DRAFT RELEASED APRIL 6, 2017

Ms. Lejeune:

Clear Channel Outdoor has had the opportunity to review the Initial Study / Negative Declaration Sunset Strip Offsite Signage Policy released on April 6, 2017. While we appreciate all of the hard work and effort that staff has undertaken in this effort, we have some concerns regarding the proposed policy.

While the Vision and Guiding Principles of the new proposed policy is appreciated and well meaning, we believe that many of the proposed restrictions and regulations runs counter to the Vision and Guiding Principles and would like the opportunity to have them addressed.

The Vision states that Modifications to existing signage and new signage would benefit from improved quality, and high design standards that would protect and enhance the value. However, the digital billboard restrictions on size and orientation, locations, number of conversions, art requirements, illumination standards, and change rate would have a negative effect on the value of the assets.

Please see our list of questions and concerns below:

- Why is there a limit of 3 conversions to digital for the entire Sunset Strip?
 - We believe that there are many other opportunities and the City could benefit from an increased number.
 - The City should consider using relocation agreements which could provide additional opportunities above and beyond the 3 contemplated and result in additional removals of older signs elsewhere in the City.

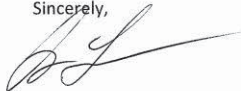
Clear Channel Outdoor
19320 Harbortgate Way Torrance, CA 90501
Call 310-755-7200 / Visit ClearChannelOutdoor.com / Follow @CCOutdoorNA

P-1

- The proposed lottery process is not defined and we will need a better understanding of that process before we can comment. We would like to reserve our right to address this issue when the details are released.
- Could you please explain how a property is considered to have a Cultural Resource which would qualify for a new billboard or conversion?
- We believe that the OAAA Illumination standards (Exhibit A) are more appropriate for digital billboards than the proposed illumination standards and highly recommend that the City adopt them into the policy. These standards are used by most cities across the nation who allow digital billboards.
- Why does the policy propose a 16 second change rate? The industry standards are 6-8 seconds and is far higher than California State law.
- Why does the policy restrict new signage from industry standards and horizontal orientations? The City should be flexible on orientation depending on specific site conditions. There are many ways the industry could use the standard sizes and still meet the creative goals of the City.
- Is the operating fee different from the negotiated development agreement fee? If so, what are the amounts of the Tier One, Tier Two and Tier Three operating fees?
- Why is the public art requirement 25% for digital billboards? This requirement would drastically reduce the value of any digital billboard. We recommend a much lower % and set times during the day for an art program.
- Could you please clarify what the vision of a Central Control System means? Does the City want control of the scheduling system? There is a security concern for operators to give up control to third parties or to have shared control.

We appreciate the hard work undertaken by the City to prepare this proposed new policy direction. We look forward to working together to enhance its positive benefits for the City of West Hollywood. While these are the questions and concerns we currently have, we reserve the right to comments further at any future public hearing or with staff directly.

Sincerely,



Layne Lawson
VP Public Affairs
Southern California Division

Cc: City Council Members
Paul Arevalo, City Manager
City Planning Staff

↑ P-1
Cont.
P-2
P-3
P-4
P-5
P-6

EXHIBIT A

OAAA Recommended Brightness Guidelines

A. OAAA Guidelines: The OAAA recommended brightness criteria for digital billboards is as follows:

- Light produced by a digital billboard should not exceed 0.3 Footcandles over ambient light levels.
- Measurement should be taken utilizing a Footcandle meter from the following distances (perpendicular to the face of the digital billboard):

Posters: 150 feet	10'6x36 Bulletins: 200 feet
14x48 Bulletins: 250 feet	20x60 Bulletins: 350 feet

The measurement distances are based on the average minimum viewing distances for each type of billboard.

- Digital billboards must have automatic dimming capability.

B. Basis for the Guidelines. These guidelines are based on recommendations by lighting expert Dr. Ian Lewin, Lighting Sciences Inc. (Scottsdale, AZ), in a March, 2008 report to the OAAA. Dr. Lewin developed brightness criteria to meet the following general guidelines:

- Appropriately Legible Copy. Digital advertising copy is appropriately legible and not overly bright.
- Simplicity. Provide a guideline that can be easily implemented and enforced. Measurement of the ambient light level of the sign on and off is conducted by a footcandle meter. If the difference in measurements is less than 0.3 footcandles, the digital billboard is in compliance.
- Established Guidelines. The criteria are based on established scientific methodology and established industry standards from the Illuminating Engineering Society of North America (IESNA) publication TM-11-00 "light trespass" theory which is an accepted standard in the lighting industry.
- Flexibility. Ensure proper brightness levels in a variety of lighting environments.

C. Additional Issues/Clarification

- **Automatic Dimming Capability.** A digital billboard must be able to automatically adjust as ambient light levels change. An automatic light sensing device (such as photocell or similar technology) should be utilized for adjusting the digital billboard's brightness. Sunset-sunrise tables and manual methods of controlling brightness are not acceptable as a primary means of controlling brightness.

