

October 2010

FINAL Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan Volume 3 - Appendix H

State Clearinghouse #2009091124



Lead Agency:
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Community Development Department
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Program Environmental Impact Report
City of West Hollywood
General Plan
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Appendix H Response to Comments on the Public Review Draft EIR

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APPENDIX H RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft Environmental Impact Report (EIR) for the City of West Hollywood General Plan was distributed for public review on June 25, 2010, initiating a 45-day public review period ending on August 9, 2010. During this public review period, a total of 63 letters and emails were received. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This chapter was prepared in accordance with CEQA and provides responses to all written comments received on the Draft General Plan and Draft EIR. Table 1 provides a list of the comment letters received, including details on the agency, organization, or individual that submitted the letter and the date it was received by the City. For organizational purposes, each letter was determined to be either a General Plan-themed letter or an EIR-themed letter. General Plan-themed letters are those that primarily relate to the content within the General Plan (i.e., Guiding Principles, goals, and policies, etc.). EIR-themed letters are those that primarily focus on aspects of the environmental analysis included in the Draft EIR. Each letter has been assigned a letter and number code as outlined in Table 1. Individual comments in each letter have also been coded to facilitate responses. General Plan-themed comments and responses are preceded by the letter G, while EIR-themed comments and responses are preceded by the letter E. Because many letters cover both topics, the City has responded to all comments. Both General Plan-themed and EIR-themed comment letters will be considered equally by decision makers during hearings for the General Plan.

A copy of each comment letter is provided prior to the response(s). Within the responses to comments, all references to General Plan refer to policies and page numbers in the Public Review Draft General Plan, dated June 25, 2010. All references to Draft EIR refer to the Public Review Draft Environmental Impact Report, dated June 25, 2010.

Table 1. List of Comment Letters on Draft EIR

Letter No.	Agency/Organization/Individual	Date Received	Page # of Response
General Plan-Themed Letters			
G1 ¹	Joe Kay	June 17, 2010	10
G2 ¹	Sylvia Strike	June 21, 2010	12
G3 ¹	Michael Spoodis	June 21, 2010	14
G4	Ian Sterling	June 25, 2010	17
G5	Vivian Gumbiner	June 28, 2010	19
G6	Tom Atwood	June 29, 2010	21
G7	Carl Gunther	July 2, 2010	23
G8	Martin Strudler	July 8, 2010	26
G9	Russell Vare	July 11, 2010	28
G10	Steven Greene	July 17, 2010	30
G11	Seth William Meier	July 30, 2010	33
G12	John Vergara	July 30, 2010	35
G13	Janene Mitchell	July 30, 2010	37
G14	Sandra Mitchell	July 31, 2010	40
G15	Manny Rodriguez	August 2, 2010	42
G16	Kirk Marcolina	August 2, 2010	44

Letter No.	Agency/Organization/Individual	Date Received	Page # of Response
G17	Michael Zannella and Richard Blons	August 2, 2010	46
G18	Steve Martin	August 3, 2010	51
G19	Rob Marcolina	August 3, 2010	57
G20	Carleton Cronin	August 3, 2010	59
G21	Sherie Stark	August 5, 2010	61
G22	Sze Wing Leong	August 6, 2010	65
G23	Kevin Burton	August 6, 2010	68
G24	Mary and Pochih Leong	August 6, 2010	70
G25	Jim Dire	August 6, 2010	72
G26	Heidi Alexander	August 7, 2010	74
G27	Brad Keistler	August 8, 2010	76
G28	Midge Barnett and Laurin Rinder; Kim Roth	August 8, 2010	78
G29	Joshua Trachtenberg and Audrey Prins	August 8, 2010	81
G30	Stuart and Beverly Denenberg	August 8, 2010	83
G31	Glenda Pollock	August 8, 2010	85
G32	Weston	August 9, 2010	87
G33	West Hollywood Chamber of Commerce – Genevieve Morrill	August 9, 2010	89
G34	Marjorie and Sandy Pollock	August 9, 2010	91
G35	Steve Miller and Steve Navarro	August 9, 2010	93
G36	City of Beverly Hills – Peter Noonan	August 9, 2010	96
G37	Beverly West Residents Association – Cary Brazeman	August 9, 2010	98
G38	Patrick Shandrick	August 9, 2010	101
G39	David Wheeler	August 9, 2010	104
G40	J. Hobart	August 9, 2010	107
G41	Roy Oldenkamp	August 9, 2010	109
G42	Victor Omelczenko	August 9, 2010	113
G43	Mary Wilberding	August 9, 2010	116
G44	Richard Giesbret	August 9, 2010	119
G45	Lynn Hoopingarner	August 9, 2010	123
G46	Donald Freeman	August 9, 2010	126
G47	Tim Raza	August 9, 2010	129
G48	Ric Abramson	August 9, 2010	131
G49	John Burns	August 9, 2010	134
G50	Stanton Coffin	August 9, 2010	137
G51	Jeanne Dobrin	August 12, 2010	140
G52	Dan Silver	August 16, 2010	142
G53	State Board of Forestry and Fire Protection (CAL FIRE)	August 19, 2010	154
G54	Anonymous	August 26, 2010	157
EIR-Themed Letters			
E1	Steven Greene	July 16, 2010	159
E2	California Department of Transportation	July 12, 2010	162
E3	Allegra Allison (West Hollywood Heights Neighborhood Association)	August 9, 2010	170
E4	Elyse Eisenberg	August 9, 2010	195
E5	West Hollywood West Residents Association (Lauren Meister, Sandra Genis, and Tom Brohard and Associates)	August 9, 2010	260
E6	County of Los Angeles Department of Public Works	August 9, 2010	307

Letter No.	Agency/Organization/Individual	Date Received	Page # of Response
E7	Sanitation Districts of Los Angeles County	August 9, 2010	311
E8	County of Los Angeles Fire Department	August 16, 2010	319
E9	Governor's Office of Planning and Research	August 16, 2010	322

¹General Plan-themed letters G1, G2, and G3 were received prior to the official start of the public review period, which began on June 25, 2010. These letters were included in this chapter in an effort to incorporate as much community input as possible and to ensure that the decision makers (i.e., Planning Commission and City Council) were able to see comments from everyone who wished to provide written input on the Draft General Plan and EIR.

Two topical responses have been developed to respond to recurring comments received regarding population growth projections and methodology and the program-level analysis provided by the Draft EIR. The responses to comments contain several references to these topics. Instead of repeating this response for each comment received, the topical responses are provided here for ease of reference.

Topical Response #1 – City of West Hollywood Growth Projections and Methodology

Part of every General Plan EIR process involves an exercise to estimate the amount of growth that could occur in the City during the planning horizon of the General Plan. The purpose of developing the growth projections is to quantitatively analyze the potential environmental impacts that could be expected from potential development envisioned in the proposed General Plan, with a particular emphasis on estimating the potential impacts to the transportation system. Growth projections developed for EIRs are not intended to be statements of policy about the amount of future growth of the City nor are they intended to represent the theoretical maximum “buildout” of a City. The growth projections developed for General Plan EIRs tend to be aggressive and “conservative”; that is, they assume a higher-than-likely amount of growth than is expected to occur in reality. This allows for an analysis of the maximum potential environmental impact to the City as a result of the proposed action (which in this case is the adoption of the General Plan).

Many acceptable methodologies exist for estimating the potential amount of development that could occur during the time horizon of a General Plan. These methodologies include a macro socioeconomic analysis of the City; applying regional growth projections developed by Southern California Association of Governments (SCAG) to the jurisdiction; projecting past growth trends into the future; or estimating the future growth based on a parcel-by-parcel analysis of development potential in the jurisdiction.

The City used the parcel-by-parcel analysis for the City of West Hollywood General Plan EIR. The first step in the process was to identify which parcels had the greatest potential to be redeveloped during the time horizon of the General Plan, based on both a parcel’s physical characteristics and the policy direction in the proposed General Plan. Characteristics included vacant parcels, parcels with older buildings, “underutilized” parcels (parcels with low Floor Area Ratio [FAR] compared to the FAR allowed by policy), and parcels where there was an existing or potential development application. Based on this analysis, the parcels identified for growth were put into four categories as is described below.

“*Pipeline*” parcels contain development projects that are approved or are in the development pipeline. The development located on these parcels is therefore included in growth projections at the density and/or intensity proposed by the developer.

“*Vacant*” parcels are parcels with no development or buildings currently on the site. These include vacant lots and parking lots. The parcels identified as vacant were verified by City staff in mid-November 2009.

“*Knowledge*” parcels were selected by City staff as parcels most likely to change during the time horizon of the General Plan. Among the reasons for including parcels in this category are parcel size, FAR, location, existing use, recent discussions with property owners who wanted to redevelop their parcels, and parcels that have similar characteristics to recent development projects. Essentially, the parcels in this category were selected based on staff’s knowledge of the City and the proposed policy framework in the new General Plan.

“*Additional*” parcels are similar to the “knowledge” parcels in that they were selected by staff based on their knowledge of the City. However, these parcels were deemed to have a lower potential to redevelop than the “knowledge” parcels, based on the same analysis.

The second step in the process was to identify a maximum amount of development allowed on each parcel. For “pipeline” parcels, the amount of development and distribution of uses in the development application were assumed as the proposed future development on each parcel. For the remainder of the parcels (“vacant,” “knowledge,” and “additional” parcels), the proposed General Plan land use designation was used. Each land use designation in the proposed General Plan establishes a maximum dwelling unit density (as measured in dwelling units per acre) or intensity (as measured in FAR) of allowed development. Certain land use designations allow for density bonuses in addition to the maximum, as shown in Table 3-2 of the Draft General Plan. Existing bonuses may be allowed for projects that provide exemplary green building, mixed-use, or affordable housing. A new height bonus is proposed for providing creative office space in the CN2 designation. As a result of the bonuses allowed in the General Plan, each land use designation was assigned an FAR greater than the maximum allowed without bonuses. This allowed the growth projections to take into account the range of density bonuses that are permitted by policy in the General Plan. To figure out the maximum amount of development projected for each parcel, the parcel area (in square feet) was multiplied by the FAR. This provided the total assumed amount of development on each identified parcel. This was a reasonable exercise to quantify the growth projections given West Hollywood’s small size, 1.9 square miles with a total of only 4,552 parcels.

It is important to note that the development that actually occurs is influenced by the physical characteristics of a parcel, existing development, access and infrastructure constraints, and compatibility considerations, among other factors. As has been observed from the recent development patterns in the City, in some instances the actual development ends up being less than the allowed maximum (without bonus), while in other cases it may be higher than the maximum due to the addition of density bonuses. The growth projections in the General Plan EIR are a numeric analysis that only addresses the density or intensity of development and does not take into account other development constraints such as height or setbacks. Ultimately, it is the development density or intensity that creates measurable increases in population and jobs, which in turn impacts the transportation system, air pollutants, noise, and other environmental considerations.

After the total amount of development on each parcel was calculated, the growth was assigned to a use category. Uses are important since the use determines the number of dwelling units and type of job, which in turn generates data for vehicle trips that are run through the traffic

model. For *knowledge*, *vacant*, and *additional* parcels, gross development capacity projections on a parcel-by-parcel basis were prepared for restaurant, retail, office, and residential uses. Each of these categories was assigned a square footage value for each parcel. Residential and commercial parcels were approached differently as subsequently discussed.

For *knowledge*, *vacant*, and *additional* parcels with a commercial land use designation (CN1, CN2, CC1, CC2, CA, CR), a square footage was assigned to the restaurant, retail, office, and residential categories.

It is assumed that each of the parcels designated as commercial would have ground floor commercial development equal to 35% of the parcel size. Thirty percent of this development was assigned to restaurant use; the remaining 70% was assigned to retail. The upstairs distribution of square footage varies by the location of the parcel and use distribution is assigned as follows:

- ▶ Santa Monica Boulevard and La Brea Avenue – ground floor commercial and upper floors 75% residential and 25% office
- ▶ Melrose Triangle – ground floor commercial and upper floors 75% office and 25% hotel (no residential)
- ▶ Melrose Avenue and Robertson Boulevard – ground floor commercial and upper floors 25% residential and 75% office
- ▶ Sunset Boulevard – ground floor commercial and upper floors 75% office and 25% residential
- ▶ Fairfax Avenue – ground floor commercial and upper floors residential

The residential parcels in the proposed General Plan (R1, R2, R3, and R4, R4B-C, or R3C-C) were assigned the maximum allowed dwelling units based on their lot size.

The last step in the process was to aggregate the projected growth into traffic analysis zones (or TAZs). This is done to analyze the traffic and transportation impacts of the proposed project.

Given the methodology explained above, Table 2 indicates the potential development capacity in the Expected Development Capacity column. The table also indicates existing (2008) conditions and the anticipated net change with long-term implementation of proposed General Plan policy.

Table 2. West Hollywood Expected Development Capacity

Land Use Category	Units	Existing	Expected Development Capacity	Anticipated Net Change
Residential				
Single-family	du	1,019	1,003	-16
Multi-family	du	23,554	27,844	4,290
Total Residential	du	24,573	28,847	4,274
Nonresidential				
Commercial and Retail	sf	4,729,616	5,594,770	865,154
Hotel	sf	1,506,422	2,257,673	751,251
Office	sf	3,691,031	4,573,105	882,074
Industrial	sf	104,300	102,635	-1,665
Subtotal – Commercial and Retail, Hotel, Office, Industrial	sf	10,031,369	12,528,183	2,496,814
Public/Institutional/Civic	sf	1,002,913	1,027,415	24,502
Human Services				
Library/Museum/Senior Center/ Other Recreational	sf	302,449	394,262	91,812
Total Nonresidential	sf	11,336,731	13,949,860	2,613,128

du = dwelling unit; sf = square feet

Notes: Existing conditions are based on 2008 land use survey

Using the parcel-specific approach described above, expected capacity of land uses pursuant to the proposed General Plan could result in an increase of 4,274 dwelling units and approximately 2,613,128 square feet of nonresidential building floor area over existing conditions. Based on a population of 1.6 persons per household (and 4,274 potential new dwelling units), an increase of approximately 6,834 persons in West Hollywood could occur based on the capacity.

Table 3 compares the development changes under the existing General Plan and the proposed General Plan.

The Existing General Plan column shows the realistic growth projections that would occur under the Existing General Plan if the proposed General Plan was not adopted. The estimates are based on 2008 calculations of proposed pipeline projects and parcel-by-parcel analysis of development potential using density and intensity assumptions for existing General Plan land use designations. As shown, the Existing General Plan is projected to result in approximately 228 fewer dwelling units, 190,606 square feet of nonresidential development, and 361 fewer residents.

Table 3. City of West Hollywood Development Changes Comparison

	Proposed General Plan	Existing General Plan	Comparison
	Projection	Projection	
Dwelling Units	28,847	28,619	-228 (-0.8%)
Nonresidential development, square feet	13,949,860	13,759,254	-190,606 (-1.4%)
Population	44,182	43,821	-361 (0.8%)

Source: California Department of Finance 2009; Raimi + Associates 2010

Given the history of development in the City, these growth projections are considered a conservative estimate and would likely not be exceeded with the implementation of the General Plan. This is because West Hollywood is relatively dense, has very little vacant land, and many of the buildings are in good condition and likely not to change over the time horizon of the General Plan. Comparing the growth assumed for analysis in the EIR to historical growth is instructive. According to data available from the State, between 1985 and 2009, the population in West Hollywood increased by only 830 people and between 1990 and 2009, the number of dwelling units in the city increased by only 745. These numbers are much lower than those assumed for the Proposed General Plan and the Existing General Plan and thus the growth analyzed in this EIR is conservative.

Population Projections

As indicated above, long-term implementation of the proposed General Plan could result in an increase of 4,274 dwelling units over existing conditions. Based on a population of 1.6 persons per household, an increase of approximately 6,834 persons in West Hollywood could occur. The estimate of 1.6 persons per household is based on actual data from the 2000s from the Department of Finance. From 2001 through 2009, the range of persons per household in West Hollywood was a low of 1.55 in 2001 to a high of 1.60 in 2005. The estimate of 1.6 persons per household does not consider any vacancy factor, which has remained at approximately 4% for West Hollywood in the 2000s. This approach was used in the Draft EIR to ensure a conservative estimate of population was analyzed. Because vacancy was not considered, actual population could potentially be lower than the capacity of 44,182.

SCAG projections indicate a population of 39,821 in 2035 which is an approximate 6.6% increase over 2008 levels of 37,348. As already noted, the development capacity pursuant to implementation of the General Plan could accommodate a capacity of 44,182 people, which is 18.3% greater than 2008 levels of 37,348.

SCAG projections of 39,821 in 2035 are based on the City's existing General Plan policy. According to SCAG, "SCAG maintains a complete set of city general plans for every city within its six county regions. SCAG uses these plans to facilitate generating its socioeconomic forecasts. General plans are constantly being updated by the individual cities. To stay current, SCAG collects and reviews city plans on an on-going basis." See: <http://www.scag.ca.gov/planning.htm>. As indicated on page 3.11-6 of the Draft EIR "SCAG projections are based on the existing General Plan. It is likely that West Hollywood's growth

projections would be revised upward in future SCAG planning documents to reflect proposed General Plan projections.”

Topical Response #2: The Program EIR

According to CEQA Guidelines (Section 15168), a Program EIR is defined as:

“an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effect which can be mitigated in similar ways.”

A Program EIR is appropriate for adoption of a plan governing the conduct of a continuing program, such as a General Plan. (14 CCR 15168). The Program EIR allows for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on individual actions (project-level), and ensures consideration of cumulative impacts that might be slighted on a case-by-case basis. This Program EIR prepared for the West Hollywood General Plan update provides a first-tier, programmatic evaluation of the potential environmental impacts related to adoption and implementation of the goals, policies, and land use plan set forth in the General Plan. It includes a broad-based evaluation of potential impacts for each environmental issue area and provides programmatic mitigation where appropriate. Due to the programmatic nature of a General Plan, the analysis in a Program EIR consequently lacks the details (location, size, etc.) of specific actions typically associated with project-level EIR analyses. Implementation of the General Plan does not make a commitment to future facilities. Implementation of the General Plan does not determine the specific location, timing of, or if future development will ever be built. In the instance that the EIR cannot provide meaningful information about a speculative future project, deferral of certain analysis is authorized under CEQA (Section 15145). Given the speculative nature of any secondary effects from uncertain future facilities and development projects, some impacts and mitigation measures are not readily quantifiable for the General Plan and will be specific to future projects. Thus, the first-tier analysis provided in this Program EIR is appropriate. CEQA is also specific on how subsequent projects can rely on the environmental analysis contained in a Program EIR. The environmental impacts of future projects will be analyzed as required by CEQA. As part of the project review process, the City will be required to review subsequent activities in accordance with the West Hollywood General Plan and examined in light of this Program EIR to determine whether additional environmental analysis must be conducted and whether any subsequent project-specific mitigation would be required.

G1-1

BIANCA,

I'm hoping that As
the future NEAR, AND
people like myself who
live in AN Apartment,
will be able to
charge AN electric
CAR.

maybe possible
stations, or charge
BATTERIES.

THANK YOU

JOE KAY
1315 N. HAYWORTH
Apt. #A 90046

323-848-7020

G1-1

General Plan Letters

Letter G1

G1-1

In response to the comment, although the General Plan does not specifically address electric car charging for apartments, the Infrastructure, Resources, and Conservation Chapter contains a goal and policies relating to improving air quality. Examples of relevant policies include supporting increased local access to cleaner fuels and cleaner energy by encouraging fueling stations that provide cleaner fuels and energy (IRC-7.6), and collaborating with other agencies within the region to reduce air pollution from mobile sources including passenger vehicles (IRC-7.7).

G2

Sylvia Strike
8276 Romaine St.
West Hollywood, Ca 90046
June 17, 2010



Bianca Siegl
City of W. Hollywood
Community Development Dept.

Dear Ms. Siegl:

In response to the query for the Draft General Plan, I would like to suggest that some of the streets in W. Ho. should be made one way. No one likes one way streets, but some of the streets are so narrow that the side mirrors on parked cars hit passing motorists.

G2-1

Also if enough thought were put into the planning, it would divert some of the traffic from well traveled streets to others alleviating the traffic situation. Perhaps bike lanes could be painted on the one way streets and get the bikes off the sidewalks.

G2-2

Respectfully submitted,

Sylvia Strike

Letter G2

G2-1

The commenter's suggestion regarding the creation of one-way streets is noted.

G2-2

In response to the comment, the Mobility Chapter of the General Plan contains a goal and policies related to improvements to the City's transportation network, including its bicycle network. General Plan Goal M-4 addresses the creation of a comprehensive bicycle network throughout the City, and Policy M-4.3 specifically addresses the installation of bicycle lanes where feasible.



Bianca Siegl

From: Michael Spoodis [mspoodis@me.com]
Sent: Monday, June 21, 2010 4:55 PM
To: Bianca Siegl
Cc: mspoodis@mac.com
Subject: comments on Climate Action Plan

Hi Bianca-

I just reviewed Weho's Draft General Plan and Climate Action Plan and wanted to weigh in with two suggestions:

- First, I strongly recommend that West Hollywood implement a ban on charcoal broiling. In reading a recent report on air pollution in the Los Angeles Times, charcoal broiling was a significant contributor of air quality degradation throughout the L.A. basin. As a would-be environmental leader, West Hollywood should implement a ban as soon as possible. Granted, enforcement would be difficult, but we've simply got to do this if we are serious about improving air quality and setting a strong environmental example. Gradually, our collective consciousness would be raised and charcoal broiling would decline or stop.

G3-1

- Second, and this does not relate directly to climate, but I find it to be a major health "disconnect" that we do not have a No Smoking policy for all multi-resident housing in West Hollywood. Personally, I live in an older 10-unit building, and I am definitely experiencing huge amounts of second-hand smoke from a downstairs neighbor. It is greatly affecting my desire to even remain in my current residence. While I respect my neighbor's right to smoke, it definitely has adverse health effects for me and my fellow neighbors. My landlord would like to be able to enforce a No Smoking policy, but informed me that his hands are currently tied. When we talk about the broader topics of "climate action" and "air quality," I think we must begin by scrutinizing issues such as smoking policies, which could greatly affect our health.

G3-2

If you had any feedback on either of these issues, I will look forward to hearing from you. And best of luck with everything...

Mike Spoodis
8024 Norton
West Hollywood CA 90046

8/9/2010

Letter G3

G3-1

The commenter's suggestion regarding a ban on charcoal broiling is noted.

G3-2

The commenter's suggestion regarding a no-smoking policy for multi-family buildings is noted.

Submit by Email

Print Form

G4

West Hollywood General Plan 2035

Public Review Draft

Comment Form

Thank you for taking the time to review and comment on the Public Review Draft of the West Hollywood General Plan. We welcome your comments on this Draft. Your suggestions for improvement are critical to the success of the General Plan. The General Plan sets the long-term vision for the future of the City, defining how we will use and manage our physical, social, and economic resources over the next 25 years. The Public Review Draft General Plan was developed with extensive community input. It documents our shared vision of tomorrow and sets the policies and programs to achieve that vision.

In an effort to make it easier to provide comments on the Public Draft General Plan, we recommend that you use the following table to describe your comments and suggestions. Your suggestions can either be hand-written or typed into the document, which is available for download on the City's General Plan web site: www.weho.org/generalplan.

Your Name: Ian W. Sterling

Your Address: 910 N. Sweetzer Ave., Apt D

West Hollywood, CA 90069

Your Phone/Email: iwsterling@yahoo.com

Please return all comment cards to:

Bianca Siegl
Community Development Department
City of West Hollywood
West Hollywood CA 90046
bsiegl@weho.org
(323)848-6859

Page Number	Goal, Policy, or Action Number	Comment
96	3.2	Minimum parking requirements for commercial and residential development are antithetical to a sustainable, livable, green urban community. For a professional critique, read: http://blogs.reuters.com/felix-salmon/2010/06/24/why-do-minimum-parking-requirements-still-exist/

G4-1

Letter G4

G4-1

In response to the comment, although the General Plan does not propose an elimination of minimum parking requirements, the Mobility Chapter includes a policy addressing possible reductions in minimum parking requirements along commercial corridors, in Transit Overlay Districts (TODs), or for projects that provide dedicated parking spaces for car-sharing programs (M-8.10). The commenter's suggestion regarding the elimination of minimum parking requirements is noted.

G5

Bianca Siegl

From: Vivian Gumbiner [laoccupant@yahoo.com]
Sent: Monday, June 28, 2010 4:17 PM
To: Bianca Siegl
Subject: WeHo general plan

Hi Bianca-

I have business interests in WeHo and have some questions about the proposed WeHo General Plan. I saw a map on the news that showed a potential subway stop at the intersection of Fairfax Ave./Santa Monica Blvd. Which corner will the potential stop be on?

G5-1

When will the decision as to whether or not the subway will run down Santa Monica Blvd. be made?

Thank you,
Vivian Perlmutter

8/9/2010

Letter G5

G5-1

In response to the comment, Metro is the agency responsible for the Westside Subway Extension project and will ultimately determine the project schedule and stop locations. Metro is currently preparing the Draft EIR for the project, which studies a proposed alternative Red Line route along Santa Monica Boulevard through West Hollywood.



Bianca Siegl

From: Tom Atwood Photography [Tom@TomAtwood.com]
Sent: Tuesday, June 29, 2010 10:13 PM
To: Bianca Siegl
Subject: General Plan Feedback

I think it all looks great. Thanks. Some community feedback (I am a WeHo resident):

- I'd love to see:
- A ban on all billboards citywide | G6-1
- More trees planted | G6-2
- Higher buildings allowed, greater density allowed, especially near the planned subway stops and along the main boulevards | G6-3
- An end to rent control | G6-4

Thanks.

Tom

T O M A T W O O D P H O T O G R A P H Y

fine art - editorial - advertising - portraits - architecture

Direct: Tom@TomAtwood.com
Studio: Studio@TomAtwood.com
Studio: 310-503-7800
Los Angeles, CA
TomAtwood.com

8/9/2010

Letter G6

G6-1

The commenter's opposition to billboards is noted.

G6-2

The commenter's support for more trees is noted. Several chapters of the General Plan contain goals and policies related to enhancing the existing tree canopy. Examples of relevant policies include providing street trees and landscaping and other pedestrian amenities where feasible (M-3.4), and expanding the tree canopy (IRC-6.6). The General Plan also includes an Implementation Action to update the Street Tree Master Plan (LU-A.6), and the Climate Action Plan includes a measure to increase and enhance the City's urban forest (G-1.1).

G6-3

The commenter's support for greater height and density near planned subway stops and along commercial boulevards is noted. The General Plan includes several policies that address transit-supportive development along commercial boulevards (LU-1.13, LU-2.1, and LU-2.4).

G6-4

The commenter's opposition to rent control is noted.

G7

Bianca Siegl

From: Carl Gunther [cgunther@ix.netcom.com]
Sent: Friday, July 02, 2010 5:23 PM
To: Bianca Siegl
Cc: ckastan@ix.netcom.com
Subject: General Plan Comments

Dear Ms. Siegl:

As a 22 year resident, I just wanted to tell you how pleased and impressed I am with the level and transparency of the draft process. I would add that the priorities I see reflected in this draft (affordable housing, renters' rights, carefully planned development away from residential areas, social services, environmental responsibility) seem very close to my own.

I have not had time to review all of these documents in detail, but I did take a good look at them today. The presentation of this potentially daunting material is very clear and accessible. I will attempt to attend the public meeting on July 10th; perhaps by then I will have sufficient knowledge to contribute to the draft process.

Best Regards,

Carl Gunther

G7-1

Letter G7

G7-1

The commenter's support for the priorities reflected in the General Plan is noted.

Martin Strudler

GP-8

403 Westbourne Drive
 West Hollywood, CA. 90048
 310-657-7868

July 8, 2010

Ms. Anne McIntosh
 Director of Community development
 City of West Hollywood
 8300 Santa Monica Blvd
 West Hollywood, CA 90069

Dear Anne;

Thank you for your recent visit to our Residents Association meeting. There was much to discuss, and with the limited time we had, some subjects got less attention than they deserved- thus this letter.

Some background: In 1985, when West Hollywood was in its infancy, the accepted vision for the City was that of an "urban village", a concept that was enthusiastically embraced by the residents, but one that -somehow- like many great ideas, never came to be, except in one small part of the city- West Hollywood West.

While the city grew and gentrified around us, somehow West Hollywood West retained its low-profile, human scale- a real "urban village".

The dedicated purpose of West Hollywood West during its entire 25 year existence has been to preserve and protect that uniqueness.

In the early years the only limits to development were setbacks and height. That freedom led to the "MacMansion" era, when construction filled every square inch of the lot and swamped the neighbors.

West Hollywood West requested, fought for, and finally achieved the imposition of a .5 FAR, which insured that the scale of new construction would be in context with the neighbors.

We also proposed that the area be designated a "Neighborhood Conservation Zone". Our feeling was that while the city is known for diversity, the special "urban village" character of West Hollywood West could be held up as an example of what could be achieved by sensitive, caring development, and as such, deserved the city's attention and protection. This point of view was finally accepted by the Planning Department and, ultimately, the City Council- and with great enthusiasm, the residents of West Hollywood West.

What the NCZ ruling ensures is that, when planning any new construction or remodeling of an existing structure, those plans must be **"compatible with and complement in scale and**

G8-1

architecture (emphasis added) existing structures where a distinctive neighborhood character exists”.

With the passing decades West Hollywood West has changed. What was a neighborhood of modest, small scale homes has become much more upscale and expensive- but the essential “distinctive neighborhood character” remains.

But there is a problem. Developers (and some new residents) are either unaware of, or choose to ignore, the NCZ ruling, and are constructing big box housing that maximize interior space, but have no relationship to the surrounding homes architecturally, as required by the NCZ. Developers are razing the human scale housing that gave the neighborhood its distinctive character, and replacing it with maximum living spaces using the same set of plans on each new property. The result is that what was a neighborhood with “Distinctive character” is in danger of becoming Orange County tract housing.

What is needed, and what West Hollywood West strongly endorses, is a Plan Review Board specifically for the NCZs of the city. One with some teeth, and the power to enforce the mandates of the NCZ provisions. Having a resident of the NCZ district sit on the board either as a member or in an advisory capacity would bring a local awareness to the Boards decisions.

Time is of the essence as there are at least 4 proposed projects which would fall under the Board’s review process, and which are prime examples of the complete disregard of the CNZ mandates.

Sincerely,
Martin Strudler

G8-1
cont.

Letter G8

G8-1

The commenter's request for greater emphasis on Neighborhood Conservation Overlay Zones and for a Plan Review Board to enforce the Neighborhood Conservation Overlay Zone is noted.

Bianca Siegl

From: Russell Vare [russellvare@gmail.com]
Sent: Sunday, July 11, 2010 8:56 PM
To: Bianca Siegl
Subject: Public Comment for West Hollywood General Plan and Climate Action Plan

Dear Bianca Siegl:
 Thank you for the public meeting on the general plan this weekend.
 Please see my emailed comment on the plan.
 Regards,
 Russell Vare
 russellvare@gmail.com
 8107 1/4 Norton
 West Hollywood, CA

I am impressed the city is taking progressive action on creating walkable and bikable neighborhoods and improving public transit. However, personal vehicles will still be a necessary part of everyday life and alternative fuels should be included as a part of the city's strategy to reduce GHG emissions, reduce smog and improve quality of life for residents.

The automotive industry is adapting and the retail fuel industry is changing. New technologies are allowing home refueling/recharging. Today, natural gas home fuelers and electric vehicle supply equipment (EVSE) can be installed in garages and parking spaces to fuel vehicles overnight. In the future, technologies such as hydrogen home fueling and power generation are advancing quickly.

There are several low-cost initiatives the city can implement to increase the use of alternative fuels. For example, the city can:

1) Simplify the City process

Engage the planning department in the permitting and inspection process for installing home fueling/charging equipment. There may be methods to increase the use of this equipment such as express permits, online permit applications, expedited inspections, or reduced fees.

These pieces of equipment can soon be as commonplace as other household appliances if there is limited bureaucracy to install them.

2) Create Incentives

There may be incentives for building infrastructure, such as encouraging charging stations a retail outlet, or supporting a retail alternative fuel station. There may also be incentives for the vehicles such as preferential parking or free metered-parking.

3) Lead by example

As more alternative fuel vehicles come to market each year, the city may make commitments to dedicate more of its own fleet to low and zero emission vehicles. Some vehicle purchases may even reduce the city's expenditure through lower operating of alternative fuels.

These are just a few suggestions of how the city can encourage the adoption of clean vehicles in addition to the transportation sections of the general plan and climate action plan.

G9-1

Letter G9

G9-1

Please see Response to Comment G1-1. The commenter's suggestions regarding initiatives to increase the use of alternative fuels for vehicles are noted.



Bianca Siegl

From: Steven Greene [sbgreene@mindspring.com]
Sent: Saturday, July 17, 2010 2:28 PM
To: Bianca Siegl
Subject: General Plan Comment

Hi Bianca,

I have the following comments on the Mobility Element of the Draft General Plan:

Circulation map: Why is Fairfax a collector but Crescent Heights an arterial? The ADT volumes in Figure 6-3 show that Fairfax carries more traffic than Crescent Heights south of Santa Monica. | G10-1

P. 116 What is meant by the statement that "West Hollywood is a built-out city"? There is plenty of unused by-right development potential within the City. Repeating statements like this without explaining their meaning supports an anti-growth attitude. | G10-2

P. 116, Regional Auto Access, The General Plan should recognize that the City of LA plans for Santa Monica Boulevard east of West Hollywood ultimately to be a 6-lane roadway, and that the City of West Hollywood needs to be proactive in its own planning to mitigate the impacts that widening could have on the City. | G10-3

P. 119 The Ventura Freeway is US 101, not 134, at Laurel Canyon Blvd. | G10-4

Goal M-2 should have an additional policy specifying that the City should collaborate with the City of Los Angeles regarding planning for roadways with significant shared jurisdiction, such as Fountain, Willoughby, La Cienega, Crescent Heights, Fairfax, and La Brea. | G10-5

Please acknowledge receipt of these comments on the Draft General Plan by return e-mail.

Thanks,
Steve

Letter G10

G10-1

The comment is noted. General Plan Figure 6-1 will be corrected to show Fairfax Avenue as an arterial.

G10-2

In response to the concern regarding use of the phrase “built-out city,” the phrase was intended to describe West Hollywood as a dense urban environment with very little available vacant land, where all new development is infill development. It was not intended to suggest there is no remaining development capacity in the City. This phrase will be clarified in the final General Plan.

G10-3

Currently, there is no approved plan to widen Santa Monica Boulevard from four lanes to six lanes within the City of Los Angeles. However, the City is aware that the Draft Hollywood General Plan shows provisions for right-of-way that may ultimately allow for six lanes. The Mobility Chapter of the General Plan will be revised to note this under the section heading Regional Auto Access.

G10-4

The error in the reference to the Ventura Freeway is noted and will be corrected in the final General Plan.

G10-5

The commenter’s suggestion to add a policy regarding collaboration with the City of Los Angeles for roadway planning is noted.

Bianca Siegl

From: Seth William Meier [seth@theflyovers.com]
Sent: Friday, July 30, 2010 10:29 AM
To: Bianca Siegl
Cc: president@whwra.org; Paul Arevalo; John Duran; Lindsey Horvath; Abbe Land; Jeffrey Prang
Subject: Comments on City of West Hollywood General Plan



Bianca Siegl
 City of West Hollywood
 Community Development Department
 8300 Santa Monica Boulevard
 West Hollywood, CA 90069

Dear Bianca and other Members of the City of West Hollywood,

I am deeply concerned with the direction that is being discussed and followed in regards to the city's General Plan.

I have been a resident for a little over a year now and had many choices of where to move when my wife and I were looking to purchase a home. We both work outside of West Hollywood but agreed it was the best area for us to settle down and raise our family. We felt the city had the best interest of their residents. I am starting to wonder if that is really the case as we have seen things move from a family friendly city to issues that can seriously effect the quality of life for the residents.

I am mostly concerned about encroaching advertising with the City leaving legislation open to backdoor methods of buildings utilizing Tall Walls and super graphics outside the sunset strip. While it might characterize the strip, it certainly does not do so in a residential neighborhood. I have had this battle before in re the building 8899 Beverly Blvd and notice they have moved to putting their plans on the web including tall walls and supergraphics (<http://8899beverly.com/>) that would shine into my bedroom window. I have had so many issues with this building that have been politely answered by the building administration but then have done nothing about the problems with the building. Signage is not the answer to bringing revenue into the city. To prove my point I would be happy to bring the studio projector from our stages and project commercials all night long into your living room and bedroom window.

G11-1

In addition the thought of less pedestrian friendly areas will drive shoppers away. More traffic will only make people try to steer away from west hollywood and would certainly make me want to move away. Loss of any sunlight and taller buildings is only going to make things worse; would you want to live in the shadow of a building? Already, what was the shining example of what a city can be in growth, creativity, quality of life and advancement is starting to go in the opposite direction.

G11-2

G11-3

I feel we all have the best interests of the city in mind and have faith the city will make the right choices, but you should know how many concerned residents are out there right now.

--

Sincerely,

Seth

8/9/2010

Seth William Meier
Executive Vice President | Staff Lien Producer
Illusion Industries Inc.

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8/9/2010

Letter G11

G11-1

The commenter's opposition to offsite signage outside the Sunset Strip is noted.

G11-2

The commenter's concern regarding the loss of pedestrian-friendly areas and increased traffic in shopping areas is noted. In response to the comment, the Mobility Chapter of the General Plan includes goals and policies to maintain and enhance the City's pedestrian orientation (Goal M-3) and a policy related to new commercial development providing for the construction of pedestrian rights-of way to allow convenient and unimpeded circulation to, through, and within the property being developed. In addition, the General Plan also contains a goal to utilize transportation demand management strategies to reduce vehicle miles traveled and vehicle trips in an effort to improve mobility and maintain the quality of the physical environment (M-6).

G11-3

The commenter's concern regarding loss of sunlight and taller buildings is noted. Page 3.1-10 of the Draft EIR analyzes shade and shadow impacts from implementation of the proposed General Plan. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

Bianca Siegl

From: jvhlmnrd@aol.com
Sent: Friday, July 30, 2010 10:38 AM
To: Bianca Siegl
Cc: haydenmichael@mac.com; president@whwra.org
Subject: Comments from Weho resident John Vergara

Hi Bianca:

Thanks again for an informative meeting the other night. I am sending you this email to provide my input regarding the proposed zoning changes that would affect height and FAR increases.

My main concerns relate to the proposed height increases along Melrose Ave from the Melrose triangle, eastward. In general, I want our city planners to support the maintenance of that area as more of an urban village...maintaining the attractiveness and pedestrian-friendly aspect that incited me to purchase our home in that neighborhood in the first place. While there have certainly been improvements to the quality of the businesses and structures in that neighborhood over the last 5-7 years (Balenciaga, new design firms, Waterworks, etc...) by the same token, we must be careful not to destroy the delicate balance between residential and commercial in this area.

The biggest concern is the already overwhelming traffic problems that exist on this stretch..esp from 3pm to 7pm commuter times. I do feel that the addition of the new 400 space parking tied to the new library will provide somewhat of a break from congestion, nonetheless the increase in height and density allowances will certainly drive developers to push the envelope and will definitely compound the traffic issues.

Separately, I am concerned that heights of 3-4 stories backing up to residential properties will have a devastating effect on those property values as well as the overall feel of the neighborhood south of Melrose (WeHo West). Specific attention in the zoning should be paid to ensuring this is dealt with in the most balanced way possible.

Bottom line, I am looking to YOU to help drive a balanced approach to any changes in zoning...we want to maintain the small, charming village feel of the melrose ave section in particular. Thanks again for your dedication and proper representation of the needs of us as citizens of West Hollywood!

Best regards,

John Vergara

John Vergara
cell: 310-913-2263

8/9/2010

G12-1

Letter G12

G12-1

The commenter's concern regarding proposed height increases along Melrose Avenue, as well as business types, traffic, and property values, is noted.



Bianca Siegl

From: janenemitchell@aol.com
Sent: Friday, July 30, 2010 1:35 PM
To: Bianca Siegl
Cc: president@WHWRA.org
Subject: General Plan

Bianca, thank you for taking my comments.

I am concerned about the proposed changes to the General Plan, and about how they will impact West Hollywood West specifically, since I live at 8734 Rangely Ave. The area has changed greatly since we moved here 8 yrs. ago. Especially the development along Melrose Ave. in the past 2-3 years has taken it from a comfortable, walking district with neighborhood friendly businesses to a series of taller showrooms that really give nothing back to the community. They are there to serve outside business interests. Let's keep that sort of commercial traffic along Beverly Blvd. which is already a busy throughfare and can handle the traffic. Also, higher buildings are more in keeping with what already exists there along the border with L.A.

G13-1

I want Melrose to continue to be a low-rise street that fits in with the surrounding residences and hosts smaller boutique businesses that are frequented by our community. Since Melrose is only a one-lane street between San Vicente and La Cienega it can not handle more traffic. Congestion here is already a big problem. Therefore, I do not support the proposed height changes along Melrose which would only encourage developers to knock down the existing smaller buildings to build up. Our neighborhood would lose more of its charm and more businesses would leave that draw local pedestrians.

G13-2

Serious pedestrian accidents have occurred over the past few years on Robertson and most recently San Vicente. More study needs to be done on traffic. It's very difficult and often dangerous to enter or cross Robertson from any of the side streets between Melrose and Beverly. I'm concerned about any more growth in the area until these problems can be solved for our current conditions. (This doesn't even take into account the added traffic flow soon to come, once the Red Building and Library parking is added into the mix.)

G13-3

The Melrose Triangle is the entrance to W. Hollywood, but allowing a height of up to 60 ft. here is so out of proportion with surrounding buildings that it would be ridiculous in context. And what about parking and traffic flow from the increased density? Doheny is already backed up into the intersection at Beverly every day during rush hour. Where would the added cars go?

G13-4

Summation:

I am strongly opposed to any changes in FAR or height allowances along any portion of Melrose Ave.

A change from CC to CD2 along the S side of Beverly Blvd. would be acceptable only if no further variances in height were allowed - such as a mixed use allowance, etc.

I am opposed to the change from CN to CN2 along E side of Doheny Ave between Rangely and Melrose.

I am strongly opposed to the change from CC to CA for the Melrose Triangle.

A stricter overview of allowances, such as for mixed-use, needs to be in place to ensure that we do not develop beyond the capacity of our infrastructure nor fail to assess the negative impact on the quality of life here in W. Hollywood.

G13-5

Janene Mitchell, LAc, FABORM
1155 S. Beverly Drive
Los Angeles, CA 90035
t 310-614-8207
f 310-203-9211
www.janenemitchell-lac.com

8/9/2010

Letter G13

G13-1

The commenter's observations regarding the changing character of Melrose Avenue are noted.

G13-2

The commenter's opposition to the General Plan's proposed height increases along Melrose Avenue is noted.

G13-3

The commenter's concern related to pedestrian safety on Robertson Boulevard and San Vicente Boulevard is noted. The General Plan contains a goal to maintain and enhance the City's pedestrian orientation (Goal M-3) with corresponding policies to enhance pedestrian accessibility by providing bulb-outs where appropriate in order to minimize pedestrian crossing distances and improve visibility. The Land Use and Urban Form Chapter of the General Plan also promotes pedestrian-oriented design and encourages pedestrian activity, access, and comfort. In addition, the West Hollywood Bicycle and Pedestrian Mobility Plan (2003) sets forth specific strategies for increasing pedestrian-oriented design features within the street network.

G13-4

The commenter's opposition to the General Plan's proposed height increase at the Melrose Triangle is noted.

G13-5

The commenter's opposition to the General Plan's proposed land use designations along Melrose Avenue, Doheny Drive between Rangely Avenue and Melrose Avenue, and the Melrose Triangle, as well as opposition to any height bonuses on the south side of Beverly Boulevard, is noted.



Bianca Siegl

From: Sandra Mitchell [sandra@mmcreativestudio.com]
Sent: Saturday, July 31, 2010 2:11 PM
To: Bianca Siegl
Cc: WHWRA
Subject: General Plan Comments

City Officials of West Hollywood,

RE: General Plan

A few comments and thank you very much for your service -

Melrose and Robertson should be low-rise streets that fit in with the surrounding residences - a mix of local businesses needs to be promoted. More police patrol is required on these streets as they grow into luxury store hang-outs – already, the crime has risen as tourists are targets. | G14-1

Cars are already speeding through our side streets as the cross streets get more and more crowded. Again, more police patrol needs to accompany development. – We need to keep these developments low as the infrastructure just cannot handle large stores and with them comes more traffic. | G14-2

Since Melrose is only a one-lane street between San Vicente and La Cienega, it can not handle more traffic. Congestion here is already a big problem. Therefore, I do not support the proposed height changes along Melrose which would only encourage developers to knock down the existing smaller buildings. Our neighborhood would lose more of its charm and more businesses would leave that draw local pedestrians. | G14-3

More study needs to be done on traffic. | G14-3

Also, the Melrose Triangle is the entrance to W. Hollywood, but allowing a height of up to 60 ft. here is so out of proportion with surrounding buildings that it would be ridiculous in context. And what about parking? Doheny is already backed up into the intersection at Beverly every day during rush hour. Santa Monica Blvd. is already at a stand-still during peak hours. Where would the added cars go? | G14-4

In addition, we need to really stop the bill board growth – I know developers love them as the tenants want to promote themselves above the other city “businesses” but they really destroy the neighborhood street skyline (and they distract drivers way too much!). The one at Robertson right north of Beverly now is really a tragedy in city planning terms. | G14-5

Finally, we need to ask ourselves what kind of city do we want – I know the luxury brands coming into Melrose and Robertson are overall a good thing BUT it all comes with a cost. We need these developments and rehabilitations to buildings to stay low with the surrounding context and a change of use needs to be evaluated in every way to promote safety and traffic management. It cannot be growth for growth sake – We will lose the character and then all these tenants will move out to find | G14-6

8/9/2010

another place with character. Local developers make one – time big bucks! I hear it first hand in my meetings every day – International and national chains are only interested in selling product – as they do not live in West Hollywood, they do not think of adding anything to the city. It is not on their agenda in any way. Make profit because West Hollywood is hot for retail and ride the wave until it is over. This is the reason city guidelines need to be specific and conservative. If they want to be here – they will meet them. If we do not manage this influx, we (the residents and city) will be left with nothing.

G14-6
cont.

Best, SPM

SANDRA MITCHELL
FOUNDER + PRESIDENT

369 S. DOHENY DR. #88
BEVERLY HILLS, CA 90211 USA
(310) 882-5000 (MAIN)
(310) 795-7185 (MOBILE)

M+M CREATIVE STUDIO

8/9/2010

Letter G14

G14-1

The commenter's concern regarding the height of buildings along Melrose Avenue and Robertson Boulevard and crime levels is noted.

G14-2

The commenter's concerns regarding traffic congestion and the height of buildings on Melrose Avenue are noted.

G14-3

A Traffic Study was conducted for the project and was included in the Draft EIR as Appendix F. Transportation and traffic impacts are also discussed in Section 3.14 of the EIR. As future projects are proposed, they will also be reviewed for traffic impacts.

G14-4

The commenter's opposition to the General Plan's proposed height increases at the Melrose Triangle is noted.

G14-5

The commenter's opposition to billboards is noted.

G14-6

The commenter's concern regarding the types of commercial businesses on Melrose Avenue and Robertson Boulevard is noted.



Bianca Siegl

From: Manny205@aol.com
Sent: Monday, August 02, 2010 9:32 AM
To: Bianca Siegl
Cc: president@whwra.org; John Heilman; John Duran; Jeffrey Prang; Abbe Land
Subject: General Plan Comment

If we all complain about density and traffic, why then do we consider any development and growth at all?

The City managers have done a good job in taking West Hollywood out of the 1970's. That has been accomplished. We now need to improve, maintain and conserve rather than aspire for more. Discourage big..... and bigger with bonuses.

If you build it, they will come....."ZERO GROWTH NOW"

Sincerely,
Manny Rodriguez
West Hollywood

G15-1

8/9/2010

Letter G15

G15-1

The commenter's suggestion to stop all growth in the City is noted.

Bianca Siegl

From: Kirk Marcolina [Kirkym@yahoo.com]
Sent: Monday, August 02, 2010 6:43 PM
To: Bianca Siegl
Subject: General Plan Comment

Dear City Planners --

I am very concerned about the proposed zoning changes in the retail area of Melrose Ave. from Doheny to La Cienega. The proposed increase in FAR and building height to this area will significantly degrade the character and nature of this unique part of West Hollywood. I have lived on Westbourne Dr. for 7 years and in the City for 13 years and one of the main attractions to this part of the City is the "urban village" that has been established. By changing the zoning to CN2 for most of this section of Melrose you are allowing much taller structures which will dramatically change the feel of this area. I feel the CN1 designation would be more in line with keeping the nature of the unique area and I urge you to revise the plan to reflect this.

G16-1

Sincerely,
Kirk Marcolina
541 Westbourne Dr.
West Hollywood, CA 90048
310/714-5946

8/9/2010

Letter G16

G16-1

The commenter's opposition to the General Plan's proposed height increases along Melrose Avenue is noted

G17



TO: Bianca Siegl AT: bsiegl@weho.org
RE: West Hollywood General Plan 2010

August 2,2010

We are supporters of the current West Hollywood City Council. Mayor Heilman, Ms. Land, Mr. Prang, Ms Horvath, Mr.Duran, we feel, have Always acted in a way they believed to be in the best interest of our city. We appreciate all they are doing for us.

However we would like them to know that there are citizen with serious Concerns about the new West Hollywood General Plan.

Having attended local meetings and speaking to many of our neighbors and friends who live in West Hollywood ,we are all Trying to understand the very complex changes proposed for Our city.

The majority of us feel that that the new general plan is heading in the Wrong direction.

We all fear the loss of our very special city....many of the changes will Negatively affect the quality of life in our neighborhood.

We're concerned about increased building heights...height bonuses...billboards.. Tall walls in areas other than Sunset...increased traffic due to over development... The lack of creativity in the creative city....etc.

West Hollywood is not Westwood...Miracle Mile or Hollywood . We are a unique City with a village feel and way of life.

A canyon of oversized buildings , billboards, and tall walls and mini mansions do not belong in West Hollywood.

Before the new general plan is finalized.....

We are appealing to the city council to hear the concerns of our community and to Share our vision for this very special city by preserving the urban village quality That has made West Hollywood such a success.

Michael Zannella
Richard Blons

8745 Dorrington Avenue
West Hollywood,CA 90048
310-657-7481
Zannella61@hotmail.com

cc: MAYOR + CITY COUNCIL

G17-1

Letter G17

G17-1

The commenter's concern regarding quality of life, building heights, offsite signage, and traffic as addressed in the proposed General Plan is noted.



General Plan Voodoo
WeHo News August 5, 2010

In politics there are lies, damn lies and statistics. West Hollywood’s proposed General Plan contains all three. It certainly lives up to the City’s reputation for dissembling in the face of uncomfortable facts. The Plan represents a windfall to developers and pretty much repudiates West Hollywood’s alleged commitment to preserving the ambiance of our urban village.

G18-1

The General Plan commits the City to massive amounts of development that far exceeds the capacities of our municipal infrastructure. It calls for a twenty percent increase in population, nearly twice that figure forecast by the Southern California Association of Governments, (SCAG). It calls for a twenty percent increase in the number of new jobs in our city, most of them being low paying service sector jobs that will overwhelm an already over burdened public transportation system. And these are just the high lights.

G18-2

For those of us who have participated in the public hearings conducted over the last three years, the proposed Plan seems to have little connection to what the residents envisioned for the future of our little city. How many of us suggested we wanted ninety to one hundred foot high buildings along Santa Monica and La Brea? I don’t remember putting a yellow post-it on a poster suggesting that we dramatically increase our population or double the number on non-functioning intersections.

G18-3

The City claims that proposed increases in height and density in the new General Plan only affect a modest number of parcels within the City. The increases “only” apply to eight percent of the City. But needless to say, is largely in areas that will wreck havoc along our major through fares and will force traffic on to our residential side streets.

G18-4

The projected figures are not even accurate. The Draft Environmental Impact Report, (DEIR), uses figures that do not include all of the major developments that have been approved over the last several years. The DEIR is chock full of grim statistics that do not support the increases in traffic and development envisioned in the proposed Plan.

For instance, the DEIR claims that the Plan will only add 4,551 jobs over the number that existed in 2008. In that year the City had 23,000 jobs. But this does not include the 3,000 new jobs the City predicted that the Red Building of Pacific Design Center which will not open for another two years. It does not include other approved projects, such as the eleven story hotel at Doheny and Sunset. The real figures of new jobs that will come into existence in the next twenty five years are easily much higher. Given what has been approved prior to the adoption of this new General Plan, the number of new jobs will probably be closer to ten thousand.

G18-5

By under counting the number of new jobs, the DEIR can misrepresent the traffic impacts of all this new development.

Let's say that ten percent of these 10,000 new jobs go to West Hollywood residents who will walk to work. That leaves 9,000 people who will be driving to their new West Hollywood employment.

G18-5
cont.

The City describes the proposed population increase as "moderate". Maybe "moderate" for Bangladesh. If we have a twenty percent increase in population, doesn't that mean something close to six or seven thousand new cars getting squeezed into our 1.9 square mile city? Sure not all of these new residents will drive, but since most of the proposed development will be luxury condos you will have to work to pay that \$800,000 mortgage.

G18-6

It should be noted that the new General Plan calls for a 17.4% increase in housing units yet the Plan claims slightly less than a twenty percent increase in our population. Somehow those numbers don't sound right. All of our new residents will unattached?

G18-7

So far with new jobs and a 20% population increase in jobs, that sounds like another 15,000 new drivers coming into West Hollywood. That does not take into account a predicted increase in our drive through commuter traffic as people travel to and from jobs on the Westside.

G18-8

The other issue the DEIR ignores is West Hollywood's existing population. Right now as much as forty percent of our population consist of seniors, most who are not working and are thus not contributing to our commuter gridlock.

In the next ten or fifteen years West Hollywood will see a major demographic shift that the DEIR totally ignores.

As the number of seniors decrease, the costs of decontrolled West Hollywood rental units will dictate that the new tenants will be younger professionals who can afford substantially higher rents. Basic economics will lead to more traffic based upon the fact that West Hollywood's average age will get younger.

G18-9

Of course a lot of us who are on the cusp of AARP membership will become seniors in the next few years. Many of us will not be retiring at 65. With improvements to seniors' health as well the extinction of defined benefit retirement plans, many of us will be working into our seventies. I won't be riding my bike to work.

While the City is encouraging massive population growth in an already built out city, there are no viable mitigation measures to avoid the impacts of this proposed growth. That means a serious degradation of our quality of life.

G18-10

The DEIR inventories 72 of our most traveled intersections. Currently ten percent are listed at "F". The DEIR predicts that the proposed Plan will result in an increase to twenty percent of our intersections as being at F. Of course these are the major intersections we all use: La Cienega and Santa Monica, Beverly and La Cienega, Crescent Heights and Santa Monica, Fairfax and Santa Monica, La Brea and Santa

G18-11

Monica, Fountain and La Cienega, Doheny and Sunset. That will be at least sixteen major intersections at gridlock. Almost half of our intersections will be under level C.

G18-11
cont.

What's worse is that the DEIR consistently states that at our most heavily impacted intersections, "no feasible mitigation" is possible. That is why the City is counting on yet to be defined improvements in public transportation to rescue us.

The fact that a West Hollywood subway is forty or fifty years away does not seem to be an impediment to the approval of large scale development in our immediate future. Apparently the City believes if we create incredible densities and gridlock, the subway will have to come to West Hollywood.

G18-12

The DEIR does call for ways to encourage people to rely less upon their automobiles. It suggests increased use of valet parking. Higher parking rates. Shortening the maximum time you can stay at a parking meter.

The City claims that it has identified large parking lots that are under utilized. I guess that would include the Pacific Design Parking Center and the parking lots are our local churches and temples. There is certainly not large numbers of unused parking in our City. Some of the parking mitigation ideas are simply pie in the sky, like shared commercial parking with valet service. Why should a business that has adequate parking enter into a shared parking agreement with a business that is under parked? That is simply not good business sense.

One of the more creative ideas is to "unbundle" our residential parking requirements. That means that the City will allow new developments to only give one parking unit per unit. While additional parking would be available on site, the landlord or condo association could charge market rate. The idea is to discourage car ownership. This just sounds like a great way to gouge residents.

G18-13

The DEIR even states that the City should "review" our existing preferential parking districts. Translation: abolish preferential parking or give out even more commercial permits to park in residential areas.

The City is also considering new developments to have less parking. It seems that after years of promising to create more parking the City Council has discovered that parking is the cause of all of our traffic woes. Get rid of parking and more of us will walk or take public transportation. That does not take into account that West Hollywood is an entertainment destination. If people can't park, they're not coming. Once again, the City is grasping at short sighted solutions in order to accommodate more and unnecessary development.

Whenever you increase traffic along your main commercial arteries you force more traffic on to your residential streets as people look for relief from the gridlock. Making parking more difficult in commercial areas only increases the number of people cruising our neighborhoods looking for free parking. It's good to see that the City is looking out for our residential quality of life.

G18-13
cont.

The DEIR also states that all of this development will have "less than significant" impact on our fire department. Well if we double the number of major intersections that are gridlocked, how can ambulance response times not be affected? Indeed it seems counter intuitive to believe that you can add 20% more residents and 20% more jobs and have more gridlocked intersections but still this would not effect response times. Sounds like voodoo urban planning to me.

G18-14

The crowning glory of the proposed General Plan is the recommended "Transit Overlay Districts". These districts take up all of La Brea and eighty percent of Santa Monica Boulevard. If the City Council determines that new public transportation programs would mitigate the impacts, the City could simply override the proposed General Plan by amending our zoning ordinances to add greater heights and densities in these Overlay Districts. If the developers gave out bus passes or sponsored shuttle programs, the City could grant them exemptions from our parking requirements.

G18-15

The "Transit Overlay Districts" are the great Trojan Horse for over development. Based upon the slightest pretense, the City Council could grant all sorts of goodies to their developer buddies and make a mockery of the General Plan process. The Transit Overlays will be the exception that destroys any meaningful limits on development in West Hollywood.

If you have concerns about the General Plan or the DEIR or just want to express an opinion about the direction of our City, please contact Bianca Siegl at the West Hollywood Community Development Department at bsiegl@weho.org, or check the General Plan website at www.weho.org/generalplan. Comments can be faxed to (323) 848-6575. The deadline for submitting comments on the Draft Environmental Impact Report is Monday, August 9th.

Steve Martin

Letter G18

G18-1

The commenter's remarks regarding the General Plan are noted.

G18-2

The commenter states that the General Plan commits the City to massive amounts of development that far exceeds the capacity of municipal infrastructure. The General Plan does not propose any development, nor commit the City to any future development projects. Rather, the General Plan provides a framework for redevelopment, infill, and mixed-use development primarily in five commercial subareas. Focusing development in these areas will promote walking and transit use, because these areas are already developed and adjacent to existing commercial and transit services. The General Plan contains numerous goals and policies (e.g., see Goal IRC-2 and associated policies) to ensure that adequate public services, facilities, and utilities are provided concurrently with new development.

Refer to Topical Response #1 for comments regarding projected growth pursuant to the General Plan.

The comment regarding low paying services sector jobs overburdening the public transportation system is noted.

G18-3

The commenter's concern regarding public input incorporated into the plan is noted. The Introduction and Overview Chapter of the proposed General Plan, pages 7–12, describes the extensive public involvement process for the General Plan, including an explanation of how the General Plan Guiding Principles were developed. These principles serve as the foundation for the goals and policies of the General Plan.

The commenter's concern with height along Santa Monica Boulevard and La Brea Avenue and with nonfunctioning intersections is noted.

G18-4

In response to the comment, a principal strategy of the General Plan is to provide a framework to accommodate redevelopment, infill, and mixed-use development primarily in five commercial subareas. Focusing development in these areas will promote walking and transit use because these areas are already developed and adjacent to existing commercial and transit services. As indicated in Chapter 2.0 of the Draft EIR, most of the City is not anticipated to experience land use change as a result of the General Plan update.

The Mobility Chapter of the General Plan contains numerous goals and policies that promote a multimodal transportation system that increases alternative transportation modes and reduces dependence on the automobile and associated traffic congestion. Examples of relevant goals include develop a world-class transit system (Goal M-1); maintain and enhance a pedestrian-oriented city (Goal M-3); create a comprehensive bicycle network throughout the City (Goal M-4); and create an environmentally and financially sustainable transportation network that provides for the mobility and livability needs of West Hollywood residents, businesses, and visitors (Goal M-5). Please refer to Section 3.14 of the Draft EIR for the analysis of traffic impacts pursuant to implementation of the proposed General Plan.

G18-5

In response to the comment, please refer to Chapter 2.0 of the Draft EIR and Topical Response #1 for an explanation of the growth projections and methodology used for the proposed General Plan.

In response to the jobs comment, the detailed growth projections performed for the Draft EIR indicated that in 2008, the City actually had 22,911 jobs. In the Draft EIR on page 3.11-3, the increase in jobs of 4,451 from 2008 through 2035 was correct. However, the 2035 figure should have been stated as 27,462 (see information on subsequent revision below) instead of 28,847. Nevertheless, this estimate includes all jobs attributable to pipeline projects included in the growth projections, including the PDC Red building (see below).

The traffic analysis for the Draft EIR undercounted 220 net additional p.m. peak hour trips and 2,620 net additional daily trips by allocating 400,000 square feet of office space at the PDC Red building as gallery space instead of office space. Gallery space has a lower trip generation rate. Since office space has a higher job generation rate than gallery space, the Draft EIR undercounted jobs by 1,243. Thus, the Draft EIR has been revised to indicate a 2035 jobs estimate of 28,705.

In response to the comment on traffic impacts pertaining to undercounted jobs, the traffic impacts of the additional jobs were reanalyzed for the Draft EIR. Additional traffic trips attributable to 1,243 additional jobs do not result in any additional significant impacts to any of the intersections analyzed in Section 3.14 because the additional traffic trips do not exceed thresholds of significance for the intersections. No additional transportation and traffic impacts were identified.

G18-6

Please refer to Response to Comment G18-2. Please refer to Section 3.14 of the Draft EIR for an analysis of the traffic impacts pursuant to implementation of the proposed General Plan.

G18-7

Please refer to Topical Response #1. Additionally, as noted by the commenter, based on the development capacity of the proposed General Plan, housing units are projected to increase by 4,274 or approximately 17.4% from 2008 through 2035. Based on 1.6 persons per household, the development capacity pursuant to implementation of the General Plan could accommodate a capacity of 44,182 people, or an increase of approximately 6,834 people over existing conditions ($4,274 \times 1.6 = 6,834$), which is 18.3% greater than existing (2008) conditions.

G18-8

Please refer to Response to Comment G18-2. Please refer to Section 3.14 of the Draft EIR for an analysis of the traffic impacts pursuant to implementation of the proposed General Plan.

As explained in Appendix F of the Draft EIR, in accordance with policy guidance provided by the SB 375 Regional Targets Advisory Committee, the following trip types and percentages are included in the tabulation of daily trips for the traffic analysis:

- Internal to External: Trips beginning inside the City and ending outside the City (50%)
- External to Internal: Trips beginning outside the City and ending inside the City (50%)
- Internal to Internal: Trips beginning and ending inside the City (100%)
- External to External: Trips beginning outside the City and ending outside the City (0%)

G18-9

In response to the comment, the commenter states that the Draft EIR ignores West Hollywood's existing population and states that as much as 40% of West Hollywood consists of seniors. The comment is noted. However, the City of West Hollywood Demographic Profile, 2002, and the U.S. Census (2000) indicate 17% of the City consists of seniors aged 65 and up. See <http://www.ci.west-hollywood.ca.us/Modules/ShowDocument.aspx?documentid=623>.

In response to the comments regarding demographic shifts and decontrolled rental units, the Draft EIR is not required to analyze these issues. Comments regarding the City's shifting demographics, the costs of decontrolled rental units and associated implications, and retirement age are noted.

G18-10

The commenter states the City is encouraging massive population growth without viable mitigation measures to avoid impacts to growth. The General Plan provides a framework to accommodate future growth through redevelopment, infill, and mixed-use development in five commercial subareas. Focusing additional development opportunities in these areas will reduce vehicular trips and promote walking and transit use because these areas are already developed and adjacent to existing commercial and transit services. In addition, the General Plan proposes an expanded pedestrian and bicycle network to improve walkability and mobility throughout the City. The General Plan and Climate Action Plan also contain numerous policies to reduce climate change impacts through greenhouse gas (GHG) reduction measures. These policies provide additional benefits to the community such as cleaner air, cost savings, energy savings, and a greener City. The General Plan also contains numerous policies that promote green buildings, green development techniques, and a variety of other strategies to reduce waste, energy use, and water consumption and to reduce the environmental impacts of existing and future development in West Hollywood. The General Plan also contains numerous goals and policies (e.g., see Goal IRC-2 and associated policies) to ensure that adequate public services, facilities, and utilities are provided concurrently with new development. In addition, Section 3.12 of the Draft EIR analyzed the impacts of implementation of the proposed General Plan on public services and utilities. As noted on page 3.12-60 of the Draft EIR, implementation of the proposed General Plan would result in less-than-significant impacts related to public services and facilities with the exception of water supply. See Response to Comment E4-54. Because the water supply impact was found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

G18-11

The commenter's concern regarding the number of impacted intersections is noted. The traffic analysis conducted for implementation of the General Plan in Section 3.14 of the Draft EIR and Appendix F does not take into account any trip reductions that could occur if public transportation improvements occur. Thus, the Draft EIR does not rely on any future public transportation improvements to reduce traffic impacts in West Hollywood.

G18-12

In response to the comment, the General Plan and Draft EIR acknowledge that the Redline Subway extension is being considered along Santa Monica Boulevard through the center of the City. These documents do not make any assumptions as to when the subway extension would

be constructed. The traffic analysis conducted for implementation of the General Plan in Section 3.14 of the Draft EIR and Appendix F does not take into account any trip reductions that could occur if the subway is extended to West Hollywood. Thus, the Draft EIR does not rely on any future rail transit to reduce traffic impacts in West Hollywood.

G18-13

In response to the comment, although CEQA does not identify a threshold for analyzing the adequacy of parking supply, Section 3.14 of the Draft EIR discussed the impact of parking capacity and demand pursuant to implementation of the proposed General Plan.

As the commenter notes, the proposed General Plan and Section 3.14 of the Draft EIR contain numerous goals and policies to manage parking supply to serve residents, businesses, and visitors as effectively and efficiently as possible (e.g., see Goal M-8 and associated policies).

As discussed in the Mobility Element of the General Plan and Section 3.14 of the Draft EIR, a parking occupancy study was conducted in two commercial areas of the City. The parking occupancy study results indicated that the number of spaces available in the study areas exceeds the demand. However, the current allocation of these spaces may not function efficiently to provide access to adequate parking, particularly during peak periods. Hence, as already stated, General Plan goals and policies seek to provide greater parking effectiveness and efficiency such as utilizing the most current parking management technology, promoting shared pools of commercial parking, and maintaining demand-responsive pricing of public parking, among others.

The commenter's question regarding shared parking agreements between businesses with sufficient parking, and parking deficits is noted.

The commenter's statements regarding unbundled parking are noted. The meaning of unbundled parking, per Appendix F of Volume 2 of the Draft EIR, unbundled parking is explained as follows:

Parking costs are generally subsumed into the sale or rental price of housing and commercial space. Although the cost of parking is often hidden in this way, parking is never free; instead the cost to construct and maintain the "free" parking is hidden in the cost of all other goods and services. For all commercial and residential development in West Hollywood, the cost to lease or purchase parking could be unbundled from the cost to lease or purchase the usable space.

Such a policy would provide a financial incentive to residents and employers to lease only the amount of parking they need. For residential development, unbundled parking may prompt some residents to dispense with one of their cars and to make more of their trips by other modes.

Among households with below-average vehicle ownership rates (e.g., low-income people, singles and single parents, seniors on fixed incomes, and college students), unbundled parking can also provide a substantial financial benefit that increases housing affordability. Unbundled parking can allow employers to provide employees with an equitable transportation benefit that can reduce vehicle commuting.

In response to the comment regarding increasing traffic on commercial arterials and additional traffic on residential streets, Goal M-7 of the General Plan contains policies to protect and

preserve residential neighborhoods from intrusion of nonresidential traffic including supporting the Neighborhood Traffic Management Program, continuing to include residents and others in discussions of neighborhood traffic management, regularly reviewing neighborhood parking permit districts to prevent commercial overflow parking, and managing traffic speeds and volume on neighborhood streets to reduce cut-through traffic.

In response to the comment regarding making parking more difficult in commercial areas resulting in cruising of residential neighborhoods for free parking, Goal M-8 contains policies specifically designed to reduce circling for parking, including creating user-friendly informational and wayfinding signage to direct motorists to parking facilities, a shared valet program, providing real-time parking occupancy information to motorists, and standardized price information displayed at all public and private parking facilities and meters.

In response to the comment on reviewing residential parking districts, the Mobility Chapter of the proposed General Plan provides a policy to maintain, not abolish, preferential parking districts and to require the City to regularly review neighborhood permit parking districts to prevent commercial overflow parking (M-8.17).

G18-14

The commenter incorrectly states that the Draft EIR indicates that implementation of the General Plan would have a less-than-significant impact on fire protection services. As indicated on page 3.12-29 of the Draft EIR “intensification of development and additional population primarily within the five commercial subareas would lead to increased demand for fire protection services in these areas. This is a significant impact.” The General Plan contains numerous goals and policies to ensure the City provides adequate fire protection services (see Goals SN-6, SN-7, and SN-8 and associated policies). In addition, the Draft EIR incorporated mitigation measures (see Mitigation Measures 3.12-1 through 3.12-6) to reduce the impact of implementation of the General Plan on fire protection services to a less-than-significant level. Additionally, emergency service response time was analyzed in Section 3.14 of the Draft EIR. Goals and policies in the Safety and Noise Chapter of the proposed General Plan contain actions aimed at ensuring emergency response readiness such as continuing to contract with Los Angeles County for police services, remaining part of the Consolidated Fire Protection District of Los Angeles County, and annually reviewing those services regarding responsiveness and effectiveness; cooperating with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services; and supporting existing mutual aid agreements, among others.

G18-15

In response to the comment, the commenter’s statements regarding the Transit Overlay area are noted. Page 52 of the proposed General Plan and Policy LU-2.4 in the Land Use and Urban Form Chapter explains how the Transit Overlays work. As clearly stated in Policy LU-2.4, greater heights and densities in the General Plan Transit Overlay Zones can only be considered by the City Council after rail transit is incorporated in the Metro Long Range Transit Plan and appropriate CEQA analysis has been conducted.



Bianca Siegl

From: Marcolina, Rob [Rob.Marcolina@Bain.com]
Sent: Tuesday, August 03, 2010 1:02 PM
To: Bianca Siegl
Subject: General Plan Comment

Dear City Planners,

I am a concerned citizen of West Hollywood ... re: the proposed zoning changes in the retail area of Melrose Ave (from Doheny to La Cienega). The proposed increase in FAR and building height will have a significant negative effect on the character and nature of this unique area, one in which I have made my home for the last 7 years. By changing the zoning to CN2, you are risking the destruction of the feel of our local environment. I urge you to NOT designate it CN1.

G19-1

Thanks.

Rob Marcolina
541 Westbourne Drive
West Hollywood, CA, 90048

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8/9/2010

Letter G19

G19-1

Please refer to Responses to Comments G13-1 and G13-2.



8/1/10 11:20 AM

Print



GP-20

From: F Carleton Cronin (f.cronin@sbcglobal.net)
To: BSeigl@weho.org;
Date: Sun, August 1, 2010 11:20:11 AM
Cc: preident@whwra.org;
Subject: Proposed general Plan

As I have stated for several years, the maintenance of the economic engine of the city, its commercial core is a necessary element in planning for the future. However, the 37, 000 or so resident citizens are being severely under-served in the current proposed General Plan

In initial discussions regarding the formation of the city, the most common comments were to preserve the unique nature of the area, maintaining easy pedestrian access to local shops and other services and the safety of residents and visitors. The current GP proposal overlooks these concerns in favor of enlarging and enhancing commercial spaces and activities.

G20-1

We are faced with an increasing inability to use our city as we were once promised. That's right -Promised. Of course, those were political promises such as "retaining our walking city", "keeping out unique urban village". (One who uttered those slogans is still on the Council, by the way.) But, those slogans are at the heart of the matter.

Here are some of the items I and some of my neighbors were looking for in the proposed GP: (in a loose order)

- bold, interesting design for commercial structures, but not doubling their height and FAR;
- a design review process for residential buildings to assist in brining "green" elements into residential building and landscapes and preventing "Levitt town" development in that sector of the city;
- cul de sacs in residential sectors to prevent drive-through traffic;
- more roundabouts and other "traffic calming" measures;
- re-design of major intersection crossings with more walk time or criss-cross walking;
- a more pedestrian-friendly approach to such things as set-backs, wide sidewalks, one-way alleys, better street lighting - and such elements which might cause visitors to use their time in the city for walking to shops, etc., as well as providing a safe environment for residents;
- real bike lanes;
- more 4-way stops

G20-2

G20-3

To be told that these elements are not part of the GP, that they must be acquired one at a time through political process certainly defines the mandate from Council for planners:" To hell with the residents. We hope to replace them."

G20-4

Our first general plan can about with much citizen input. This time around I see none. Still, however, we have the ability to vote at municipal elections.

Carleton Cronin-8748 Dorrington Ave.-West Hollywood,CA-90048

Only a fool would believe that the city will become more dense in the near future. But,

Consider why people buy houses (and, now condominiums) here.

Letter G20

G20-1

The commenter states that the proposed General Plan does not incorporate principles established when the City was founded regarding the commercial streets within Sub-Area 1. In response to the comment, the General Plan incorporates community input gathered during the General Plan Update process, as summarized in Chapter 1.0 of the proposed General Plan. The specific vision for Sub-Area 1 is contained in the Intent statement of Goal LU-11 and related policies, particularly Policy LU-11.3, which addresses maintaining the small-scale, pedestrian-oriented character of Melrose Avenue and Robertson Boulevard.

G20-2

In response to the comment regarding support for bold design of commercial structures and a design review process for residential buildings, please refer to General Plan Goal LU-5 and related policies, which address encouraging a high level of quality and sight design in all construction and renovation of buildings. Green building is addressed in the Infrastructure, Resources, and Conservation Chapter, Goal IRC-5 and related policies.

G20-3

In response to the comments regarding specific street and pedestrian improvements, the General Plan addresses such improvements at a broad policy level. The Mobility Chapter includes a Goal and Policies relating to minimizing nonresidential traffic in residential neighborhoods (Goal M-7); a Goal to maintain and enhance the City's pedestrian orientation (M-3) and related Policy requiring provision of pedestrian amenities including wider sidewalks, pedestrian-oriented lighting, and bulb-outs at cross walks where feasible (M-3.4); and a Goal related to expanding the City's bicycle network (M-4).

G20-4

In response to the comment regarding inclusion of specific items in the General Plan, please refer to Response to Comments G20-3. In response to the comment regarding community input into the Draft General Plan, please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.



Bianca Siegl

From: Sherie Stark [starkbiz@sbcglobal.net]
Sent: Thursday, August 05, 2010 12:43 PM
To: Bianca Siegl
Cc: WHWRAPresident@aol.com
Subject: General Plan comment (edited letter)

Dear Bianca and city leaders,

I am more and more concerned that our town is losing its distinct appeal in the face of its quest for non-stop commercial makeover, and I want to complain. As a homeowner in West Hollywood West, I attend community meetings as often as I can to try to help the city from mistakenly "improving" itself beyond recognition. The changes I see in the General Plan, like the mixed-use zoning exemptions that have taken away so much of our charm already, may mean more money for the city in the short term, but we should be looking at the longer haul.

G21-1

The other high-income communities I can think of that I would consider living in have managed to retain their feeling of history, livable, walkable community space, open, airy views, etc.; they didn't start building their properties up to the sky to take short-term advantage of the real estate profits to be made! I can think of cohesive, beautiful architectural panoramas in Beverly Hills, Malibu, Brentwood, not to mention Santa Barbara. I don't know if they had to fight their homeowners to keep their character, but I'm glad they did; they seem to have stood the test of time, they seem to have been able to hold on to their zoning plans, and the cities' looks don't keep transforming abruptly.

G21-2

So why is this city so eager to throw all to the wind and lose its vision, get around the zoning intentions it had for itself with the "mixed use" alibi and these other changes? We don't need so much change! The city has enough traffic and parking problems as it is, being a thoroughfare through the L.A. basin and a destination for so much commerce; can we please just leave the residential growth alone, and make money some other way?

G21-3

The reason the high-end showcase businesses want their offices here is because it feels different. If we continue to make it more and more non-descript, less and less unique, they'll take their offices elsewhere and we'll lose a lot of their charm (and revenue).

G21-4

Thanks for your considering your citizens' views, Sherie Stark

Letter G21

G21-1

The commenter's observations regarding changing commercial neighborhoods are noted. In response to the comment regarding mixed-use zoning, the General Plan does not propose to change the current mixed-use bonus for commercial zones. It should be noted that, per City records, only three buildings using the mixed-use bonus have been constructed since the bonus was established in 1991.

G21-2

The comment regarding the character of other cities is noted.

G21-3

Please see Response to Comment G21-1. In response to the comment regarding residential growth, the General Plan seeks to maintain and enhance existing residential neighborhoods (see General Plan Guiding Principles, page 12 and Goal LU-8) and only proposes increases to existing residential land use in two limited areas, south of Beverly Boulevard and on the west side of Detroit Street (see Figure 3-4, General Plan Designations).

G21-4

The commenter's questions regarding mixed-use, traffic, and commercial business types are noted.



Bianca Siegl

From: Sian Maria Sze Wing Leong [szewing@mac.com]
Sent: Friday, August 06, 2010 1:20 PM
To: Bianca Siegl
Cc: WHWRA; Jason Simpson
Subject: City of WeHo's draft General Plan - Proposed Zoning Changes

Dear City of West Hollywood,

Re: City of WeHo's draft General Plan - proposed Zoning Changes.

I attended a meeting at the West Hollywood Sheriff's office on 28th July.

Referring to the proposed zoning changes - increases in height and density limits in West Hollywood - I would like to raise the following questions:

A) Re: the proposed increase to height and or density limits along Melrose between San Vicente and La Cienega.

i) The planners stated they wish to maintain and encourage the unique creative and boutique spirit of this stretch of Melrose. However, statistically, allowing for increased floor area or size of structure (which is basically what the height and density increases do) means increased rents, unaffordable to boutique businesses but affordable to franchises and chain store businesses. What will happen is the big chains will come in: whether upmarket or fast food businesses. This has happened in Hong Kong, London and Paris where higher rents have pushed out the boutique and unique artisan cafes and businesses and been replaced by brands that you see on every high street - e.g. Robertson, Beverly Hills. This is exactly opposite to what the planners are proposing in their vision. In fact, the recommendation of increased heights and densities opposes their vision, attracting more commercial rather than boutique tenants and will lead to the loss of what makes WeHo unique and desirable and hip: its West Hollywood village character.

G22-1

ii) The planners stated they wish to encourage and attract more art showrooms and that consulting these businesses they had discovered that the art showrooms require more ceiling height hence the proposed height limit increase. But there is no provision to guarantee that these new higher buildings will be occupied by these kinds of businesses. So this is not properly thought through as a reason and does not justify the height or density increases until there is a provision to guarantee this art showroom vision along Melrose.

iii) A further concern is that a series of much taller buildings along Melrose would create a narrow corridor of buildings along Melrose:

a) hemming in and blocking views to the north and south residences creating an unattractive environment on Melrose. Casting earlier shadows and perhaps permanent shadows in certain areas.

G22-2

b) creating a tunnel effect for wind/car pollution down melrose and the buildings to the side funnel the air down the street. This will affect walkers and road side cafe, creating a hemmed in feeling when sitting or walking down the streets, become more of a corridor for traffic rather than an open environment for the community. And likely result in rat running through the streets meaning more traffic flow, slower traffic, more pollution etc.

iv) One planner put forth the argument that compared a future vision of a narrow high building Melrose to the streets of Paris and Barcelona - NO - this overlooks the fact that the buildings in Paris and Barcelona are culturally significant, beautiful historical buildings often with significant architects / designers. If this is what he envisions, then perhaps it'd be more appropriate and effective way to meet

G22-3

8/9/2010

that vision is to have a provision / variance allowing increased building height and density based on the merits of the building design and its architect.

B) The proposed height and density increases for the "Gateway of West Hollywood". I believe this to be proposed to 60ft or a significant height.

The planners' vision for this is a landmark building to mark the gateway to West Hollywood. Proposing a height and density increase does not guarantee a landmark building, all it guarantees is much developer interest. To guarantee a landmark building, the height and density increases need to come with requirements for a "landmark" building. What makes a landmark building is significant and quality design by a significant and quality architect, as in the Pacific Design Center. So why not do this on a case by case basis - as was done with the Pacific Design Building - a cultural landmark and made certain of that by having to satisfy the criteria with a quality architect and design. This would be far more effective in achieving these visions than just raising height and density limits across the board no matter what the quality of the design and project.

G22-4

C) Other proposed increases to height and density limits along La Cienega East, Beverly North, Melrose West etc

- these back up right against zoned two-storey height residential area and would hem in the West Hollywood West village - with concerns of loss of light, views and the following:

- Loss of our urban village
- Less pedestrian-friendly area
- Less people on the streets (shopping, etc.)
- More traffic on our commercial streets
- More cut-through traffic in our neighborhood
- More angry, frustrated drivers in our neighborhood
- More parking problems
- Loss of views
- Loss of light (shade/shadow)
- Less open/airy feeling
- West Hollywood becoming just like every other city
- Loss of WeHo's uniqueness
- Lack of creativity
- Concern about how the City came up with these changes
- Concern that the City is not listening to its residents
- Concern about increased heights and Floor Area Ratio (FAR)
- Concerns about density
- Concern that "cumulative bonuses" can increase heights (and/or FAR) significantly.
- Concerns about signage — that billboards and tall walls will be allowed in areas other than Sunset
- Concerns about infrastructure (water, etc.)
- Concern that WHW's Neighborhood Conservation Overlay status needed to be better defined
- Concerns about quality o life
- Concerns about increasing density

G22-5

Conclusion:

I wish to protest against any increases in height and density at all. In fact, I am in agreement with some of the planners' visions - creating landmarks, attracting creative and boutique businesses, preserving the spirit of the West Hollywood village, creating a pedestrian and bicycle friendly neighbourhood etc, but the zoning proposals do not do this.

I respectfully ask you to reconsider the proposed height and density limits. To meet the planners' vision as above, provisions and requirements need to be put in place to guarantee that the visions are met. In fact, I believe the increases to height and density are not necessary at all, and that in fact a case by case review of cultural value and worth would be much more effective in terms of preserving the nature of the city and growing it in the right direction.

G22-6

8/9/2010

West Hollywood is presently a desirable neighbourhood, different from Beverly Hills and Miracle Mile in so many ways including its unique village-oasis feel, being creative, hip and not having the same commercial chain stores. People want to visit and live here. We should retain this to keep West Hollywood a special place.

G22-6
cont.

Regards and thanks,

Sze Wing Leong
435 Westmount Drive

8/9/2010

Letter G22

G22-1

The commenter states that the General Plan allows for height and density increases on Melrose Avenue. This is not entirely correct. The General Plan proposes a change from CN1 (1.0 floor area ratio [FAR] and 25 feet in height) to CN2 (1.0 FAR and 35 feet in height) along much of Melrose Avenue between Doheny Drive and La Cienega Boulevard—an increase of 10 feet in height, but no change in density. The only increase in density proposed on Melrose Avenue is for the north side of the block between Robertson and San Vicente Boulevards, which would change from CN1 to CC1 (1.5 FAR and 35 feet in height), an increase of 0.5 FAR and 10 feet in height. The commenter's concern regarding the mix of commercial business types and neighborhood character is noted.

G22-2

In response to the commenter's concern regarding potentially taller buildings on Melrose, please refer to the Draft EIR, Section 3.1, Aesthetics, which analyzes environmental impacts related to scenic vistas, and shade and shadow. The commenter's concern regarding a "tunnel effect" is noted.