Page 3 of 4

• **Brightness Measurement Methodology.** The brightness standard requires the use of a Footcandle meter (also known as a "Lux meter"). A Footcandle meter measures the amount of light arriving at the meter (illuminance), as opposed to an absolute measurement of the amount of light emanating from a light source or light sources (luminance). A Footcandle is a measure of lumens (light rays) that fall on one square foot area; Lux is the metric equivalent of a Footcandle.

In contrast, a Candela Meter / NIT Gun) measures the amount of light emanating from a specific light source (luminance). A NIT gun measures candelas (a measure of luminance or brightness) per meter squared (also known as "NITS"), which is a measure of the brightness emanating from a specific light source. It excludes ambient light (which may include light from many sources) from the measurement. Standard NIT levels and/or utilization of a NIT gun are not a part of the OAAA recommended brightness guideline.

Response to Comment Letter P

Clear Channel Outdoor

Layne Lawson

April 27, 2017

- P-1** This comment pertains to negative effects that the proposed policy may have on the value of billboard assets. This comment also poses questions and suggestions regarding the proposed policy (namely, the commenter requests an increase in allowable digital conversions, suggests relocation agreements, and requests more information regarding the selection process.)

Economic effects, such as the value of assets, are not discussed in this IS/ND, since these are not issues related to environmental impacts under CEQA. (See CEQA Guidelines, Section 15131.) The questions and suggestions presented in this comment do not pertain to the adequacy of the environmental analysis in the IS/ND. However, these questions and suggestions will be included in the Final IS/ND for review and consideration by decision makers.

- P-2** This comment requests further information regarding which properties are considered to have a cultural resources, enabling the property to be eligible for a new billboard or a digital conversion.

Please note that new billboards are not required to be located on a property containing a cultural resource. Relative to the 3 allowable digital conversions, such conversions can occur on a property with a locally designated historic building/structure. See Appendix A, which describes the details of the requirements for digital conversions.

- P-3** This comment recommends a different lighting standard for digital billboards. See Response M-2.

- P-4** This comment questions the required refresh rate of 16 seconds, stating that 6 to 8 seconds is the standard. See Response M-2.

- P-5** This comment poses questions to the City regarding the proposed requirements for billboard orientation, operating fees, public art requirements, and the control systems for digital billboards. The commenter also suggests decreasing the percentage of art that is required.

These questions and suggestions do not pertain to the adequacy of the environmental analysis in the IS/ND. However, these questions and suggestions will be included in the Final IS/ND for review and consideration by decision makers.

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Comment Letter Q

From: Claudia Lewis <claudialewis1019@gmail.com>
Sent: Thursday, April 27, 2017 4:20 PM
To: Sarah Lejeune
Subject: Sunset Strip Off-Site Signage Policy

Dear Ms. Lejeune and To Whom It May Concern:

Thank you for encouraging public discussion of the proposed project cited above.

As a 7-year resident of the area, I STRONGLY discourage any additional development of billboards or signage, digital or otherwise. In the past few years, we've seen a profound increase in the density of the area due to seemingly unending development/ construction of tower-sized buildings, and an overwhelming amount of increased foot and car traffic. This coupled with tourists, club-goers, and workers who are frequently texting while driving and walking has already created a tremendously unsafe level of distraction for drivers and pedestrians alike. As it is, one lives in a constant zone of accident-avoidance as people stand or cross in the middle of the street or text in a moving vehicle. One can only imagine the additional distractions and increased lack of safety if one had pixillated moving images and even MORE advertising to capture one's attention and further encourage "selfies", social media self-promotion, and photographs of billboards and signs that pretend to represent "The Strip".

The notion that these billboards could provide cultural or artistic value is laughable. It is ADVERTISING, plain and simple. There is plenty of advertising on the Strip as it is, and being a constant victim of marketing is neither stimulating nor artistically beneficial. Furthermore, the notion that the historic Sunset Strip needs or merits new "glittering" visual interest is offensive to its history and to the history of our diverse and historically beautiful city. We don't need to be Times Square's grossly tacky West Coast cousin.

Please leave the Sunset Strip alone and reject this unsafe, inelegant, and unsightly proposal.

Respectfully,

Claudia Lewis
8484 Harold Way
Los Angeles CA 90069

Q-1

Q-2

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Response to Comment Letter Q

Claudia Lewis
April 27, 2017

Q-1 This comment expresses opposition to new billboards. The commenter states that an increase in density has occurred in the City and describes several concerns related to existing conditions. Specifically, the commenter expresses concerns regarding construction of “tower-sized buildings”, increased foot and car traffic, tourists, nightlife, and workers. The commenter also states that there are currently unsafe levels of distraction for drivers and pedestrians and expresses concern that digital billboards and additional advertising would worsen these existing conditions.

The existing conditions of the Sunset Strip are considered as part of the baseline environmental conditions against which the potential effects of the proposed project were analyzed. For concerns related to driver distraction, see Response B-2.

Q-2 This comment states that billboards would not provide cultural or artistic value. The commenter further states that the new visual interest would be “offensive” to the history of the Sunset Strip and to that of the City. The commenter requests that the decision makers do not approve the proposed policy.

The cultural or artistic value of future billboards developed pursuant to the proposed policy is subjective and is not evaluated in this IS/ND under CEQA. However, the effects of the policy relative to visual character/quality have been evaluated in this IS/ND and were determined to be less than significant (see Section 3.1(c)). Additionally, the proposed policy would include public art requirements for new billboards and modified billboards. As such, under the proposed project, new billboards and billboards that have undergone modifications would be required to fulfill certain public art requirements. For example, digital billboards would be required to program a designated percentage of inventory with public art (see Appendix A).

The effects of the proposed project relative to historic resources are evaluated in Section 3.5(a) of the IS/ND. See also Response D-2, which discusses view obstruction of cultural resources. The effects of the proposed project on historic resources, as evaluated per CEQA, were determined to be less than significant. Nevertheless, the commenter’s statements regarding the history of the Sunset Strip and the City, as well as their opposition to the project, will be included as part of this Final IS/ND for review and consideration by decision makers.

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Comment Letter R

TRUMAN & ELLIOTT LLP

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April 27, 2017

VIA EMAIL AND U.S. MAIL

Ms. Sarah Lejeune
Senior Contract Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069

Re: Initial Study/Negative Declaration Regarding Sunset Strip Off-Site
Signage Policy

Dear Ms. Lejeune:

On behalf of our client, Wolverines Owner LLC, the owner of the Mondrian in the City of West Hollywood, we appreciate the opportunity to comment on the Initial Study/Negative Declaration for the Sunset Strip Off-Site Signage Policy Project. We are pleased the City is moving forward with an update to the City's Sunset Specific Plan regarding off-site signage and offer the following comments for your consideration.

Project Overview/Project Description:

We recognize the City is combining a policy document with the circulation of an Initial Study/Negative Declaration under the California Environmental Quality Act. In this vein, it is critical the Project Overview and Project Description are complete and comprehensive. While the Project Description need not analyze every imaginable planning scenario which may affect the environment, it should be stable and consistent to give the public a vehicle for intelligent public participation. See *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185.

Our client is concerned the proposed project and its objectives are not clearly described in the Project Description. For example, Page 14 of Section 2.3 (Project Details) of the Initial Study/Negative Declaration indicates the proposed regulations would allow for the following:

R-1

R-2

TRUMAN & ELLIOTT LLP

Ms. Sarah Lejeune
City of West Hollywood
April 27, 2017
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1. Updated standards, requirements, and guidelines for integrating new billboards into new development and facade remodels that supply major aesthetic improvements to existing buildings;
2. Opportunities for providing a limited number (20) of digital sign faces on the Sunset Strip, either integrated into new development or facade remodel projects, or as 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").

Then, Page 17 of Section 2.3 (Project Details) of the Initial Study/Negative Declaration states:

The project does not propose **any new off-site signs or digital conversion** of particular billboard faces. Rather, the proposed project provides regulations for how many digital billboard faces would be allowed and for the nature of development projects that could incorporate off-site signage into the project design.

These proposed policies and regulations seem internally inconsistent. Later, Page 20 of Section 2.3 (Project Details) of the Initial Study/Negative Declaration states:

The proposed policy language includes comprehensive standards, requirements, and guidelines for digital billboards and limits the number of digital billboards to no more than **20 sign faces constructed over the next 15 years**. . . . Recognizing that the opportunities are valuable and limited, the City is **proposing a series of non-preferential lotteries to award opportunities to install digital billboard faces at these 20 locations**. The multi-phase lottery system which would provide opportunities for: (a) up to 3 conversions from existing standard billboard faces that are located on sites that have designated cultural resources (e.g., sites with historic buildings that have been officially designated at the local, state or national level); (b) 7 new billboards as part of facade remodels; and (c) up to 10 new billboards integrated into new development (see standards above). Multiple lotteries would occur during this 15-year period.

The proposed policies leave the public uncertain as to whether new signage actually will be allowed or will be subject to a "lottery system". It is unclear how the "winner" would qualify and how new signage created over a fifteen-year period would ensure the proposed regulations would "comprehensively define a policy relative to off-site signage on the Sunset Strip and to allow for an optimal balance of signage to support the built environment."

Most importantly, the proposed project, as defined in the Project Description, appears to discriminate against existing owners of properties with billboard signage that consistently and carefully have maintained their buildings and billboards. Why would the City award signage to

R-2
Cont.