G22-3

In response to the comment regarding allowing increased height or density based on the individual merits of a building, please refer to General Plan policy LU-2.8, which states that such an incentive may be considered for projects that offer architectural design that is of unusual merit and will enhance the City.

G22-4

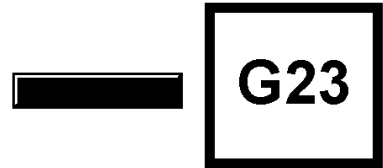
The commenter's opposition to the proposed height and density increase for the Melrose Triangle is noted. Regarding the commenter's suggestion of case-by-case consideration of height increases based on architectural merit, please see Response to Comment G22-3.

G22-5

The commenter's opposition to the proposed land use changes along La Cienega Boulevard, Beverly Boulevard, and Melrose Avenue is noted. The comments regarding neighborhood character, pedestrian activity, traffic and parking, views, shade and shadow, the community input process, offsite signage, and other matters are noted.

G22-6

The commenter's opposition to height or density increases is noted. Regarding case-by-case review of projects, please see Response to Comment G22-3.



West Hollywood General Plan 2035

Public Review Draft

Comment Form

Thank you for taking the time to review and comment on the Public Review Draft of the West Hollywood General Plan. We welcome your comments on this Draft. Your suggestions for improvement are critical to the success of the General Plan. The General Plan sets the long-term vision for the future of the City, defining how we will use and manage our physical, social, and economic resources over the next 25 years. The Public Review Draft General Plan was developed with extensive community input. It documents our shared vision of tomorrow and sets the policies and programs to achieve that vision.

In an effort to make it easier to provide comments on the Public Draft General Plan, we recommend that you use the following table to describe your comments and suggestions. Your suggestions can either be hand-written or typed into the document, which is available for download on the City's General Plan web site: www.weho.org/generalplan.

Your Name: Kevin Burton

Your Address: Eastside, WeHo

Your Phone/Email: KevBurto@gmail.com

Please return all comment cards to:

Bianca Siegl
Community Development Department
City of West Hollywood
West Hollywood CA 90046
bsiegl@weho.org
(323)848-6859

Page Number	Goal, Policy, or Action Number	Comment	
115-116 125 Impl. p. 11 Impl. p. 10	Bikes M-4: Bike network M-?: action items Bus-only lanes	In addition to bicycle lanes, road markings such as "sharrows" now being used in nearby cities should be explicitly mentioned. Erect more signage alerting motorists to the presence of bicycles. Add action item to implement bicycle facilities on shared roads. "Bus-only" lanes should be designated "Bus- and BICYCLE-only" lanes.	G23-1
125 128 Impl. p. 11	M-4: Bike network M-6: Reduce autos M-A.27: Bike parking	The City should require all EXISTING major employers and retailers to provide secure bicycle parking.	G23-2
125 128 Impl. p. 11	M-4: Bike network M-6: Reduce autos M-A.26: update plan	The City should accelerate implementation of the 2003 Bicycle and Pedestrian Master plan.	G23-3
202 203 Impl. p. 23	CERT SN-7.4 SN-A.11	The City of West Hollywood should take the lead in working with the LA County Fire Department to establish teams of CERT-trained residents to respond to emergencies in the early hours or days when emergency services may be unavailable. This is the "T" in CERT.	G23-4
193-194 200 Impl. p. 23	Non-transpt. noise SN-5 SN-A.14	Noise standards should be applied to existing residential HVAC systems, both furnaces in the winter and aging/loud air conditioners in the summer. (The city of Los Angeles uses 5 db as the limit for residential air conditioners)	G23-5

Letter G23

G23-1

In response to the commenter's suggestion regarding bicycle facilities, please refer to General Plan Implementation Action M-A.28 regarding installing bicycle parking facilities. The commenter's suggestions regarding the use of "sharrows" and bicycle-related signage and the creation of bus- and bicycle-only lanes are noted.

G23-2

The commenter's suggestion regarding requiring existing major employers and retailers to provide bicycle parking is noted.

G23-3

The commenter's suggestion regarding accelerating implementation of the 2003 Bicycle and Pedestrian Master Plan is noted. Implementation will continue as funding allows.

G23-4

The commenter's suggestion regarding CERT training is noted. The City hosts periodic CERT trainings for residents.

G23-5

The commenter's suggestion to set noise standards for residential HVAC systems is noted.



Bianca Siegl

From: Mleonghk@aol.com
Sent: Friday, August 06, 2010 8:18 PM
To: Bianca Siegl
Cc: president@whwra.org; leongpochih@aol.com; szewingleong@gmail.com
Subject: City of WeHo's draft General Plan - Proposed Zoning Changes

Dear Ms Siegl,

My husband and I are very concerned about the recommendations in the WEHO General Plan.

We wonder what prompted the plan and how the recommendations were developed. By polling the WEHO population? We have not received any such questionnaire in our 5.5 years of living here.

Our neighbourhood is unique for its village atmosphere, low-rise housing, lack of chain stores, and generally enjoyable surroundings. In short it has great charm. Taller buildings, denser traffic, pavements without people will not enhance its charm, they will detract from it.

What growth is being planned for? The population charts displayed at a recent meeting, ostensibly to show growth, in fact showed the opposite. The population has remained pretty stable over many years.

Melrose Avenue in WEHO is a unique attraction to residents, visitors and tourists. But it has already lost the Bodhi Tree bookstore and the Tea Garden. Will we next lose the pleasure of relaxing at le Pain Quotidien or Urth Cafe, really unique experiences, as greedy developers move in? Heaven help our little community if those havens are replaced by Starbucks and Coffee Beans.

We do not want taller buildings, or larger buildings blocking our sunlight and views. Nor do we want tall walls and billboards with bright lights shining into our homes day and night.

We are already seeing what development is bringing us - the new Library (a good thing in itself) with a building 2/3 of which is an unsightly car park.

Yours sincerely,
Mary Leong
Pochih Leong

G24-1

G24-2

G24-3

G24-4

G24-5

G24-6

8/9/2010

Letter G24

G24-1

In response to the comment regarding community input into the Draft General Plan, please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.

G24-2

The commenter's observations regarding the character of the West Hollywood West neighborhood and concerns regarding potential change are noted.

G24-3

Please see Thematic Response #1.

G24-4

Please see Response to Comment G24-2.

G24-5

The commenter's opposition to the General Plan's proposed height increases along Melrose Avenue and opposition to offsite signage are noted.

G24-6

The commenter's concern regarding the new library parking structure is noted.

Bianca Siegl

From: Jim Dire [jfdire@sbcglobal.net]
Sent: Friday, August 06, 2010 4:39 PM
To: Bianca Siegl
Subject: West Hollywood General Plan

I would like to object to the fact that the City Council gets to approve this plan. I think it should be put to a vote of the citizens of West Hollywood. Too many times we have had developmeent decisions made that are completely at odds with what the residents want.

G25-1

8/9/2010

Letter G25

G25-1

The commenter's concern about the approval process for the General Plan is noted; however, California Government Code sections 65300 and 65350 et seq. require that the Planning Commission review the General Plan and make recommendations to the City Council, who is responsible for final approval of the document.



Bianca Siegl

From: Heidi Alexander [heidialexander@sbcglobal.net]
Sent: Saturday, August 07, 2010 6:08 PM
To: Bianca Siegl
Subject: City of WeHo's draft General Plan - Proposed Zoning Changes

I live on Rangely in the Melrose Triangle. I have concerns about traffic, density, *noise*, parking. | G26-1

Thank you,
Heidi Alexander

8/9/2010

Letter G26

G26-1

The commenter's concern regarding traffic, density, noise, and parking is noted. Please refer to the Draft EIR for the analysis of these issues pursuant to implementation of the proposed General Plan. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

Bianca Siegl

From: Brad Keistler [bkeistler@hotmail.com]

Sent: Sunday, August 08, 2010 11:34 AM

To: Bianca Siegl; WHWRA Meister

Subject: General Plan Draft - zoning changes

I do not see any reason what-so-ever to increase the height of buildings on our major thoroughfares, especially Melrose. Our city is dense enough. City Counsel seems bent on over- development. Why? Just for more tax revenue to the detriment of our quality of life? Are you doing this because you think that somewhere in the distant future a subway down Santa Monica will solve all our traffic problems?

G27-1

Brad Keistler

8/9/2010

Letter G27

G27-1

The commenter's concern regarding building heights, quality of life, and traffic is noted. Please refer to the Draft EIR for the analysis of these issues (except for quality of life, which is a broad term not required to be directly addressed in the Draft EIR) pursuant to implementation of the proposed General Plan. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

Bianca Siegl

From: midgeba@aol.com
Sent: Sunday, August 08, 2010 12:13 PM
To: Bianca Siegl
Cc: president@WHWRA.org; k.roth@imagine-entertainment.com
Subject: General Plan comments

As home-owners, and 23-year and 10-year residents, in West Hollywood, we are quite concerned how the proposed General Plan will affect the quality of life in our neighborhood. During the time we have lived in WeHo, we have already witnessed more parking problems, more traffic and congestion, more noise and disruption from people visiting the clubs and bars in our neighborhood. We cannot imagine how much worse it could get, but the proposals regarding the Melrose Triangle and others, would ensure more traffic and more problems in our once peaceful neighborhood.

The impact on the neighborhood has not been adequately addressed.

We want to voice our concerns and displeasure regarding the zoning changes that are being proposed in the General Plan.

Thank you for your time and consideration.

Kind regards,
Midge Barnett & Laurin Rinder
8833 Rangely Avenue
West Hollywood, California 90048

Kim Roth
8831 Rangely Avenue
West Hollywood, California 90048

G28-1

8/9/2010

Letter G28

G28-1

The commenter's concern regarding quality of life, noise, traffic, congestion, and parking is noted. Please refer to the Draft EIR for the analysis of these issues (except for quality of life, which is a broad term not required to be directly addressed in the Draft EIR) pursuant to implementation of the proposed General Plan. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.



Bianca Siegl

From: Joshua Trachtenberg [joshua.trachtenberg@gmail.com]
Sent: Sunday, August 08, 2010 5:45 PM
To: Bianca Siegl
Subject: Addendum to: proposed changes to commercial development in WeHo

Hi Bianca,
I should have added that the proposed height for the Sherbourne Triangle is something like 65 feet in the proposed General Plan. This is way out of proportion with the neighborhood. I would like to see this reduced to 3 stories maximum.

G29-1

Thank you.

Josh Trachtenberg

On Sun, Aug 8, 2010 at 5:41 PM, Joshua Trachtenberg <joshua.trachtenberg@gmail.com> wrote:

> Dear Bianca,
>
> It was a pleasure to have met you and your colleagues the other night
> at the Sheriff's station to hear your presentation on the proposed
> General Plan zoning changes for commercial development. As a resident
> and home owner in West Hollywood West we have a keen interest in this
> and hope that our voice may add something constructive to the decision
> making process.

>
> After the meeting we took some time to explore Melrose both east and
> west of La Cienega to see how zoning in WeHo vs. LA has impacted the
> pedestrian's sidewalk experience. We had lunch at Lemonade on Beverly
> Blvd and Urth on Melrose to think about the proposed height increases
> on that street.

>
> Here are our conclusions from this walkabout:
> Building Height:

> The new plan will allow development up to 35 feet in height along
> Melrose. That seems great. What is not great is the excessive
> application of Height/Density Bonuses as proposed. Instead of adding
> 3 bonuses, we think that one should be the limit. Our understanding
> from the meeting is that each bonus increases height by 10 feet.
> Thus, Melrose could witness 6 story buildings (65 feet). This is
> excessively high and entirely out of place. Current buildings range
> from 1 to 2 stories. It is not clear to me why the city does not
> simply mandate Green Building. Also, our understanding is that state
> law already requires a certain amount of Affordable Housing - so why
> is the City incentivizing something that is already mandated? This
> excessive use of Height/Density Bonuses really must be re-examined.
> We came here from New York and are used to tall buildings. But this
> is not New York and it would be very odd to have a new 6-story
> building appear on Melrose surrounded by 1 story buildings. Don't you
> agree? So lets please limit Height/Density Bonuses to 1, not 3.
> Three is just crazy - you all can't really believe that a 6-story
> building would fit it on Melrose.

G29-2

>
>
> Relationship of a Building to the Sidewalk:

> From our walk around the neighborhood it became clear that commercial
> development on Melrose between Robertson and La Cienega benefits from
> two things: 1) varied shapes of the store fronts - note how facade
> for Henry Beguelin, Alpha, and Kaffee Wien are not all on the same
> line; the storefronts advance and recede from the sidewalk which is
> visually much preferable to a single line. 2) it looks like most of
> the stores have a foot or two of plantings that separate them from the
> sidewalk (c.f. John Varvatos). Indeed, many are set well back from

G29-3

> the sidewalk (c.f Cecconi's, Rose Tarlow Melrose House, and of course
> the PDC). These two architectural elements add a great deal of
> character to the neighborhood which, sadly, is lacking east of La
> Cienega. Unfortunately, the new Kitson building does not take
> advantage of these simple elements. Instead it presents a single
> "box" that immediately abuts the sidewalk. We would like the City to
> discourage to whatever degree possible the construction of "boxes".
> This neighborhood deserves better, no?
>
> Our mutual goal is to have West Hollywood have a unique character.
> The unique and vibrant character that is West Hollywood is what
> encourages people to come here to shop. If Melrose just becomes a
> series of boxes selling wares this flavor will be lost, and shoppers
> will gravitate elsewhere as they renew their search for the intangible
> feel they now get here. Indeed, the sole reason we moved here and are
> raising our kid here is because of the neighborhood feel - both at the
> commercial and residential level.
>
> We hope these comments have been constructive.
>
> Best regards
>
> Joshua Trachtenberg & Audrey Prins
> 407 Huntley Drive
> West Hollywood 90048
> 310-659-6036
>

G29-3
cont.

G29-4

Letter G29

G29-1

The commenter states that the General Plan proposes a height increase to the Sherbourne Triangle. This is inaccurate. No land use changes are proposed for the Sherbourne Triangle.

G29-2

The commenter's support for the proposed height increase along Melrose Avenue is noted. The commenter states that up to three height bonuses of 10 feet each may be applied to projects on Melrose Avenue. This is not entirely correct. As illustrated in Table 3-2 of the proposed General Plan, properties designated Commercial Neighborhood 2 (CN2) may receive Green Building, Affordable Housing, or Creative Office bonuses. These bonuses are described in the footnotes to Table 3-2, on page 54 of the proposed General Plan. The Green Building bonus allows for an additional 0.1 floor area ratio (FAR), but no height increase, for projects that exceed minimum green building requirements and achieve a minimum of 90 points on the West Hollywood Green Building Point System. The Affordable Housing bonus is mandated by state law and allows projects to have up to a 35% density bonus and to request a range of other incentives including a 10-foot height increase, for providing certain amounts of affordable housing. The Creative Office bonus would allow for an increase of 0.5 FAR with no additional height for projects that include office spaces for fashion, arts, design, and other similar uses, but no increase in height. If a project were able to provide the community benefits required to achieve all three bonuses, the total additional height would be no more than 10 feet over the 35-foot height allowed in the CN2 zone, for a maximum of 45 feet depending upon state affordable housing bonuses.

G29-3

In response to the commenter's observations regarding the design of commercial storefronts along Melrose Avenue, please refer to proposed General Plan policies LU-4.2, LU-4.6, and LU-11.7, which require projects to incorporate a series of urban design techniques intended to enhance pedestrian activity and comfort.

G29-4

The commenter's observations regarding the changing character of Melrose Avenue are noted.



Bianca Siegl

From: Stuart Denenberg [stuart@denenbergfinearts.com]
Sent: Sunday, August 08, 2010 10:21 PM
To: President; Bianca Siegl
Subject: Respnse to the General Plan draft and Proposed Zoning Changes

Dear Bianca

Thank you in advance for including this email in the community responses to the General Draft Plan.

We are very concerned with the issue of traffic safety in our neighborhood, and in particular at the corner of Sherbourne and San Vicente--The entry there into San Vicente from Sherbourne is totally blind whenever there are any parked cars on the San Vicente curve that is just north of Sherbourne on the west side of the street.

Also, directly in front of our home, when a car is parked at the meter directly in front, it is very dangerous to pull out of our driveway into traffic on San Vicente, making another blind entry.

And there is wholly inadequate accomodation for pedestrians to cross the street--except at the far ends of San Vicente either at Melrose or Beverly Boulevard--Placing a crosswalk or traffic light half-way on the long San Vicente block at Sherbourne would be ideal.

Traffic solutions we wish would be four-fold--

1. Disallow parking on the San Vicente curve where there is already a partial "red" no parking curb.
2. Install a 4-way STOP sign on San Vicente at Sherbourne on both the east and west side--or better yet, a traffic light.
3. Change the meter in front of our double-entrance drive to a "Passenger Loading Zone."
4. Designate a crosswalk from west to east across San Vicente at Sherbourne.

If there's more development, the infrastructure to support that must be met, including water service, sewer service, telephone, noise, light and shadow, and of course traffic and parking.

Gratefully submitted,

Stuart and Beverly Denenberg
417 North San Vicente Blvd
West Hollywood, CA 90048

T310-360-9360

F-310-499-5244

G30-1

G30-2

Letter G30

G30-1

The commenter's concerns regarding traffic safety, on-street parking, and pedestrian crosswalks, and recommendations for specific roadway improvements are noted. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

G30-2

In response to the comment, the General Plan contains numerous goals and policies (e.g., see Goal IRC-2 and associated policies) to ensure that adequate public services, facilities, and utilities are provided concurrently with new development. Section 3.12 of the Draft EIR discusses the public services and utilities impacts pursuant to implementation of the General Plan.

In response to the comment on light and shadow, Section 3.1 of the Draft EIR discusses the impacts of implementation of the proposed General Plan on light and glare on page 3.1-1, and shade and shadow on page 3.1-10.

In response to the comment on traffic and parking, Section 3.14 of the Draft EIR discusses the impacts of transportation and parking pursuant to implementation of the proposed General Plan.

The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

Bianca Siegl

From: Glenda Pollack [glenda.pollack@gmail.com]
Sent: Sunday, August 08, 2010 11:31 PM
To: Bianca Siegl
Subject: Fwd: Comments about the height and zoning

On Aug 8, 2010, at 1:41 PM, Glenda Pollack <glenda.pollack@gmail.com> wrote:

> Hi Lauren/Bianca
>
> I'm still in Cape Town caring for Mom, but have been reading/following closely regarding the new zoning/heights etc. I tried to email Ms Siegel but I keep getting the website and not being able to access the email address,
>
> It makes my heart sink when I read about the possibility of my current limited view of the sky out of my window (overlooking the alley - towards Melrose Ave.) being totally obliterated and the lack of any sunshine coming into the apartment! I will have to give serious consideration to whether it's still comfortable to live in the area upon my return. I've lived happily in West Hollywood West since 1980 and I know that things have to move forward - but it seems that they have lost sight of the important simple things in life these days - and it's no longer about the people it's all about the project.
>
> I wish you all the best and I miss and love my city.
>
> Kind regards,
>
> Glenda Pollack
> 9007 Rangely Avenue #4

G31-1

8/9/2010

Letter G31

G31-1

The commenter's concern regarding potential view and shading impacts is noted. Section 3.1 of the Draft EIR discusses the impacts of implementation of the proposed General Plan on light and glare on page 3.1-1, and shade and shadow on page 3.1-10.

The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.



Bianca Siegl

From: Weston [weston@1stnetusa.com]
Sent: Monday, August 09, 2010 2:22 AM
To: Bianca Siegl

Comments on General Plan

Keep the town individual small businesses, not tall buildings, keep it a village, do not further develop things that will increase traffic, remove things which were represented to reduce traffic but increased traffic (accountability for what is represented to people), no more luxury condos, no more putting the burden of traffic and pollution and congestion and high rises on the backs of citizens ruining the character of the town through bonuses for developers who provide a few less expensive apartments. Enact term limits for all elected leaders and put lists of all city staff, their credentials and salaries on the city's internet site.

G32-1

G32-2

8/9/2010

Letter G32

G32-1

The commenter's concern regarding building heights, traffic, and neighborhood character is noted.

G32-2

The comment regarding term limits is noted. In response to the comment requesting the availability of staff salary information, please refer to the City's website, www.weho.org, for a full list of staff salaries.

G33



August 5, 2010

Ms. Bianca Siegl
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Bianca:

On behalf of the West Hollywood Chamber of Commerce, we thank you for the opportunity to submit comments on the Draft General Plan. It is an understatement that the work that went into the plan has been thorough and extensive and we applaud the efforts that have been committed to the City's 25 year future.

While we do not have specific comments to address, we wish to state our support for the direction it's taking. The Chamber will continue to be active in shaping its development, and support the implementation of our future strategies and how they impact business in West Hollywood.

G33-1

Sincerely,

Genevieve Morrill
CEO/President

*8272 Santa Monica Boulevard, West Hollywood, CA 90046
Phone: 323-650-2688 Fax: 323-650-2689*

Letter G33

G33-1

The commenter's support for the proposed General Plan is noted.



Bianca Siegl

From: Pollack, Sandy [SPollack@randomhouse.com]
Sent: Monday, August 09, 2010 10:25 AM
To: Bianca Siegl
Cc: WHWRA
Subject: proposed zoning changes to general plan

Dear Bianca,

We are extremely upset by the proposed changes to the West Hollywood General Plan. We fell in love with and bought our home in West Hollywood precisely because of the warmth, charm and small town feeling the community offers. After reading proposed changes it feels like our dream is about to be shattered. The present height limits on Melrose between Doheny and La Cienga create an intimate feeling to the community, welcoming tourists to enjoy and participate in our special way of life.

Please consider the impact these proposals will have on the quality of life for residents and tourists. Hopefully you will work with us to ensure that what is unique and special about West Hollywood is preserved.

G34-1

Thanking you in advance,
Marjorie & Sandy Pollack
415 Westbourne Dr.
West Hollywood, CA 90048

8/9/2010

Letter G34

G34-1

Please refer to Response to Comment G13-2.

Bianca Siegl

From: Steve Miller [stevenalanmiller@aol.com]
Sent: Monday, August 09, 2010 10:29 AM
To: Bianca Siegl
Cc: president@whwra.org
Subject: Addressing West Hollywood West Area Zoning Changes

Dear Ms. Siegl,

My name is Steve Miller and I am a homeowner, living at 8735 Rangely Avenue in West Hollywood, 90048. I would like to state my opposition to the general plan as stated in the West Hollywood West Area Proposed Zoning Changes. My partner and I moved to West Hollywood and in particular West Hollywood West because of the quaintness of the community, both architecturally and civically. This is a true community, where families walk together and enjoy one another's company. People walk their dogs, speak to one another as they walk by and do look out for their neighbors. With the amount of traffic that traverses Doheny to La Cienega on Melrose, with no solution in site for extreme bottlenecking and the severe... severe lack of parking (unless you call exorbitantly priced valet parking an option), we are quite concerned that any height changes (not to mention the mixed use bonus being discussed) to buildings on Melrose and surrounding areas will just exacerbate an already deteriorating situation. I fear that this is a very slippery slope that will not only destroy what makes West Hollywood West so special including the boutiques, bookshops, design galleries and furniture showrooms, but I am truthfully fearful that it will become more difficult for everyone concerned to cross streets, drive in and out of the area, and have a the right to enjoy our properties for which we paid so dearly.

I don't want angry and aggravated drivers to cut through my street. With Cecconis on the corner, enough do already and they drive fast. I also don't want our precious city services to be affected by increased building.

Please keep West Hollywood West a special place. A destination location. Don't turn it in to downtown Glendale.

Respectfully,
Steve Miller
And
Steve Navarro
8735 Rangely Avenue
West Hollywood, CA 90048

Steve Miller
Cross Cultural Brand Marketer + Published Writer
[East & South East Asia Specialist]
www.stevemillerwriter.com
Follow me on twitter @culturalstew
T: 323.394.3690

8/9/2010

Letter G35

G35-1

Please refer to Response to Comment G27-1.



Peter Noonan, AICP, Associate Planner
Community Development Department

August 9, 2010

Bianca Siegl
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: West Hollywood General Plan and Climate Action Strategy, and joint Environmental Impact Report and Appendices

Dear Ms. Siegl,

Thank you for the opportunity to provide comments on the draft West Hollywood General Plan and Climate Action Strategy, and joint Environmental Impact Report and Appendices.

The cities of West Hollywood and Beverly Hills both value and strive to protect the quality of residential neighborhoods. The City of Beverly Hills looks forward to continuing to work with the City of West Hollywood to assure that needs and concerns of residents are addressed as future development projects are considered in our communities. The City of Beverly Hills recently adopted a Sustainable Community Plan and amended its general plan to adopt many similar goal, policy and action statements as proposed in the draft West Hollywood documents referenced above. A summary of shared statements would include:

1. Maintaining, protecting and enhancing residential neighborhoods
2. Assuring that new development is sensitive to its surroundings
3. Requiring new development to provide beneficial public open space, and to be designed with sidewalk appeal, and for pedestrian travel
4. Encouraging alternatives to driving, such as walking and bicycling
5. Encouraging a variety of businesses that provide goods and services to the community

The City of Beverly Hills looks forward to continuing to collaborate with the City of West Hollywood towards realizing the shared vision of our two communities.

G36-1

The City of Beverly Hills has the following specific comments:

- 1) **Development and Traffic.** The City of Beverly Hills continues to be concerned about vehicle traffic patterns and volume on local and regional streets resulting from new development. The cities of West Hollywood and Beverly Hills have collaborated in the past on traffic related issues. The City of Beverly Hills looks forward to continuing to work with the City of West Hollywood to assure that vehicle traffic patterns do not impact residents, and that the character of residential neighborhoods is protected.
- 2) **Reduced Water Consumption.** The City of Beverly Hills supplies 22% of the City of West Hollywood with water, this equates to 8% of the City of Beverly Hills Water Utility's overall service demand. The Climate Action Strategy targets a 30% reduction in water usage by the year 2035 (Page 3-38). Water conservation is one of the most important factors in assuring a sustainable community, and water conservation is encouraged. The Beverly Hills Water Utility is required by the State to reduce water consumption by 20% by the year 2020. A 30% reduction in water use is greater than the reduction required; however the Beverly Hills Water Utility would encourage that, through implementation of the strategy, a 20% water reduction by 2020 be targeted as an initial milestone towards reaching the 30% by 2035 goal.
- 3) **Water Supply.** The Beverly Hills Water Utility draws 90% of its water supply from the Los Angeles Municipal Water District (MWD) and supplements the remaining 10% from local ground water sources. MWD's water supply is not limited to Northern California (Page 155). MWD obtains water from the California Aqueduct (originating in North California) and from the Colorado River Aqueduct when water from the California Aqueduct is limited (based on season and availability).

G36-2

G36-3

G36-4

On behalf of our residents, the City of Beverly Hills thanks you for the opportunity to provide comments. If you or others at the City of West Hollywood have questions for the City of Beverly Hills, I can be reached at (310) 285-1123.

G36-5

Regards,



Peter Noonan, AICP, Associate Planner
Community Development Department

cc: Anne McIntosh, AICP, Director of Community Development, City of West Hollywood
John Keho, AICP, Planning Manager, City of West Hollywood
Mahdi Aluzri, AICP, Assistant City Manager, City of Beverly Hills
Susan Healy-Keene, AICP, Director of Community Development, City of Beverly Hills
David Gustavson, Director of Public Works, City of Beverly Hills
Jonathan Lait, AICP, Assistant Director - City Planner, City of Beverly Hills
Aaron Kunz, AICP, Deputy Director - Transportation, City of Beverly Hills
Shana Epstein, Environmental Utility Manager, City of Beverly Hills

Letter G36

Note: Two comment letters were received from Peter Noonan at the City of Beverly Hills. Both letters contain identical comments but were provided in two separate formats; one letter format that was signed and dated, and the other in the comment form provided by the City. The signed and dated letter is included in this section.

G36-1

The comment makes opening remarks and is noted. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

G36-2

In response to the comment, the proposed General Plan contains goals and policies to collaborate on regional transportation solutions that improve mobility and the quality of life for residents. Policy M-2.3, in particular, encourages collaboration with the City of Beverly Hills on mobility issues.

G36-3

In response to the comment on the Climate Action Plan, the 2020 target for the performance indicator percentage of households and businesses that voluntarily reduce indoor water consumption by 30% or more over 2008 levels was erroneously listed as 15% but should have been listed as 30%. The greenhouse gas emission reductions associated with this measure were calculated at a target of 30% for both 2020 and 2035. See page B-9 of the Climate Action Plan.

G36-4

In response to the comment, page 3.12-8 of the Draft EIR notes that Metropolitan Water District (MWD) imports its water from the State Water Project and the Colorado River. Page 3.12-14 contains a more detailed description of MWD's water supply sources. No further response is necessary.

G36-5

The comment offers concluding remarks and is noted. No further response is necessary.



Beverly West Residents Association
Cary Brazeman, Founder
128 N. Swall Drive, #304
Los Angeles, CA 90048
(310) 205-3592
cary@laneighbors.org

August 8, 2010

Bianca Siegl
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: Comments on Draft General Plan Announced June 17, 2010 and DEIR Announced June 25, 2010

Dear Bianca:

We are writing to communicate concerns about the proposed rezoning of five blocks south of Beverly Boulevard (between Beverly and Alden) from R4A to R4B-C.

Our principal concerns regard the proposed allowance of commercial uses on these lots, which are directly adjacent to single and multifamily residential buildings with no alley separation. More specifically, we are concerned about:

- 1. Types of allowable uses: Child day care centers, religious facilities, schools and full-scale restaurants (in particular restaurants serving alcohol) represent incompatible uses and should not be allowed. No outdoor seating or dining should be allowed. | G37-1
- 2. Noise: We are concerned that certain uses directly adjacent to single and multifamily residential buildings would generate intolerable noise levels that could not be mitigated. To reiterate, there is no alley separation between these lots and adjacent residential lots. | G37-2
- 3. Parking: We are concerned that certain uses would generate levels of traffic for which there is neither surface-street capacity nor parking capacity. | G37-3
- 4. Signage: We are concerned about the aesthetic impact of commercial signage on the neighborhood. We oppose any and all electronic or digital signage on these potential storefronts. More appropriate would be modestly sized signs (with muted colors and designs) on windows, awnings or canopies. Projecting signs would be incompatible. | G37-4

If you have any questions or would like to discuss our concerns, please let me know. Our interest is in ensuring the compatibility of allowable commercial uses and signage with the existing character and aesthetic of the residential neighborhood.

I understand from you that the code implementing the new R4B-C zone has yet to be drafted. Please keep us informed as that process is undertaken. Thank you.

Sincerely,

Cary Brazeman
cc: Douglas P. Carstens, Esq., Chatten-Brown & Carstens

Letter G37

G37-1

The commenter's concern regarding the types of commercial uses to be allowed in the proposed R4B-C zone is noted. The specific types of commercial uses allowed will be determined during the Zoning Ordinance update following adoption of the General Plan. Table 2-5, section 19.10.030 of the Zoning Ordinance details allowable uses in current commercial zones. In response to the commenter's request regarding the prohibition of specific land uses in the R4B-C zone, it may be useful to note that child day care centers, religious facilities, and schools require a major or minor Conditional Use Permit in all existing commercial zones. Restaurants are typically allowed in all commercial zones.

G37-2

The commenter's concern about potential noise impacts from implementation of the General Plan along Beverly Boulevard adjacent to residential development is noted. The Draft EIR analyzed this issue on page 3.9-36. In addition, the proposed General Plan contains numerous goals and policies in the Safety and Noise Chapter to minimize the impact of noise in the community, and to mitigate, as needed, for certain uses adjacent to residences and other noise-sensitive land uses. Individual development projects would be reviewed for project-specific impacts, including noise, during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

G37-3

The commenter's concern regarding traffic and parking congestion as a result of the proposed R4B-C zone is noted. Please refer to Section 3.14 of the Draft EIR, which analyzes the traffic impacts of the proposed General Plan. Any new development within the proposed R4B-C zone would be required to provide adequate parking as defined by section 19.28.040 of the Zoning Ordinance.

G37-4

The commenter's opposition to electronic or digital signage on potential storefronts is noted. The impact of signage pursuant to implementation of the General Plan was analyzed in Section 3.1 of the Draft EIR. The Land Use and Urban Form Chapter of the General Plan contains goals and policies to minimize signage impacts on adjacent development. Additionally, Chapter 19.34 and G-34 of the City's Municipal Code regulate signage in the City of West Hollywood, including color, type, design, placement, etc.



Bianca Siegl

From: Patrick Shandrick [pshandrick@yahoo.com]
Sent: Monday, August 09, 2010 1:13 PM
To: Bianca Siegl
Subject: General Plan Comments

As a long term West Hollywood resident, booster and property owner (9000 / 9002 Rangely Ave, 90048), I have serious concerns about the draft General Plan and Draft Environmental Impact Report (DEIR). I have concerns about how the proposed changes will affect the neighborhood and quality of life.

The majority of my concerns are with the proposed height, density and FAR increases.

BONUSES: Plan states “where multiple bonuses are indicated ... individual projects may be able to cumulatively apply each bonus...” This is not acceptable as multiple bonuses will just encourage additional height and density that will be out-of-character with our low-density neighborhoods and adversely affect our quality of life. Limit these – 1 bonus per project.

G38-1

ZONING CHANGES: Very concerned with the proposed zoning changes – specifically for Melrose Ave, Beverly Blvd and Melrose Triangle. Again, the increase in height and density that will be out-of-character with our low-density neighborhoods and adversely affect our quality of life.

Regarding the Melrose Triangle, the current CC zoning is appropriate. Changing this to CA allows a 66% increase in FAR and a 71% increase in height (60ft tall with a 2.5 FAR) pre-bonus – is shocking and completely out of character with the neighborhood as it removes our light and views, is an odd behemoth size and will turn what already is the worst traffic zone into something even more horrible.

G38-2

One goes through a “Gateway” not get stuck in traffic for 20 minutes trying to go a block.

INFRASTRUCTURE: I do not believe the General Plan has adequately determined the huge demand on infrastructure that such huge increases in height and density would bring. We are asked to severally conserve water now – how on earth are we going to supply all this growth with additional water. The property owners now are being tasked to underwrite the updated sewer system – how can we expect to upgrade this system again to accommodate such a huge growth – who will pay for it?

G38-3

8/9/2010

Additional concerns with the General Plan are:

- Loss of our urban village
- Less pedestrian-friendly area
- Less people on the streets (shopping, etc.)
- More traffic on our commercial streets
- More cut-through traffic in our neighborhood
- More angry, frustrated drivers in our neighborhood
- More parking problems
- Loss of views
- Loss of light (shade/shadow)
- Less open/airy feeling
- West Hollywood becoming just like every other city
- Loss of WeHo's uniqueness
- Lack of creativity
- Concern about how the City came up with these changes
- Concern that the City is not listening to its residents
- Concern about increased heights and Floor Area Ratio (FAR)
- Concerns about density
- Concern that "cumulative bonuses" can increase heights (and/or FAR) significantly.
- Concerns about signage < that billboards and tall walls will be allowed in areas other than Sunset
- Concerns about infrastructure (water, etc.)
- Concern that WHW's Neighborhood Conservation Overlay status needed to be better defined
- Concerns about quality of life
- Concerns about increasing density

G38-4

Thanks you for your time and the support you give to the City of West Hollywood.

Patrick Shandrick
 pshandrick@yahoo.com
 www.shandrick.com
 310.989.1048

* * * * *

8/9/2010

Letter G38

G38-1

The commenter's concern about the applicability of multiple bonuses in commercial areas surrounding the West Hollywood West neighborhood is noted. The General Plan does not propose new bonuses that are substantially different from those currently allowed. Further, the City currently allows projects to cumulatively apply bonuses—this is not a new proposal in the General Plan, but rather a statement of existing policy. Please refer to Response to Comment G29-2 for a description of the incentives offered by the bonuses listed in Table 3-2 of the proposed General Plan.

G38-2

The commenter's opposition to the proposed height and density increase for the Melrose Triangle is noted.

G38-3

In response to the comment, Section 3.12 of the Draft EIR analyzed the impact on public services and utilities with implementation of the proposed General Plan. The General Plan contains numerous goals and policies (e.g., see Goal IRC-2 and associated policies) to ensure that adequate public services, facilities, and utilities are provided concurrently with new development. Section 3.12 of the Draft EIR also analyzed the impact of water supply with implementation of the proposed General Plan. Additionally, Implementation Program LU-A.4 in the proposed General Plan requires that a study be conducted for exaction/impact fees for new development. The fees could pay a variety of capital expenditures including public safety, streetscape, transportation, and other improvements.

G38-4

The commenter's concern regarding neighborhood character, pedestrian activity, traffic and parking, views, shade and shadow, the community input process, offsite signage, and other matters is noted.



Bianca Siegl

From: david_wheeler_esq@yahoo.com
Sent: Monday, August 09, 2010 1:53 PM
To: Bianca Siegl
Subject: WeHo General Plan 2035

My name is David Wheeler. I have lived at Horn Plaza, 1230 N. Horn Ave., in West Hollywood since 1980.

I am providing my comments concerning the West Hollywood General Plan 2035 Public Review Draft.

I understand and appreciate that a lot of good hard work has been put into this draft. I make my comments without meaning in any way to take away from the hard work that has been done.

My main concern is the transportation and traffic issues. The General Plan correctly recognizes the huge traffic problems within the city of West Hollywood and the fact that additional development will increase the traffic.

G39-1

The General Plan's response to the congestion issue is to suggest that the citizens of West Hollywood will change their transportation habits. That is seen in its proposed solution of getting people away from the use of a single person vehicle into other forms of transportation such as public transportation, walking and biking. That assumption pervades the entire General Plan. I will address it in more detail below.

But before I get to that, I would like to address the assumption made in the plan of a West Hollywood red line subway. That assumption also pervades the entire general plan.

But it is also my understanding that there are no specific plans to have a red line subway in place in WeHo by 2035. It is also my understanding that the current political thinking is leaning away from a West Hollywood Subway.

G39-2

My point is that given the marginally tenuous possibility of a subway through West Hollywood within the time frame of the General Plan, maybe another plan should be submitted that does not assume such a subway. Put another way, what would be the effect on the proposed general plan if the red line subway assumption is removed?

It seems that a prudent approach by the City Council would be to prepare another General Plan that removes the assumption of a redline subway going through West Hollywood.

G39-3

My primary concern is the Mobility section beginning on page 102 of the existing draft General Plan. It's optimistic---but unrealistic---approach to reducing traffic congestion is to discourage use of single occupancy vehicles in favor of what is referred to as the multi-modal transportation system. That means walking, biking, and using the buses and subways.

In passing, I note that I live in West Hollywood and work in Century City. When I go home at night after work, I often stop at a restaurant or coffee shop for dinner, park in the parking lot there, and then drive home. I don't come home, park my car, and then venture out to a restaurant or coffee shop by walking or biking or taking a bus.

G39-4

I don't own a bike and have not taken the city bus in the 30 years in which I have become lived in West Hollywood. And because I live in the very hilly section of West Hollywood above Sunset, I seldom, if ever walk to my destination.

I believe that a significant number of West Hollywood residents have a similar profile as mine.

I believe that a fundamental assumption of the general plan is thinking of West Hollywood as an urban village. It seems to have a fundamental assumption that the citizens of West Hollywood venture out by foot or by bike from their homes to shop, dine and for

recreation. Even if this is partially true for certain parts of West Hollywood, I cannot believe that is true for all of West Hollywood.

G39-4
cont.

There is a picture on page 105 of the General Plan that shows someone waiting at a bus stop with a bicycle. It is interesting because there's only one person at the bus stop.

G39-5

That raises another question. How many people currently West Hollywood actually own bicycles? And if they do own them, do they use them for transportation (as opposed to recreation)? Another question is how many people in West Hollywood within the last six months used the bus to go anywhere? Another question is how many people in West Hollywood have ever used the bus in the form illustrated in the picture on page 105? I mean biking to a bus stop, getting on the bus with your bike, then alighting from the bus at another location to continue your trip by bicycle. How many West Hollywood residents do that? And how many do that as a regular form of transportation?

To put a fine point on it, I ask how many members of our City Council own a bike? Use a bike for transportation (as opposed to recreation)? Has used a local bus for transportation in the last six months? Has ever done a bike / bus trip from or to any part of West Hollywood? How many members of our City Council do not use a single occupancy vehicle as their primary transportation?

G39-6

My point is that I believe that currently overall West Hollywood has relatively limited use of walking, biking, and bus transportation by its residents on a regular basis.

Another point is that I believe that it is very unlikely that there would be significant change in the transportation habits and patterns of West Hollywood residents within the next week twenty-five years to justify the increase in the density of development envisioned by the draft general plan at present.

To approve the proposed general plan would be an optimistic Pollyanna-ish but overall unrealistic approach to the increasingly severe transportation and traffic congestion issues that snarl our beloved city.

Respectfully submitted.

/s/ David E. Wheeler
David E. Wheeler
Law Offices of David E. Wheeler
1925 Century Park East, Suite 2300
Los Angeles, California 90067
Tel: (310) 286-1812
Fax: (310) 286-1819
David_Wheeler_Esq@yahoo.com

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Letter G39

G39-1

The comment is noted. The Draft EIR analyzes transportation and traffic issues pursuant to implementation of the proposed General Plan in Section 3.14 of the Draft EIR.

G39-2

The Draft General Plan encourages the expansion of both local and regional transit systems which includes the Red Line extension. The City is aware that the subway may not align through West Hollywood but does not preclude other rail systems and major transit improvements along its transit corridors. Please see Response to Comment G18-2 regarding the impacts of a subway on the proposed General Plan traffic analysis.

G39-3

The No Project (Existing General Plan) alternative analyzed a “do-nothing” scenario with no Red Line Subway. Please refer to the General Plan and Climate Action Plan Program Environmental Impact Report Section 5.3.1 for details on the EIR traffic study in the “No Project” alternative. Additionally, the traffic analysis for the proposed General Plan did not assume any reductions to vehicular travel due to the Red Line Subway.

G39-4

The commenter’s opinion that promoting other modes of travel besides single-occupancy vehicles is optimistic and unrealistic is noted. The statement that the commenter’s personal travel habits do not include the use of other modes of travel is noted.