R-3

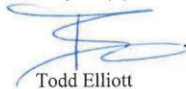
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Ms. Sarah Lejeune
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new developments or significant façade remodels and exclude existing billboard properties with the potential to convert to digital signs? Allowing existing billboard properties to participate would mitigate and/or avoid several potentially significant environmental impacts of the proposed project, as currently defined in the Project Description. If an objective of the proposed project is to enliven the Sunset Strip with digital signage and make the Sunset Strip the digital media center of west coast, why exclude existing billboard properties which could be converted to digital signage without a massive façade remodel?

We respectfully ask the City to consider a more consistent and stable policy, which would provide property owners, the public and residents a clear means of participating in the process of allocating off-site signage within the Sunset Specific Plan area.

Very truly yours,



Todd Elliott
of TRUMAN & ELLIOTT LLP

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R-4
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Response to Comment Letter R

Truman & Elliot LLP
Wolverines Owner LLC
April 27, 2017

- R-1** This comment expresses support for the City's updating of the off-site signage regulations in the Sunset Specific Plan. This paragraph is introductory in nature.
- R-2** This comment states that it is unclear from the project description in the IS/ND whether new signage would be allowed under the proposed policy or whether new signage would be subject to a lottery system. The commenter further states that it is unclear how the winners of the lottery system would qualify.

Contrary to the statements in this comment, the project description in the IS/ND clearly describes whether or not new signage would be allowed along the Sunset Strip. As quoted in this comment letter, the IS/ND states that "The project does not propose any new off-site signs or digital conversion of particular billboard faces. Rather, the proposed project provides regulations for how many digital billboard faces would be allowed and for the nature of development projects that could incorporate off-site signage into the project design." As explained throughout the IS/ND, the proposed project itself does not propose the development of specific new billboards, nor does it propose conversion of certain traditional billboards to digital. The specific locations of future billboards and digital conversions are currently unknown. Rather, the proposed project amends the City's current regulations to allow for new billboards and to allow for the conversion of traditional billboards to digital. The development of new billboards and the conversion of traditional billboards to digital would be subject to regulations set forth in the proposed policy. The City will be proposing a selection process to award opportunities for new billboards and digital conversions. As such, new billboards would be allowed and the selection of specific development applications would be subject to a system for selection that will be determined by the City.

The details of the proposed policy that are described in the project description of the IS/ND are those that are pertinent to the analysis of the environmental impacts of the proposed policy under CEQA. The selection process is generally summarized in the IS/ND (see Section 2.3). Details that are pertinent to the environmental analysis in the IS/ND are characterized in this section, such as how many digital billboards would be allowed and the general requirements for installing a new billboard or converting an existing billboard to digital. Further details on the process, such as how the winner would qualify and be selected, do not have bearing on the environmental analysis in the IS/ND. As such, to the extent that certain details of the proposed policy do not affect or pertain to the environmental analysis in the IS/ND, they were not exhaustively discussed in the project description.

The commenter also states that it is unclear how “new signage created over a fifteen-year period would ensure the proposed regulations would ‘comprehensively define a policy relative to off-site signage on the Sunset Strip and to allow for an optimal balance of signage to support the built environment.’ ”

The above quote has been taken out of context. The full quote is below:

“The City is also setting forth the proposed regulations to comprehensively define its policy relative to off-site signage on the Sunset Strip and to allow for an optimal balance of signage to support the built environment.”

This sentence is from the “Background” section of the project description (Section 2.2 of the IS/ND). As such, the intent of the sentence is to provide background for why the City is pursuing the proposed project. This comment suggests that it is unclear how the new signage would comprehensively define the policy and how the new signage would allow for an optimal balance of signage. It is not the new signage would define the policy—rather, it is the proposed regulations that define the City’s off-site signage policy and allow for an optimal balance of signage. The City’s policy direction regarding off-site signage and the proposed balance of signage is subjective, and City decision makers will decide whether or not to approve the policy and the balance of signage that it would allow.

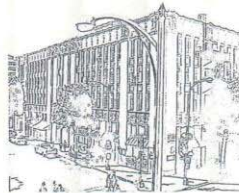
R-3 This comment expresses concern regarding discrimination against existing owners of properties with billboards. The comment states that allowing existing billboards the potential to convert to digital would mitigate and/or avoid several potentially significant environmental impacts of the proposed project, as currently defined in the project description of the IS/ND.

The proposed policy would allow for 3 conversions of traditional billboards to digital billboards. Furthermore, the IS/ND does not identify any potentially significant environmental effects. As such, no mitigation is required under CEQA.

R-4 This comment requests that the City consider a more consistent and stable policy that would provide property owners, the public, and residents a clear means of participating in the process for allocating off-site signage.

This comment does not pertain to the adequacy of the environmental analysis in the IS/ND. The City has held public meetings to gather input on the proposed policy and has notified the public, agencies, and interested organizations and individuals of the proposed project and of the IS/ND, in a manner consistent with CEQA Guidelines Section 15072. Additionally, public outreach was conducted during the drafting of the proposed policy and during the environmental review process. (See Response O-9 for details regarding public outreach and research.) Furthermore, after the draft policy language and the associated IS/ND were released for public review in April 2017, the City collected comments on the project and on the IS/ND. Additional opportunities for public comment will be available during public hearings that will be held as the proposed project is brought before decision makers for review and approval.