G39-5

The picture on page 105 of the proposed General Plan depicting the bicyclist at the bus stop was provided for illustration purposes only. It was not meant to quantify nor reflect the degree or magnitude of bus or bike riders in the City.

G39-6

The commenter’s questions regarding current transit and bike usage are noted.



Bianca Siegl

From: Hobart, J. [J.Hobart@tuckerellis.com]
Sent: Monday, August 09, 2010 3:20 PM
To: Bianca Siegl
Subject: General Plan Comments

Dear Bianca,

I am a resident of West Hollywood. I thank you for considering my strong objections below to parts of the proposed General Plan:

1. I object to increase in heights, including Bonuses. The increased heights will create buildings that tower over neighboring residences and deprive us of privacy, light, views, and quiet; and will increase noise and traffic, and pressure the City to make our residential streets into thorough-fares like Crescent Heights, which has undermined the residential character of the houses there and nearby. (See, also, Westwood Blvd vs. the homes nearby, the Doheny high-rises north of Santa Monica, the 8900 block of Beverly vs. the houses to its north). The increased heights create a dominoes effect on nearby properties and ultimately changes the character of neighborhoods and gives developers arguments about increasing their buildings because others have done so.

G40-1

2. The Plan seems premised on growth for growth's sake and a fallacy that increasing heights and density will somehow bring development. Our commercial area has plenty of capacity, so there's no need to increase heights or density. Store fronts are vacant. A developer has plenty of available space to developed at current heights.

3. The Plan and Survey seem to favor business and developers over residents, and equates inconsistent users as the same. For example, citizens who favor more apartments with increased heights shouldn't mean you increase heights next to single family residences, which deprive the residents of the benefit of their bargain. Condo owners and apartment dwellers want height and density, because they then have a new apartment and view at the expense of those below and/or their apartment will be less expensive (due to increased supply). Who wouldn't? But it's unfair that current residents are disadvantaged by not-as-yet residents and/or commercial developers.

G40-2

4. The Plan needs to eliminate height increases for properties that abut R1 residences. The proposed heights along the south side of Melrose from Doheny to La Cienga are objectionable. The new heights will tower over the backyards and homes on the south of Melrose - especially given the slope of the land - and create a dominoes effect for continued increases along Melrose.

G40-3

5. The heights increases ignore past use and undermines the City's past promises in zoning variances. For example, we used to height average, but the City eliminated that controlled-growth method for a cap on heights - that the proposed Plan now seeks to increase without corresponding growth in neighboring properties or need. Also, Bristol Farms and Petcock on Doheny south of Melrose were zoned residential. Developers promised not to undermine the neighborhood and the City agreed to change these to commercial overlay. Subsequent zoning

G40-4

8/9/2010

variances came with City promises to the residents that no domino-effect would occur and the property wouldn't change the character of the neighborhood. BUT, the Plan proposes to increase the height limits for Petco, to the detriment of its neighbors. Look at the negative effects happening on Doheny across the street with the height increases on the Beverly Hills side. Why are you bringing this cancer to our side? The south side of Melrose abuts smaller homes and shouldn't be raised.

G40-4
cont.

6. The Plan shouldn't emulate Paris or Old Pasadena. Those cities are urban, and the residents there live in apartments or in commercial, mixed use buildings. The Plan should honor the differences in each neighborhood and give us the freedom to pick the character of the neighborhood in which we live. The Plan is eliminating choices, pushing us to an urban lifestyle. Emulate Carmel, instead.

G40-5

7. Why is development favored over residents who own their houses? Why are commercial interests given advantage over residents? The Plan emulates Old Town Pasadena, but who would want a house next to one of those multi-story commercial buildings? Now, the Plan seeks to alter current conditions on the ground to the detriment of R1 owners. Is the City broke? Does the City need even more revenues? To service ever more new residents? But the premise is wrong - growth for growth's sake is short-sided and ignores that the City was incorporated to stop what LA was doing - which the Plan starts back up again.

G40-6

THE BOTTOM LINE - increases in heights and density fuels further increases - to the detriment of neighboring properties and the unique character of Weho. Please stop this now.

Thank you for your service to the City. Please call me if you have any questions.

J. Hobart
(213) 430-3365

8/9/2010

Letter G40

G40-1

The commenter's opposition to the proposed height increases in the General Plan is noted.

G40-2

The commenter's interpretation regarding land use policies that could favor one segment of the community over another is noted. However, the proposed General Plan policies reflect the combined input of residents, community groups, property owners, and others. Please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.

G40-3

Please see Response to Comment G40-1.

G40-4

Please see Response to Comment G40-1. The commenter's statement regarding the past use of height averaging is not entirely correct. Height averaging was a technique for controlling the height and massing of buildings in residential areas, but the City never applied that method to commercially zoned properties as is suggested in the comment.

G40-5

The commenter's concern regarding neighborhood character is noted.

G40-6

Please see Response to Comment G40-2.



Bianca Siegl

From: Roy Oldenkamp [royo@buddhajonestrainers.com]
Sent: Monday, August 09, 2010 3:39 PM
To: Bianca Siegl
Subject: General Plan Commentary

Dear Ms. Siegl:

The General Plan needs to be scaled down. Certainly, not enough consideration will be given to the tremendous impact from the surrounding streets outside of our city limits, for example the accelerated growth around major intersections like La Brea and Santa Monica Boulevard, where within a few city blocks gigantic developments are planned. The area is already approaching complete gridlock, as density increases and building heights soar. No matter the plan, per project there will most likely be an endless stream of "statements of overriding consideration" adding a huge percentage of development throughout our stressed city.

G41-1

It is disingenuous to claim there will be no undue impact on emergency services and other vital, time sensitive services in West Hollywood. Please consider a reduction, not increase, in city population and building density. We are losing our quality of life at an alarming rate. The General Plan should take into consideration the needs of existing citizenry rather than plan for an overbuilt, congested and vertical future.

G41-2

G41-3

Roy Rogers Oldenkamp
1336 N. Laurel Avenue
West Hollywood, CA 90046

Letter G41

G41-1

The City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts on traffic identified in the EIR. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

G41-2

The commenter's concern regarding emergency service response time is noted. This issue was analyzed in Section 3.14 of the Draft EIR. Goals and policies in the Safety and Noise Chapter of the proposed General Plan contain actions aimed at ensuring emergency response readiness.

G41-3

The commenter's concern regarding the land use changes in the proposed General Plan is noted. Please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.

Bianca Siegl

From: voweho@gmail.com
Sent: Monday, August 09, 2010 4:26 PM
To: Bianca Siegl
Subject: Comments on WEHO General Plan/EIR

Hello, Ms. Siegl, and thank you for your assistance during the public comment period for the new General Plan (GP) 2035 and its accompanying draft Environmental Impact Report (EIR). Here are my comments and concerns:

1. I am very concerned that the concept of “Neighborhood Conservation Overlay Districts” does NOT appear on any of the maps/charts that accompany the GP or EIR. Section 19.14.060 of the municipal code says such districts are used to “identify sites and areas within the city that represent clearly defined neighborhoods with predominately consistent history or architectural character.”

The color-coded WEHO Zoning Districts map (dated 3/26/2002) that I use shows four such districts, zoned R1B and considered “conservation overlays.” These neighborhoods are identified as Greenacre/Poinsettia, Laurel Park, Norma Triangle, and West Hollywood West.

GP Guiding Principle #4 on “Neighborhood Character” recognizes the need to maintain and enhance the quality of life in our residential neighborhoods. Therefore, please have these neighborhoods included in the maps/charts of the new GP and its EIR.

G42-1

In recent discussions at the Historic Preservation Commission, the R1B zone of Lexington/Norton (crossed by Spaulding) was mentioned as a potential district of early West Hollywood craftsman homes. Also, the one street in the city that truly retains its original character is Betty Way, a cul-de-sac with small, one-story bungalows all built during the Great Depression. I recommend that these two additional areas be considered “conservation overlay” districts and be so designated in the new GP/EIR.

The conservation overlay district concept could be added to the GP’s “Land Use and Urban Form” section – under Goal LU-8: Maintain and enhance residential neighborhoods – and to the “Historic Preservation” section – under a new Goal HP-7: Conservation Overlay Districts.

2. GP Page 82 says that “As of 2010, seventy-seven buildings have been individually designated as West Hollywood Cultural Resources and there are seven West Hollywood Thematic Districts.” The

G42-2

8/9/2010

narrative on Pages 83-84 describes five of these. What are the other two? These should be included in the GP/EIR.

G42-2
cont.

3. Regarding GP Page 85 on "Cultural Resource Surveys," it's good the see the city assess the status of its cultural resources, but the time between the original 1986 survey and the 2008 update was just too long! We now have an update of all properties in the R2, R3, and R4 zones built prior to 1961.

G42-3

I recommend that a survey of the R1 zones be initiated as soon as possible after the new GP is adopted and that the implementation time frame be considered "short" or 1-2 years. Thus, on Page 88 under HP-2.1, I ask that you consider adding a thought/statement along the lines of "The first order of business here should be to conduct a survey of R1 zones."

4. GP Page 89 under HP-4.3 says that "The City should maintain information on cultural resources on its website. " I recommend that the 2008 update of the Historic Resources Survey, in which a total of 61 additional properties were determined to be eligible cultural resources, be immediately available on the website. Particularly during these difficult economic times, such eligibility could be a selling point as such properties come on the market. In addition, you may want to add the 2008 update to the GP Section on "Referenced City Documents and Plans."

G42-4

5. The EIR identifies significant and unavoidable impacts to air quality, traffic management, global climate change, and water supply if the new GP is implemented as proposed. Such impacts over the next 25 years will undermine the foundation of West Hollywood. Such impacts negate the very guiding principles that the public has identified over the years as important to them. In particular, our quality of life and the quality of our environment will suffer.

The EIR considers various alternatives, including "Two Transit Overlay Areas Only" in contrast to the three that are discussed in the GP. I don't understand exactly what any of the three transit overlay areas are predicated upon. And, then I wonder: why did the EIR not also consider the alternative of just one transit overlay area? I refer here to the area around La Brea/Santa Monica. This area may one day have a subway running south down under La Brea from Hollywood/Highland Avenue. But much hope and speculation seems to focus on the subway then turning west and going under Santa Monica Boulevard on to Fairfax Avenue and points west.

G42-5

Fairfax/Santa Monica feature prominently in the GP as an area ripe for even more development and a new transit overlay, but this area is already highly congested and densely populated. And it is not at all clear that a subway will ultimately go through this area. Before the GP is adopted, I ask that the EIR more clearly explain the reasoning behind transit overlays in the first place, and also conduct an EIR analysis based on just "One Transit Overlay Area" at the eastern gateway into West Hollywood.

8/9/2010

--

Victor Omelczenko
1246 N. Laurel Avenue
Apartment G
West Hollywood, CA 90046

8/9/2010

Letter G42

G42-1

In response to the comment regarding Neighborhood Conservation (NC) Overlay Districts, please refer to page 52 of the proposed General Plan, which describes the NC Overlay as one of the Zoning Overlay Districts included on the Zoning Map. The proposed General Plan does not preclude future expansion of the NC Overlay, but any changes to the Overlay would be detailed as part of an update to the Zoning Ordinance. The commenter's request to consider expansion of the NC Overlay is noted.

G42-2

The commenter noted an error in the comment in the Historic Preservation Chapter, page 82. The error will be corrected as follows: the reference to seven Thematic Districts will be corrected to read "there are six historic districts and groupings," and a description of the Old Sherman District will be included with the descriptions of the other five districts in that chapter. The six historic districts and groupings are Harper Avenue Historic District, Courtyard Thematic District, Plummer Park Apartment Grouping, Craftsman District, Lingenbink Commercial Grouping, and Old Sherman.

G42-3

The commenter's suggestions regarding increasing the frequency of cultural resource surveys and completing a survey of the R1 zones are noted. Please refer to Implementation Action HP-A.6 in the proposed General Plan, which states that the Cultural Resources Survey should be revised and updated on an ongoing basis as resources allow.

G42-4

The commenter's suggestion regarding posting the Historic Resources Survey on the City's website is noted. Please refer to Implementation Action HP-A.12 in the proposed General Plan, which describes posting and updating preservation-related information on the City's website within a short timeframe.

G42-5

The commenter's concern regarding impacts to the quality of life due to the Draft EIR's identified significant and unavoidable impacts is noted. The City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts on air quality, traffic, water supply, and global climate change identified in the EIR. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

In response to the comment regarding the Transit Overlay areas, page 52 of the proposed General Plan explains the premise of the Transit Overlay areas. To reiterate, Transit Overlay areas are sites close to existing major transit nodes, i.e., already served by frequent transit services (i.e., bus services). Therefore, this designation encourages mixed-use development around existing transit nodes to reduce the need for auto trips. As indicated in Policy LU-2.4, if certain conditions are met, modifications to General Plan requirements for density, height, etc. could occur if future rail transit is planned for West Hollywood (see the specific conditions in this policy).

Since the Transit Overlays consider existing transit services (i.e., bus services) that already exist at La Brea Avenue and Santa Monica Boulevard, and Fairfax Avenue and Santa Monica

Boulevard, and not just potential future subway stops, the alternative of two Transit Overlays is appropriate for the EIR. A one-Transit Overlay alternative at La Brea Avenue and Santa Monica Boulevard is not justified.

Bianca Siegl

From: Mary Wilberding [marysusanw@tmo.blackberry.net]
Sent: Monday, August 09, 2010 4:47 PM
To: Bianca Siegl
Cc: president@whwra.org
Subject: Proposed general plan

Bianca: I am writing to strongly oppose the general plan DEIR, proposal to raise the heights and offer even more bonuses to development in west hollywood. There is a reason that there are established height limits. The fact that once again the city is cowtowing to developers and lobbyists to alter the rules is both disheartening and immoral. It is a fact that raising heights on commercial properties that border residential does NOT increase pedestrian traffic, nor does it discourage crime, and for sure it does not beautify the area, in fact it's the opposite: crime increases, quality of life decreases and certainly the property values go south. I am surprised that the city has not learned from its mistakes, and continues to eat at the heart and soul of the "neighborhood" in relinquishing its values to development that does not pan out. example: all of the empty building, for lease, or in a dead zone, since the recession like the building on Beverly, the sunset mile in project (a mess), the looming library that is a monster etc. We can surely do better, and challenge the council to come up with creative ideas for green space and parking that allows for families, small businesses, outdoor dining, and basically revenue to the cottage industry of neighborhoods. Or maybe you should just go ahead and continue handing out variances to development...another house of blues would look swell in the melrose triangle. And god knows, the westwood demise of a wonderful college town gone sour...huge overwhelming structures, that loomed over residential!!! Movie theatres closed, crime snuck in, and the charm is gone along with the people. Clearly, we depend on you to protect and enhance our living, it is your fiduciary duty. And to once again destroy the rules for development is in my mind, immoral. Regards, Mary Wilberding, 9031 dorrington avenue, west hollywood, ca 90048 Sent wirelessly via BlackBerry from T-Mobile.

G43-1

Letter G43

G43-1

The commenter's opposition to the proposed height increases in the General Plan and concerns regarding pedestrian traffic, safety, and quality of life are noted.



Bianca Siegl

From: Richard Giesbret [rgiesbret@richardmanion.com]
Sent: Monday, August 09, 2010 5:01 PM
To: Bianca Siegl
Subject: About General Plan comments and concerns.....

Bianca Siegl, Associate Planner

City of West Hollywood

Subject: West Hollywood General Plan and Climate Action Plan

Draft Program Environmental Impact Report (SCH No. 2009091124)

Dear Ms. Siegl:

The following are my concerns about the proposed General Plan:

The proposed changes to Melrose are of great concern and seem counter to the "urban village" planning concepts espoused by planners and schools across the nation. What are more specific features of the city's application of these well understood and implemented design and planning concepts in relationship to the general plan? The explanations and references within the plan are far too general for application.

G44-1

I am concerned that the increase in heights and density [as it variously applies] along Melrose Blvd., the West Hollywood West Residents Association district and the Melrose Triangle district [Santa Monica Blvd, Robertson, Melrose] will destroy the existing street scale, overwhelm the adjacent neighborhoods not only in scale, massing, shadow, deprivation of light, views and inviting "urban village" street scape.

Melrose Ave, WHW and the aforementioned Melrose Triangle are already impacted with traffic and will most certainly be worse, should these increases be approved. There is insufficient explanation as to the necessity for increases in these areas. There is no clear explanation how the densities and traffic will be mitigated.

G44-2

It is not possible to understand the planning and design of the Melrose Ave., Melrose Triangle and WHW district as the explanations are far too general and do not address the multifarious, extraordinary possibilities of the area.

G44-3

There are no specific, clear direction for the design and planning of buildings that will enhance the Melrose Ave., Melrose Triangle and WHW district.

8/9/2010

The specific directions towards developing an "urban village" are not effectively expressed in the general plan, nor is the map and related text reflective of such planning concepts. These are the concerns:

Please provide much more specific text explanations and localized general plan designs in which "requires introduction, review and approval of specific design features which support the tenets of the Urban Village concept".

Provide substantive, concrete explanations about how "significant modulation and detail of the facades at street level shall emphasize the pedestrian scale of the facades and streetscape" in an urban village setting.

Proposed height and density increases undermine the urban village concept, whereas "limiting height to further make the streetscape pedestrian friendly".

With regard to the city as a whole, but especially the Melrose Triangle and the Melrose Ave. and WHW district will benefit from less intensity and more pedestrian friendly development, such as:

Provide more specific planning direction about how the Melrose Triangle might enjoy the "introduction of pedestrian walkways at mid-block to further encourage a pedestrian-friendly environment and minimize driving", "connecting the existing park with the adjacent westward blocks by means of several midblock connectors, further enhancing the use of the park space and walking environment".

How can this district benefit from extensive pedestrian friendly network of walks to enhance and encourage walking and street friendly development?

Richard Giesbret

G44-3
cont.

Richard Manion Architecture INC.

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rgiesbret@richardmanion.com

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8/9/2010

Letter G44

G44-1

The commenter's opposition to the General Plan's proposed height increases along Melrose Avenue and the Melrose Triangle area is noted. In response to the comment regarding the "urban village" concept, the proposed General Plan is not directly based on that concept. Please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.

G44-2

The commenter's concern with traffic on Melrose Avenue, West Hollywood West, and the Melrose Triangle areas is noted. Section 3.14 of the Draft EIR analyzed the traffic impact of implementation of the proposed General Plan, including the aforementioned areas. As noted in Section 3.14 of the Draft EIR, no feasible mitigation exists for some of the intersection impacts within this area. Mitigation was identified for the intersection on San Vicente Boulevard at Beverly Boulevard. Nevertheless, the impact would still be significant and unavoidable. The City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts on traffic identified in the Draft EIR. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

G44-3

The commenter requests greater specificity regarding the design of buildings and storefronts and pedestrian walkways in the proposed General Plan. The General Plan is a broad visioning and policy document for the City as a whole. The broad vision of the General Plan is implemented in conjunction with other, more specific and detailed documents, including the Zoning Ordinance and applicable Specific Plans. Please refer to the Land Use and Urban Form Chapter of the proposed General Plan for numerous goals and policies regarding design, pedestrian-scale development, and connectivity (e.g., Goal LU-4, LU-5, LU-6, LU-11, et. al. and associated policies. Also refer to Policy LU-11.8 and Implementation Action LU-A.11 regarding developing a planning study for the Greater Melrose Triangle Area, and Implementation Action LU-A.7, regarding updating the Streetscape Master Plan.

Ms. Bianca Siegl
Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: Draft General Plan

Dear Bianca:

Thank you for the opportunity to meet with you to discuss the General Plan and Draft Environmental Impact Report (“DEIR”). The following are just some of my comments but all that I have time to provide at this juncture.

After such tremendous effort and expense I frankly am deeply disappointed with this Draft General Plan. According to the authors, West Hollywood is “called the ‘creative city’ for its collection of art, design and architecture” (p. 26). Yet I see **nothing “creative”** in this plan. It is more of the same. AND more and taller. **What is “creative” about bigger?**

We have the opportunity with this Plan to create a “vision” of what we want this city to look and feel like. The city of Holland, Michigan has zoning ordinances that require all buildings to have “Dutch fronts” (stair step façades). Their primary source of revenue (like ours, tourism) is from all things Dutch, including the Tulip Festival. They won’t even let McDonalds build a standard format—they have to have a “Dutch front.” Where are our guiding principles that say “we are the creative city—your design must meet creativity guidelines and be approved by a design committee made up of residents, architects, artists, who are RESIDENTS”? This document says that “bunkers” like the new Union Bank building at the corner of Santa Monica and Westbourne will continue to be acceptable in our “creative city”. There is nothing in this document that says, if you want to build a huge 10 story building on Sunset Blvd. it better be designed by Mr. Geary or someone of equal skill and be something more than an excuse to post a tall wall.

WHY? Throughout this plan there is lots of HOW but very little WHY.

What I find fundamentally missing in this plan is **WHY?** Why does Melrose Blvd. need to be 2-5 stories taller? Why does the Melrose triangle need to be more than 7 stories tall? Why does Santa Monica Blvd. need to be 10 stories tall? I have never heard an answer to these questions other than “that is what the developer wants.” I have NEVER heard “that is what the Residents want.” That is what neighboring businesses want. Or, better yet, that is what the owners of the businesses who will lose their businesses want.

What is creative about, more and higher?

People flock to the Sunset Plaza and avoid the Sunset Millennium. Why?

People flock to Melrose Blvd. and stroll and lunch. Why? Will it be better with 3, 4 and 5 stories of buildings blocking out the light and so many cars driving in that you can’t cross the street? Once again WHY does it need to be taller?

How does tearing down local businesses and creating “destination” businesses in high rises make the city more pedestrian friendly and create less traffic?

With the loss of every shoe repair shop, locksmith, pharmacy and (God Forbid!) Koontz Hardware Store, you put the residents in their cars to leave the city to find their basic needs. In turn we get high-end clothing shops that are not frequented by residents (we can only buy so many pairs of \$500 jeans) and attract traffic from shoppers outside the city. Of course we wish to encourage a certain revenue base but must we be so greedy?

This plan—by definition—is the end of every shop on Melrose. The Bodhi tree has already become a casualty of the value of the land over the value of the business. If you change the zoning to 3+ stories you increase the value of the land through future rents and increase the incentive of the owner to kick out Urth, Soolip and others. No more neighborhood friendly, pedestrian friendly businesses, only high priced vendors that require much more traffic to survive. Too much traffic and people stop coming. Then you have a lot of very expensive, unoccupied real estate. Oh, and good luck getting any healthy plants and trees to grow in a narrow street overshadowed by 3-5 stories on each side.

G45-1

G45-2

Why?

Why do people get on planes, trains and automobiles to come to West Hollywood from all over the world? Because we have unique venues, shopping, entertainment and in a combination that they can't find anywhere else. **How does this General Plan further that uniqueness and plan to provide for it into the future?** Without guidelines and requirements anything goes. Drive by that Union Bank building one more time if you don't think this is true.

G45-3

Unstated and unproven Assumptions. Underlying the absence of answers to the WHY of things is a series of assumptions that have been implied but not explicitly stated nor validated.

1. **More is better.** More buildings. Taller buildings. MUCH taller buildings. More density. More traffic. The only thing there is not more of—the two things the residents most want—parks and parking.
2. **“More” contributes to the Guiding Principles.**
 - a. **Quality of Life of residents**—“More” as outlined in the Draft General plan does nothing to improve our Quality of Life.
 - b. **Neighborhood Character**—Like the new Union Bank building at Santa Monica and Westbourne. That is character? Maybe if you are into bunker architecture.
 - c. **Environment**—How is it consistent to
 - d. **Traffic and Parking**—Yes, this plan guarantees more of the former and less of the later. When you keep adding housing with 1.5 parking spaces for every 2 people with 2 cars the inevitable—more traffic and less parking.
 - e. **Greening**—where is the creativity? What about **“Pocket Parking Parks”** Instead of selling city property to a developer (like 901 Hancock) why not get creative and build a parking structure with a park on top?
 - f. **Arts and Culture**—nothing says culture like a 10 story high rise.
 - g. **Safety**—more density, more traffic, less parking – more conflict
3. **“More” is more pedestrian friendly.**—Actually not. Physiologically people actually hunch and become uncomfortable when overshadowed by tall buildings right next to them. Look at the studies. Lack of sunlight and huge buildings are the antithesis of pedestrian friendly. You can build all the wide sidewalks you want and you have the Wilshire corridor. You can probably count the number of pedestrians per day on two hands.

G45-4

Specifics:

1. While all the maps are lovely—they obfuscate reality. The reality is, for every single zone there are **“bonuses”** and multiple bonuses. So while the zoning says 3,4,5,6,7 stories, with bonuses they can be 2 or 3 stories higher—with related traffic, parking and other density problems. This plan should show the “reality” and the related DEIR should show the “reality” of all the build out with all the density and other bonuses. This plan also does not state what the City would do if another SB1818 comes along adding even further density and heights.
2. **Parking**—PLEASE show me what half a car looks like. I have gone online and found a Smart Car but even that takes a full parking place. We are doing NO ONE any favors by allowing less parking than is reality. When a developer builds condos that they expect to sell for \$750,000 to \$1M for a one bedroom and they only have 1.5 parking places, that is NOT realistic. That one bedroom WILL have two residents who will have two cars. That means the developer will have a more difficult time selling, the residents who buy will end up with one car on our already crowded streets AND that one car will be driving around and around looking for a space—further exacerbating our parking problems. **REALITY—2 people = 2 cars.**
3. **Green Buildings**—if we really are the creative city and environmentally conscious then green buildings should be mandatory for any new development—better yet, green roofs should be required for every commercial development with a requisite minimum size. Create parks where we have never had parks before.



G45-5

G45-6

G45-7

4. **Pedestrian friendly** isn't just wider sidewalks. It is having the types of services that RESIDENTS wish to walk to. Yes we wish to encourage tourism and people to come to our entertainment venues. But there must be enough parking, easily accessible for people to then be able to walk throughout our city. Saying "pedestrian friendly" doesn't make it so.

G45-8

In short, where are the design principles? Where are the resident committees that will be actively involved in the implementation of the General Plan? WHERE is the CREATIVITY?

G45-9

Please look at principle No. 1—Quality of Life. This pertains to the people who, live, vote and shop here. It is rightly No. 1. Perhaps every single item should be measured against that principle first and if it fails, it should fail to make it into the plan.

G45-10

Thank you.

Lynn M. Hoopingarner
Westbourne Dr.
West Hollywood, CA 90069

Letter G45

G45-1

The commenter's concern about the lack of creativity is noted. Please refer to General Plan Goal LU-5 that specifically encourages a high level of quality in architecture and site design.

G45-2

The commenter expresses broad questions regarding why the General Plan proposes increases to height and density. In response to the comment regarding 10-story buildings on Santa Monica Boulevard, the only designation that would allow buildings of 90 feet (typically eight to nine stories) is CR, which is limited to the parcels at the intersection of La Brea and Santa Monica Boulevards. The remainder of Santa Monica Boulevard is limited to 35-foot-high and 45-foot-high zones, exclusive of applicable bonuses as shown in Figure 3-4. In response to the comment regarding community input into the Draft General Plan, Please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, which helped to determine how and where the City will develop, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan.

G45-3

Please refer to Response to Comment G45-1.

G45-4

The commenter is wondering why more is better. The General Plan Land Use Element provides for a framework for development. With the exception of density minimums in the R3 and R4 classifications, the General Plan does not require that all property be developed to its maximum capacity. The General Plan provides a framework of density and height to accommodate a variety of development.

G45-5

The commenter is concerned that the maps do not accurately reflect density because density bonuses are permitted. In response to the comment, please refer to Table 3-2 on page 53 of the General Plan, which lists all of the height and density bonuses and describes in which zones each bonus is permitted. The only new bonus shown in the table is for Creative Office. All others are existing bonuses that are detailed in the City's Municipal Code.

G 45-6

The commenter is concerned with the number of parking spaces required for developments. The General Plan does not identify parking requirements. These are detailed in the Zoning Ordinance. General Plan Goal M-8 and related policies describe strategies to manage parking supply to serve residents, businesses and visitors.

G45-7

The commenter raises concerns about green building requirements and parks. Policies relating to green building and principles of sustainability are incorporated throughout the document and are identified by a leaf symbol. Goals and policies relating to the provision of park space are included in Chapter 8, Parks and Recreation.

G45-8

The commenter's concern about pedestrian orientation is noted.

G45-9

Please refer to Response to Comment G45-1.

G45-10

The commenter's concern about quality of life is noted.



Bianca Siegl

From: Donald T Freeman MD. [dfreeman@ucla.edu]
Sent: Monday, August 09, 2010 2:31 PM
To: Bianca Siegl
Subject: General Plan comments

I would like to offer the following comments on the West Hollywood General Plan 2035 public review draft. I have been a resident of West Hollywood for 18 years, renting for 12 and owning for 5, including owning a rental unit. I really live in the city, walk in it routinely, and enjoy the use of private, commercial, and civic space and experience.

G46-1

This is a massive document representing a great deal of successful work on the part of many professionals, for which I am grateful. Given the importance of this plan, and it's size, it is disappointing that we have only been given five weeks to review and comment on it. I do appreciate that there has been review and comment along the way of its development.

My two concerns are the plan's allowing dramatically higher buildings and the absence of a plan to modify rent control.

G46-2

The city's plan to allow a few buildings to go more than 90 feet high is in conflict with goal LU-4 which "provides for an urban environment oriented and scaled to the pedestrian" and goal LU-6 which "creates a network of pedestrian-oriented, human-scale and well landscaped streets and civic spaces throughout the city." Given these goals, which I support, 90 feet is preposterously high. I am deeply against this. I recommend limiting development to three stories and with rare exceptions to four stories.

G46-3

The general plan does not seek to modify the city's current rent control laws which are in conflict with the city's goals to improve it's old housing stock. I have been on both sides as a renter and as an owner. I like rent control, even as an owner, and hope to see it continued. However, the current laws do not allow a landlord to make improvements and pass the costs through to the tenant. This is a powerful disincentive to improvement of buildings with long term tenants. It depends on the decontrol between tenancies. This is in conflict with the desirability of long term tenancies for the city. I wish that the city plan would consider some modification in the rent control laws along these lines.

Thank you for your consideration of my concerns.

Sincerely,
Donald T Freeman, MD

Letter G46

G46-1

The comments regarding the quality of life in the City and the General Plan update process are noted.

G46-2

The commenter's concern regarding the proposed expansion of the CR zone (90 feet high) at the intersection of La Brea and Santa Monica is noted. In response to the concerns regarding pedestrian scale, Goals LU-4 and LU-6 discuss techniques for improving the pedestrian environment and civic spaces that can be effective regardless of building height.

G46-3

The commenter's concern regarding rent control and the ability to pass the cost of improvements to aging residential buildings through to tenants is noted.



Bianca Siegl

From: laratza77@aol.com
Sent: Tuesday, August 10, 2010 4:16 AM
To: Bianca Siegl
Subject: Comments...

Tim Raza
8932 Dorrington Ave
West Hollywood, CA 90048
August 8th, 2010

City of West Hollywood
Department of Urban Planning and Development
Attention: Bianca Siegl
CC: John Keho, Ivor Pine, Lindsey Horvath, Ryan Gierach (WeHo News)

Hello Bianca

Thank you for keeping in touch with me, regarding my voice and comments, with respect to the City's proposed revision of the general plan.

I am have not consulted with an attorney or an engineer or a planner or an architect etc... I am merely a home-owner with general ideas, hopes and aspirations as to the ideological and bureaucratic tendency of the city he lives in. As a resident of 'West Hollywood West'.

Over the past few years, I have found myself faced with not only unusually limiting and highly regulated city rules, with respect to construction permits and remodeling permits on my own house, but I have been confronted with neighbors who behaved in a concerning invasive, intrusive and patronizing fashion. By my understanding, I am by numerous decades, the youngest homeowner in WeHo-W. Not only have current City regulation proven to limit and inhibit an appropriate accommodation for proper modernization of residential and commercial architecture, but there seems to clearly be an undue influence of some of WeHo-W's residents on how this City currently operates and on the potential this City has to properly move into the 21st century.

G47-1

As a layperson and home-owner, I wish to address some of the points that my neighbors have raised over the past few weeks...

1) 'Urban Village': By my understanding, the 'City of West Hollywood' is just that, a CITY; a city that sits in the heart of the largest metropolitan area in the Western world. By my understanding, a 'city' differs from a 'village' in that there is a higher density, business, commercial and social activity, hustle-and-bustle, sounds, cutting edge architecture, and primarily: a city is a place where individuals can find a place to develop and expand upon the creativity, freedom, anonymity and potential perspective not possible in a 'village'. By my understanding, the CITY of West Hollywood was founded on the vision that this CITY would provide a foundation for progressive and diverse ideas, and that this CITY would provide a safe-haven and support for ideas with perspective and broadmindedness, and that this CITY would strive to be a center of culture and development, and that this CITY would strive NOT to stagnate and NOT limit or inhibit or discriminate against the ideological freedoms or advancement of artistic/commercial/individual/modern potential.

G47-2

2) Quality of life/Diversity (as defined and quoted by WHWRA): Indeed a somewhat vague statement, potentially lacking more specific definition... but before this city allows the 'old boys club' in a better-connected neighborhood to dictate or patronize public policy, I suggest this city considers that it is the same kind of better-connected 'old boys club' that will have prolonged slavery and (more recently) would have forbidden gay-marriage. Sometimes, it is necessary for the bureaucrats to distance themselves from the established 'connections' with an 'entitled' (to quote from city and neighborhood meetings) few, in the interest of the progression of freedom and said diversity. To even allow for any one person or body to be officially more 'entitled than other members of the same community is not only societally extremely questionable, but it also

G47-3

8/10/2010

raised fundamental question with respect to the constitution of this country. By my understanding, the City of West Hollywood was founded on the premise of catering to INDIVIDUAL diversity, and with a vision and mission to promote INDIVIDUALISM, and to break away from previous mainstream mandates, limitations and especially DISCRIMINATION.

G47-3
cont.

3) Neighborhood character: With respect to the suggested 'addition' to the WeHo General Plan (by WHWRA), I point out that terms like 'will cherish... their unique character' are dangerously vague, and pose no definable framework for what is or what is to be cherished, and what is or what is not to be granted. I especially point out the suggested term 'eclectic', which according to common definition suggests a deliberately NON-UNIFORM style, and which seems to stand in direct contradiction to the proposed limitations, mandates and dictated 'conservation' of style, according to WHWRA.

G47-4

4) Economic development: I point out that an abundance of 'small-scale businesses in our neighborhood' (WHWRA) no longer exist, and have left behind gaping, empty store-fronts, due to an unfortunate inability to cater to the obvious, ever-evolving consumer needs of either our neighbors or visitors... or these businesses would likely still be in business, and our prime commercial real-estate would not be showing an increasing number of 'for lease' signs. If these businesses were as invaluable as WHWRA suggests, I wonder what prohibited WHWRA from unilaterally subsidizing said businesses...

G47-5

5) Having suffered the attacks, discrimination, intimidation-tactics and nepotistic politics in my neighborhood, I shall absolutely not be silenced. While I understand the dangers involved in voicing opposition to legally and morally questionable tactics by members of my neighborhood, I point out that just because I am one of the very few members of my neighborhood, willing to publicly express my concerns, this does not mean that there are not other members of a new, enlightened, more diverse, more progressive, more ambitious generation of WeHoians. While I respectfully acknowledge the tenor of more senior members of this community and specifically, my neighborhood, I cannot help but candidly point out that common statistics make obvious the fact that a notable amount of homeowners in WeHo-W will for various reasons, definitely not reside in this city in another 10-20 years, and that it is highly important to entirely disqualify or disregard the invariable ideas, demands and needs of a new generation of home-owners... a new generation of home-owners that will find its way into this very neighborhood, by means of purchase, inheritance etc. In order to maintain and promote the specific appeal of living in WeHo-W, and not least to maintain and promote the monetary, visual and architectural value of WeHo-W, one must specifically allow for measures that cater to ongoing development, modernization and up-keep of residential and commercial infrastructure, design and expansion. Anything less would clearly limit the (relatively near) future potential that this neighborhood (or this city) has!

I am no expert in the delicate details involved in the planning of a city. I am a single voice and constituent who must rely on the elected officials and employed 'experts' to devise, suggest and make decisions that will hopefully benefit myself and those around me. As a citizen of this neighborhood and city, and as someone who is truly and dearly concerned and interested in the direction, the future and the maximal potential of this city, I humbly request that you hear my voice, and that you consider that I am not the only person with the opinions expressed in this letter, and that there may be others who are more intimidated to express their opinions, and that those with the loudest/most audible voices are not always those with the most legitimate or just causes, and that those with said more audible voices might not necessarily have an absolute understanding or foresight or interest in a future that allows for true and just equality or expansion or development of individual freedoms and potential. I ask you to sincerely understand and consider that there may be 'greater things' at stake in this discussion than the mere 'height of a store-front'. I ask you sincerely understand and consider the real and true dangers involved in curtailing and limiting the freedoms and ambitions of individuals and just current and future members of this community.

G47-6

I have been dealing closely with the city's 'Community Development' department, over the past few years. I have encountered administrative challenges of all sorts during these dealings. Ultimately, I have concluded that the leading administrators exercise their duties with meticulous diligence and integrity. I trust that you will recognize some of the broader implications involved in your upcoming decisions, and that you will take some of my plea(s) to heart...

I sincerely thank you for allowing me to express my thoughts and concerns in this public discussion

Tim Raza

8/10/2010

Letter G47

G47-1

The commenter's concern regarding City regulation of building remodels and regarding the influence of certain neighborhoods is noted.

G47-2

The commenter's support for acknowledging West Hollywood as a "city" rather than an "urban village" is noted.

G47-3

The commenter's concern regarding the influence of certain neighborhoods in public policy is noted.

G47-4

The commenter's opposition to specific changes to the General Plan proposed in Letter E5 is noted.

G47-5

The comment regarding the character and occupancy of storefronts along Melrose Avenue and Robertson Boulevard is noted.

G47-6

The commenter's concern regarding neighborhood politics and expression of dissenting opinions is noted.

Bianca Siegl

From: Ric Abramson [rabramson@designarc.net]
Sent: Monday, August 09, 2010 5:50 PM
To: Bianca Siegl
Subject: RE: GPAC: meeting notes

Attachments: General Plan notes.xlsx


 General Plan
 notes.xlsx (28 KB...)

Hi Bianca-

I spent several hours scanning thru the GP in a cursory manner. For now, I have attached an initial round of comments. It was too difficult to try and track down every issue throughout the document so some of these comments may have been addressed in other sections.

Ric. Abramson Architect
 Workplays studio*architecture
 323 848-4869

-----Original Message-----

From: Bianca Siegl [mailto:BSiegl@weho.org]
Sent: Tuesday, July 27, 2010 5:40 PM
To: Bianca Siegl
Subject: GPAC: meeting notes

Hello GPAC members,

Attached please find PDF files containing meeting notes and agendas from our two recent meetings, for your reference. The June 29 meeting was focused on a discussion of urban design issues in the General Plan, and the July 14 meeting covered the Environmental Impact Report. Attendance at the meetings was small, but we had lively and informal discussions among the participants. If you have any questions about the attached notes, please let me know.

The end of the public review period for the Draft General Plan, Draft Climate Action Plan, and Draft EIR is rapidly approaching - August 9 is the official closing date. Please encourage your fellow community members to send in their comments and questions on the three draft documents! Additional information, as well as downloadable copies of the documents, can be found on the General Plan website:
www.weho.org/generalplan.

Thank you,

Bianca Siegl
 Associate Planner
 City of West Hollywood
 8300 Santa Monica Boulevard
 West Hollywood CA 90069
 323.848.6853

No virus found in this incoming message.

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Version: 9.0.851 / Virus Database: 271.1.1/3031 - Release Date: 07/26/10 23:09:00

Letter G48

G48-1

The commenter's suggestion to promote redevelopment of residential buildings that do not positively contribute to the street or neighborhood character is noted.

G48-2

In response to the comment, please refer to Policy LU-8.7 of the proposed General Plan, regarding reconstruction or replacement of nonconforming residential buildings.

G48-3

Proposed General Plan Policy LU-1.15 will be clarified to prohibit drive-through commercial land uses.

G48-4

The commenter's suggestions regarding adding policies to encourage creativity in the design of public rights-of-way and residential street standards that integrate utilities and other features are noted.

G48-5

The commenter's suggestion to modify Policy LU-2.2 to specify that new development improve character and enhance livability is noted.

G48-6

The commenter's concern regarding the lack of specificity in Policy LU-2.9 is noted. The broad General Plan policy will be detailed in the Zoning Ordinance, as described in Implementation Action LU-A.1.

G48-7

The commenter's opposition to proposed General Plan Policy LU-3.2 is noted.

G48-8

The commenter's opposition to eliminating street parking for valet use is noted.

G48-9

In response to the commenter's suggestion that the City strive for net-zero energy use in public spaces, please refer to Goals IRC-1, IRC-4, IRC-6, and related policies, which describe measures to reduce citywide and municipal energy use.

G48-10

The commenter's opposition to Policy LU-9.3 is noted. In response to the commenter's concern, Policy LU-9.3, which requires maximizing the number of residential units in high-density zones, is already mandated in the Zoning Ordinance. It does not conflict with Policy LU-9.1 regarding encouraging new courtyard housing, as the design of individual development projects varies. Further, Policy LU-9.3 only requires maximizing the number of residential units in a project, but not the size of units.

G48-11

The commenter's suggestion to add a policy encouraging expansion of the Veterans Memorial as a public gathering space is noted.

G48-12

The commenter's suggestion regarding linking commercial setbacks to sidewalk and street widths is noted.

G48-13

The commenter's opposition to proposed General Plan Goal LU-16 and related policies regarding offsite signage is noted. Please refer to Goal LU-18 and related policy regarding provision of adequate City informational signage.

G48-14

The commenter's concern regarding the effectiveness of current rehabilitation incentive programs is noted.

G48-15

The commenter's suggestions regarding coordination with utilities regarding street parking and allowing use of lifts in residential parking is noted.

G48-16

In response to the commenter's suggestion regarding creative use of alleys, please refer to proposed General Plan Policy M-5.6.

G48-17

Please refer to Response to Comment 48-9.

G48-18

The commenter's suggestions regarding creative methods for creating affordable and workforce housing in the City is noted.