Comment Letter S



JDC Investments

May 5, 2017

To Whom It May Concern:

My family and I have been proud owners of 9169 Sunset Blvd for over four decades. We have had the opportunity to read the Initial Study / Negative Declaration that was prepared in April of this year and are both incredibly impressed and supportive of what the City is trying to do.

The strategy is thoughtful and deals with many of the concerns that we would have as property owners. Having a long-term approach to the new policy will pay dividends for the residents, property owners, visitors, and patrons of our City. Furthermore, the plan takes into account both environmental and traffic impacts. Lastly, having an artistic approach to it, will add to the meaningfulness of the project and continue to allow the Sunset Strip to remain iconic for decades more to come.

We are very supportive of the plan and looking forward to its success

Sincerely,

Bijan Chadorchi

9615 Brighton Way • Management Office • Beverly Hills, CA 90210 • Phone: (310) 550-6296 • Fax: (310) 278-0660

S-1

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Response to Comment Letter S

Bijan Chadorchi

May 5, 2017

S-1 This comment expresses support for the proposed project. No response is necessary.

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Comment Letter T

Hello,

My name is Christopher Shane. I became the property owner of 8752 Sunset Blvd when my father passed away in October of last year. My father was sick for many years prior to his death. During this time, I was caretaker for him and his business.

Over the last seven years, the building on our property has been leased to the Eveleigh restaurant. The restaurant is a vibrant space with farm to table cuisine, an outdoor dining patio lined with homegrown herbs and vegetables and a grove of olive trees in front. The one thing you won't see in front is a sign with the name Eveleigh on it. The Eveleigh group decided not to post a sign for their restaurant, and the nameless façade is intended to add to the allure of what is inside.

However, there is a 20 by 20 foot pole sign on the property, which Kenneth Cole used for advertising prior to Eveleigh moving in. My grandfather built the sign in 1962 originally to advertise for Economy Rental Car. While running the business for my father, I grew sick of the blank abandoned look of the sign and worked with the city to put art up on it. I also donated the sign to the city to advertise for the Farmers Market.

As West Hollywood is considering new sign policy, I would like to propose additional eligibility for situations like this one.

To allow for previously constructed onsite signs to be converted to off-site if the following conditions are met.

- A. The signs were constructed prior to the 2017 update to the SSP.
- B. The sign are not/cannot at any point be the sole producer of income on the property.
- C. Only a certain number of onsite to offsite proposals should be considered on a yearly basis
- D. The property has undergone a change of use, which has made the on-site use of the sign greatly diminished.
- E. There should be a minimum amount of advertising square footage to be eligible.
- F. The signs should be required to post art for a certain percentage of time out of the year.

T-1

These are only a list of possible options to consider. I would really like to have the opportunity to discuss this more. I think that more updated art and advertising on this sign and other ones like it would dramatically improve the look of the strip and coordinate well with the new regulations being considered. Thank you very much for taking the time to read all of this.

Kind Regards,
Chris Shane
310.666.7266

↑
T-1
Cont.

Response to Comment Letter T

Christopher Shane

Date unknown

T-1 This comment contains suggestions for the proposed policy. Specifically, the commenter suggests included provisions for existing on-site signs to be converted to off-site signs. The comment lists provisions that the City could use to regulate this process.

These suggestions do not pertain to the adequacy of the environmental analysis in the IS/ND. However, these suggestions will be included in this Final IS/ND for review and consideration by decision makers.

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Comment Letter U

Response to Sunset Digital District Zoning Ordinance Draft

1.) ENHANCED VALUE

In the planning phases of a city, there are few if any scenarios that are of benefit to every agency involved. Usually the most profitable are the most taxing on the environment or those that go to reverse climate impact are prohibitively expensive. Until the first discussion of this, ordinance, West Hollywood's smart and comprehensive public art percentage was either endured or ignored. Since digital signage tends to be an incredibly polarizing topic, I hope the following ideas address a few constituent concerns...

- i. With funding from the outgoing administration, and a deep interest in reinvigorating American Cities, the NEA taught us the term "place-making". Usually a way for an ailing, hopeless city to cure and invigorate its community.
- ii. The Strip is not, by any means ailing, but in answer to the corporatization of a cultural icon, West Hollywood understands that Corporate America lacks authenticity and emerging Art in America lacks funding.
- iii. That is why this plan has incredible potential. The art lends credence to the advertising and the advertising pays for the art.
- iv. This district is one of the most unusual models for place-making, and will put West Hollywood in position to qualify for both public and private grant funding.

2. UNDERSTANDING THE OPPORTUNITY

West Hollywood is and always has been at the avant-garde. With this bold iteration, the city of West Hollywood is redrawing the boundaries of art and commerce.

- i. With great power comes great responsibility.
- ii. This platform if protected and curated, will become a funded museum for the next century.
- iii. As the billboards go up, there needs to be a period experimentation and testing to understand inherent and invisible pitfalls. Because of the associated controversy the platform needs to emerge fully formed- no contests until you have cache.

U-1

U-2

3. THE CARE AND FEEDING OF A NEW PLATFORM.

Because the closest model for this is a fraction of what the Sunset Digital District could become, there are a few objectives that must not be forgotten.

- I. This is not public art in so much a museum exhibition.
- II. The work must reflect the city that surrounds it- yes, in demography, but also in its ability to provoke and engage.
- III. Above all, the content of this platform must begin with credible and mid-career artists of considerable weight. The more emerging and experimental phase can follow. (see 2iii)
- IV. Without a strong beginning, this platform has the potential to become a neighborhood art fair.
- V. Today's audiences are not concerned with keeping art and commerce exclusive of one-another. In fact, social media and branded content are the comingled conduits through which free expression flows to them. Witness the "films" that Louis Vuitton and Prada and BMW commission from digital creators. The only requirements audiences have, are quality and authenticity.
- VI. Art and Commerce may inspire each other- with the enhanced aesthetic of the Strip as the main recipient.

U-2
Cont.

4. PROTECT CREATIVITY FOR THE BENEFIT OF ALL.

Because of the vague language in the current contracts, there was never a provision that required payment to artists or curators.

- i. Create a fund paid into by the developers and the lease holders- Either gross profits from dollar 1 of ad revenue or a flat art tax tied to an annual license renewal.
- ii. From this fund will be a standard artist fee- as determined by WAGE standards as a bare minimum.
- iii. From this fund will be allocated a standard amount for each of the curators.
- iv. Possibilities for inclusion: a) Create a production fund or grant for special projects- Curators recommend a recipient-decided by arts council or digital

U-3

councils. b) There should be an ongoing discursive program based on the currently exhibited films, an art-talk located ON the strip.

- v. Make the interior of the Bell tower the home of an artist residency.
- vi. There needs to be conservation baselines as well—see following...

U-3
Cont.

5. TECHNOLOGY BASELINE

As each year brings the installation of newer digital signs, technology must be incrementally upgraded so the standard of excellence for exhibition is maintained.

- i. Upgrading digital boards is expensive, but outmoded tech is wasteful and creates light pollution- outmoded signs increase nits and foot-candles to compete with higher definition.
- ii. What zoning incentive can be created to encourage owners to upgrade their technology?
- iii. An RFP for a tech conservation company—or a financial provision, per sign for tech upkeep. This can double as a means of keeping the foot candles in compliance.

U-4

6. OBSERVE AND ENGAGE

If this is to be a legitimate platform, then people need to stand still long enough to witness it. Using the Highline in Manhattan, and the Super Tree Grove in Singapore, as inspiration, how can the Strip use this opportunity for digital growth and be welcoming to humanity as well. Sunset Strip is a cool place to drive, but a cold place to walk and sit.

- i. Encourage all developments in this area to create vertical, terraced public gardens that have viewing platforms and seating.
- ii. Create seated green medians.
- iii. Create seated green roof gardens- ala SoHo House
- iv. Encourage existing buildings on Sunset to open their roofs for viewing.
- v. Build permanent terraced, greens caped, *elevated* bleachers around the Bellowers.
- vi. Create space along Sunset for viewing decks.

U-5

- vii. Encourage outdoor dining in existing buildings.
- viii. Make every billboard pole a Super Tree climbing garden.

I have come to respect and admire West Hollywood. The City is a model for inclusion and tolerance, and as some of the greatest arts advocates in America. Thank you for letting me be a part of your vision and thank you for letting me be of service.

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↑ U-6

Examples of integrated greenspace:

I U-7

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Response to Comment Letter U

Anonymous
Date unknown

U-1 This comment expresses support for the proposed project, particular the public art component. No response is necessary.

U-2 This comment recommends a period of experimentation and testing as billboards are installed. The comment also contains a number of recommendations relative to the implementation of the public art component of the proposed project.

These recommendations do not pertain to the adequacy of the environmental analysis in the IS/ND. The art component of the proposed project is generally discussed in the IS/ND as being a part of the project and as contributing to the potential for the project to enhance viewing experiences and visual character along the Sunset Strip. However, the specifics of the art component, such as the types of artists and artwork that would be displayed, does not pertain to the adequacy of the environmental analysis in this IS/ND. However, these suggestions will be included in this Final IS/ND for review and consideration by decision makers.

U-3 This comment contains recommendations for how artists who are displaying art as part of the Sunset Strip Billboard District would be paid.