G48-19

The commenter's suggestion that the development handbook described in Housing Program 21 (Streamlined Processing) be illustrated is noted.



Bianca Siegl

From: JOHN J BURNS [jjburnsla@aol.com]
Sent: Monday, August 09, 2010 6:15 PM
To: Bianca Siegl
Cc: "WHWRA <president">@whwra.orgWHWRA
Subject: W Hollywood Master Plan

Dear Ms Siegl,

As a homeowner and a landlord and a West Hollywood registered voter. As a dual property owner (8827 Rosewood Avenue & 9016 Rangely) I pay close to \$20,000. in property taxes ever year. I have worked in West Hollywood since 1979 and bought my first home in West Hollywood in 1988. For the most part I feel the city has grown at a healthy pace and has been very progressive.

But I take great issue with the current Master Plan. I have concerns about the amount of vehicles being driven in and through W Hollywood. I am VERY concerned with height density and the loss of light and air to 1 story dwellings in the shadow of these massive building projects. No one ever mentions the very high underground water table West Hollywood has and what the sinking of massive deep subterranean garages is doing to the flow of that water and the disruption of underground streams. I have a great distaste for the mixed use concept when it comes to low cost housing. The housing should be required but not mixed into the new development where developers are hoping to sell condos for hundreds of thousands and you have section 8 residents next door or down the hall. Developers should be required to provide that housing but at another location.

G49-1,
G49-2,
G49-3,
G49-4

I see no mention or provisions in the plan for the city to EXPLORE the concept of annexing additional land to W Hollywood to solve some of the problems that have existed since the city became a city. I am OPPOSED to the "tall Wall" billboards on Beverly Blvd, Melrose, Robertson, Doheny, San Vicente etc. Sunset is another story and part of an existing policy. Green space, rental apartments, an additional school, ELDER HOUSING to name a few. I feel density MUST be reduced and as I have said many times lets move forward with the "Granny Flat" concept. How long could it take to arrive at an over all plan, inform residents who the candidates for the programs are, the set back restrictions, square footage allowed, design concepts and parking requirements. With interest rates at historical lows it would be prudent for the city to step up the pace on this program and make sure residents are informed and understand the program qualifications and restrictions. I have a huge issue with the Council allowing commercial and business encroach into residential streets. Zoning should not fall into gray areas, be approved by the council and for ever change the character of our neighborhood streets.

G49-5,
G49-6,
G49-7,
G49-8,
G49-9

JOHN J. BURNS, III

8/9/2010

Letter G49

G49-1

The commenter's concern regarding current levels of traffic is noted. Transportation and traffic impacts of the proposed General Plan are analyzed in Section 3.14 of the Draft EIR.

G49-2

The commenter's concern regarding the impacts of height and density is noted. Section 3.1 of the Draft EIR analyzes shade and shadow and other impacts of the proposed General Plan.

G49-3

In response to the comment, please refer to page 179 of the proposed General Plan, which discusses the safety concerns related to the City's high water table. Further, Section 3.5 of the Draft EIR analyzes geologic conditions in the City and Section 3.7 discusses hydrology and water quality, including the high water table. Section 3.7 of the Draft EIR found that with adherence to and implementation of permits, proposed regulations, and policies of the proposed General Plan, impacts to hydrology and water quality are less than significant at the Program EIR level of analysis. No mitigation measures were required.

G49-4

The commenter's opposition to mixed-use development and to providing affordable housing onsite in new development projects is noted.

G49-5

The commenter's desire for the City to explore annexation of additional land is noted.

G49-6

Please refer to Response to Comment G11-1.

G49-7

The commenter's suggestion is noted.

G49-8

The commenter's opposition to additional density and support for accessory dwelling units is noted.

G49-9

The commenter's opposition to commercial overlays in residential zones is noted.

G50

6 August, 2010

Bianca Siegl
City of WEHO
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069



Dear Ms. Siegl :

Since 1976, I have lived on Fairfax just north of Norton in a 1930's courtyard and without parking. I attempted to find a written summary of future plans online, but was unsuccessful. However, the "Project Description" in the "Public Notice" indicated an increase in 4,274 units or a 6834 population increase. Frankly I find this appalling. I challenge you to provide one benefit to the existing population by increasing it by 6800 people, in fact by any increase. The experience of the last ten years or so has provided more than ample evidence that increasing housing and population has been disastrous for those of us living here. I know of no current resident who is please with the recent construction. As I'm sure you know, WEHO was founded on a platform of little or slow growth, maintaining existing houses and duplexes, and not adding high end housing. I believe our Mayor, Mr. Heilman, championed these guidelines when running for the Council 25 years ago.

G50-1

However, about the turn of the century or so, there was a dramatic change and the doors were opened to all sorts of new construction. Houses have been torn down to build very, very high end condos. I have toured the 3 new condos on Norton between Crescent Hts. and Sweetzer and all are substantially higher than the county average, substantially higher. I also note that the humungous new apartment complex on Sunset near Fairfax, or those further south on Fairfax near Willoughby, are high end rental, luxury apartments. And why is it the new construction is generally 1 floor higher than their neighbors? Incidentally, providing 1 parking space per bedroom dooms us (who must park on the street) to a substantial increase in competition...a significant number of 1 bedroom apartment have 2 occupants and 2 cars. Ten or or so years ago I never had a problem parking near where I live. Thanks to you all, I now drive around and around and often park quite a ways from home. Brilliant planning!!

G50-2

So my question to you is what happened? Why about ten years ago did new construction start booming? What change took place? Incidentally what committee is in charge of making these decisions about development and new construction? Have there been changes in their personnel and what is the background of that personnel? I'm trying to figure out why suddenly all the old guidelines were thrown aside and replaced with a lot of new construction...and now you are proposing more. Do you and the people on this committee making these decisions all live in West Hollywood? Does one have to live in West Hollywood to work for the city? Something strikes me as very wrong and I hope you or someone else can provide me with answers. You cannot deny a big change has taken place. So why?

G50-3

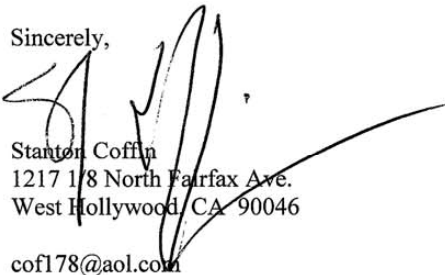
Over the last couple years I have written to each councilmember 4 different times requesting information on changes in the number of apartments; houses & duplexes; and condos comparing

25 years ago and today. I have gotten no response to this question except that Ms. Land once indicated she had passed it on to the appropriate party who would respond, but they never did. Perhaps you could easily provide me with this information. My experience to date has made me cynical and very curious why my questions are never answered. Something to hide?

G50-3
cont.

So, I shall be curious if you respond and, if so, with answers to my questions.

Sincerely,



Stanton Coffin
1217 1/8 North Fairfax Ave.
West Hollywood, CA 90046

cof178@aol.com

Letter G50

G50-1

The commenter's opposition to population growth is noted.

G50-2

In response to the commenter's expressed concern that buildings constructed since the turn of the century are taller than those built earlier, although City regulations did not change significantly in the past 10 years, residential land prices and the resulting housing market went through a significant escalation in prices throughout Southern California. These market conditions impacted the type of development built in the City.

G50-3

In response to the commenter's expressed concern about specific change in the number of apartments, houses, duplexes, and condominiums over the last 25 years, please refer to Table 18 on page 33 of the Housing Element Technical Appendix, which details changes from 1990 to 2009.



Bianca Siegl

From: Jeanne Dobrin [jeannedobrin@gmail.com]
Sent: Thursday, August 12, 2010 1:46 PM
To: Bianca Siegl
Subject: General Plan NOISE begins on pg. 187 of DRAFT GP

Under CONTEXT, the city of WeHo is committed to minimizing excessive noise & limiting the community's exposure to loud noise sources & the Municipal Code is intended to protect people from [various noises, including] nightlife. This currently is not true. Residents have been targets for out of control noise from nighttime restaurants which become de facto bars after appx. 10PM. Inherent in the city's governing documents are the words "so as to not disturb the resident's sleep between the hours of 10 PM and 8AM.

The venues on mostly Sunset Blvd. & 2ndly Santa Monica Blvd (like the above) are constantly causing great anguish from loss of the peace & enjoyment quality of their homes. Why?

G51-1

Noisy, rowdy and even drunk patrons both in these places and exiting are the problem., thereby constituting these establishments as public nuisances. Car honking sounds, car honking, yelling & car radios go on not only until 10 PM, but under the city's new regime of granting later & later operation hours, including later hours of sales, service & consumption of alcohol contribute to the situation.

Public safety enters the issue. Little by little, more & more of these venues are asking for & getting their operation & alcohol hours an sometimes also extensions of their exterior square footage. The City Council has been on record to voice concern re extensions of operation hours until 3 AM AND EVEN 4 AM. The Sheriff's dept. is opposed to this added burden to the need for their services, which is reflected to an extent to the annual cost our contract with the County Sheriff's Dept.

Lately, these requests for later hours are growing in number, AND ARE BEING GRANTED.

The maximums hours for sales, service and consumption under California State law are 6 AM, thru 2AM the following day. Many venues with CUP's limiting them to various operating hours of say, 10, 11 & 11:30 PM, 12 midnight are getting these extensions through the Community Development Director's Minor Conditional Permit Hearing. And naturally when one gets these extensions, the others feel they should have them too. And I contend that this disregard for the peaceful & quiet enjoyment of their homes for residents, especially the loss of sleep stemming from these actions belie what is said in this chapter on NOISE & SAFETY i.e. what the mission of the city is & its dedication to that.

G51-2

As for TRANSPORTATION NOISE, anybody with a grain of sense knows the intense goal of expanding the city's current population in this already over-populated city re its tin 1.9 sq. miles to a greater density AND the constant demolition permitting of few dwelling units, & passing new entitlements of developments of 200, 300, & close to 400 new dwelling units, will create enough circulation chaos to take us way beyond traffic service levels of "F", many of which already exist in our city. Our problems cannot all be faulted on the east/west & west/east other cities' commuters passing through.

G51-3

AS REGARD TO THE CURRENT DRAFT EIR.....Yes we do need sustainable growth. But that 4th category of expected options "Cannot be mitigated" is being approved too often without cautionary reasoning, and those dreaded words "A statement of Over-riding Consideration" does not result in unintended consequences", to our everlasting shame, it results in INTENDED CONSEQUENCES, that could be dire!

G51-4

Our city has provided some great governance, & we hhave made many first step in taking the initiative with addressing local, national & worldwide issues. .We need to continue to be truly a caring city, with development at a reasonable level.

And I hope not to hear anymore those who question why residents live here who need peace & quiet in hours after 10 or 11 PM, many of us were here living happily for many, many years. For those who feel they can only socialize with friends after midnight in a bar, they can socialize by going home OR to Las Vegas!

Our City has grown immensely in governance & great deeds , & deserves much laudability.]

G51-5

Letter G51

G51-1

The commenter's concern regarding noise from nightclubs both by patrons and from music is noted.

G51-2

The commenter's concern regarding the increasing number of late-night venues and related resulting noise and safety issues is noted. Please refer to proposed General Plan Goal SN-5 and related policies, which discuss control of noise from stationary sources, including restaurants, bars, and night clubs.

G51-3

The commenter's concern regarding traffic is noted. Section 3.14 of the Draft EIR analyzed the traffic impact of implementation of the proposed General Plan. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary.

G51-4

The commenter's comments regarding the need for sustainable growth and concerns over Statements of Overriding Considerations are noted. The City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts on air quality, traffic, water supply, and global climate change identified in the EIR. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

G51-5

The commenter states that those wanting to socialize after midnight can do so at home or in Las Vegas. The comment is noted.



Bianca Siegl

From: Dan Silver [dsilverla@me.com]
Sent: Wednesday, August 18, 2010 10:44 AM
To: Bianca Siegl
Subject: Draft General Plan and DEIR - REVISED (PLEASE SUBSTITUTE FOR EMAIL OF AUG 16, 2010)

August 18, 2010

Ms. Bianca Siegl
Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: Draft General Plan and DEIR

Dear Ms. Siegl:

I have lived in West Hollywood since 1978. I am a renter and property owner.

1. Residents living in residentially zoned property near Sunset Blvd. suffer from noise and other nuisance emanating from businesses (like an outdoor sports bar) and the drunken, shouting patrons of these establishments. The Business Improvement District, code compliance, and law enforcement do not effectively address these problems. Much stronger General Plan provisions to protect a reasonable, minimum quality of life in affected areas are needed. At the General Plan *policy and objective* levels, protection of neighborhoods and residents from these impacts should be addressed. Relevant factors that should be covered include limited hours of alcohol consumption, limits upon the concentration of alcohol-serving businesses, prohibition of *business-generated* noise (noise originating from *within* the confines of the business property lines) from extending into residential areas, and volume limits on music. The draft General Plan is woefully inadequate in the area of residential quality of life relative to adjacent commercial uses. The result will be "entertainment blight."

G52-1

2. The following language should be deleted: "Because of the prestige and exposure of these billboards, they also have the capacity to provide public benefits through development agreements, and to make high-quality new development possible." Billboards should remain limited to the Sunset Strip. Spread elsewhere would have high negative impacts on the aesthetic quality of the City, and such signage is not needed for high quality new development. Witness Santa Monica and Beverly Hills.

G52-2

Sincerely,

Dan Silver, MD
1422 N Sweetzer Ave #401
WH, CA 90069

8/18/2010

Letter G52

G52-1

In response to the commenter's concern regarding noise from businesses on the Sunset Strip, please refer to proposed General Plan Goal SN-5 and related policies, which discuss control of noise from stationary sources, including restaurants, bars, and night clubs. Mitigation measures related to noise impacts are also discussed in the Draft EIR, Section 3.9.5. The commenter's suggestions regarding adding business noise-prohibition policies to the General Plan are noted.

G52-2

The commenter's opposition to offsite signage outside the Sunset Strip is noted. Please refer to Section 3.1.4 in the Draft EIR for an analysis of signage impacts pursuant to implementation of the proposed General Plan. As noted on page 3.11-11, all new development, including signage, will be required to comply with the regulations, development standards, and design guidelines in the City's Zoning Code and all development will be reviewed through the design review process to make sure that individual development projects do not include materials that would create adverse light or glare effects. The impact was found to be less than significant. .



BOARD OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 653-8007
(916) 653-0989 FAX
Website: <http://www.bof.fire.ca.gov/>

August 19, 2010

Ms. Bianca Siegl
Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Re: General Plan Fire Safety Element Recommendations for the City of West Hollywood

Dear Ms. Siegl:

The State Board of Forestry and Fire Protection (Board) is required to review and provide recommendations to the safety element of county and local government general plans when such plans are being updated. This review is in accordance with Government Code (GC) §65302.5 which requires the Board to review the fire safety element when the general plan update contains State Responsibility Areas or Very High Fire Hazard Severity Zones.

Enclosed is a list of standard recommendations titled "*General Plan Fire Safety Elements Standard Recommendations*" which should be incorporated into the General Plan. Each entity should evaluate their general plan and include the appropriate recommendations from the list.

Please note requirements for response pursuant to GC §65302.5(b). Thank you for the opportunity to participate in your planning process. We hope this input leads to greater protection and reduced cost and losses from wildfires in your jurisdiction.

Sincerely,

Stan Dixon
Chair, State Board of Forestry and Fire Protection

G53-1

Bianca Siegl

From: Zimny, Chris [Chris.Zimny@fire.ca.gov]
Sent: Thursday, August 19, 2010 1:22 PM
To: Bianca Siegl
Cc: Gentry, George
Subject: City of West Hollywood General Plan Comments from Board of Forestry and Fire Protection
Attachments: Approved 3_3_10 General Plan review template 01_26_10.pdf; City of West Hollywood BOF General plan.pdf

To:
Ms. Bianca Siegl
Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Please accept the attached General Plan recommendations for the City of West Hollywood from the State Board of Forestry and Fire Protection pursuant to Government Code 65302.5.

Thank you.

Christopher Zimny
Regulations Coordinator
Board of Forestry and Fire Protection
California Department of Forestry and Fire Protection
1416 9th Street
P.O. Box 944246
Sacramento, CA 94244-2460
(916) 653-9418
Fax (916) 653-0989
cell (916) 712-7329
chris.zimny@fire.ca.gov

8/19/2010

General Plan Fire Safety Element

Standard Recommendations

January 26, 2010

State Board of Forestry and Fire Protection



Contents

Purpose and Background

Methodology for Review and Recommendations

Standard List of Recommendations

Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations to the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire Hazard Severity Zones (VHFHSZ) (GC 51175).

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- *“The draft elements...to the fire safety element of a county’s or a city’s general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ].”*
- *“The Board shall... review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element....”*
- *“Prior to adoption of the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations...,” the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.*

Methodology for Review and Recommendations: The Board established a standardized method to review the safety element of general plans. The methodology includes 1) examining the general plan for inclusion of factors that are important for mitigation of fire hazard and risks, and 2) making recommendations related to these factors. The evaluation factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

Enclosed are the entire set of recommendations suggested by the Board’s for any entity. Each entity should evaluate their general plan using the factors and include the appropriate recommendations from the list as part of the general plan.

Standard List of General Plan Safety Element Recommendations

1.0 Wildfire Protection Planning

- 1.1 General Plan References and Incorporates County or Unit Fire Plan: Yes Partial No

Recommendation: Identify, reference or create (if necessary) a fire plan for the geographic scope of the General Plan. General Plan (GP) should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan.

Recommendation: Ensure fire plans incorporated by reference into the GP contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

2.0 Land Use Planning:

- 2.1 Goals and policies include mitigation of fire hazard for future development. Yes Partial No

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

Recommendation: Develop fire safe development codes used as standards for fire protection for new development in State Responsibility Area (SRA) within the entity's jurisdiction that meet or exceed statewide standards in 14 California Code of Regulations Section 1270 et seq.

Recommendation: Adopt, and have certified by the BOF, local fire safe ordinances which meet or exceed standards in 14 CCR § 1270 for State Responsibility Area.

- 2.2 Disclosure of wildland urban interface hazards including Fire Hazard Severity Zones designations and Communities at Risk designations: Yes Partial No

Recommendation: Specify whether the entity has a Very High Fire Hazard Severity Zones (VHFHSZ) designation pursuant GC 51175 and include a map of the zones that clearly indicates any area designated VHFHSZ.

Recommendation: Adopt CAL FIRE recommended Fire Hazard Severity Zones including model ordinances developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

Recommendation: Identify and disclose information on communities listed as "Communities at Risk".

3.0 Housing/structures and neighborhoods:

- 3.1 Incorporation of current fire safe building codes. Yes Partial No

Recommendation: Adopt building codes for new development in State Responsibility Areas or incorporated areas with VHFHSZ that are established by the Office of the State Fire Marshal in Title 19 and Title 24 CCR, referred to as the “Wildland Urban Interface Building Codes”.

- 3.2 Identification and actions for substandard fire safe housing and neighborhoods relative to fire hazard area. Yes Partial No

Recommendation: Identify and map existing housing structures that do not conform to contemporary fire standards in terms of building materials, perimeter access, and vegetative hazards in VHFHSZ or SRA by fire hazard zone designation.

Recommendation: Identify plans and actions to improve substandard housing structures and neighborhoods. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, neighborhood –wide fuels hazard reduction projects, community education, and other community based solutions.

Recommendation: Identify plans and actions for existing residential structures and neighborhoods, and particularly substandard residential structures and neighborhoods, to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

- 3.3 Consideration of occupancy category effects on wildfire protection. Yes Partial No

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

- 3.4 Fire engineering features for structures in VHFHSZ. Yes Partial No

Recommendation: Ensure new development proposals contain specific fire protection plans, actions, and codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

4.0 Conservation and Open Space:

4.1 Identification of critical natural resource values relative to fire hazard areas.

Yes Partial No

Recommendation: Identify critical natural resources and other “open space” values within the geographic scope of the GP. Determine maximum acceptable wildfire size, fire prevention plans, emergency response plans and initial attack suppression success rates for protection of these areas and values.

4.2 Inclusion of resource management activities to enhance protection of open space and natural resource values. Yes Partial No

Recommendation: Develop plans and action for vegetation management that provides fire damage mitigation and protection of open space values. Plans should address protection of natural resource financial values, establishment of fire resilient natural resources, protection of watershed qualities, and protection of endangered species habitats. Actions should consider prescribed burning, fuel breaks, vegetation thinning and removal

Recommendation: Establish goals and policies for reducing the wildland fire hazards within the entity’s boundaries and on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts with fire hazards that threaten the entity’s jurisdiction.

4.3 Mitigation for unique pest, disease and other forest health issues leading to hazardous situations. Yes Partial No

Recommendation: Establish goals and policies that address unique pest, disease, exotic species and other forest health issues in open space areas for purposes of reducing fire hazard and supporting ecological integrity.

4.4 Integration of open space into fire safety effectiveness. Yes Partial No

Recommendation: Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the GP area, water sources for fire suppression, and other fire prevention and suppression needs.

4.5 Urban forestry plans relative to fire protection: Yes Partial No

Recommendation: Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

Recommendation: Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

5. Circulation and Access:

- 5.1 Adequacy of existing and future transportation system to incorporate fire infrastructure elements. Yes Partial No

Recommendation: Establish goals and policies for proposed and existing transportation systems to facilitate fire infrastructure elements such as turnouts, helispots and safety zones.

- 5.2 Adequate access to high hazard wildland/open space areas. Yes Partial No

Recommendation: Establish goals and policies for high or very high fire hazard hazard zones adequate access that meets or exceeds standards in 14 CCR 1270 for lands with no structures, and maintain conditions of access in a suitable fashion for suppression access or public evacuation.

- 5.3 Standards for evacuation of residential areas in high hazard areas. Yes Partial No

Recommendation: Goals and policies should be established to delineate residential evacuation routes and evacuation plans in high or very high fire hazard residential areas.

6. Defensible Space

- 6.1 Geographic specific fire risk reduction mitigation measures using fuel modification.
 Yes Partial No

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

- 6.2 Fuel Modification around homes. Yes Partial No

Recommendation: Establish ordinances in SRA or VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines, (http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf) for SRA.

- 6.3 Fire suppression defense zones. Yes Partial No

Recommendation: Establish goals and policies that create wildfire defense zones for emergency services including fuel breaks, back fire areas, or other staging areas that support safe fire suppression activities.

Recommendation: Establish goals and policies that identify structures (or other critical/valuable assets) that have adequate fuel modification or other fire safe features that provide adequate fire

fighter safety when tactics call for protection of a specific asset (i.e. which houses are safe to protect).

7.0 Emergency Services:

7.1 Map/description of existing emergency service facilities and areas lacking services:

Yes Partial No

Recommendation: Include descriptions of emergency services including available equipment, personnel, and maps of facilities.

Recommendation: Initiate studies and analyses to identify appropriate staffing levels and equipment needs commensurate with the current and projected emergency response environment.

7.2 Assessment and projection of future emergency service needs: Yes Partial No

Recommendation: Ensure new development includes appropriate facilities, equipment, personnel and capacity to assist and support wildfire suppression emergency service needs. Future emergency service needs should be:

- Established consistent with state or national standards.
- develop based on criteria for determining suppression resource allocation that includes elements such as identified values and assets at risk, ignition density, vegetation type and condition, as well as local weather and topography.
- Local Agency Formation municipal services reviews for evaluating level of service, response times, equipments condition levels and other relevant emergency service information.

7.3 Adequacy of training. Yes Partial No

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

7.4 Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements. Yes Partial No

Recommendation: Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid/automatic aid and other cooperative agreements with adjoining emergency service providers.

8.0 Post Fire Safety, Recovery and Maintenance: The post fire recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk. They also provide for immediate post-fire life and safety considerations to mitigate potential losses to life, human assets and critical natural resources.

8.1 Reevaluate hazard conditions and provide for future fire safe conditions Yes Partial No

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs.

8.2 **Recommendation:** Develop burn area recovery plans that incorporate strategic fire safe measures developed during the fire suppression, such as access roads, fire lines, safety zones, and fuelbreaks, and helispots.

8.3 Restore sustainable landscapes and restore functioning ecosystems. Yes Partial No

Recommendation: Develop burn area recovery plans, evaluation processes and implementation actions that encourage tree and biomass salvage, reforestation activities, create resilient and sustainable landscapes, and restore functioning ecosystems.

8.4 Incorporate wildlife habitat/endangered species considerations Yes Partial No

Recommendation: Establish goals and policies for consideration of wildlife habitat//endangered species into long term fire area recovery and protection plans, including environmental protection agreements such as natural community conservation plans.

8.5 Native species reintroduction. Yes Partial No

Recommendation: Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

8.6 Evaluation of redevelopment. Yes Partial No

Recommendation: In High and Very hazardous areas, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past 'substandard' fire safe conditions.

8.7 Long term maintenance of fire hazard reduction mitigation projects Yes Partial No

Recommendation: Provide polices and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

8.8 Post fire life and safety assessments Yes Partial No

Recommendation: Develop frameworks for rapid post-fire assessment and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Recommendation: Identify flood and landslide vulnerability areas related to post wildfire conditions.

Recommendation: Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing debris maintenance.

Recommendation: Encourage rapid post-fire assessment, as appropriate, and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

9. Terrorist and homeland security impacts on wildfire protection

These recommendations are included to address fire protection needs related to terrorist acts or other homeland security preparedness and response actions. Both preparedness and incident response can adversely impact fire protection. Adverse effects include substantially decreasing emergency resources' availability, responsiveness and effectiveness by diverting resources, interrupting communications, or restricting emergency access.

9.1 Communication channels during incidences. Yes Partial No

Recommendation: Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

9.2 Emergency response barriers. Yes Partial No

Recommendation: Identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc.). Develop an alternative emergency access plan for these areas.

9.3 Prioritizing asset protection from fire with lack of suppression forces. Yes Partial No

Recommendation: Identify and prioritize protection needs for assets at risk in the absence of response forces.

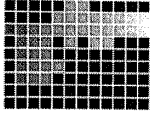
Recommendation: Establish fire defense strategies (such as fire ignition resistant areas) that provide adequate fire protection without dependency on air attack and could serve as survivor safety zones for the public or emergency support personnel.

End Standard Recommendations (version 1/26/10)

Letter G53

G53-1

As illustrated in Figure 10-1 of the proposed General Plan, the City of West Hollywood does not contain a Very High Fire Hazard Severity Zone. Therefore the "General Plan Fire Safety Elements Standard Recommendations" from the State Board of Forestry and Fire Protection do not apply.



NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

To: All Interested Agencies, Organizations, and Persons
From: City of West Hollywood Department of Community Development
Date: June 25, 2010

Project Title: West Hollywood General Plan and Associated Climate Action Plan

A Draft Initial Environmental Impact Report (EIR) has been prepared by the City of West Hollywood (City) for the proposed General Plan and Associated Climate Action Plan (proposed project). The City is the local lead agency, pursuant to the California Environmental Quality Act, responsible for preparation of this document.

Project Location:

West Hollywood is located in western Los Angeles County, about 8 miles northwest of downtown Los Angeles. West Hollywood is 1.9 square miles in size and approximately 7,216 acres and is within a highly urbanized area of greater Los Angeles region. The City of Los Angeles surrounds West Hollywood to the north, south and east. To the west, the City is bounded by the City of Beverly Hills.

Project Description:

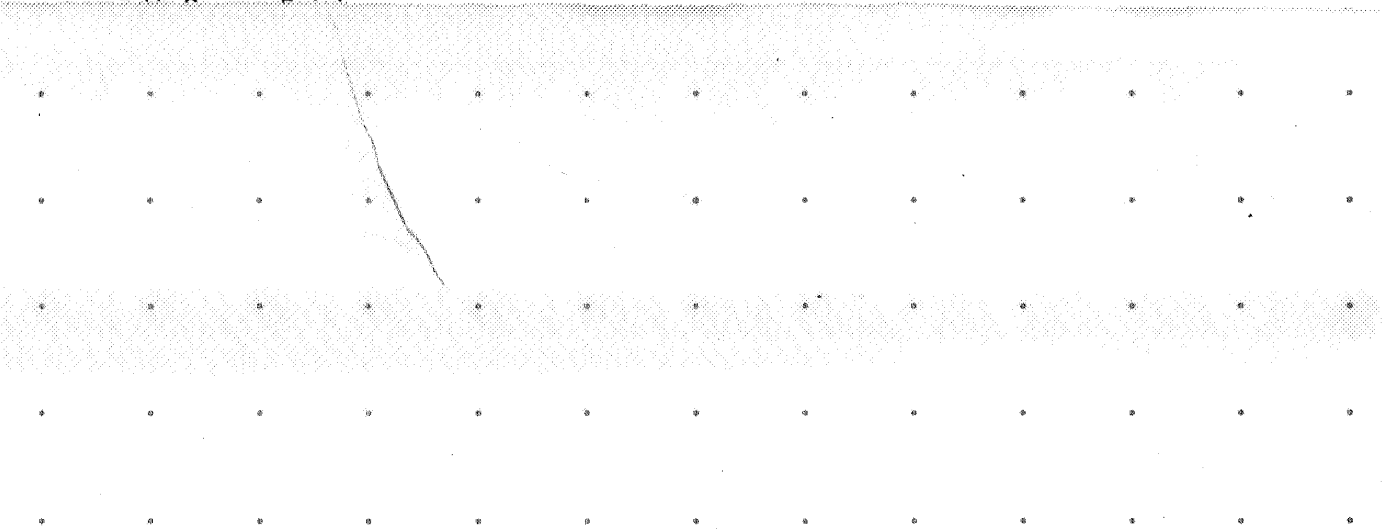
The proposed project analyzed in the EIR is the adoption and implementation of the West Hollywood General Plan and associated Climate Action Plan. The West Hollywood General Plan serves as a blueprint or policy guide for determining the appropriate physical development and character of the City and establishes an overall development capacity. Expected buildout of land uses by 2035 pursuant to the proposed General Plan could result in an increase of 4,274 dwelling units and approximately 2,613,128 square feet of nonresidential building floor area over existing conditions. Based on a population of 1.6 persons per household, an increase of approximately 6,834 persons in West Hollywood could occur by 2035. As an implementation action to the goals and policies within the General Plan, the Climate Action Plan (CAP) includes measures intended to reduce greenhouse gas emissions within City operations and the community at-large.

Ho! Ho! Ho!

Summary of Impacts:

The EIR identified the following impacts as less than significant: (1) Aesthetics (2) Air Quality – objectionable odors; toxic air contaminants (3) Biological Resources (4) Cultural Resources (5) Geology, Soils, and Mineral Resources (6) Hazards and Hazardous Materials (7) Hydrology and Water Quality (8) Land Use and Planning (9) Noise – transportation noise; aircraft noise; vehicular-traffic induced vibration; and industrial and commercial operations vibration (10) Public Services and Utilities – storm drain system; schools; the library; electricity and natural gas; water infrastructure; wastewater; and solid waste (11) Recreation – construction or expansion of existing facilities (12) Traffic – design hazards; air traffic patterns; emergency access; public transit, bicycle, and pedestrian facilities; and parking. Impacts to the following issue areas can be mitigated to a less than significant (1) Noise – construction noise; stationary and area-source noise levels; changes in land use; other noise sources; and construction-induced vibration; (2) Paleontological Resources (3) Public Services and Utilities – police protection and fire protection (4) Recreation – increased use and physical deterioration of existing recreational facilities. The proposed project would result in the following significant and unavoidable impacts: (1) Air Quality – compliance with air quality plans; construction related emissions; and operational emissions (2) Traffic – intersection and congestion management program level of service (3) Global Climate Change – construction and operations related GHG emissions; conflicts with applicable plans (4) Public Services and Utilities – water supply.

over



due to tenants unemployed,
I haven't raise our rents for
2 yrs now. I am against your new
project! Your greed extends to yourselves
our leaving W. Hollywood could not be an
option. Our properties in other areas
would be 50 to 100% + +. "Help to clean up
the poorer areas. Give owner lee-way to raise
very low rents" "Those are great gifts" but
no advantages for you

G54-1

Letter G54

G54-1

The commenter's opposition to the proposed General Plan and to rent control is noted.

Bianca Siegl

From: Steven Greene [sbgreene@mindspring.com]
Sent: Saturday, July 17, 2010 2:31 PM
To: Bianca Siegl
Subject: Comment on Draft EIR for General Plan Update

Hi Bianca,

I have the following comments on the Draft EIR for the General Plan update:

Beginning on Page 3.14-31, there are formatting problems with the paragraphs describing the intersection impacts, so it is difficult to identify where the discussion of each intersection begins.

E1-1

On Page 3.14-31, the discussion of the intersection of Crescent Heights and Santa Monica Boulevard states that, "Additional turn lanes are not feasible due to right-of-way constraints. There is no feasible mitigation for this intersection LOS impact within the existing right-of-way, and taking additional right-of-way for vehicular traffic would be infeasible." This statement is not true. The City has already proposed a condition of approval for the proposed Walgreens project to take right-of-way on the southwest corner to add a northbound left turn lane. This additional right-of-way and the resulting shifting of the southbound departure lanes to the west would actually improve the geometrics of the intersection by reducing the lane shift through the intersection for southbound traffic.

E1-2

Please acknowledge receipt of these comments on the Draft EIR by return e-mail.

Thanks,
Steve

Environmental Letters

Letter E1

E1-1

In response to the comment, the formatting under the peak hour intersection level of service (LOS) analysis on pages 3.14-19 through 3.14-34 of the Final EIR has been adjusted to improve readability.

E1-2

The commenter is correct in that a previously proposed project submitted for this area contained some traffic mitigation. However, that project is no longer proposed. A new project has been submitted for the 8120 Santa Monica Boulevard property, which is currently being assessed. An EIR has just been initiated for the new submittal, which also includes a Walgreens. The potential impacts and mitigation measures have not yet been determined.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC
TRANSPORTATION AND REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012
PHONE (213) 897-6696
FAX (213) 897-1337



*Flex your power!
Be energy efficient!*

July 12, 2010

IGR/CEQA DEIR CS/100641
City of West Hollywood
West Hollywood General Plan Program EIR and
associated Climate Action Plan
Vic. LA-101/2, SCH# 2009091124

Ms. Bianca Siegl
City of West Hollywood,
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Ms. Siegl:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the West Hollywood General Plan Program EIR and associated Climate Action Plan. Based on the information received, we have the following comments:

The City of West Hollywood is generally bounded by Doheny Drive on the West, Beverly Drive on the South, La Brea Avenue on the East and Sunset Boulevard/Fountain Avenue on the North. Santa Monica Boulevard east of La Brea Avenue is still a State Highway and the closest freeway to the City of West Hollywood is the US-101 Hollywood Freeway.

The General Plan Transportation Element should reflect current transportation issues such as Strategies to implement a Complete Streets Action Plan that reflect changing priorities and challenges. The action plan should include transportation improvement opportunities for safety, mobility and access for all travelers. A particular emphasis should be given to bicycle, pedestrian and transit modes providing safe mobility for all users including the elderly, disabled and children. The benefits of a complete streets program would include reduce traffic congestion and greenhouse gas emissions.

E2-1

Transit Oriented Developments (TODs) such as mixed-use developments should be considered for locations adjacent to future Metrorail stations. TODs would increase the overall supply of housing, reduce motor vehicle trips and increase public transit ridership.

E2-2

The preferred alternative 2, would involve growth constrained to two transit overlay areas only. The concept of involving growth constrained to two transit overlay areas only appears to be consistent with SCAG's preferred growth scenario, SCAG's regional blueprint planning program.

E2-3

Future developments in the City of West Hollywood that are expected to generate a significant amount of vehicular trips will need a traffic study that will analyze its impact on the State Highway System.

E2-4

"Caltrans improves mobility across California"

Ms. Bianca Siegl
July 12, 2010
Page Two

If you have any questions regarding our comments, you may reach me at (213) 897-1726 and please refer to our record number 100641/CS.

Sincerely,



Carl Shiigi
IGR/CEQA Coordinator
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

Letter E2

E2-1

In response to the comment, the principal strategy of the General Plan is to provide a framework to accommodate future growth through redevelopment, infill, and mixed-use development in five commercial subareas of West Hollywood. Focusing additional development opportunities in these areas will reduce vehicular trips and promote walking and transit use, because these areas are already developed and adjacent to existing commercial and transit services.

Although the proposed General Plan does not propose a formal “Complete Streets Action Plan,” the Mobility Chapter of the General Plan contains numerous goals and policies that encompass components of a “Complete Streets Plan.” Examples of relevant goals include the following: develop a world-class transit system (Goal M-1); maintain and enhance a pedestrian-oriented City (Goal M-3); create a comprehensive bicycle network throughout the City (Goal M-4); and create an environmentally and financially sustainable transportation network that provides for the mobility and livability needs of West Hollywood residents, businesses, and visitors (Goal M-5). The environmental impact analysis pertaining to transportation impacts pursuant to implementation of the General Plan found that adherence to General Plan goals and policies would reduce impacts to intersection LOS impacts, congestion management program LOS impacts, and parking impacts to the degree feasible. It follows that implementation of pedestrian, bicycle, and transit improvements for a variety of users in West Hollywood as provided for in the General Plan would reduce congestion and future levels of greenhouse gas emissions due to reductions in vehicle miles traveled in comparison to a future “business as usual” mobility scenario.

E2-2

In response to the comment, the General Plan proposes a Transit Overlay, which designates sites close to major transit nodes, for which modifications to the General Plan’s permitted density and/or intensity, height, parking requirements, or other development standards may be considered when individual projects provide specified supplemental Transportation Demand Management programs and/or at such time as fixed rail transit to the City is funded and final design studies are complete. The Transit Overlay District (TOD) designation is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips. Additionally, the principal strategy of the General Plan is to provide a framework to accommodate future growth through redevelopment, infill, and mixed-use development in five commercial subareas of West Hollywood. Focusing additional development opportunities in these areas will reduce vehicular trips and promote walking and transit use, because these areas are already developed and adjacent to existing commercial and transit services.

E2-3

The commenter’s statement that the concept of growth being constrained to only two Transit Overlay areas appears to be consistent with the Southern California Association of Government’s preferred growth scenario, the regional blueprint planning program, is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E2-4

The commenter's statement that future developments in West Hollywood that are expected to generate a significant amount of vehicular trips will need a traffic study to analyze the impact on the state highway system is noted. As stated throughout the Draft EIR, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.



Bianca Siegl

From: Allegra Allison [savetara@sbcglobal.net]
Sent: Monday, August 09, 2010 3:17 PM
To: Bianca Siegl
Subject: Comments on the General Plan DEIR

Hi Bianca,
I'm afraid, I don't have time to properly organize my thoughts and concerns.
It's an overwhelming lot of information, which will be obvious if you read this.
so, here goes, anyway....pushing send...
Thank you!,
Allegra

Much of the draft General Plan appears to be a lovely fantasy. We will add an additional 18% to our overly dense population, build massive developments but because (not in spite) of the anticipated gridlock and additional density, everyone will ride the bus, bike & walk and we'll reduce traffic and improve everybody's quality of life. The DEIR feeds the fantasy and makes it appear that we can have it all, both ways.
It does not, realistically and adequately address enormous problems we face if the General Plan, as is, is implemented or accurately reflect the results of public input from the community outreach process.

I was one of the 125 stakeholders, a visionary and attended the GP public Fair. From the personal experience of my participation in the GP process, the resulting DEIR does not actually address the concerns and desires of the majority of residents of West Hollywood. The public process, if little else, has been down zoned. Much of the DEIR appears to be a rationalization of a pre-ordained plan.

From the focus groups conducted among residents and business people in the city:

- Preserving treed neighborhoods and avenues
- Maintaining a small-town feel ("more boutique, less shopping mall")
- Reducing traffic congestion
- Providing better connected transportation systems
- Increasing availability of parking
- Reviving eclectic identity that once defined West Hollywood
- Enhancing focus on the arts
- Creating international destination for shopping and entertainment
- Identifying and developing more open/green space
- Attracting a good mix of demographics, particularly with regard to age groups
- Respecting styles of existing architecture when developing/redeveloping properties

In the telephone survey (a quantitative study among 440 residents – 70% renters, 30% owners), residents were asked, unaided, "If the City government could change one thing to make West Hollywood a better place to live now and in the future, what change would you like to see?" The top five responses (again, unaided) were:

- Improve parking
- Not sure/can't think of anything

E3-1

8/9/2010

- Improve traffic circulation
- Reduce growth/development
- Provide affordable housing

E3-1
cont.

There is no distinction between subsidized low income housing and "affordable" housing.
 In fact, the DEIR states that public concern about affordable housing is that residents will loose *their* affordable housing due to new development.

E3-2

The most obvious element that does genuinely reflect the desires of the majority of residents during public participation is the cover of the Climate Action Plan. It also seems to reflect the DEIR.

The cover shows a lovely tree laden street with no traffic other than one car and one bus. The drawing shows a two and a three story building, an antique store sign, a café with two couples, a bicycle rider. In the foreground are three people walking down the street. It looks like a drawing of a small town in Iowa. It could possibly be a slice of Robertson Boulevard at 6AM. Maintaining a small town feel and preserving our urban village feel is one of main desires of the community. The reality of the General Plan in the entirety of West Hollywood is quite the opposite of the communities wishes. Of course, the entire city can't be Robertson. It can be developed reasonably. The cover of the CAP would not look so good with the proposed additional density, traffic and heights. Neither would the city.

E3-3

We seem to be presented with a false choice.
 If we don't want our neighborhoods overdeveloped then we must allow for "over" development on our major streets.
 In the meetings I attended, most of the community stated that we are dense enough and no more density needs to happen.
 We are built out.

E3-4

Mixed use has not worked in the city before. The General plan and the DEIR assumes it will. To what evidence?

The General plan weighs heavily on the transportation corridors "needing" to be built to accommodate the possible subway through the city and/or bus hubs.
 We will not have a subway built for the lifetime of this General Plan. Other than possibly at Santa Monica/LaBrea, there is *no* reason to zone for something that is not going to be implemented in the next twenty five years.
 The DEIR ignores that the subway fairy tale is a fairytale and that many unknown factors could come to life by the end of this GP's life.

E3-5

If the heights remain as they are now, utilizing bonuses would keep the development at a sensible height. There should not be triple bonuses allowed if we are to keep within the urban village vision of the public.