Economic concerns, such as compensation for artists, are not discussed in this IS/ND, since these are not issues related to environmental impacts under CEQA. (See CEQA Guidelines, Section 15131). These suggestions will be included in this Final IS/ND for review and consideration by decision makers.

U-4 This comment suggests that the City include provisions to encourage digital billboard owners to update the digital technology over time. The commenter notes that incentives or requirements for maintaining digital technology would help ensure that digital billboards remain in compliance with the City's proposed standards for light trespass.

Note that the proposed policy includes verification measures for the lighting standards that would require digital billboard operators to submit monitoring reports to the City's Community Development Department upon installation, three months after installation, and annually thereafter. As such, the proposed policy includes measures to ensure that digital billboards remain in compliance with the proposed lighting standards throughout their operational life. However, the commenter's recommendations regarding maintenance and updates to digital technology will be included as part of the IS/ND for review and consideration by decision makers.

U-5 This comment recommends urban design techniques to create a pedestrian environment for the observation of digital signage.

This comment does not pertain to the adequacy of the environmental analysis in this IS/ND. However, it is noted that the proposed policy includes a variety of requirements that would support the enhancement of the pedestrian environment along the Sunset Strip (see Appendix A). These recommendations will be included as part of this Final IS/ND for review and consideration by decision makers.

U-6 This comment expresses support for the art advocacy, inclusion, and tolerance in West Hollywood and thanks the City for the opportunity to comment. No response is necessary.

U-7 This comment is a placeholder for “examples of integrated greenspace.” However, no examples were included. No response is necessary; however, the City has reviewed the commenter’s recommendations regarding pedestrian improvements. These recommendations included pedestrian improvements that incorporate greenspace. As stated in Response U-5, the commenter’s recommendations for pedestrian improvements will be included as part of this Final IS/ND for review and consideration by decision makers.

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

Comment Letter V

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May 15, 2017

Sarah Lejeune
Contract Senior Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Re: Sunset Boulevard Offsite Signage Policy

Dear Ms. Lejeune:

On behalf of my client, ACE Outdoor Advertising, I am writing to follow up on the letter you received from Kaufman Legal Group pertaining to the proposed off-site signage policy for Sunset Boulevard. Please note that although there are some concerns about the proposal in its current form, as a West Hollywood-based small business, ACE supports key components. For instance, we recognize that the Sunset Specific Plan (SSP) was adopted more than 20 years ago and are in agreement that there exists a need to revisit key provisions so as to ensure their relevance to emerging technologies. At the same time, however, it is imperative that the City weigh these alternatives while considering the range of adverse impacts to surrounding residential communities, to public safety, and to traffic flow.

ACE supports staff's proposal to retain the overall limit on the number of digital signs but shares concerns expressed by numerous residents as well as members of the City's Historic Preservation Commission regarding the potential for a geographic concentration of such signs. The proposal to establish seven smaller geographic zones is a step in the right direction. However, the overall number of 20 new digital signs is far greater than that which Sunset Boulevard can accommodate without experiencing unintended consequences.

A key justification that has been provided for the large number of off-site digital signs to be permitted along Sunset has been that some of these signs will be placed on properties with cultural resources and serve to support those resources' adequate maintenance. Yet not all 20 of these signs will serve such a purpose. The "Initial Study/Negative Declaration" prepared by Dudek notes that as many as "17 new digital billboards" can be incorporated into new developments (p. 21). Planning staff themselves noted publicly that the overall figure is merely intended as a starting point. To minimize negative impacts, we propose a limit of one off-site digital sign per zone and a stipulation that digital signs be incorporated into uniquely-designed structures, such as the Sunset Spectacular pilot the City recently approved.

ACE supports the proposal to allocate a minimum of 25 per cent of digital advertising space for public arts programming and encourages staff and decision-makers to consider increasing this number to 40 per cent as a means of mitigating the adverse impacts that digital signs will have on surrounding neighborhoods, on public safety, and on traffic flow. Aside from the obvious benefits of such a feature,

V-1

V-2



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

doing so would inject a spirit of community and public-mindedness into these signs and into the Sunset Strip as a whole – something both the City and residents have endeavored to achieve for decades.

As part of the City's framework of having off-site signage contribute to public services, we urge Planning staff and decision-makers to consult residents on community benefits – both in this process and in development agreement negotiations. Moreover, ACE applauds the inclusion of language which permits obstructed signs to be raised higher so that trees and other streetscape are encouraged rather than viewed as a hindrance; sets out a process for the relocation of existing signs on the same property; allows the relocation of square footage of tall wall space; and disallows standard-sized digital signs in order to encourage creativity. We are confident that the combination of these proposals and the feedback you have received to date will contribute to the continued vibrancy of Sunset Boulevard.

Sincerely,



AARON GREEN
President

CC: Paul Arevalo, City Manager
Stephanie DeWolfe, Assistant City Manager
Bianca Siegl, Manager, Long Range and Mobility Planning

↑ V-2
Cont.