The transportation corridors, at first glance, appear to have reasonable heights. With triple bonuses those heights would become unreasonable. There would be no pedestrian friendly sidewalks if new developments get certain variances. Buildings which could go up to the maximum heights would also affect the light, air and quality of life of residents in buildings directly behind the developments. The DEIR does not address that issue. The DEIR does not address or consider the development which could happen in between those transportation corridors. It does not address that with development approved on a project by project basis, we will loose sight of the overall plan and

E3-6

overall cumulative effects of all of the proposed development including the already approved development in the pipeline. Suddenly, in the last couple of years, we've had developers trying to create a Specific Plan for their project. How many more will in the future? What about development agreements?
The possibility of these need to be considered.

E3-6
cont.

We adjusting the SCAG projections which show that we will have 64 new residents a year until 2035. The DEIR states that we could have 273 new residents a year. The new projections show that we will have almost 7,000 more residents by in the next 25 years. Considering the development currently in the pipeline, we will go well above those numbers.

E3-7

The DEIR states that focusing development and mixed use in the five sub-areas "will reduce vehicular trips" because these areas are already developed and adjacent to existing commercial and transit services. I would like that statement more fully explained.
I live within one Transportation Corridor at Fairfax/Santa Monica. In my neighborhood, other than the 7/11, the Mexican restaurant, laundry employees and other service industry employees, the majority WH residents in my neighborhood, do not use public transit. The majority of those service industry and other service industry employees already use public transit. Most of those (from personal knowledge) live closer to downtown L.A. with their families. They will likely, never be able to afford a unit/home/condo in West Hollywood or want one and will continue to commute on public transportation. Who does use our public transit? The current development, as is, already fulfills the needs of my neighborhood and it's transit users.

E3-8

TRAFFIC REDUCTION

The solutions and idea that the methods suggested for traffic reduction might work in Iowa but are unlikely in West Hollywood. This is Los Angeles. Carpooling is unlikely when most people's homes in relation to their workplace are widely scattered throughout the city of Los Angeles. City leaders have tried to encourage carpooling for years with few results. Why would that happen in the future? The DEIR represents that methods such as carpooling, discouraging commuter parking through pricing, subsidized transit, transit system improvements and telecommuting/alternative work schedules will be the solution to our traffic nightmare. The comparison cities do not reflect that a large portion of our residents work in the entertainment and similar fields, and have meetings, lunch's, errands etc. from downtown to the west side of Los Angeles to the valley.
At the same time as relying on discouraging car use, the DEIR states "Although the City itself is relatively compact and amenable to alternative transportation, it's regional context suggest that the automobile will be the dominant mode of transportation in the city as well".
How does the DEIR propose to discourage drive through commuters? These commuters have an enormous impact our traffic.
How would we "promote" walking and transit use and implement the traffic reduction measures with that outside commuter group?

E3-9

Only four people I know utilize public transit and are likely to continue. Two of those are city employees. I know two people who bike. One was hit by a car last week. I, myself don't use public transit or bike in the city. I don't foresee, that I ever will.
Expanding and creating safe bike lanes, throughout the city, is not an idea properly explored.

<p>Other public safety issues in and around proposed new development corridors and across the city are not adequately examined or flushed out. If we were to require a Sheriff's substation, where would that be located? What would the impacts of even more gridlock be on Fire and emergency access? What would those impacts be to people who live in the hills (Los Angeles) directly to the north of W.H.?</p>	<p>E3-10</p>
<p>The GP & DEIR does not honestly address the Guiding Principles such as Quality of Life. On one hand we say that quality of life is the most important factor. ES.1 states that numerous policies provide additional benefits such as cleaner air. 3.2-1 states that air quality will be so adversely severe that it can't be mitigated. This is certainly a factor adversely affecting the health and welfare of our residents. Still, the decision making body is asked to vote in overriding considerations to approve this project which will destroy the quality of life of our residents if the project is realized.</p>	<p>E3-11</p>
<p>The DEIR contains many results that appear to be pure speculation and/or make little sense. In the Greening section: Street trees removed due to new development would be replaced with ornamental plantings. How does that accomplish greening?</p>	<p>E3-12</p>
<p>We have one community garden and have been looking for opportunities for additional gardens for several years. Why are we to believe this is now a probability?</p>	<p>E3-13</p>
<p>Traffic congestion will be unmitigatable yet, results of proposed traffic mitigation measures proposed, appear to be simple speculation. A lot of weight placed on inspiration such as "inspiring residents and businesses to reduce GHG projections". Under Environment: "provide leadership to inspire others outside city limits". Inspiration is not a concrete measure and it's results can not be measured.</p>	<p>E3-14</p>
<p>Neighborhood character: To pretend that commercial development on our major streets is not a part of our neighborhood character doesn't make it so. We have few alleys and most commercial property directly abuts the neighborhood. Smaller development, sensitive to the neighborhoods, of three to five stories max, would meet the need of new development and not destroy the character of the city and it's neighborhoods.</p>	<p>E3-15</p>
<p>There is an LAUSD school for special needs children smack in the middle of the Fairfax/Santa Monica corridor. This school is not mentioned. Are these children to be sacrificed for future development as well as the bordering convalescent home filled with seniors? The projection of allowing neighborhood use of of LAUSD school playgrounds seems to have possibly more problems than could be handled. But, that idea is not flushed out.</p>	<p>E3-16</p>
<p>Diversity: My center city neighborhood is already diverse. With the addition of housing planned for the TC, it would be simply</p>	<p>E3-17</p>

overpopulated.
 The historic buildings (one designated, one not) on the southwest corner of Fairfax and Santa Monica would now be prime development property.
 Those historic buildings would likely be destroyed. How would this fit into preserving historic building stock?
 * just as a note: The Weisman house was built in 1914 not c1928 and the DEIR states.

E3-18

Economic development: With the proposed transportation corridors, the GP and the DEIR ignores the number of small businesses that will be lost due to new development. A displaced small business would not be likely to survive a displacement during construction or higher rents. This is not addressed. Yes we will have more revenue but the loss of current businesses should be a major concern.

E3-19

These are only a few of my concerns with others being aesthetics, water, transportation, the effects on surrounding communities, etc. I have not even has time to explore the possible consequences on my own property.

E3-20

Even though, I imagine there are creative ideas explored in the GP and the Climate Action plan, I have not gotten that far.
 Being a member of the public and not a professional, digesting the documents for comment is a daunting task.
 These documents took years to compile and we are limited to days to explore the ideas and consequences of the proposed project.
 There has been low availability of the General Plan and the DEIR to the public. At \$80 a pop, to obtain a copy is not affordable.
 To hang out at the planning counter to read the huge documents is unreasonable. Those of us with vision problems and most seniors would find it almost impossible to read on line (or at the Planning counter). In the last week, I learned that there is one copy of each that can be checked out for a couple of days and a wait.
 At Planning Commission last Thursday, Commissioner Altschul requested that more copies be made available to the public, but, the comments are due today, four days later. The lack of easy availability of the documents, makes it appear that there was little actual desire for public participation in this portion of the process.

E3-21

A fantasy of mine would be that every city employee, council member, commissioner, EIR and GP consultant, use public transportation, walk or bike to and from their home to their workplace, meetings, lunches and errands for two weeks. This is a perfect target group and would be easy to research. Even though the results would represent a stable workplace and not the lifestyle of of our many entertainment industry residents it would be an interesting study in relation to the the proposed project.

E3-22

Thank you for your time and attention,

Allegra Allison

1034 North Hayworth Avenue
 West Hollywood

8/9/2010

8/9/2010

Letter E3

E3-1

The commenter's concern regarding growth, density, and congestion pursuant to implementation of the proposed General Plan is noted. The commenter's concern regarding the level of incorporation of the community's feedback into the proposed General Plan and Draft EIR is noted. Refer to Section 2.1.1 of the Draft EIR and the Introduction and Overview Chapter of the General Plan for a discussion on the public outreach process and the use of community input throughout the General Plan update process.

E3-2

Section 3.11-2 describes the Southern California Association of Government's Regional Housing Needs Assessment, which projects a need for the construction of an additional 584 housing units within West Hollywood, allocated as follows: very low income (142 units), low income (91 units), moderate income (99 units), and above moderate income (252 units). In addition, the City's Inclusionary Housing Program mandates that 20% of new multi-family housing units be reserved for low and moderate income households, mandates a maximum sales price and rental rate for designated low and moderate units, allows density bonus for provision of affordable housing, and collects an in-lieu affordable housing fee for all residential development that does not provide the specified percentage of affordable units. Pages 3.11-7 and 3.11-8 of the Draft EIR analyze the displacement of housing that could occur with implementation of the General Plan.

E3-3

The comment is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E3-4

The commenter's statements regarding overdevelopment along major corridors and concerns that mixed-use development hasn't worked in the City are noted.

E3-5

Please refer to Response to Comment G18-2. The issues raised by the commenter address the merits of the proposed project and do not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E3-6

Impact to visual character of a site, and shade or shadow effects are addressed in Section 3.1.4 of the Draft EIR. This section acknowledges the potential for impacts associated with shade and shadow effects from future development. The Draft EIR concludes that these and other aesthetic impacts are less than significant at a program level of analysis. Individual development projects would be reviewed for project-specific impacts, including noise, during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval. Table 3-2 of the proposed General Plan allows only a 0.1 floor area ratio (FAR) bonus for green buildings; affordable housing is allowed a 35% FAR or density bonus per state law plus incentives, and a maximum height bonus of 10 feet is only allowed for residential mixed-use projects. The bonuses can be combined.

E3-7

Please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E3-8

Section 3.14.3 of the Draft EIR states: “the Mobility Element includes policies and programs to reduce vehicle trips....” This refers to Goal M-6 in the Mobility Element that refers to the City’s Transportation Demand Management (TDM) ordinance to require that all major new development and all employers of five or more employees located in a development of 10,000 or more square feet must submit a Trip Reduction Plan to seek to achieve a vehicle ridership goal of 1.5 people per vehicle. The strategies associated with this program are for employers to provide cash to employees rather than free parking so that they will have the choice of paying for parking or to use alternative transportation modes; install preferential carpool parking and for bicycles; and distribute information to encourage use of alternative transportation modes. Goal M-1 seeks to “develop a world-class transit system in West Hollywood” and contains policies to improve the quality and convenience of public transit services. While the Draft EIR acknowledges these goals, it does not conclude that traffic impacts would be fully mitigated. Section 3.14.4 of the Draft EIR identifies specific intersection improvements at Fountain Avenue at Fairfax Avenue, Fairfax Avenue at Santa Monica Boulevard, Santa Monica Boulevard at Gardner Street, and San Vicente Boulevard at Beverly Boulevard that would reduce delays at these intersections. Even with these improvements, the Draft EIR concludes that no feasible mitigation would reduce intersection impacts to less than significant and impacts would remain significant and unavoidable at the program level of analysis.

E3-9

The automobile is the primary transportation mode in West Hollywood. For example, according to the 2000 US Census, 75% of West Hollywood residents’ work trips are single-occupant vehicles. At the same time, West Hollywood’s geographic location, land use patterns, community values, adopted policy goals, and ongoing programmatic and financial commitments mean that a significant number of West Hollywood residents are able to commute to work by more environmentally sustainable and space-efficient modes—approximately 6% walk or bike, 5.5% take transit, 6% carpool, and 7% work at home. While the automobile will continue to be the primary transportation mode in West Hollywood for the foreseeable future, these data show that the City of West Hollywood’s past investments in TDM strategies (including transit, carpooling, bicycling, and walking) have been effective at allowing a significant portion of West Hollywood residents to travel for work (and presumably other trips) without the need for a car. The General Plan Update represents a comprehensive effort to (a) expand existing TDM programs and incentives that have previously been effective at reducing vehicle trips in West Hollywood and (b) to establish new ones that empirical research and the professional judgment of transportation planners suggest would be effective at reducing the rate of growth in vehicle trips in West Hollywood in the future.

E3-10

The Draft EIR concludes that there is no current need for a new Sheriff’s substation. It is beyond the scope of the current Draft EIR and would be speculative to identify potential impacts of an unplanned new station location.

Section 3.12.1 of the Draft EIR concludes that police and fire protection services and response times are currently adequate and, therefore, no mitigation is needed for improved response times. Section 3.12.5 of the Draft EIR identifies programmatic mitigation measures to improve

funding and services. Emergency response times are based on distance and staffing levels and, with sirens and lights deployed, would not be significantly reduced by traffic congestion.

As stated above, the Draft EIR concludes that police and fire protection services and response times are currently adequate, which would include adequate capability to respond to all areas outside the City that are within the service boundaries of local police and fire stations.

E3-11

In response to the comment, Section 3.2 of the Draft EIR provides a full analysis of the air quality impacts associated with implementation of the proposed General Plan. As concluded on pages 3.2-27 and 3.2-28, the project area lies in a nonattainment air basin and growth associated with proposed General Plan implementation will continue to contribute pollutant emissions in that nonattainment context. Implementation of the policies contained in the Infrastructure, Resources, and Conservation Chapter of the General Plan (Goal IRC-7) and the mitigation measures contained in the Draft EIR (pages 3.2-25 through 3.2-37) will reduce the impact to the extent feasible; however, this impact will remain significant and unavoidable. Because this impact was found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

E3-12

Page 3.3-7 of the Draft EIR has been corrected as following: New development would be required to replace any street trees and vegetation permitted for removal as a result of an individual development project with another tree or trees, of a type and quality to be determined by the City.

E3-13

The City Council recently authorized negotiations with the owner of a property on Detroit Street for use as a community garden.

E3-14

Mitigation measure 3.14-1 in Section 3.14 of the Draft EIR is not based on speculation as suggested by the commenter. The commenter's concerns regarding the use of the term inspiration is noted. Both the terms "inspire" and "inspiration" are used in the project objectives of the General Plan and the Climate Action Plan but neither is used for goals, policies, or programs of the proposed General Plan or mitigation measures in the Draft EIR.

E3-15

Please refer to Section 3.1, pages 3.1-8 and 3.1-9, of the Draft EIR for a description of potential visual character alteration and analysis of potential impacts pursuant to implementation of the proposed General Plan. As noted, the proposed General Plan includes a variety of policies regarding aesthetic improvements and visual character. Specific development projects proposed pursuant to the implementation of the proposed General Plan would be required to comply with the regulations, development standards, and design guidelines in the City's Zoning Code. In addition, the City will evaluate individual future projects and determine whether project impacts were sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

E3-16

Table 3.12-2 in the Draft EIR lists the schools that have a resident attendance area located within the vicinity of the City of West Hollywood's planning area in accordance with the Los Angeles Unified School District (LAUSD) Schools Enrollments and Capacities Report provided to the City of West Hollywood on March 31, 2010, by the LAUSD. Enrollment and capacity information was not included for schools that did not report any resident attendance, which may include affiliated charter schools or other LAUSD facilities. However, language has been added to page 3.12-6 of the Draft EIR to acknowledge that there are affiliated charter schools and other LAUSD facilities serving the planning area.

In response to the comment regarding the neighborhood use of LAUSD facilities, the possibility of Joint Use Agreements for recreational use of school grounds is described in Section 3.13.1 of the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E3-17

The commenter's opposition to the proposed project is noted.

E3-18

In response to the comment, the Draft EIR determined that implementation of the goals and policies of the proposed General Plan would not have a significant impact on historic resources at a program EIR level of analysis. In addition, the Historic Preservation Chapter of the Draft General Plan states:

The primary mechanism for the protection of cultural resources from demolition, inappropriate alteration, and neglect is through cultural resources designation programs. While listing in the National Register and California Register may dissuade demolition and inappropriate alterations, such listings also trigger environmental review through Section 106 of the National Historic Preservation Act and the California Environmental Quality Act. Designation under the West Hollywood Cultural Heritage Preservation Ordinance offers the strongest protection. Buildings may only be demolished if their preservation will result in economic hardship for the owner. Alterations to these cultural resources are reviewed by the Historic Preservation Commission.

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

The commenter's statement regarding the date of construction of the Weisman house is noted.

E3-19

The comment is noted. Pages 3.11-7 and 3.11-8 of the Draft EIR analyze the displacement of housing and people that could occur with implementation of the General Plan. Although the General Plan Draft EIR is not required to analyze the displacement of businesses, the City may wish to analyze impacts as subsequent development is proposed. The Economic Development Chapter of the proposed General Plan contains goals and policies to support existing businesses (see ED-3.2, ED-3.10, ED-3.11, and ED-6.2).

E3-20

Section 3.1 of the Draft EIR analyzed the aesthetic impacts of implementation of the proposed General Plan; Section 3.12 analyzed the water infrastructure and water supply impacts of

implementation of the proposed General Plan; Section 3.14 analyzed the traffic impacts of implementation of the proposed General Plan. Throughout the Draft EIR, the environmental impacts of implementation of the proposed General Plan to surrounding communities are analyzed at a level of detail appropriate for a programmatic EIR.

E3-21

In response to the comment regarding availability of the Draft EIR, General Plan, and Climate Action Plan, the documents were made available to the public on June 25, 2010, as follows: a copy of each document was available at the Planning Counter and at the City Clerk's Counter at City Hall; several copies were made available for loan from the City Clerk, digital copies were posted on the City's website, www.weho.org/generalplan; the Draft EIR was available at the West Hollywood Library; and copies of each document were available for purchase at a discount directly from the WeHo Copy Center. These copies will remain available for public use through the hearings regarding the General Plan.

Pursuant to CEQA Guidelines Section 15203, the 45-day public comment period for this Draft EIR began on June 25, 2010, and ended August 9, 2010 (comment letters must be postmarked by August 9, 2010).

E3-22

The comment is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4

Bianca Siegl

From: Elyse Eisenberg [eisenberg@earthlink.net]
Sent: Monday, August 09, 2010 4:41 PM
To: Bianca Siegl
Subject: General Plan DEIR Comments
Attachments: General Plan comments 2010 08 09.pdf

Dear Bianca,

The following are my comments on the General Plan DEIR. Thank you in advance for confirming receipt of this email in time for the comment deadline.

Summary

The DEIR does not seem to represent the extensive feedback that the City received through its various community outreach surveys, including the feedback from the General Plan Advisory Committee (GPAC) of the past year.

In the outreach surveys, community presentations, and during each session of the GPAC, as well as in the introductory comments of the Draft General Plan, the overwhelming feedback indicated that the residents feel the most critical issues facing the community are the constant traffic congestion throughout the city, lack of sufficient parking in both the commercial and residential areas and overdevelopment in both the residential and commercial areas. Furthermore, there has been consistent push back of increased height in both residential and commercial areas.

E4-1

The Draft General Plan and the DEIR does not realistically address those concerns. It is proposing the exact opposite direction of the city in every one of those areas! The proposed policies to mitigate the future proposals are not realistic and do not reflect how the city actually manages these ongoing and critical issues now. If the city does not really adhere to its policies for managing these issues now, why should it be assumed to be any different in the future?

This is totally against the guiding principles of a General Plan which is supposed to represent the wishes of a community. Furthermore, the city states that it wishes to maintain the quality of life for its residents. This would not be possible if the proposals of the GP are implemented.

The DEIR is supposed to address CEQUA issues in an honest manner. This DEIR does not do that. Many of the issues which are well known to currently have significant and adverse impacts are dismissed stating there are less than significant impacts and/or are not or will not be mitigated.

E4-2

The GP and DEIR also propose to exceed by FOUR TIMES the projected growth for the community by the SCAG. This is unconscionable for the densest city in California and in the US west of the Mississippi! It is also against what the community has expressed its direction of the city to be – to maintain its urban village feel, to support its neighborhood serving businesses, to have low rise – not high rise – development, and to relieve the traffic and parking insufficiencies.

E4-3

Also, by not following the guidelines of the SCAG, the regional planning organization, and by quadrupling WH's population and housing estimates – and necessarily its traffic impacts, this severely impacts the SCAG's ability to guide the rest of the region. What if every community quadrupled its growth projections? This is not acceptable and WH's plans should be – at a minimum – reduced to

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reflect the current projections, if not reduced further since WH has not proven it can manage the existing impacts of increased traffic.

E4-3
cont.

The DEIR has major inaccuracies and distortions in its traffic studies, enough so that a close look by a governing authority could and likely would invalidate the entire DEIR.

Any reference to future rail transit – and any proposals based on future rail transit – should be eliminated from the DEIR since it has already been determined that there is little to no chance of rail transit access in WH prior to 2035, the life of this document. Any statement contrary to this is not supported by facts in evidence, even with the City of LA’s 30/10 plans. Should the City of LA’s plans be realized and funds found, given the current economic conditions in the State of California and in US, it is still years away from breaking ground. Those plans to not include WH at this point, and there is no guarantee at this point it ever will, but most definitely, not during the lifetime of this General Plan.

E4-4

When all the historical EIRS for the community rate every intersection on the major arteries of Sunset, Santa Monica, Melrose and Beverly as having LOS F intersections throughout the day and especially at peak periods, to see charts without a single F rating and to even have A, B, and C ratings for both current conditions in areas where there have never been before and for projections on future conditions shows the extent of the errors in this report.

E4-5

It is a known and obvious fact that it is impossible to drive more than 2-3 miles an hour on any of these arteries for close to ten hours of every day, if not more. How does this support the ratings in the traffic tables? This section alone invalidates the entire DEIR and General Plan proposal and must be revised to reflect both the existing conditions of the City and the desires of the community as expressed consistently through outreach surveys, community presentations and as expressed by the General Plan Advisory Committee.

The DEIR repeats existing plans and policies as the intent to mitigate any impacts caused by a four-fold increase in density. These current plans have not done anything to prevent the problems as they exist now. In fact, the city consistently waives minimum requirements and allows variances on virtually every single project that comes before the city, whether in a residential or commercial zone. On what basis can it be assumed that things will be any different with a four-fold increase in population and housing?

E4-6

In summary, the current General Plan and DEIR does not reflect the wishes of the community and will likely not stand a CEQUA review if challenged.

The specific comments below are not complete nor are they comprehensive. However, as much as possible they reflect concerns that show inadequacy by the DEIR and GP and need to be readdressed in a manner that realistically reflects the community response and desires for the future of West Hollywood.

E4-7

Thank you.

Sincerely,
Elyse Eisenberg

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Chair, WeHo Heights NA
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West Hollywood Heights NA
 Representing WeHo above Sunset Blvd — Clark, Horn, Larrabee, Sherbourne & Shoreham
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General Plan Comments

1. ES.1 Project Summary. The summary states that WH will increase by 4,274 dwelling units and over 2.6 million commercial square feet, with an increase of over 6,800 people. This is an increase of over 18% in 25 years!

2. Considering that WH's population growth has had essentially a -0-% increase for the past 30 years, how can we assume an increase dramatically different from what has happened in the past? On what basis is this increase projected? WH has consistently increased at a rate dramatically lower than its surrounding cities of Los Angeles and Beverly Hills.

3. The SCAG projects an increase to 39,821 by 2035, an increase of less than 2,500 people and an increase in housing units to 24,940. This is a less than 7% increase, which is still high compared to historical records, but more realistic and sustainable.

4. Per the SCAG, WH's population was 35,703 in 1980. In 2008, it was 37,348. WH has had no or decreased growth in a similar time frame. During the same period, LA County has had significantly greater increases in its population, while during the same periods, WH has declined.

5. We are already the densest city in the Western US, more than three times as dense as the City of LA which surrounds us. We cannot handle an increase in density and sustain our quality of life which has already been severely compromised by the growth in the surrounding communities and the lack of supporting infrastructure on a County-wide basis. The infrastructure issues must be dealt with on a regional level in order to help this city. Because of chronic fiscal problems with the County and State, as well as the current economy, there is no realistic expectation that the proposed rail transit will be built during the lifetime of this GP. Therefore, we cannot continue to build out this city at the current pace in the blind hope that things will change.

6. If the City is using the guidelines of the SCAG for its EIR projections, they should be consistent and not attempt an unmanageable burden on the infrastructure of the City which is dependent on the Region's support for critical issues that affect WH, such as its Regional Transportation and Housing Plans.

E4-8

E4-9

3.1 Environmental Impacts & Mitigation Measures.

7. Aesthetics. Scenic Vistas. Discusses that taller structures will block or obscure existing scenic views and no mitigation is required and the impact is less than significant. Although it states conditions would be imposed via the Sunset Specific Plan (SSP), since the city has been issuing Statements of Overriding Consideration for every project that impacts these views, the SSP carries no weight and in fact, there will be significant impacts. Mitigation should be required.

E4-10

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| <p>8. Visual Character. Because of the amount of development that has occurred in the city since 2000, the visual character of the city has changed dramatically. More will only increase the level of impact and mitigation should be required.</p> | <p> E4-11</p> |
| <p>9. Light, Glare & Signage. Almost every commercial development that has recently been proposed has requested new signage permits, most including new forms of lighting and animation. This will cause a significant impact and mitigation should be required.</p> | <p> E4-12</p> |
| <p>10. Shade & Shadow. Taller structures are anticipated to be built causing an increase in mass and height, intensifying shade and shadow impacts. This is a significant impact and mitigation should be required.</p> | <p> E4-13</p> |
| <p>11. Cultural Resources. Historical Resources. The City has a proven track record of a willingness to destroy its historical resources in favor of new development, as evidenced in the Save Tara case. This is a significant impact and mitigation should be required.</p> | <p> E4-14</p> |
| <p><u>3.5 Geological Resources.</u></p> | |
| <p>12. Fault Rupture, Ground Shaking, Liquefaction and Ground Failure, Earthquake-Induced Landslides. The EIR states that Future development allowed under the General Plan would expose additional people and structures to hazards. How could this possibly be a less than significant impact with no mitigation required? The City is willing to place in further jeopardy the lives of its citizens?</p> | <p> E4-15</p> |
| <p>13. The City has a proven track record of ignoring the potential for harm caused by residential and hotel developments within a very close proximity of known faults, as proven by their willingness to consider the Sunset Time project on the current House of Blues site which has a known and active fault running through the center of the property. This is a hotel and residential development with over 200 rooms that will be built a mere 50 feet from the fault which has prevented a previously entitled parking structure from being built. It is preferable for our citizens to sleep so near to a major fault, rather than cars in a parking lot? This is a significant and major adverse impact and mitigation should be required. It is terrifying the incredible disregard for the future residents and visitors of this site.</p> | <p> E4-16</p> |
| <p>14. Soil Erosion or Loss of Topsoil, Soil Hazards. The EIR states that the northernmost portion of the City, adjacent the Hollywood Hills – namely Sunset Blvd, is susceptible to soil erosion due to the hilly topography. Future development allowed under the General Plan would expose additional people and structures to these problems. This is a significant and major adverse impact and mitigation should be required.</p> | <p> E4-17</p> |
| <p>15. Hazardous Materials within 0.25 Mile of Schools. The proposed land uses in the General Plan include commercial and mixed-use designations within 0.25 mile of schools. However, the California Department of Education enforces school siting requirements, and new facilities would</p> | <p> E4-18</p> |

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not be constructed within 0.25 mile of facilities emitting or handling materials. But the City chooses to allow these proposed land uses under the General Plan? This shows further disregard for its residents. These are significant and major adverse impacts and should not be allowed.

E4-18
cont.

16. Conflict with an Adopted Land Use Plan. The document states that implementation of the General Plan may impact the existing land use plans, policies, and regulations that have been adopted to avoid or mitigate an environmental effect including the SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles; and the City of West Hollywood Municipal Code, Specific Plans, and Redevelopment Plan. As WH is already the densest and arguably the most congested city in California, as well as in the US west of the Mississippi, why would the City push for increasing density against the SCAG Goals and Principles? Isn't this counter to the State's demand to manage the population of this State and a major adverse impact? How can this be desirable, allowed and approved?

E4-19

3.11. Population and Housing.

17. Induce Substantial Population Growth. The SCAG has a dramatically lower forecast for population growth for the city – 6.6% versus over 18%. As the quality of life has already dramatically decreased for the current residents in the past decade, why would the City push for an increase in density and the subsequent impacts such as more congested traffic and even further lower the quality of life? How and why is this acceptable? This must be mitigated.

E4-20

3.12. Public Utilities and Utilities.

18. Water Supply. It is well known that the availability of existing water supply is strained beyond capacity and current mitigation measures do not satisfy this ongoing and increasing need, how does the City meet the ability to increase our demand when the State cannot? How can this be desirable, allowed and approved? This must be mitigated.

E4-21

19. Energy. The EIR states that this increased demand may exceed the capacity of these existing facilities and result in the need for new, upgraded, or expanded facilities. Will place a further financial burden on the existing property owners and not renters, as recently has happened with the increase in sewer rates? With a City that is less than 24% owners, this places an unfair burden on a small part of the population to cover over 75% of the rest of the City? How is this fair? This must be mitigated.

E4-22

3.13. Parks & Recreation.

20. Recreational Facilities. Throughout the EIR, it is stated that the City is fully built out and has no capacity for further green space or parks. Yet this section states that the City will conduct a study to identify current, potential, and new parks and open space opportunities in the City, including both public land and private land that can be purchased for open space. As part of the study, prioritize open space opportunities based on community need. Yet there are already several opportunities that have presented themselves to the community and the City has done nothing, as witnessed with the Norwich Community Garden that is has been used by the community for decades and is available for purchase. The City has rejected this opportunity. There remain many other properties around the City that are vacant, available for purchase, and can be developed into public and green space. The City has no active program to pursue these opportunities, nor is there a budgetary line item dedicated to these purchases. There should be a dedicated program to

E4-23

purchase and develop properties for the benefit of the current residents.

- | | |
|--|------------------------|
| <p>21. The EIR states that the City will review existing funding mechanisms for acquiring additional park land and open space. There are no existing funding mechanisms for this purpose. The City frequently negotiates side Development Agreements when developers pursue projects that wish to circumvent current code requirements. Substantial sums are paid to the City for this purpose and are put into the General Fund. Since these developers are often eliminating existing open space and existing green space and usually dramatically reduce or totally eliminate what little open and green space this city has, the sums paid could and should be dedicated to a Parks and Green Space purchase program.</p> | <p>E4-23
cont.</p> |
| <p>22. 3.13-7. The EIR states that the City will create an incentive program for developers that includes pocket parks, increased open space and other new open space as part of programming for new development. This is an excellent idea and should be implemented immediately. There is no need to wait for adoption of this General Plan.</p> | |
| <p><u>3.14. Transportation & Circulation.</u></p> | |
| <p>23. The City expects a dramatic increase to the resident population, number of employees, and number of visitors to the City. This will result in overwhelming increases in traffic volumes and the need for additional parking, yet the City states that a few left turn signals at a few major intersections will mitigate impacts. These intersections are already so severely congested that traffic is at a frequent standstill throughout the City. If these mitigation measures were adequate, why haven't they already been implemented? It is incredible and without reason that an increase in population, employees and visitors is sustainable on any level.</p> | <p>E4-24</p> |
| <p>24. Congestion Management Program Level of Service. The EIR states that the implementation of the proposed General Plan would exceed LOS standards established by a County congestion management plan, and that no feasible mitigation exists. That is incorrect. It is possible to mitigate these impacts by not allowing an increase in density through the creation of additional housing, hotel and offices. Why would this City ignore or circumvent the plans of the County, when those plans must have been studied at great length and at great cost and considered not just the City of WH, but also its surrounding communities? We are not an island, but must work with our neighboring communities for the benefit of all.</p> | <p>E4-25</p> |
| <p>25. Emergency Access. The EIR states that intersection LOS impacts will generate traffic congestion at intersections that will also have the potential to impede emergency access, and that no mitigation is required. Are the lives and safety of this City's residents valued so little and with such wanton disregard? This can and should be mitigated.</p> | <p>E4-26</p> |
| <p>26. Parking. The EIR states that changes in the number of residential units, number of employees, and number of visitors that would affect parking needs and that no mitigation is required. This is contrary to the existing conditions in the City where there is already inadequate parking for residents and visitors in residential as well as commercial areas. Parking is currently in a crisis situation. The current codes allow for reduction in parking requirements as bonus incentives, further reducing the availability of parking for residents and visitors. There needs to be an</p> | <p>E4-27</p> |

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increase in parking requirements for new developments and an active program to provide more public parking in both residential and commercial zones throughout this severely under-parked city. The lack of sufficient parking greatly impacts small businesses and neighborhood serving businesses, which we are losing at a rapid rate due to the encroachment of new developments.

E4-27
cont.

27. Table 3.0-1. Land Use, 2008, page 88 & 248 of the GP, shows that only 1.4% of the City is dedicated Park space and only 1.3% is dedicated Parking, including Private Parking, when over 65% of the city is either Residential or Commercial. There is twice as much Vacant space (2.6%) as there is Park or Parking space. Why doesn't the City pursue purchasing these vacant properties to develop and increase our Green Space and create additional Parking opportunities for its overburdened and stressed residents? The City can well afford these purchases from its rich coffers.

E4-28

28. Table 3.8-2. City of West Hollywood Development Changes, page 254 of the GP, shows plans to increase the City's housing units by over 4,000 units, the commercial area by over 2.6 million square feet, and a population increase of almost 7,000 people – all in an area of only 1.9 square miles!

E4-29

29. Considering the population has been virtually flat for the past 20 years, and the City is fully built out and already the densest and likely the most congested city in California, the impact on the quality of life and the resources – including water, energy and emergency services, is a terrifying proposition for the current residents who have become increasingly vocal and distraught and the impact of just the past few years which has already witnessed an increase of almost 1,000 new housing units. The current infrastructure of the City simply can't handle this increase and these proposals must be mitigated.

E4-30

30. The Sunset Strip currently has existing entitled and/or pending but not yet approved over 1.5 million square feet of commercial space proposed but not yet built. Several more very large projects are in the pipeline. Per the Sunset Specific Plan, over 3 million square feet already existed in 1996 and a capacity of 4.5 million sq ft allowed. The Millennium and several other projects have been built since then. We are likely at capacity now just on Sunset Blvd, a street that has much less capacity than Santa Monica or La Brea to handle this increased density. Every intersection of Sunset is rated LOS F now and is gridlocked to such an extent that a recent EIR report's traffic analysis said that the traffic moved so slowly most of the day – less than two miles per hour, it was impossible to appropriately analyze. It is with reckless and wanton disregard to consider an increase in density unless and until the supporting infrastructure throughout the County has mitigated the traffic impacts.

E4-31

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles

31. In Section 3.8, RTP G51-4, the EIR discusses establishing a transit overlay district to support increased density in sites close to transit nodes such as a future rail transit system and other forms of transportation. However the chances of a rail system being built during the life of this Plan is slim to none, and current state funding is causing a reduction in existing public transport systems in these same areas, as evidenced in the recent attempt to cancel the Dash line on Fairfax, which was only barely preserved – but for who knows how long, given the current fiscal health of this State? This is misdirection by the Plan and will wreak further havoc with our traffic congestion.

E4-32

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|--|-------|
| 32. RTP G5. The table also discusses increasing bicycle network throughout the City. This is not possible along Sunset Blvd as the road is too narrow, always too congested, and cannot be widened to accommodate bicycle lanes. There are very few streets in the City where this network can be expanded. It is folly and misdirection for the EIR to encourage this fallacious goal. | E4-33 |
| 33. Section RTP G6. Encourages land use and growth patterns that complement the transportation investment and would allow modifications to - among other things - parking requirements because of the presumed reduction in need for auto trips. | E4-34 |
| 34. WH is a destination city with many entertainment venues, including hotels, restaurants and night clubs, and which attracts thousands of people from outside the City throughout the course of each day. While the residents of the City may be encouraged not to use their cars, where are their visitors and the city's thousands of daily guests supposed to park? There are no plans by the city for an INCREASE in public parking facilities to accommodate non-resident visitors, or residents who wish to visit other parts of WH, or even those who need a car for near by errands since we must assume that cars will be used for grocery shopping, going to the cleaners, and other purchases where a long walk with heavy items is not feasible. Are we to assume that the residents of WH live in a vacuum and all their friends and family reside within walking distance? | E4-35 |
| 35. Principle 1: Increasing the region's mobility. GV P1.1-4. Encourages transit-oriented development and investments. This section also discusses modifications to parking requirements. As in the previous paragraph, these policies are ill-advised and specious in their reasoning and not based on a realistic and common sense approach and ignores the existing situation throughout the surrounding communities, the County and the State. | E4-36 |
| 36. Principle 3: Enable prosperity for all people. GV P3.1-4. Support local and state fiscal policies that encourage balanced growth. Although an increase in Affordable Housing is supported by the City, and developers have shown a distinct preference for building more luxury housing throughout the city, there are no incentives, policies or other encouragement for people who fall in between those economic extremes. At the expense of those two demographics, a wide scale destruction of work force housing has occurred. Almost 1,000 Rent-Controlled and work force homes have been demolished in the past few years, none of which has been replaced, and may be the reason the City's population has declined in recent years. | E4-37 |
| 37. Principle 4: Promote sustainability for future generations. GV P4.1. Although the EIR states that the City's Land Use and Urban Form Element and the Parks and Community Facilities Element contain policies and programs to enhance, increase, and expand parks and recreational opportunities in the City, that is in fact not the case. There are no substantive policies in place to purchase additional parks and green space for the community. There are no dedicated line items in the budget for this purpose. This should be a line item in the annual budget to support this very worthy goal in for a city with likely the least amount of public green space per capita in California. | E4-38 |
| 38. GV P4.2-5. Unlike some other cities in our county, WH does not have mandatory green building | E4-39 |

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- | | |
|--|------------------------|
| <p>policies in place. This is something that can and should be implemented to further the goals of the Region.</p> | <p>E4-39
cont.</p> |
| <p>39. Section 3.8-13. States that upon adoption of the proposed General Plan, the City will review its currently adopted specific plans and redevelopment plan and revise these where necessary to reflect changes made in the proposed General Plan, such as land use, density/intensity, design, and development. It also state that it is not anticipated that the City's specific plans would need to be revised.</p> | <p>E4-40</p> |
| <p>40. Every developer who has a project pending on the Sunset Strip has asked for variances from the SSP which are consistently granted, giving the SSP no teeth. What good is a Specific Plan if it isn't being followed? Much research and study went into the original SSP. It should be followed, and variances should not be granted as a matter of course or because a side development agreement with money paid to the City General Fund compromises the integrity of both the document and the City's ethics. At a very minimum, this money should be dedicated to the purchase of additional Park & Green Space for the City's residents.</p> | <p>E4-41</p> |
| <p>41. Page 3.8-14. States that implementation of the proposed General Plan would be consistent with applicable adopted plans and policies for the City of West Hollywood.</p> | <p>E4-42</p> |
| <p>42. The proposed GP is filled with contradictions to the policies of the City and to the direct responses of a majority of the residents who provided input throughout the GP process. The majority results of all the surveys show that parking, traffic and increased density are critical problems of the community that are not being addressed. A common sense review of the policies of the proposed GP and the supporting EIR show that these issues are not being appropriately addressed and the problems generated by these new policies will increase substantially.</p> | <p>E4-43</p> |
| <p><u>Table 3.11-2. SCAG Growth Projections, City of West Hollywood</u></p> | |
| <p>43. According to SCAG projections, the population in West Hollywood will increase to 39,821 in 2035. Under the proposed General Plan, however, the population at build out could increase to a total of 44,182, which is a difference of 4,361 over SCAG projections.</p> | |
| <p>44. WH's growth from 2000-2008, an era of rampant new construction, has been only 4.6%. That is almost half the growth rate of the City of LA. For a city that is already the densest in the Western US, a city that is acknowledged by this report to be fully built out, and a city that has its residents screaming for relief from constant traffic congestion and lack of parking, it is unconscionable that we would attempt to further burden our limited resources and exceed the growth projected by an advisory regional planning organization.</p> | <p>E4-44</p> |
| <p>45. This is most certainly an adverse and significant impact and one that can be mitigated if the City would limit the amount of density that could be created, if it would revise its policies so developers aren't encouraged to request variances, and those requests are not routinely granted.</p> | |

Table 3.11-2. SCAG Growth Projections, City of West Hollywood.

- 46. According to the 2008 RTP projections, the number of households within the City limits will increase at a rate of 1.1% to 24,940 by 2035, a net increase of 1,820 households over the 2000 U.S. Census baseline or a rate of 2.0% annually. Under the proposed General Plan, however, the population at buildout could increase to a total of 44,182, which is a difference of 4,361 over SCAG projections.
- 47. WH is projecting an increase in households FOUR TIMES that projected by SCAG.
- 48. This is unconscionable. It is most certainly an adverse and significant impact and one that can be mitigated if the City would limit the amount of density that could be created, if it would revise its policies so developers aren't encouraged to request variances, and those requests are not routinely granted.

E4-44
cont.

3.11.2 REGULATORY SETTING. STATE REGULATIONS.

- 49. Regional Housing Needs Assessment. The report states SCAG's RHNA for the planning years January 1, 2006, through June 30, 2014, projected a need for the construction of an additional 574 housing units within the City of West Hollywood, allocated as follows: very low income (141 units), low income (90 units), moderate income (93 units), and above moderate income (250 units). Construction of new housing is not mandated by the RHNA, which is intended as a planning tool and a guide to an equitable distribution of housing.
- 50. It has recently been acknowledged by City Staff that WH has already exceeded its requirements for total housing either in actually built or entitled projects, most of which has been designated as luxury housing. By exactly how much have we exceeded our allocation? There are several large scale developments have recently gone or are currently going through the entitlement process, including Movietown Plaza (370 units; 294 market rate + 76 low and very low income) and the two Monarch projects (447 units; 371 market rate + 76 low and very low income), which alone will add 817 units to the city. Together with other approved and entitled projects, WH has already added in the past two years more than twice as many housing units as was required for almost a ten year period!
- 51. All of this is without any support to the existing infrastructure or mitigating traffic measures that have relieved traffic congestion in any discernible amount. Furthermore, it can be argued that there is insufficient parking available in all of these developments, further adding to an existing problem in this area. Again, it is unconscionable that the city intends to further quadruple the housing recommendations from SCAG's planning. These are severe, significant and adverse impacts and need to be mitigated.

E4-45

3.11.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

- 52. The impact of the proposed project related to population and housing would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the CEQA Guidelines:
 - i. Induce substantial population growth in an area, either directly (for example, by proposing

E4-46

- new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- ii. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- iii. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

E4-46
cont.

53. It can be fairly and reasonable argued that the proposal by the City to quadruple the amount of housing over SCAG’s projections is a significant threshold and should be designated as such. Furthermore, since the City is not required to even achieve the minimal projections by SCAG, it can certainly be mitigated.

3.11.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

54. According to SCAG projections, the population in West Hollywood will increase to 39,821 in 2035, an approximate 6.6% increase from 2008. Under the proposed General Plan, however, population could increase to 44,182, an increase of about 18.3% over 2008 at some point in time after 2035 based on the capacity of the land use plan. Under the proposed General Plan, housing units are projected to increase by more than 4,274 or approximately 17.4% from 2008 to 2035.

E4-47

55. It is unconscionable that the City would propose a General Plan that TRIPLES an increase over projections by SCAG. This is a severe, significant and adverse impact and need to be mitigated.

56. The proposed General Plan states that it anticipates and plans for this growth through numerous policies aimed at reducing the impacts associated with population and housing unit growth in the City. In particular, the Infrastructure, Resources, and Conservation Element contain specific policies to manage future growth including the following:

- i. Supporting city-wide access to water, gas, power and telephone and other telecommunications services.
- ii. Requiring development projects and redevelopment or remodel projects to provide a “will serve” letter or similar proof of the availability of necessary infrastructure and services by outside service providers during the permit review process.
- iii. Requiring development projects to be responsible to pay for their share of the costs of improvements to water, gas, power and other utilities that they necessitate.
- iv. Sharing information, on an ongoing basis, on projected growth in jobs and housing with service providers and regional agencies to ensure that there is sufficient infrastructure capacity to support future population growth in the City.
- v. Not allowing for the construction of new development until it is demonstrated that there will be sufficient water to supply the development, as determined by the service provider.

E4-48

57. And further states that impacts from population growth are considered less than significant. No mitigation is required.

58. Stating that the projects must provide proof of availability is absurd in the extreme. The hypocrisy and cynicism that are in these policies are incredible and appalling. The existing infrastructure is inadequate to provide these resources, as evidenced in the constant power outages and water shortages and the demand to reduce the current level of need.

E4-49

59. These policies do not remotely address the regional problems with infrastructure. To say these impacts are less than significant are unconscionable and a dereliction of responsibility by the City towards its existing residents. These most assuredly are severe, significant and adverse impacts and need to be mitigated.

60. The proposed Land Use and Urban Form Element of the General Plan contains numerous goals and policies to ensure that infill and redevelopment activities in the commercial subareas and throughout the City are compatible with adjacent development, including single-family residential areas. The Land Use and Urban Form Element, in particular, contains the following policies:

- i. Requiring development along commercial boulevards to employ architectural transitions to adjoining residential properties to ensure compatibility of scale and a sense of privacy for the existing residences.
- ii. Requiring new buildings to incorporate combinations of setbacks, scale transitions, and buffers, as appropriate, in relation to existing residential areas to maintain physical compatibility between new and existing buildings.
- iii. Requiring new buildings to incorporate combinations of setbacks, scale transitions, and buffers, as appropriate, in relation to existing residential areas and to maintain physical compatibility between new and existing buildings along Santa Monica Boulevard.

E4-50

61. Although these policies currently exist, they are not adhered to, as evidenced with the constant protest of by surrounding residents to almost all developments that have been proposed to the City in recent years, and which have been approved with limited to no mitigation on behalf of affected residents. Again, the hypocrisy and cynicism of the City to put forth these policies as though they intended to actual implement them, is appalling in the extreme.

62. Development allowed under the proposed General Plan absolutely has displaced substantial numbers of housing and people, as evidenced in the numbers which show that the City has lost over 1,000 households in recent years. These are absolutely severe, significant and adverse impacts and need to be mitigated.

E4-51

3.11.5 MITIGATION MEASURES

63. The EIR states that no mitigation is required because population and housing impacts are less than significant at the program level of analysis.

E4-52

64. For all the reasons stated previously, this is a false statement and should be redacted. The population and housing impacts are definitely adverse and significant and need to be mitigated.

3.12 PUBLIC SERVICES AND UTILITIES

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65. Water Infrastructure Impact. Pursuant to section 15145 of CEQA, the specific environmental impact of constructing new water infrastructure in the City of West Hollywood cannot be determined at the General Plan level of analysis because no specific water infrastructure construction projects are proposed as part of the General Plan, yet states that impacts are less than significant.
66. If WH increases its housing and population at the rate projected, water infrastructure should be the very essence of concern. It is obvious that this will cause a significant impact, which should be reflected in the EIR.
67. Water Supply Impact. Development of land uses by 2035 pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. The increase in residential and nonresidential development would result in an increase in the need for additional water supply and water pressure for fire flow (particularly for mixed-use and multi-story development), which could strain water supply sources. This is a potentially significant impact and needs to be addressed at this time.
68. The EIR states that development of land uses by 2035 pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. The increase in residential and nonresidential development would result in an increase in the need for additional water supply and water pressure for fire flow (particularly for mixed-use and multi-story development), which could strain water supply sources.
69. Common sense dictates that this is a definitely a significant and adverse impact, not potentially so. It needs to be mitigated.
70. The plan states: Water demand assumptions are based on SCAG projections of future population. The UWMP assumes that the City of West Hollywood would have approximately 39,609 people in the year 2030 (no projections were done for 2035). The proposed West Hollywood General Plan indicates that the City of West Hollywood would have approximately 44,182 people in 2035. Therefore, a conservative estimate indicates that the UWMP does not account for approximately 1,020 people ($44,182 - 39,609 = 4,573 * 22.3\% = 1,020$). Based on the actual highest water use from 2006 through 2009, at 143 gpcd (to ensure a conservative estimate of demand), approximately 145,450 gallons or 0.45 AF per day, or 163 AFY additional water supply would be needed to serve population growth in West Hollywood that was not anticipated in the Beverly Hills UWMP.
71. That the BH UWMP has not anticipated such an increased demand of the water supply by WH is a significant and adverse impact and must be mitigated. How can we be assured that BH will increase its supply in order to meet the WH demand? Who would be paying for the increase? Will the burden be on the current residents, as has been happening in recent years when homeowners are being charged an increase based on their usage or inability to cut back? These costs are not passed on to renters, so the burden is borne by property owners, who own only 20% of the housing. This is an unfair burden on a minority that is not shared by everyone.

E4-53

E4-54

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- 72. Furthermore, uncertainty exists for the long-term supply of water to the City of Beverly Hills and for all of California. Uncertain climate change impacts and variable hydrology and environmental issues in the Bay-Delta could reduce the quantity of water that the SWP delivers to MWD, and in turn to the City of Beverly Hills water service area (including the City of West Hollywood), among other issues. And the Beverly Hills UWMP did not address the potential effects of climate change on water supply.
- 73. This is frightening. It is a significant and major adverse impact and should be mitigated.

Table 3.12-10. Projected Water Demand LADWP Water Service Area (AFY)

- 74. The EIR states: A conservative estimate assumes that the LADWP UWMP does not account for any growth in the City of West Hollywood associated with implementation of the proposed General Plan. At 155 gpcd, approximately 823,050 gallons or 2.5 AF per day, or 922 AFY of additional water supply would be needed to serve population growth in West Hollywood that was not anticipated in the LADWP UWMP! The LADWP UWMP would not account for approximately 6,834 people!
- 75. If neither the BH UWMP nor the LADWP have accounted for ANY growth in WH, much less projects FOUR TIMES what the GP is proposing, this is a reckless disregard to the residents of this City. This is a major adverse and significant impact and must be mitigated.

E4-54
cont.

Electricity and Natural Gas

- 76. The increased population resulting from implementation of the proposed General Plan will create demand for additional electricity and natural gas as well as transmission infrastructure. This increased demand may exceed the capacity of these existing facilities and result in the need for new, upgraded, or expanded facilities.
- 77. Many of the Infrastructure, Resources, and Conservation Element goals and policies to reduce the total and per capita amount of energy used in the City, such as energy auditing programs, green building techniques, the purchase of solar water heaters, the development of solar energy production systems on private property, and increasing the minimum standards for Green Building Certification, should be mandatory, not voluntary, for all new developments. This will help mitigate the significant and adverse impacts of the increase in new housing. Unless this is done, the impacts to the energy infrastructure would be significant and adverse.

E4-55

E4-56

3.12.6 SIGNIFICANCE AFTER MITIGATION

- 78. The EIR states: Implementation of the proposed General Plan would have a less-than-significant impact on the City's storm drain system, schools, the library, electricity and natural gas, water infrastructure, wastewater, and solid waste.
- 79. Based on the previous sections, this statement is FALSE and must be changed to Significant and Adverse Impacts.

E4-57

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3.13 RECREATION

- 80. Based on the population of West Hollywood in 2008 of 37,348, the current park acreage equates to 0.41 acre of parkland per 1,000 persons. The City does not have an adopted park standard in terms of park acreage per resident. The State Quimby Act recommends a park acreage of 3 acres per 1,000 population.
- 81. The lack of adequate park acreage contributes to the stresses of living in such a dense city. The proposed increase in population and housing without a dedicated program to purchase additional land for the express purpose of expanding the City's green space as part of the General Plan shows a lack of consideration for the residents. This is a significant impact and must be mitigated.
- 82. Section 19.64.020 of the West Hollywood Municipal Code requires applicants for new development within the City to pay Quimby Act/Public Open Space fees for residential and nonresidential development in the amounts set by the City's Fee Resolution.
- 83. The City has been collecting these fees for many years. Where has this money been going? If it has been diverted to the City's General Fund or Reserves, it should be redirected to a Parks & Green Space Acquisition Program with a dedicated Line Item in the City's Annual Budget expressly for this purpose.

E4-58

3.14 TRANSPORTATION AND TRAFFIC

- 84. Figure 3.14-1. Please note that in the WeHo Heights neighborhood, the only streets in WH above Sunset, the following streets are missing from the map or mismarked: Shoreham and Sherbourne are missing from the map, Clark is mislabeled Ozeta Terrace, and Ozeta Terrace is not labeled at all.
- 85. Table 3.14-4. Existing Levels of Service City of West Hollywood General Plan Update Study Intersections. It is curious that none of the Sunset Blvd and Santa Monica Blvd intersections in this table are rated LOS F, which has been the case on every previous EIR submitted to the City in recent years.
- 86. A recent EIR for the Sunset Doheny Hotel project stated that because of the traffic, it was impossible to determine even the minimum traffic flow because the traffic was too slow at under 2mph. The current table appears to be a major subversion of the actual traffic congestion on the streets and undermines the validity of the entire EIR, especially the capacity for the City to handle any increase in population and housing.
- 87. From pages 501-502 of the PDF file of the Sunset Doheny EIR Volume II Appendices B-H, Under Traffic & Circulation, Existing Levels of Service, Table A states that of the 19 signal-controlled intersections studied during the existing weekday AM and PM Peak Hours, the LOS for 15 of those intersections are rated LOS E or worse. According to field observations, traffic flow along Sunset Blvd is currently operating at over-saturated, stop-and-go conditions during the PM

E4-59

E4-60

E4-61

E4-62

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peak period. The current Critical Movement Analysis (CMA) methodology is unable to account for the over-saturated conditions observed along Sunset Blvd. Therefore, six intersections along Sunset Blvd. are assumed to operate at LOS F during the peak PM period. The following three intersections operate at LOS F during peak periods: Sunset & Doheny, Santa Monica & San Vicente, and La Cienega & Holloway. Doheny & Elevado are operating at LOS C and LOS D in the AM peak periods, respectively.

E4-62
cont.

88. Table B states that 15 of the 19 intersections operate at LOS D or worse on the weekends. So the General Plan DEIR;s Figure 3.14-2 Existing (Year 2008) Intersection Levels Of Service is clearly in error when these same intersections are rated LOS A-D.

E4-63

89. It is no doubt certain that similar conflicts in LOS ratings can be found in the EIRs for recent projects affecting Santa Monica Blvd.

90. As shown in Figure 3.14-3 Daily Segment Volumes – Existing over 50,000 cars per day travel along Sunset and Santa Monica Boulevards. As has been well publicized, Sunset hasn't been expanded – and doesn't have the capacity to expand – since it was constructed in the 1930s. It cannot handle its current traffic load, much less an increase of over 3,000 more cars per day. In some of the projections, the expectations are that there will be over 60,000 cars per day on these same streets.

E4-64

91. This traffic analysis needs to be corrected to reflect actual conditions, and realistic future conditions which the DEIR does nothing to mitigate the impacts that would occur with the addition of on the average over 3,000 more cars per day, as stated in Table 3.14-5. No Project Scenario and Proposed Project Scenario Forecast Roadway Segment Volumes.

E4-65

92. This is a gross dereliction of responsibility by the city and should be sufficient grounds to invalidate the entire DEIR and General Plan.

Vehicle Miles Traveled

93. The DEIR states: VMT measures the miles traveled in and to the City of West Hollywood. For VMT calculations, 100% of the mileage is counted for trips that begin and end in the City. For trips to or from the City to or from other areas, 50% of the mileage is counted. Cut-through trips, which neither begin nor end in West Hollywood, are not counted in VMT calculations. Current daily VMT for the City is 1,503,700 miles per day.

E4-66

94. The current daily VMT is already at 1.5 million miles per day – in a city of 1.9 square miles! How can this city handle any sort of increase in population, traffic or density? It cannot be done and maintain even the current level of quality of life. The DEIR states that some areas will see an increase to over 3 million miles per day! This cannot be allowed.

3.14. Vehicle Trips

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- 95. The DEIR states: VT measures the total number of vehicle trips made in the City of West Hollywood (including trips into and out of the City, but excluding cut-through trips). Existing VT in the City is 355,000 trips per day. E4-67
- 96. 355,000 trips per day – not counting cut-through trips - in a city of less than 34,000 adults! The City cannot handle an increase in population.

3.14. PEDESTRIAN AND BICYCLE FACILITIES

- 97. It is not realistic to expect an aging population, as is currently the case in WH, to be expected to walk or bicycle the congested streets of WH with heavy loads such as groceries and dry cleaning. Currently, there are no grocery stores or supermarkets located north of Santa Monica Blvd. Residents in those areas who live above Santa Monica Blvd, an increasingly steep area of the city, especially for those residents who live north of Sunset Blvd, are at an even further disadvantage and it must be assumed that, as is currently the situation, those residents will continue to use their vehicles for even short trips. E4-68
- 98. The GP and DEIR have unrealistic expectations for an increase in the utilization of these facilities.

3.14.2 THRESHOLDS FOR DETERMINING SIGNIFICANCE

- 99. Since the DEIR is incorrect in warranting that there are ANY intersections, signaled or unsignaled, along the commercial corridors rated higher than D, this entire section must be stated to have significant adverse impacts. Stating that there are less than significant impacts is erroneous in the extreme. This must be corrected. E4-69
- 100. All the information in the tables in this section and the subsequent related sections are inconsistent with tables from other EIRs approved by the City since 2008. All of the previously approved tables indicate that all the signalized intersections and many of the unsignalized intersections along the major arteries of the city are rated much lower than that reflected in this DEIR's tables. All these tables should be revised to be consistent with those already approved, which mean that all of the LOS ratings should be revised to LOS D or lower. Most of the major intersections in previous approved DEIR's are rated LOS F at peak periods. E4-70

3.14.3 ANALYSIS OF ENVIRONMENTAL IMPACTS. PEAK HOUR INTERSECTION LEVEL OF SERVICE

- 101. The DEIR states: Table 3.14-6. Doheny Drive & Sunset Boulevard: This intersection is projected to degrade one service level during both the a.m. and p.m. peak hours with buildout of the proposed General Plan. E4-71
- 102. Since the Table is already incorrect since as shown in the Sunset Doheny Hotel Project EIR, this intersection is in fact already rated LOS F and the traffic had limited to no circulation. And this is the current conditions, prior to this oversized and under-parked high-rise hotel has broken ground.

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103. This is unconscionable. The GP’s plans that impact this intersection are unsustainable and should be eliminated in its entirety. This is a significant adverse – and completely avoidable – impact and should be reflected as such in the DEIR. The tables need to be revised to reflect the actual LOS ratings as stated in the other EIRs that have been approved by the city since 2008, when this traffic study was presumably done.

E4-71
cont.

104. Figure 3.14-5 Proposed General Plan (Year 2035). This table is clearly incorrect in assuming that there will be ANY intersections rated above LOS F if the current GP proposal is allowed to proceed. This must be corrected.

E4-72

105. Just one example is the intersection at Sunset and Larrabee. Should anything be developed at 8801 Sunset (Tower Records), the current DEIR shows that over 550 cars per day will be added to this intersection. That most certainly does not warrant a NO Impact designation.

106. The accompanying analysis of this section measures future delays in seconds, all less than one minute. Would that this were true. It is highly unlikely that the addition of more than 3,000 cars per day on these streets will delay the traffic by mere seconds. These delays should be measured in minutes, which is a more accurate reflection of the real on-the-street situation.

E4-73

107. The proposed policies are not realistic and do not reflect how the city actually manages these issues.

DAILY AND PEAK HOUR ROADWAY SEGMENT VOLUMES

108. The DEIR states that development under the proposed General Plan will not substantially alter the overall pattern of traffic on West Hollywood streets.

109. This is yet another false statement in the DEIR as residential streets have been complaining that because of the arterial traffic congestion, side street traffic has been increasing as drivers look for alternative ways to avoid the main thoroughfare congestion. This is only likely to increase as the traffic congestion becomes even more severe.

E4-74

110. Table 3.14-7. Daily Performance Measures. Just looking at this table for current levels is scary enough. Based on all the evidence presented here, the growth expectations are likely to be lower than they actually will be. This needs to be re-evaluated more realistically.

E4-75

111. Table 3.14-8. Intersection Levels of Service for CMP Impact Analysis. As stated with the previous examples, this table is filled with errors. There are many significant and adverse impacts in existing conditions even without the implementation of the GP proposal. That is not reflected accurately in this table.

E4-76

EMERGENCY ACCESS

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112. The DEIR states: The intersection LOS impacts summarized in Table 3.14-6 will generate traffic congestion at intersections that will also have the potential to impede emergency access.

E4-77

113. The phrase 'ALSO HAVE POTENTIAL' needs to be removed as there is already sufficient evidence that under existing conditions, Emergency Access has been impeded for fire and ambulance vehicles, possibly resulting in at least one death, certain injuries, and definitely hundreds of thousands of dollars of damage.

PARKING

114. This section refers to the Sunset Strip Parking Study and states that the number of parking occupancy spaces available in the study areas exceeds the demand.

E4-78

115. I am a part of the committee involved with this study and have read the study in its entirety. This statement is incorrect and refers only to a small section of the Strip. The Study in fact acknowledges that in the East section of Sunset, the area is severely under parked. And even in the section where it states that availability exceeds demand, many of those spaces are owned by private parking facilities and there is no indication that those private facilities are willing to release their spaces to the general public as they would likely prefer to retain them for their own occupants.

116. Therefore, this entire section is based on incorrect assumptions and needs to be redone.

117. All parking requirements in new developments throughout the City, whether residential or commercial, should be thoroughly to code with no variances allowed. Reduction in parking incentives such as tandem parking, compact parking, all valet parking, and similar should be abolished. The lack of sufficient parking in the city is already at critical levels and currently severely and negatively impacts the quality of life of current residents. Measures must be taken now and changing of current code requirements should be addressed now to mitigate the current situation.

E4-79

3.14.5 SIGNIFICANCE AFTER MITIGATION

118. The DEIR states that these impacts and significant and unavoidable. This is not the case. This issue IS avoidable, should the City decide to address it.

119. The City could begin looking for sites and funds to build municipal parking structures to alleviate this critical problem. That the City has not chosen to do so is a poor indicator of any future resolution to this problem, a problem that has consistently registered as one of the top two issues the residents would like the City to address. To further increase the problem in this area with the implementation of the current General Plan is unconscionable and should not be allowed.

E4-80

120. In the interest of time and because this is already a very lengthy document, I will cease my

E4-81

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comments here.

121. In summary, this DEIR and General Plan proposal is seriously flawed, is inconsistent with both the Goals and Policies of the City and with the wishes of the community, and does not satisfy the requirements of CEQUA.
122. Please revise the documents accordingly.

E4-81
cont.

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Letter E4

E4-1

The commenter's concern regarding the level of incorporation of the community's feedback into the proposed General Plan and Draft EIR is noted. Refer to Section 2.1.1 of the Draft EIR and the Introduction and Overview Chapter of the General Plan for a discussion on the public outreach process and the use of community input throughout the General Plan update process.

The commenter provides a brief summary of concerns regarding the critical issues facing the community, including traffic congestion, parking, overdevelopment, and increased building heights. These concerns are noted and are addressed individually throughout these responses to comments.

The commenter's concern regarding deferral of mitigation measures to future proposed projects pursuant to the General Plan is noted. In response to the comment, the level of analysis and references to future project-specific environmental documentation throughout Sections 3.1 through 3.15 of the Draft EIR are commensurate with a first-tier, or programmatic EIR. Per CEQA Guidelines Section 15152 "...the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed." As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA. Please refer to Topical Response #2.

The commenter's concern regarding the guiding principles and opinions on the merits of the proposed General Plan and Draft EIR is noted.

E4-2

In response to the comment, the commenter's concern about the level of the analysis included in the Draft EIR is noted. In response to the comment, the level of analysis performed throughout Sections 3.1 through 3.15 of the Draft EIR is commensurate with a first-tier, or programmatic EIR. Per CEQA Guidelines Section 15152 "...the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed." As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA. For impacts that are found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

E4-3

In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E4-4

The proposed General Plan encourages the expansion of both local and regional transit system which includes the Red Line extension. The City is aware that the subway may not align through West Hollywood or within the General Plan timeframe but does not preclude other rail systems improvements or transit enhancements along its major transit corridors. Examples of other potential transit improvements include but are not limited to light-rail, bus rapid transit (BRT), and an increase in transit services.

E4-5

The commenter discusses a number of issues related to intersection level of service (LOS).

In October of 2009 the City of West Hollywood adopted new significance criteria to determine significant impacts at intersections. Please see <http://www.ci.west-hollywood.ca.us/index.aspx?page=187&parent=552> for the October 19, 2009 City Council meeting minutes that cover this topic. This change in criteria was accompanied by the introduction of an updated intersection LOS calculation methodology, the *Highway Capacity Manual* Methodology (Transportation Research Board 2000), which is better able to address the type of congestion experienced in West Hollywood. This new methodology accounts for the effects of signal timing at individual intersections and signal coordination between intersections.

It is also important to note that the *Highway Capacity Manual* delay-based methodology for signalized intersections bases the LOS grade on average control delay at the intersection, which effectively gives a weighted average LOS grade for the overall experience of delay at the intersection for all motorists. This means an intersection approach movement with a large volume, but less delay will have a greater effect on the overall LOS grade than a movement with a smaller volume but more delay.

A ready example is the intersection of Sunset Boulevard and Doheny Drive, particularly during the p.m. peak hour. The eastbound and westbound approach volumes at this intersection (those traveling along Sunset Boulevard) greatly outnumber the northbound and southbound movements (those traveling along Doheny Drive). The signal at this intersection is timed to allow more time for the eastbound and westbound movements. This signal is also timed to coordinate with others along Sunset Boulevard to help improve traffic flow. Thus the larger number of cars traveling on this path experiences a smaller amount of delay. Currently, during the p.m. peak hour the average delay for vehicles on the eastbound and westbound approaches is 27 seconds and 41 seconds, respectively, which translates to LOS C and LOS D.

The smaller numbers of vehicles on the northbound and southbound approaches experience much greater delay, 163 seconds and 141 seconds, respectively, which are both LOS F. The overall intersection grade in this case is LOS E because the majority of people using this intersection experience relatively less delay, while a smaller number of users experiences considerably more delay.

This situation is often the case in West Hollywood for smaller north-south streets that cross the major east-west streets.

The Draft EIR adequately analyzes the traffic and transpiration impacts pursuant to implementation of the proposed General Plan at the programmatic level of analysis. Also refer to Topical Response #2.

E4-6

In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

Mitigation measures, including proposed General Plan implementation programs, were identified throughout the Draft EIR to reduce impacts below a level of significance. Where impacts were found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

In response to the comment regarding variances, variances are outside the scope of the proposed General Plan and the Draft EIR.

E4-7

This comment provides closing remarks and acknowledges the attached list of remaining comments, which are addressed below. The commenter's concern and opinions on the merits of the proposed General Plan and Draft EIR are noted.

E4-8

The commenter's concern regarding the projected population growth is noted. In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E4-9

The commenter's concern regarding impacts to quality of life due to the projected population growth and infrastructure issues is noted. Please refer to Topical Response #1 for explanation of projected growth pursuant to implementation of the proposed General Plan. In addition, Section 3.12 of the Draft EIR analyzed the public service and utility impacts, including police protection, fire protection, education, libraries, water infrastructure, water supply, wastewater, storm drains, energy, and solid waste, pursuant to implementation of the proposed General Plan. This included an analysis of the adequacy of infrastructure pursuant to implementation of the proposed General Plan. The environmental impact of construction of police stations, fire stations, schools, and water infrastructure cannot be analyzed in project-level detail in this program Draft EIR because no development or specific locations for development have been proposed. As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

E4-10

In response to the comment, the City's Municipal Code provides details on the approval authority for proposed development projects within the City. As noted in Section 3.1, page 3.1-8, the Sunset Specific Plan, City Code requirements, and development standards would impose conditions upon new development, requiring view preservation, as well as enhancement of the surrounding streetscape and limiting adverse visual impacts on adjacent uses. Individual

development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E4-11

In response to the comment, refer to Section 3.1, pages 3.1-8 and 3.1-9, of the Draft EIR for a description of potential visual character alteration and analysis of potential impacts pursuant to implementation of the proposed General Plan. As noted, the proposed General Plan includes a variety of policies regarding aesthetic improvements and visual character. Specific development projects proposed that would occur during implementation of the proposed General Plan would be required to comply with the regulations, development standards, and design guidelines in the City's Zoning Code. In addition, the City will evaluate individual future projects and determine whether project impacts were sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

E4-12

The commenter's concern regarding new signage permits, including new forms of lighting and animation, is noted. As noted in Section 3.1, page 3.1-10, the proposed General Plan includes a variety of policies intended to reduce the impact of signage as stated in the Land Use and Form Chapter. In addition, all new development, including signage, will be required to comply with the regulations, development standards, and design guidelines in the City's Zoning Code and all development will be reviewed through the design review process to make sure that individual development projects do not include materials that would create adverse light or glare effects.

E4-13

In response to the comment, please refer to Section 3.1, page 3.1-10, for an analysis of shade and/or shadow impacts pursuant to implementation of the proposed General Plan. As described in the analysis, it was determined that impacts related to shade and/or shadow would be less than significant at the program level of analysis and no mitigation is required. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E4-14

The commenter's concern regarding the destruction of historical resources in favor of new development is noted. Section 3.4.4 of the Draft EIR provides a description of potential impacts to historical resources with implementation of the proposed General Plan and determines that with adherence to the existing federal and state regulations and those policies set forth in the proposed General Plan, impacts would be less than significant. Also noted in Section 3.4.4, the Historic Preservation Chapter of the proposed General Plan contains policies specifically written to address impacts to historical resources and conformance with the City's Municipal Code. Furthermore, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E4-15

The commenter's concern regarding the exposure of people and structures to hazards related to fault rupture, ground shaking, liquefaction, and earthquake-induced landslides impacts pursuant to implementation of the proposed General Plan is noted. Please refer to Section 3.5.4 for a complete analysis of the potential seismic-related hazards. As noted, all future development in

conformance with the General Plan would be subject to mandatory federal and state regulations concerning seismic safety. These regulations are stringent and strictly enforced. In addition, the Safety and Noise Chapter of the proposed General Plan contains policies specifically written to address seismic impacts, including following state guidelines for the seismic performance of buildings and requiring fault rupture studies for sites located within the City-defined Fault Precaution Zone delineated around the Hollywood Fault Zone. Furthermore, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E4-16

The commenter's concern regarding siting new developments within proximity of known faults is noted. As discussed in Section 3.5.4, any future development that could occur near or on known faults would be required to comply with the requirements of the City's fault precaution zones (Chapter 19.32 of the West Hollywood Municipal Code), which requires fault location investigations. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

The environmental impacts of the Sunset Time project are beyond the scope of the Draft EIR. Please refer to the Sunset Time EIR for the analysis of environmental impacts pursuant to the Sunset Time project.

E4-17

The commenter's concern regarding soil erosion hazards in the northernmost portion of the City is noted. In response to the comment, please refer to Section 3.5.4, page 3.5-24. The analysis states that, "The northernmost portion of the City, adjacent the Hollywood Hills, is susceptible to soil erosion due to the hilly topography. However, this area is already developed, and the level of future development is likely to be limited." In addition, policies in the Infrastructure, Resources, and Conservation Chapter of the proposed General Plan are specifically written to address the protection of people and structures from natural hazards, including soil hazards. As stated on page 3.5-25, adherence to these policies, along with the federal, state, and local regulations, would reduce the impacts associated with soil erosion to a level less than significant at the program level of analysis and no mitigation would be required. Furthermore, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E4-18

The commenter's concern regarding hazardous materials within 0.25 mile of schools is noted. As noted on page 3.6-23 of the Draft EIR, the California Department of Education enforces school siting requirements regarding facilities to be constructed within 0.25 mile of facilities emitting or handling hazardous materials. In instances where potential materials handling and emission could occur, evaluation and notification pursuant to Public Resources Code Section 21115.4 would be enforced.

E4-19

In response to the comment, please refer to Section 3.8-4 for the analysis of the proposed General Plan's consistency with adopted land use plans. In particular, refer to Table 3.8-3: Consistency with the 2008 Regional Transportation Plan (RTP), beginning on page 3.8-9. As concluded on page 3.8-12, the proposed General Plan is consistent with the 2008 RTP and

Compass Growth Visioning Principles administered by the Southern California Association of Governments (SCAG). The proposed General Plan was also determined to be consistent with the locally adopted land use plans, policies, and regulations governing development within the City (i.e., Municipal Code, Specific Plans, and West Hollywood Redevelopment Plan).

In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E4-20

The commenter's concern regarding the projected population growth is noted. In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E4-21

The commenter's concern regarding the proposed General Plan's potential effects on water supply is noted. Section 3.12 of the Draft EIR evaluated the impact on water supply from implementation of the General Plan and explains how water use attributable to implementation of the General Plan was estimated. Because the water supply impact was found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.. Also refer to Response to Comment E4-54.

E4-22

Section 3.12-54 of the Draft EIR analyzed the energy impacts pursuant to implementation of the Draft EIR. As indicated on page 3.12-55, Southern California Edison (SCE) provides capacity to meet the electricity load and demand of the City of West Hollywood. SCE works with the City to provide and meet the demand for electricity and electricity infrastructure as growth is proposed. Questions pertaining to cost rates related to energy facilities are beyond the scope of the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-23

Please refer to Response to Comment E3-13. Also, proposed General Plan Implementation Actions describe short- and medium-term programs to evaluate open space opportunities, identify funding sources, and implement a Parks Master Plan to expand parkland in the City (PR-A.1, PR-A.2, PR-A.4, and PR-A.6). The existing funding mechanisms referred to in the EIR and in General Plan Implementation Action PR-A.2 include development fees collected pursuant to the Quimby Act, which fund park operations and maintenance. The commenter's suggestion regarding a dedicated program for the purchase of parkland is noted.

E4-24

The commenter addresses mitigation measures at study intersections and asserts that the City states that "a few left turn signals at a [sic] future major intersections will mitigate impacts."

The EIR traffic analysis found significant and unavoidable intersection LOS impacts at 28 of 43 study locations. These impacts are the result of future traffic conditions. Improvements to

address these future traffic conditions, including protected-permissive left turns and striping specified right-turn lanes, were suggested at four locations to reduce delay. The analysis still declared the delay to result in a significant and unavoidable impact at all 28 study intersection locations.

E4-25

The commenter states that feasible mitigation exists for intersections anticipated to exceed applicable Congestion Management Plan (CMP) standards.

This is incorrect. The No Project (Existing General Plan) alternative analyzed a “do-nothing” scenario with decreased development potential and still found a greater number of significant intersection impacts than the proposed project scenario. As noted on pages 2 and 3 of the *Travel Forecasts and Traffic Impact Report for the West Hollywood General Plan Update* technical appendix to the EIR (Fehr & Peers 2010):

Cut-through traffic—trips with neither a beginning nor an end in the City—accounts for a sizeable portion of vehicle trips in West Hollywood. Additionally, West Hollywood attracts trips from all over the Southern California area as a regional destination for entertainment and shopping. Therefore, much of the traffic in West Hollywood can be attributed to sources over which the City has little control, in the case of cut-through traffic, or that are vital to the City’s ongoing economic success, such as attracting regional visitors.

Similarly, it was stated on page 15 of the same report:

It should be noted that through trips will continue to grow regardless of decisions made in West Hollywood as development in the surrounding jurisdictions continues to grow. Therefore all future scenarios will see some growth in congestion regardless of the quantity of development or TDM programs implemented.

The primary factor of intersection congestion between future scenarios was not the quantity of development, but the robustness of the Transportation Demand Management (TDM) programs. The reasons for this can be found on page 15 of the *Travel Forecasts and Traffic Impact Report for the West Hollywood General Plan Update* technical appendix to the EIR.

E4-26

The commenter’s concern regarding emergency access is noted.

E4-27

The Draft EIR states that parking impacts associated with the proposed General Plan would be less than significant; therefore, no mitigation is required. New development would still need to provide onsite parking per the West Hollywood Municipal Code. In addition, the Mobility Chapter of the proposed General Plan contains policies that specifically address parking. The policies include actions aimed at better managing existing and future parking supply, both on- and off-street, which would make parking in West Hollywood more available and efficient.

E4-28

The commenter’s suggestion that the City purchase vacant land and surface parking lots to convert to park space is noted.

E4-29

This comment regarding the information presented in Table 3.8-2: City of West Hollywood Development Changes, found on page 3.8-8 of the Draft EIR, is noted. The information presented in the table represents development capacity and would not necessarily translate into direct change. Please refer to Topical Response #1 for a full explanation on growth projections and expected development capacity anticipated with implementation of the General Plan. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-30

See Response to Comment E4-9.

E4-31

In response to the comment regarding increasing density on Sunset Boulevard, no changes to land use designations along Sunset Boulevard are included as part of the proposed General Plan. Refer to the Sunset Specific Plan for information on individual parcels. The Sunset Specific Plan is available online at <http://www.ci.west-hollywood.ca.us/index.aspx?page=191>. Also refer to Topical Response #1 for a full explanation on growth projections and expected development capacity anticipated with implementation of the General Plan. In addition, refer to Section 3.14 of the Draft EIR, which contains the traffic analysis conducted for implementation of the General Plan.

E4-32

The commenter's statement regarding Transit Overlay Districts and traffic impacts is noted. Transit Overlay Districts are discussed in Section 3.8 of the Draft EIR. The traffic analysis conducted for implementation of the General Plan in Section 3.14 of the Draft EIR and Appendix F does not take into account any trip reductions that could occur if public transportation improvements, including a rail system, would occur. Thus, the Draft EIR analysis does not rely on any future public transportation improvements to reduce traffic impacts in West Hollywood.

E4-33

The commenter's statement regarding the expansion of the bicycle network along Sunset Boulevard is noted. Please refer to the adopted Bicycle and Pedestrian Mobility Plan (2003), available online at <http://www.weho.org/index.aspx?page=252>, which identifies 11.3 miles of bike lanes and routes for implementation. Any future bicycle improvements would be required to comply with the safety design guidelines set forth by the American Association of State Highway and Transportation Officials, the Federal Highway Administration and Caltrans as discussed in Chapter 4 of the Bicycle and Pedestrian Mobility Plan. In addition, the Sunset Boulevard Beautification Project includes installation of bicycle detection traffic signals pursuant to state requirements to also ensure the bicycle safety.

E4-34

This comment regarding RTP G6 is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-35

In response to the comment regarding parking, page 119 of the proposed General Plan indicates the following:

According to a 2010 study by the City, the total amount of parking in some commercial areas is sufficient for existing businesses, but it is either not available

to the public (because it is in private lots) or the parking is not convenient for visitors. This creates a situation where the parking supply does not match the demand patterns, so that visitors may perceive that there is no parking near their destination while just a few blocks away there could be numerous spaces available. To address the parking situation and to help balance supply and demand, the City charges for on-street parking at certain places and at certain times of day. The City also operates a public valet program to expand parking opportunities in commercial areas of the City. The City's Zoning Ordinance addresses off-street parking in commercial and residential areas.

The City also owns and operates 12 public parking facilities totaling over 569 parking spaces in commercial areas. As of 2010, approximately 444 additional parking spaces are under construction at West Hollywood Park. Future development projects will add an additional 600 parking spaces for public use.

E4-36

This comment regarding GV P1.1-4 is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-37

This comment regarding GV P3.1-4 is noted. In response to the comment, please refer to the Technical Background Report (specifically pages 90, 91, and 92) prepared for the Proposed General Plan Housing Chapter available online at <http://www.weho.org/Modules/ShowDocument.aspx?documentid=5413> This Technical Background Report contains specific information on the community's housing needs, constraints to housing development, and resources available for the delivery of housing services and affordable housing. A key component of the detailed analysis contained in the Technical Background Report is the City's ability to provide adequate sites to meet its share of the regional housing needs assigned to the City by SCAG. Table 47 of the Technical Background Report provides data for the remaining Regional Housing Needs Assessment (RHNA) for the City of West Hollywood.

No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-38

In response to the comment, the proposed General Plan Implementation Actions describe short- and medium-term programs to evaluate open space opportunities, identify funding sources, and implement a Parks Master Plan to expand parkland in the City (PR-A.1, PR-A.2, PR-A.4, PR-A.6). The existing funding mechanisms referred to in the Draft EIR and in General Plan Implementation Action PR-A.2 include development fees collected pursuant to the Quimby Act, which fund park operations and maintenance. The commenter's suggestion regarding a dedicated program for the purchase of parkland, such as a dedicated line item in the City's budget, is noted.

E4-39

The commenter's statement regarding mandatory green building policies is incorrect. On October 1, 2007, the City of West Hollywood adopted one of the first mandatory Green Building Ordinances to protect the environment and promote sustainable development. As such, a Green Building Section was created and included as part of the Zoning Ordinance; Section 19.20.060. This section describes the program requirements, including minimum green building requirements for all new projects, including new construction, tenant improvements, and

remodeling and additions. The Green Building Ordinance is found online at http://qcode.us/codes/westhollywood/view.php?topic=19-19_3-19_20-19_20_060&frames=off.

In addition, the proposed General Plan's Land Use and Form Chapter contains policies and programs that promote green buildings, green development techniques, and a variety of other strategies to reduce waste, energy use, and water consumption and to minimize the environmental effect of existing and future development in West Hollywood.

E4-40

This comment is noted. No further response is necessary because no questions or new information regarding the environmental analysis was raised.

E4-41

The commenter's statement regarding variances from the Sunset Specific Plan is noted. This comment, however, is beyond the scope of this project and the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E4-42

This comment is noted. The Draft EIR concluded that implementation of the proposed General Plan would be consistent with applicable adopted plans and policies and no mitigation is required. Also see Response to Comment E4-19.

E4-43

In response to the commenter's concern regarding the proposed General Plan reflecting the input of the community, please refer to the Introduction and Overview Chapter of the General Plan, pages 7 through 12, for a description of the extensive public involvement process, including an explanation of how the General Plan Guiding Principles were developed, which serve as the foundation for the goals and policies of the General Plan. As the commenter notes, traffic and parking were among the top concerns expressed by residents during the community outreach process. The proposed General Plan's approach to these issues is described in the introductory pages of the Mobility Chapter, pages 102 through 121. The commenter's concern about the effectiveness of these policies is noted.

E4-44

In response to the comment, please refer to Topical Response #1 for a discussion of how growth pursuant to implementation of the General Plan is analyzed in the Draft EIR. In addition, Chapter 2.0 of the Draft EIR provides a description of where growth is likely to occur throughout the time horizon of the proposed General Plan. As noted on page 2-16, most of the City is not anticipated to experience land use change as a result of the General Plan update. In response to the comment regarding household projections, as indicated on page 3.11-6 of the Draft EIR, "SCAG projections are based on the existing General Plan. It is likely that West Hollywood's growth projections would be revised upward in future SCAG planning documents to reflect proposed General Plan projections."

E4-45

In response to the comment, please refer to the Technical Background Report (specifically pages 90, 91, and 92) prepared for the Proposed General Plan Housing Chapter. This Technical Background Report contains specific information on the community's housing needs, constraints to housing development, and resources available for the delivery of housing services and affordable housing. A key component of the detailed analysis contained in the Technical

Background Report is the City's ability to provide adequate sites to meet its share of the regional housing needs assigned to the City by SCAG. Table 47 of the Technical Background Report provides data for the remaining RHNA for the City of West Hollywood. For a complete analysis of infrastructure and traffic impacts pursuant to the implementation of the General Plan, please refer to Draft EIR Sections 3.12 and 3.14, respectively.

E4-46

The commenter's concern regarding the projected population growth is noted. In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR. The comment about adding a threshold, the comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency.

E4-47

The commenter's concern regarding the projected population growth is noted. In response to the comment, please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of the growth methodology and growth estimates developed for the proposed General Plan and analyzed throughout the Draft EIR.

E4-48

The comment regarding the policies included within the Infrastructure, Resources, and Conservation Chapter of the General Plan and their relation to population growth and housing is noted.

E4-49

In response to the comment, this comment regarding the policies included within the Infrastructure, Resources, and Conservation Chapter of the General Plan and their relation to population growth and housing is noted. Please refer to Response to Comment E4-48.

E4-50

The commenter's concern regarding the implementation of policies relating to architectural transitions between commercial and residential development is noted.

E4-51

Please refer to Section 3.11, pages 3.11-3 and 3.11-4, for a discussion of the housing projections and current housing inventory by unit type. As shown in Table 3.11-3, while the total number of dwelling units has shifted by unit type (i.e., single-family vs. multi-family), there is an overall increase in the total amount of housing units from 1990 to 2008. This does not reflect a substantial displacement of housing. Individual development projects would be reviewed for project-specific impacts, during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E4-52

Section 3.11 of the Draft EIR analyzes the potential impacts to population and housing with the implementation of the proposed General Plan. Even though the proposed General Plan does not propose new development, the development capacity allowed by the proposed General Plan could result in a moderate increase in population (18.3% over 2008 levels) and housing units (17.4% over 2008 levels). However, the proposed General Plan anticipates and plans for this

growth through numerous policies aimed at reducing the impacts associated with population and housing unit growth in the City. In particular, the Infrastructure, Resources, and Conservation Chapter contains specific policies to manage future growth. Additionally, development allowed under the proposed General Plan would not displace substantial numbers of housing or people necessitating the construction of replacement housing elsewhere. Most of the development will occur through infill, adaptive reuse, or new mixed-use development in the commercial subareas where existing residential units are not the dominant use. Therefore, at the program level of analysis, impacts were determined to be less than significant without mitigation.