↑ V-3

↑ V-4

Response to Comment Letter V

The Afriat Consulting Group, Inc.

Aaron Green, President

May 15, 2017

V-1 This comment states that the commenter is submitting a letter on behalf of ACE Outdoor Advertising. This comment expresses support for components of the proposed project, such as updating the Sunset Specific Plan to account for new technologies. However, this comment also expresses concerns regarding several aspects of the proposed policy. Specifically, the commenter states that the overall number of allowable new digital signs is “far greater than that which the Sunset Boulevard can accommodate within experiencing unintended consequences.” The commenter also states that the City must consider adverse impacts to surrounding residential communities, to public safety, and to traffic flow. The comment recommends a limitation of one digital off-site sign per each of seven geographic zones along the Sunset Strip. The commenter also recommends a requirement for digital signs to be incorporated into uniquely designed structures.

The City has considered the potential effects of the proposed project, including impacts to surrounding residential communities, public safety, and traffic. Effects on nearby sensitive receptors are addressed in particular in Sections 3.1(d), 3.3(d), and 3.12(a) of the IS/ND. See also Response O-6 for details regarding how impacts to surrounding areas and sensitive receptors have been evaluated. Regarding public safety, the IS/ND assessed potential effects on police and fire services, emergency access, implementation of emergency plans, and roadway hazards. Effects were determined to be below a level of significance. See also Response B-2 for details regarding driver distraction and the City’s proposed regulation of the potentially distracting aspects of digital imagery. Effects to traffic and transportation were addressed in Section 3.16 of the IS/ND, and effects were determined to be below a level of significance. See also Response F-1, which addresses concerns regarding traffic congestion and flow.

The limitations on the number of digital billboards were developed by the City based on an off-site signage study (see Appendix A) and feedback from consultants and stakeholders who are experts in the industry. From a land use and planning perspective, determining the optimal number of digital signs was based on evaluation of the existing conditions and determining the correct balance between enhancement and preservation of the urban design sensibility of the Sunset Strip. Also, the policy requires a phased approach that would result in incremental changes over time. The allocation process was generally based on two concepts: an even distribution along the billboard zones that reflects the high visual activity in the east and west regions but minimal change to the existing low scale and somewhat more subtle visual aesthetic of the central region. This “procession” of digital opportunities is overlaid with additional allocations for areas containing public open space and key activity areas. The proposed policy was also formulated in a manner consistent with policy direction contained in the City’s General Plan. (See Section

3.10(b) of the IS/ND, which demonstrates how the proposed policy is consistent with applicable, adopted land use plans.) This IS/ND evaluates the potential environmental effects of implementing the proposed policy, relying on the policy's limitation of the number of digital billboard faces as the maximum potential buildout of digital billboards. Further limitations on the number of digital billboard faces, as suggested by this commenter, would likely reduce the environmental effects of the proposed policy that were identified in this IS/ND. However, no potentially significant effects have been identified; as such, the City need not consider mitigation measures or alternatives. It should also be noted that all new digital billboards would be required to be integrated into either a new development project or a project involving the remodel of the facade of an existing building. Such projects, including the associated digital signage, would be subject to project-specific review under CEQA. The proposed policy specifies the outer limit of the number of new digital billboards that would be allowed—the number of digital billboards that would actually be constructed is unknown and would be dependent on the property owners' development applications and whether or not those applications comply with this policy (as well as other applicable codes, specific plans, and the General Plan).

The commenter's concerns regarding the allowable number of digital billboards and their suggestion regarding further limitations on the number of digital billboards will be included in the IS/ND for review and consideration by decision makers.

V-2 This comment states that ACE Outdoor Advertising supports the proposed allocation of 25% of programming for digital billboards to be public art. ACE further encourages City staff and decision makers to consider increasing the required percentage to 40%. The commenter states that additional art requirements would mitigate adverse impacts of digital signs on surrounding neighborhood, public safety, and traffic flow.

No significant or potentially significant environmental impacts were identified in the IS/ND. Furthermore, the display on a digital billboard (whether it consists of advertising or public art) is not expected to alter the potential environmental effects of digital imagery, such as light trespass and roadway hazards. However, the suggestion to increase art requirements will be included as part of the IS/ND for review and consideration by decision makers.

V-3 This comment provides a suggestion that the City consult residents on the community benefits that are outlined in this proposed policy and in more specific benefits that would be identified in future project-specific development agreements.

The City has held public meetings to gather input on the proposed policy and has notified the public, agencies, and interested organization and individuals of the proposed project and of the IS/ND, in a manner consistent with CEQA Guidelines Section 15072. For future development projects, including those that contain a billboard, the City would continue to comply with CEQA requirements for public

notices and commenting periods. City decision makers would review and consider recommendations for community benefits that are submitted by residents.

- V-4** This comment expresses support for specific aspects of the proposed policy, which are listed in the comment. No response is necessary.

APPENDICES AVAILABLE IN THE PLANNING DIVISION

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