Individual development projects pursuant to the proposed General Plan would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E4-53

Please refer to Section 3.12.4 for a discussion on water infrastructure. As noted on page 3.12-32, new development and redevelopment pursuant to the General Plan would be primarily located within five commercial subareas of West Hollywood where water infrastructure already exists. Portions of three of the commercial subareas are located within the water service area of the City of Beverly Hills. As indicated in Section 3.12.1, water lines already exist in this service area. In addition, the City of Beverly Hills' Capital Improvements Program (CIP) allocates ongoing funding to repair and replace water infrastructure in the service area. The 2009–2010 adopted CIP includes funding and programs to replace or rehabilitate undersized, deteriorated, or old water mains. Both the City of Beverly Hills and Los Angeles Department of Water and Power (LADWP) would be required to review development proposals, in consultation with the City of West Hollywood, for consistency with water infrastructure requirements established in development plans and agreements, and to ensure that sufficient water infrastructure capacity is available to serve new development prior to approval of the project.

E4-54

The commenter's concern regarding the proposed General Plan's potential effects on water supply is noted. Section 3.12.4 of the Draft EIR evaluated the impact on water supply from implementation of the General Plan and explains how water use attributable to implementation of the General Plan was estimated. Because the water supply impact was found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944. In response to questions related to the Beverly Hills Urban Water Management Plan (UWMP), please refer to pages 3.12-35 and 3.12-36 of the Draft EIR for an explanation of the available water supply and demand. Based on the available information in the City of Beverly Hills UWMP and information from the Metropolitan Water District (MWD), it was determined that the City of Beverly Hills has adequate access to water supply.

The comment pertaining to increasing cost of supplying water is noted. However, questions pertaining to cost are beyond the scope of the Draft EIR

In response to the comment related to long-term water supply, please refer to the City of Beverly Hills Service Area Alternative Water Sources and the LADWP analyses beginning on

page 3.12-38. These analyses provide detailed discussions of alternative water source options compliant with the guidance set forth by the California Supreme Court's decision in *Vineyard Area Citizens for Responsible Growth v. the City of Rancho Cordova*. Table 3.12-3, located on page 3.12-48, provides a summary of the reasonable environmental impacts associated with alternative water supply projects. In addition, while the City of Beverly Hills UWMP did not address the potential impacts of climate change on water supply, climate change impacts are analyzed in the Draft EIR and accounted for within the water supply analysis.

In response to the comment related to the projected water demand for the LADWP water service area, please refer to the discussion of LADWP's Water Service Reliability Assessment for 2030, beginning on page 3.12-40 of the Draft EIR. Also refer to the letter inserted below from the MWD and the West Basin Municipal Water District dated July 16, 2010. This letter confirms that the MWD and the West Basin Municipal Water District, in cooperation with LADWP, have adequate supply and reliable access to water into the future based on regional water supply planning for all of Southern California.

E4-55

The commenter's concern regarding increased demand for additional electricity, natural gas, and transmission facilities is noted. Please refer to the discussion beginning on page 3.12-54 of the Draft EIR. As noted in this section, SCE and Southern California Gas (SoCalGas) have adequate facilities to meet the electricity and natural gas demands for the City of West Hollywood. In addition, Pursuant to Section 15145 of CEQA, analysis of physical changes in the City that may occur from future electrical and gas infrastructure would be speculative and no further analysis of the impact is required at this time. The environmental effects of expansion, construction, and operation of additional electrical and gas infrastructure would be evaluated under CEQA by SCE and SoCalGas in their efforts to plan for construction of new electrical and gas infrastructure or expansion of existing facilities, if applicable. SCE and SoCalGas continually evaluate demand, capacity, and plans for facility needs. If project-level significant impacts are identified, specific mitigation measures will be required. Lastly, the mandatory Green Building Ordinance (Zoning Ordinance; Section 19.20.060) and the Infrastructure, Resources and Conservation Chapter of the proposed General Plan contain goals and policies to reduce total and per capita energy used by the city. The Draft EIR concluded that impacts related to this issue would be less than significant based on this analysis and the policies in place to reduce energy use by the City. No mitigation is necessary.

E4-56

The commenter's support for the energy conservation policies in the General Plan, and suggestion that they be mandatory for new development, is noted. Please also refer to the Draft Climate Action Plan, which describes additional energy-conservation measures as part of a toolkit of programs to reduce the community's greenhouse gas (GHG) emissions.

E4-57

In response to this comment, the commenter's concern regarding impacts to the City's storm drain system, schools, library, electricity and natural gas, water infrastructure, wastewater, and solid waste is noted. Please refer to the discussion beginning in Section 3.12-4 of the Draft EIR for a full analysis of these topics. Also refer to Responses to Comments E4-53, E4-54, and E4-55.

E4-58

In response to the commenter's concern regarding programs to acquire additional green space, please refer to Response to Comment E4-23. In response to the commenter's question about

Quimby Act fees, the State Quimby Act permits cities and counties in California to require that developers of subdivisions either dedicate parkland or pay a "Quimby Fee" in lieu of providing land, allowing the City to purchase land for parks. The Quimby Fees in West Hollywood are used for the purpose of developing new or rehabilitating existing park facilities to serve residents. The fees have historically been used for the construction of improvements to existing parks and construction of new parks such as Havenhurst Park, Formosa Park, and Kings Road Park. In the future, fees collected will be utilized for park acquisition and development (renovation, construction of improvements, etc.).



July 16, 2010

Paul Arevalo, City Manager
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. Arvelao:

The purpose of this letter is to affirm that the Metropolitan Water District of Southern California (Metropolitan), as Southern California's regional wholesale provider, and the West Basin Municipal Water District (West Basin), as your member agency to Metropolitan, can provide long-term assurance of water supply to the City of West Hollywood for municipal and industrial use as needed.

Metropolitan is committed under a policy directive known as the Laguna Declaration to provide sufficient water for current and future needs of the region. This commitment includes West Hollywood through its annexation to West Basin. Although West Hollywood is within West Basin's service territory, direct retail water service is provided by the Los Angeles Department of Water and Power (LADWP).

Metropolitan and West Basin, in cooperation with LADWP, can assure West Hollywood of a reliable and dependable water supply into the future based on the regional water planning for all of Southern California. If you would like to discuss this further, please feel free to contact our agencies.

Sincerely,

Handwritten signature of Rich Nagel in black ink.

Rich Nagel, General Manager
West Basin Municipal Water District

Handwritten signature of Jeff Kightlinger in black ink.

Jeff Kightlinger, General Manager
Metropolitan Water District

cc: Jim McDaniel, LADWP
Tom Erb, LADWP
Shana Epstein, City of Beverly Hills
Bianca Siegl, General Plan Project Manager

E4-59

The commenter states that Clark is mislabeled Ozeta Terrace. Comment noted. Figures have been corrected accordingly.

E4-60

The commenter indicates that Draft EIR LOS results are different than previous studies prepared for similar streets and intersections. Please see Response to Comment E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

The commenter also states that none of Sunset Boulevard, and Santa Monica Boulevard intersections are operating at LOS F, which is incorrect. The following Santa Monica Boulevard intersections are shown in Table 3.14-4 to be operating at LOS F during the a.m. or p.m. peak hour:

- Doheny Drive & Santa Monica Boulevard
- La Cienega Boulevard & Santa Monica Boulevard
- Crescent Heights Boulevard & Santa Monica Boulevard, and
- Fairfax Avenue & Santa Monica Boulevard

E4-61

The commenter references a previous EIR and indicates apparent contradictions between the Draft EIR and previous results. Please see Response to Comment E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

E4-62

The commenter references a previous EIR, and indicates apparent contradictions between the Draft EIR and previous results. Please see Response to Comment E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

E4-63

The commenter references a previous EIR, and indicates apparent contradictions between the Draft EIR and previous results. Please see Response to Comment E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

E4-64

The commenter indicates projections for Sunset Boulevard and Santa Monica Boulevard will increase between existing conditions and future conditions. The Draft EIR acknowledges these increases and describes the potential impacts and mitigation measures through intersection analysis. Even if the proposed General Plan were not implemented, traffic would still increase on Santa Monica Boulevard and Sunset Boulevard.

E4-65

The commenter states that mitigation measures have not been proposed for daily volume increases that are anticipated between current conditions and the 2035 horizon year. Further, the commenter states that mitigation measures should be proposed for daily volume impacts.

The traffic analysis is based on field collected data and projected future conditions with the potential future development under the Proposed General Plan. The Draft EIR acknowledges these increases and describes the potential impacts and mitigation measures through intersection analysis. The City of West Hollywood Traffic Impact significance criteria do not include criteria for Average Daily Traffic volumes on arterial roadway segments. CEQA standards require traffic impacts to be analyzed under the responsible jurisdiction's established traffic impact analysis criteria.

E4-66

The commenter's concerns regarding vehicle miles traveled are noted.

E4-67

The commenter states that the City cannot handle 355,000 trips per day, in the context of the City's current population. There is currently no empirical research correlating the adult population of a city to the number of vehicle trips the city's roadway network can handle.

E4-68

In response to the comment, the commenter's concern regarding the aging population and their utilization of bicycle and pedestrian facilities is noted. No further response is necessary because no questions or new information regarding the environmental analysis was raised.

E4-69

Tables 3.14-4, 3.14-5, and 3.14-6 of the Draft EIR indicated the LOS results for the General Plan update study intersections, including commercial corridors. Commercial Corridors include Sunset Boulevard, Santa Monica Boulevard, Melrose Avenue, Beverly Boulevard, Doheny Drive, Robertson Boulevard, portion of San Vicente Boulevard, La Cienega Boulevard, Fairfax Avenue, and La Brea Avenue. Section 3.14.3 of the Draft EIR analyzes the impacts to intersections pursuant to implementation of the proposed General Plan.

E4-70

The commenter mentions comparison between Draft EIR LOS results and results from previous environmental documents. Please see the response E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

E4-71

The commenter discusses differences between the Draft EIR and previous analysis of the Sunset Boulevard at Doheny Drive intersection. The commenter states that significant impacts are avoidable.

The Draft EIR analysis found a significant impact at the intersection of Sunset Boulevard and Doheny Drive. This impact was found for the Proposed General Plan land use scenario and all three of the alternative scenarios analyzed. These alternative scenarios had varying levels of development and varying deployments of TDM strategies. Therefore, it is likely that this impact is the result of increased through traffic and future development that was already permitted, and that was allowed under the 1984 General Plan.

Mitigation measures were investigated for this intersection. The only possible mitigation measures that would reduce average vehicular control delay involved the expansion of the roadway. This expansion conflicted with other City goals and policies and was therefore deemed infeasible.

Please see the response E4-5 for a discussion of the difference between the City's new LOS calculation methodology, used for the West Hollywood General Plan Update EIR, and the LOS methodology used in previous studies.

E4-72

The commenter's comments regarding Figure 3-14.5 and any intersections rated above LOS F if the proposed General Plan is adopted are noted. The commenter states that the Sunset Boulevard at Larrabee Street intersection is an example of a location that is not anticipated to operate at LOS F, but will in fact operate at LOS F, due to proposed development at 8801 Sunset Boulevard. Currently proposed development projects, in addition to future development potential under the proposed General Plan, are included in traffic forecasts and the LOS results.

E4-73

The commenter questions the accuracy of the delay-based intersection LOS results and states that delay should be expressed in minutes and not seconds. The *Highway Capacity Manual* methodology, the accepted professional standard and currently adopted methodology for the City of West Hollywood, defines LOS based on average control delay in seconds. A number of intersections in both the Existing LOS table (Table 3.14-4) and Proposed Project LOS table (Table 3.14-6) show average control delays of greater than 60 seconds (there are 60 seconds in 1 minute). For example, in Table 3.14-6 the intersection of Sunset Boulevard & Doheny Drive shows an average control delay of 73 seconds during the a.m. peak hour and 80 seconds during the p.m. peak hour for the Proposed Project scenario.

E4-74

The commenter states that the proposed General Plan will substantially alter the overall pattern of traffic in West Hollywood, and that the Draft EIR indicates otherwise. The Draft EIR clearly documents the impacts associated with anticipated future development at intersections throughout the City and compares future conditions to existing conditions.

E4-75

The commenter notes that "growth expectations are likely to be lower than they actually will be." This comment is noted. The traffic analysis relies on accepted professional standards, developed through a substantial body of research, to present a reasonable worst-case scenario as required by CEQA.

E4-76

The commenter states that the CMP analysis is filled with errors. The CMP impact analysis in the Draft EIR follows the guidelines for determining a significant impact established in the Los Angeles County Congestion Management Program. These significance criteria are based upon a change in intersection volume-to-capacity ratios between existing conditions and some future scenario. The Proposed Project represents one such possible future scenario. The analysis found that implementation of the proposed General Plan would have significant and unavoidable impacts at a CMP location. However, because the Proposed Project conditions do not currently exist, the Proposed Project cannot cause significant and adverse impacts at a CMP location for the existing conditions. This situation is accurately represented in Table 3.14-8.

E4-77

The commenter's concerns regarding emergency access are noted. The emergency response impact was found to be less than significant and no mitigation is required. Page 3.14-48 explains why the impact is less than significant, i.e., adherence to existing regulations, plans, and a variety of General Plan policies. Maintaining emergency plans, using new technology, and

continuing coordination with law enforcement and emergency services would help reduce the potential impacts on emergency access.

E4-78

In response to the comment regarding the West Hollywood Parking Study prepared by Civic Enterprise Associates, page 3.14-49 of the Draft EIR has been modified to read as follows:

These studies focused on the Sunset Strip and the area bounded by Santa Monica Boulevard, Melrose Avenue, and San Vicente Boulevard. The parking occupancy study results indicate that the number of spaces available in the study areas generally exceeds the demand. However, the current allocation of these spaces, including private ownership of some parking facilities, may not currently function efficiently to provide access to adequate parking, particularly during peak periods.

E4-79

The commenter's concern regarding the reduction of parking incentives for new developments is noted.

E4-80

In response to the comment, refer to page 3.14-51 of the Draft EIR for a discussion of parking impacts. As stated, the Draft EIR concludes that impacts to parking would be less than significant with adherence to and implementation of the proposed General Plan policies and regulations. Therefore, no further response to this comment is necessary.

E4-81

In response to the comment, the commenter's concern and opinion about the General Plan and Draft EIR is noted.



West Hollywood West Residents Association

PO Box 691427
West Hollywood, CA 90069
Phone: 310.659.3379; Email: president@whwra.org

August 9, 2010

Ms. Bianca Siegl
Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: Draft General Plan and DEIR — Comment Letter

Dear Bianca:

Thank you for giving West Hollywood West Residents Association (“WHWRA”) the opportunity to comment on the proposed General Plan and Draft Environmental Impact Report (“DEIR”) for the City of West Hollywood.

First, I’d like to address the draft **Guiding Principles** because the Guiding Principles “serve as the foundation for the goals and policies in the West Hollywood General Plan 2035.”

Baseball’s Yogi Berra once said, *“You got to be careful if you don’t know where you’re going, because you might not get there.”*

In general, there is a lack of precision in the Guiding Principles. As currently written, the City could probably come up with any policy decision and say that it falls under one of the ten guiding principles that you’ve drafted.

Here are some comments and suggestions:

- #1. QUALITY OF LIFE. “Maintain the high quality of life enjoyed by West Hollywood residents.” “Quality of life” has a different meaning for different people. In a city like West Hollywood, where the constituency is so diverse, this statement is vague and needs to be clarified.
- #2. DIVERSITY. “Value the social, economic and cultural diversity of our people, and work to protect people who are vulnerable.” It’s a nice statement, but it’s not linked to a direction.
- #4. NEIGHBORHOOD CHARACTER. How does “Emphasize opportunities to meet housing needs and economic development goals along the commercial boulevards” fit with NEIGHBORHOOD CHARACTER? This should be removed from NEIGHBORHOOD CHARACTER. We suggest adding: West Hollywood will cherish its distinctive, diverse, and eclectic neighborhoods by recognizing that future changes must preserve their unique character.
- #5. ECONOMIC DEVELOPMENT. This statement does not adequately address our small-scale, neighborhood businesses that meet residents’ daily shopping and service needs, and should be revised.

E5-1

As you know, there was extensive community outreach conducted by the City. Preserving our City’s unique character as an urban village and creative center, low-scale development, improving traffic and parking conditions, providing social services and workforce housing, and ensuring a decision-making process that provides a high level of community input – these were consistent themes throughout the community outreach.

We recommend that the following be added to the Guiding Principles:

- Promote policies that recognize, cherish and preserve our unique, urban village.
- New development will respect and harmonize with the City’s existing character.
- West Hollywood’s city government will operate in an open, transparent and responsive manner.

WEST HOLLYWOOD GENERAL PLAN, CLIMATE ACTION PLAN, AND DPEIR (DEIR)

WHWRA has a number of questions and concerns regarding proposed changes in the General Plan 2035 draft. Regarding the DEIR, we believe that the City has not adequately addressed impacts on aesthetics, traffic, parking, infrastructure, air quality, etc., all of which contribute to the quality of life and "livability" of our city.

According to our planning consultant Sandra Genis, Planning Resources, who reviewed the documents on WHWRA's behalf:

"As currently presented, the DEIR is inadequate to fulfill the purposes of CEQA. The DEIR must be revised to reflect all growth permitted under the proposed General Plan update and must be re-circulated pursuant to Guidelines Section 15088.5 in order that the public and decisions makers may be fully informed of the impacts of the proposed project."

E5-2

Please see the attached comment letter from Sandra Genis, Planning Resources, for detailed comments regarding the West Hollywood General Plan and Climate Action Plan - Draft Program Environmental Impact Report.

FUTURE DIRECTION OF THE CITY

We would like to see the new General Plan place more emphasis on preserving West Hollywood's small-town feel (urban village), encouraging neighborhood-serving businesses and pedestrian-friendly streets, limiting the scale and intensity of new buildings, and making responsible planning and land use decisions – i.e., taking into account infrastructure and the current environment. We feel this would be consistent with the extensive community outreach conducted by the City.

E5-3

OUR RESIDENTIAL NEIGHBORHOOD

Zoning Changes (Residential)

Regarding the proposed down-zoning of the residential portion of Doheny (R3B to R3A) and the east side of West Knoll (R3C to R3A), we feel that these are positive changes. We believe that by reducing the maximum heights of these two streets to a height that is more compatible with the rest of West Hollywood West not only makes good planning sense, but also helps to protect the integrity of the surrounding R1B neighborhood. Of course, with a development bonus, these streets could potentially attract larger developments; however, we will tackle bonuses later in the document.

E5-4

Please note, the detailed descriptions of the R1 zones on Page 48 of the draft General Plan are not correct/missing information.

E5-5

Regarding "unbundling parking," we do not think this is a good idea. There are many potential negative impacts that the City is clearly not anticipating. For instance, we have seen cases where a landlord has a rental unit with an accessible garage but doesn't offer it to the prospective tenant, and instead rents it out to a nearby business for storage purposes. Unbundling parking would encourage these types of activities and create more on-street parking problems.

E5-6

Sherbourne Triangle

The Sherbourne Triangle, north of the commercial section, is zoned R4B. We know that the property currently has its entitlements, so if the property were to be down-zoned, those entitlements would be "grand-fathered." However, assuming the entitlements do expire, we would like to see a more compatible zoning in place that takes into consideration the current environment with respect to traffic, water and other utilities, parking, public safety, green space, solar access, etc., as well as fits in with the character and integrity of the surrounding neighborhood.

The case for down-zoning...

- A lower zoning designation would be more compatible with the surrounding R1B neighborhood in terms of mass and scale.
- Down-zoning would reduce potential environmental impacts and growth-inducing impacts.
- Down-zoning would be consistent with the City of West Hollywood's Vision 2020 core values: "Quality of Residential Life" and "Responsibility for the Environment."

E5-7

Neighborhood Conservation Overlay Zone

As we move forward with the General Plan update, an important goal for us is to preserve the unique nature of our neighborhood. As you know, our neighborhood is comprised primarily of low density residential (R1B) and neighborhood-serving, low impact businesses. We'd like to preserve and maintain that composition. As such, we believe that West Hollywood West will remain a thriving residential and business community and continue to be an asset to the city.

West Hollywood West is a designated Neighborhood Conservation Overlay Zone. It is important that residents and businesses, as well as city staff, comprehend the significance of that overlay zone, particularly as development, both residential and commercial, continues throughout the city. The neighborhood conservation overlay was created to "ensure that new development is compatible with and complements, in scale and architecture, existing structures where a distinctive neighborhood character exists."

Staff confirmed verbally that WHW's Neighborhood Conservation Overlay Zone would remain intact; however, I did not see WHW (or other neighborhoods) specifically designated in the draft document.

We want to make sure that it is included in the new General Plan 2035 and we would also like to see a more detailed definition of the overlay zone than what is in the current General Plan – which is extremely vague:

"The Neighborhood Conservation Overlay (NC) District is used to identify sites and areas within the City that represent clearly defined neighborhoods with predominantly consistent historic or architectural character."

Specifically, we would like to see the following concepts incorporated as requirements of the Neighborhood Conservation Overlay Zone:

- Infill residential development must be compatible in scale, siting, detailing and overall character with adjacent buildings and those in the immediate neighborhood. This is crucial when a new or remodeled residence is proposed to be larger than others in the neighborhood. When new residential structures are developed adjacent to older single-family residences, the height and bulk of the new construction can have a negative impact on adjacent, smaller scale buildings. Given this, infill residential structures with greater height must step back above the first story to reduce impacts on adjacent smaller homes.
- Houses must not only be compatible with the character of existing development in the neighborhood, but must also possess a well-developed "personality" and have integrity as design objects in their own right. Good architecture involves the creation of meaningful relationships between all the forms, materials, detailing, siting and window and door openings in a building. Meaningful architectural relationships can take many forms.
- Proposed development must avoid similar or identical building facades on the block or adjacent blocks.
- Residential development must continue existing patterns of functional, on-site relationships in the surrounding neighborhood, for example, common residential patterns such as front porches and entries facing the street.
- Front yard setbacks for residential infill development must match the existing setback patterns of surrounding dwellings.
- The design must not create an unreasonable invasion of the privacy of neighboring properties.
- The design must not adversely affect the lighting or noise quality of the local neighborhood.
- The proposed development must limit the amount of design components which unnecessarily add bulk and mass to the building but which are not calculated as floor area ratio (FAR).
- The component elements of the design must be in proportion to one another.
- Neighborhood Conservation Overlay Zone is not intended to dictate a particular style or ambiance. It is intended to make sure that the design is fully committed and that all the potential for the creation of meaningful relationships has been fully realized. In a good residential design, there are meaningful relationships between all the components and aspects of a building such as forms, materials, detailing, siting and window and door openings.

E5-8

The goal is to protect the character and integrity of the neighborhood, as well as promote and support West Hollywood's unique identity as a creative urban village.

BONUSES

In the General Plan draft, it states that the City can give bonuses to developers of commercial projects and residential projects with 5 or more units and that "where multiple possible bonuses are indicated in a particular designation, individual projects may be able to cumulatively apply each bonus, as described in the Zoning Ordinance."

This is not acceptable. One, residents and businesses have a right to a reasonable expectation of the zoning of the properties around them. Two, bonuses encourage more height, more mass, more density, and more impacts.

If I buy a single-family home just south of Melrose (R1B), and the adjacent commercial zone is CN (or CN1), I have an expectation that the adjacent commercial area will be compatible with the residential area, and it is not unreasonable to assume that the adjacent commercial property will be compatible in the future. However, with the allowance of bonuses, one bonus can add 10 ft., and cumulative bonuses can add up to 30 ft. We are concerned about the potential environmental impacts as well as related issues such as quality of life, right to privacy and enjoyment of our homes and potential negative impacts to our property values.

E5-9

Height and density bonuses allow a developer to build a much larger project that is not compatible with the surrounding neighborhood. In a low-density neighborhood, where homes are only up to 25 ft. in height, even an additional 10 ft. in the adjacent commercial zone will have a major impact.

No more than one bonus should be allowed for any development/project in a commercial zone, and the one affordable housing bonus proposed for residential zones should be limited to higher density areas. No bonus should be applied if, by doing so, it would result in a significant environmental impact and/or a project that is not compatible with the surrounding neighborhood.

Regarding the Green Building bonus – green buildings should be mandatory for any new development. Green should not be "optional" and the City shouldn't have to give incentives to developers to be green. Offering additional height and/or density or a lower parking requirement to a green building seems counter-productive.

E5-10

The draft states, "the City may adopt or modify height or density bonuses in the future to further the goals and policies of this General Plan." What about environmental impacts? If you increase heights and/or FAR piecemeal – i.e., one project at a time, it's easier to dismiss the impacts of that one project and avoid the bigger discussion of cumulative impacts of cumulative projects. Frankly, it's not just poor planning; it's a lack of planning.

E5-11

OUR COMMERCIAL NEIGHBORHOOD

Zoning Changes (Commercial Area)

We are opposed to any zoning changes that increase density or height in the West Hollywood West area, from the south side of Melrose to the north side of Beverly; from the east side of Doheny to the west side of La Cienega. We believe that any increases to height or density (1) will lead to development that is not compatible with our neighborhood, (2) will cause significant environmental impacts, (3) will affect the quality of life in our city, and (4) is not consistent with the community's vision.

The DEIR specifically states, "*Based on the data and conclusions of this Program EIR, the City of West Hollywood finds that the project will result in the following potentially significant impacts that cannot be fully mitigated:*

E5-12

- *Air Quality – compliance with South Coast Air Quality Management District Air Quality Management Plan; construction related emissions; operational emissions*
- *Traffic – intersection level of service, congestion management program level of service*
- *Global Climate Change – construction related GHG emissions; operations related GHG emissions; conflicts with applicable plans, polices, or regulations*
- *Public Services and Utilities – water supply*

If the City chooses to approve the project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126 (b) of the CEQA Guidelines for these unavoidable significant impacts."

Furthermore, if we take into account the possibility of a height and/or density bonus, a project/development will have the potential to reach the maximum height/density that is being proposed in the draft General Plan by applying just one bonus.

E5-12
cont.

Regarding zoning changes to the north side of Melrose, south side of Beverly and Santa Monica Boulevard, we, again, have concerns about environmental impacts, specifically traffic, parking, aesthetics, shade and shadow, solar access, public services and utilities, parks and public safety.

Melrose Avenue - Preserving West Hollywood's Jewel

We are very concerned about the zoning changes being proposed for Melrose (i.e., CN to CN2, CN to CC1). The draft General Plan proposes increased heights on Melrose to accommodate showrooms and art galleries; however, there is no guarantee that the space will be rented for showroom or art gallery use, and, in fact, may end up a business with a much higher impact.

While we understand that the economics of the city is changing and properties are increasing in value, we are concerned that we will continue to lose the neighborhood-serving businesses that exist on Melrose — businesses that are part of the city's character and appeal, such as the quaint courtyard stores between Westbourne and Westmount.

We are also concerned about the threat to the small scale that gives the area its distinct charm and desirability. In just the last few years, the city has lost a number of neighborhood-serving businesses on Melrose, and we know that The Bodhi Tree is slated to go soon. Which neighborhood-serving businesses will the City lose next... Soolip, Le Pain Quotidien, Urth?

These types of businesses serve our neighborhood and add to the character and desirability of our neighborhood and West Hollywood in general. It will be a tremendous loss for all of us if they were to be torn down and replaced with another Kitson-like store. With the Neighborhood Conservation Overlay, can't the City do something to encourage neighborhood-friendly businesses and neighborhood-friendly scale on Melrose?

E5-13

We also wonder what the long-term impacts will be on the neighborhood if the properties on Melrose are permitted to go to three stories, which is currently possible under the City's mixed-use ordinance. Melrose is a unique street with a small town-feel, and it is particularly narrow, particularly along the section between Norwich and West Knoll. Unlike Santa Monica Boulevard, it may not be able to accommodate the height or mass of a three-story development.

We challenge the General Plan DEIR traffic studies findings that report an LOS of C and C (AM and PM peak hours, respectively) at the Melrose and San Vicente intersection and an LOS of C and A (AM and PM peak hours, respectively) at Melrose and Huntley. If you have ever been on Melrose between San Vicente and La Cienega around 5:30 or 6:30 PM, you would see that traffic is at a standstill.

In addition, we have yet to see the traffic impacts of the Pacific Design Center RED building, the West Hollywood Library/Parking Garage, the Sherbourne Triangle project (aka Greenwich/Rosewood Place), or Cedars Sinai Medical Center expansion project, all of which are entitled projects – three of which are currently under construction.

Beverly Boulevard

The General Plan draft proposes changing the south side of Beverly Boulevard from CC to CC2 and the residential portion below (south of) Beverly Boulevard from R2 to R4A with some new permitted (commercial) land uses that have yet to be defined. The General Plan draft cannot be approved without knowing the land uses being proposed. It cannot be deferred to a later date. How can consultants conduct environmental review of that area for the DEIR without knowing the proposed land uses?

E5-14

Additional density and/or intensity of the zoning on Beverly will, of course, create traffic impacts. According to the General Plan DEIR traffic studies, the Doheny and Beverly intersection already has an LOS of D for both AM and PM peak hours. The Robertson and Beverly intersection has an LOS of E in the AM peak hours; the La Cienega and Beverly intersection has an LOS of E and F (AM and PM peak hours, respectively). How much more traffic can these intersections handle? As it is, drivers cut through the neighborhoods to avoid these streets.

Land Use And Parking Issues

Both the District 1 businesses and WHWRA (and the City's Parking Division!) were quite pleased with the final comprehensive changes made to the District 1 parking restrictions that now allow residents to park on both sides of area residential streets. However, it is very important that the updated General Plan ensures that new development in this area doesn't inadvertently undermine all that we have achieved.

For instance, if the City allows a change of use on the commercial properties on the Avenues, i.e., from showroom to retail, will this change of use upset the delicate balance that WHWRA and the District 1 businesses have worked so hard to obtain?

If the businesses will be using valet parking, are we going to lose public metered spaces? If so, this means that public spaces are being taken away for the benefit of private use and although there might be more spaces for, say, Kitson customers, there will be less public parking available for other Melrose businesses such as Le Pain Quotidien or Beckley's, or for people who just like to come to Melrose to window shop.

We are also concerned that the loss of public metered spaces will lead to more people driving through the neighborhood in search of a "free" parking space. We advocate for maintaining the availability of public metered parking along our commercial streets rather than a reduction to accommodate an intensification of use, which may not be appropriate.

E5-15

Change of use along with its potential impacts also raises questions about whether it is appropriate for a store like Kitson to be located along this special stretch of Melrose, which is part of the Avenues of Design and has a delicate mix of showrooms and design support businesses, galleries and restaurants.

We believe the City needs to actively encourage and support the placement of businesses that enhance and complement this unique district and also actively discourage the placement of businesses that do not.

As a member of the Melrose Parking Steering Committee, I've been involved in the discussion regarding the development of a Parking Credits program and I believe the following must be incorporated into the program:

- Parking requirements for projects using Parking Credits must be the full requirements detailed in the zoning code, and not reduced by density bonuses, waivers or other incentive programs.
- Do not allow any single use or single property to obtain more than 20% of the Parking Credits in a district.
- New development should be self-sustaining and should be required to have sufficient parking to accommodate the project – otherwise the Parking Credits program will be destined for failure. For new construction projects, only those on two lots or less, or 15,000 SF of land (whichever is less), should be entitled to use Parking Credits (i.e., be in the program).

Off-Site Signage – Billboard And Tall Walls

This statement in the General Plan draft concerns us: "Because of the prestige and exposure of these billboards, they also have the capacity to provide public benefits through development agreements, and to make high-quality new development possible."

We assert that the negative impacts of billboards and tall walls in our neighborhood outweigh any supposed public benefit.

E5-16

WHWRA supported the Sunset Specific Plan, which kept billboards and tall walls on Sunset. We believe that permitting tall walls on Beverly Boulevard (or any commercial street other than Sunset) is inappropriate, particularly when the commercial street abuts a low-density residential neighborhood.

If the City is proposing a policy of billboards or tall walls for areas other than Sunset, there needs to be thorough environmental analysis now, during the General Plan update process, and not project-by-project.

Transitional Zoning

Transitional Zoning can be an important planning tool, particularly since many of our residential neighborhoods abut commercial zones without the benefit of a buffer such as an alley.

E5-17

Melrose Triangle

The current zoning of the Melrose Triangle is CC (Commercial, Community) – which allows for a maximum FAR of 1.5 FAR and 35 ft. In relation to the Avenues of Design (Melrose/Robertson commercial district), the CC zoning is appropriate. In relation to the adjacent low-density residential neighborhood directly south of the Triangle (West Hollywood West), the CC zoning is appropriate. In relation to the adjacent low-density residential neighborhood to the north (Norma Triangle, Beverly Hills), the CC zoning is appropriate.

The General Plan draft proposes a 71% increase in height and a 66% increase in FAR for the Melrose Triangle – in other words, a 60 ft. tall project with a 2.5 FAR — pre-bonus.

Aside from the environmental impacts, changing the zoning to CA (Commercial, Arterial) will make the zoning of this property incompatible with the surrounding neighborhoods. I would quote the #1 Guiding Principle about QUALITY OF LIFE if it weren't so vague!

E5-18

Regarding traffic, the General Plan DEIR traffic studies showed an LOS of F and D (AM and PM peak hours, respectively) at the intersection of Doheny and Santa Monica Boulevard westbound and an LOS of E (AM peak hours) and F (PM peak hours) at the intersection of Doheny and Melrose/Santa Monica Boulevard eastbound. With a CA zoning, Santa Monica Boulevard at Doheny won't be a gateway; it will be a parking lot!

It should be noted that the findings from the General Plan "community outreach" telephone survey conducted among residents showed that more residents were in favor of lower building heights much more so than higher building heights. Three-fourths (74%) of the residents surveyed supported three-story buildings with affordable housing units included vs. one third (33%) of residents who supported seven-story buildings with affordable housing units.

TRANSIT OVERLAY DISTRICTS/PUBLIC TRANSPORTATION

The General Plan draft proposes more intense development on "the transit corridors," those commercial streets that are currently served by major bus routes.

Just because there are bus routes, doesn't mean there is service. Over the last year, the City of Los Angeles has cut funds for its local transit – the DASH, specifically, in the Los Angeles/West Hollywood/Fairfax area. So rather than increasing public transportation, the City of Los Angeles has actually decreased public transportation.

E5-19

Metro is a County agency and the City of West Hollywood does not control its operation or budget. Metro is facing an historic operating deficit (\$250 million in the fiscal year starting July 1, 2010) and recently raised its rates. More than 500 Metro jobs are being eliminated as well as steep cuts in administrative overhead and other expenses.

Further decreases in transit service appear imminent.

The proposed continuation of the Metro line seems to be the City's stock answer to concerns about increases in density and traffic. Yet in public meetings, LA County MTA representatives have reported that it could take more than 20 years until the train makes its way through Los Angeles and it is highly unlikely that there will be sufficient funding for it to go through West Hollywood. Furthermore, even if a line through West Hollywood were to get funded, MTA reps said it will be at least 30 years – in other words, past the life of this General Plan 2035. Considering the potential impacts of new development in terms of population, public services, traffic and parking – the City must be realistic and plan responsibly.

E5-20

Also, based upon the City's telephone survey, we learned that 91% of West Hollywood residents own or lease a vehicle – with half owning/leasing 2+ vehicles. Is it realistic to assume those vehicle owners are going to get out of their cars to wait for a bus, when public transportation services are decreasing, rather than increasing?

E5-21

INFRASTRUCTURE ISSUES

Utilities – Water

We have entered a period of drought during which the Metropolitan Water District ("MWD") has already mandated water supply and use reductions. What impact will this increased use have on diminishing supplies of water and on existing customers who are being asked to conserve? How will this additional demand affect our rates?

Due to current water supply conditions, cities are already required to cut back on water use and demand, yet development is moving along as if there are unlimited sources for water. Any suggestion of increased density, whether it be in residential or commercial zones, should be evaluated in the current environment of diminishing water.

Why should existing uses be forced to conserve so there can be new development? Shouldn't existing water use and demand have priority over new development that will by definition create new demand? Why are residents' rates (Tier 1, Tier 2, etc.) based on past usage; yet, new projects do not have to abide by past usage in order to conserve? How is "baseline usage" determined for the new project?

According to the DEIR, "development of land uses by 2035 pursuant to the proposed General Plan would result in an increase in dwelling units, population, and nonresidential building floor area over existing conditions. The increase in residential and nonresidential development would result in an increase in the need for additional water supply and water pressure for fire flow (particularly for mixed-use and multi-story development), which could strain water supply sources."

E5-22

The DEIR then states that the level of significance is "Significant and unavoidable." It is avoidable if you don't approve the proposed General Plan. It is avoidable if you curb development, and certainly, it would help if you down-zoned areas rather than up-zone! It's common sense.

Approving the draft General Plan as proposed would be inconsistent with State and local policies regarding water conservation. Water is a limited resource that cannot be replaced like electricity can with solar energy. Every drop of water that goes towards this project is a drop being literally taken away from current customers. Every raise in current customers' rates to force conservation is effectively forcing current customers to subsidize new developments.

Utilities – Solid Waste

Approving the General Plan as proposed would be environmentally irresponsible. The more development, the more solid waste. Landfills in and around Los Angeles are already full.

The DEIR indicates that they can dump waste in the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County after Puente Hills Landfill closes in 2013.

Is there any analysis of trips or traffic along routes to those areas, or should Los Angeles and West Hollywood stakeholders not be concerned with the bigger picture?

Have the governmental agencies, residents, business owners of the areas surrounding landfills been contacted to gather their feedback regarding additional waste being dumped in their respective areas?

E5-23

What are the environmental impacts of increasing waste production, transportation and disposal including impacts relating to increased transit (e.g., air quality and traffic)?

Are these landfills currently in compliance? Because a number of landfills appear to have had compliance issues in the recent past.

In addition, Southern California cities, including the City of West Hollywood, have been raising property owner's taxes on City Solid Waste And Recyclable Collection And Disposal Service to keep up with demand. Current customers continue to have to subsidize new development, which is an unfair financial burden for a city to expect of its citizens.

OTHER IMPACTS

Aesthetics

The significance of aesthetic impacts is, to some extent, subjective. In Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District, the court held that the placement of an aluminum cover on a reservoir, which would be visible from private residences as well as from a hiking trail, was a significant impact even though landscaping of the area was proposed as mitigation. The court also found that while the significance of this impact could be subjective, that there were more than just "a few people expressing concern about the aesthetics of the project."

There exists a 'fair argument' that the drastic changes in the area's aesthetics that would be caused by bigger or taller buildings would be a significant impact.

E5-24

We also have concerns about light, glare, sun and shade. For example, staff is proposing taller buildings on Melrose – an additional 10 feet on the south side. With multiple bonuses, we could be looking at buildings that are 55 ft. tall, and those buildings will be towering over houses 25 ft. tall – facing their backyards and impinging on residents' privacy, creating impacts that will affect their quality of life.

Shade And Shadow:

Historically, standards of significance for shade and shadow are inappropriately lax since hardly any proposed project would ever have a significant impact.

Structures that block sunlight can have a significant impact by blocking the sun for even one hour of the day. If you allow 40 ft., 50 ft., 60 ft. buildings, what will happen to the grass, trees and other landscaping of surrounding properties? How will shade and shadow impacts affect property owners' ability to utilize solar panels?

E5-25

We would like to see a strict threshold on the standards of significance for shade and shadow so as to encourage lower buildings and more solar panel use.

Traffic Issues

According to our traffic consultant, Tom Brohard, Tom Brohard and Associates, who reviewed the DEIR on WHWRA's behalf regarding traffic issues:

"Further study must be undertaken to properly identify the traffic impacts of the Proposed Project. Application of robust transportation demand management (TDM) strategies to only the highest land use intensities in the Proposed General Plan 2035 masks the true environmental impacts of the Proposed Project and the TDM Alternative, and distorts the Alternatives Analysis. Mitigation of significant traffic impacts in the near term and in the long term is defective as all feasible transportation planning and traffic engineering measures have not been properly considered or analyzed. Mitigation measures that may have been considered at the significantly impacted Robertson Boulevard/Beverly Boulevard intersection have not been disclosed or explained. In addition, replacement of the City's current performance standards is suggested in the Mobility Element of the Proposed General Plan, but no alternatives are proposed or available for public review and comment within the Draft EIR."

E5-26

Please see the attached comment letter from Tom Brohard, Tom Brohard and Associates, written on behalf of WHWRA, for detailed comments regarding Traffic Issues.

ADDITIONAL COMMUNITY FEEDBACK

As you know, WHWRA invited Planning Staff to hold a "working" session to review the zoning and land use changes being proposed in the draft General Plan specifically in the WHW area. This really helped clarify what was being proposed and we appreciate Staff's time. Thirty (30) residents attended.

During the session, residents expressed concerns regarding the following:

- *Loss of our urban village*
- *Less pedestrian-friendly area and less people on the streets (shopping, etc.)*
- *West Hollywood becoming just like every other city, loss of WeHo's uniqueness and creativity*
- *More traffic on our commercial streets, more cut-through traffic in our neighborhoods and more angry, frustrated drivers in our neighborhoods*
- *More parking problems*
- *Loss of views*
- *Loss of light (shade/shadow)*
- *Less open/airy feeling*
- *Concern about increased heights, Floor Area Ratio (FAR) and density on our commercial streets*
- *Concern that "cumulative bonuses" can increase heights (and/or FAR) significantly*
- *Concerns about signage — that billboards and tall walls will be allowed in areas other than Sunset, specifically, Beverly Boulevard, Melrose and/or Santa Monica Boulevard*
- *Concerns about infrastructure (water, etc.)*
- *Concerns that the Neighborhood Conservation Overlay zoning needs to be better defined*
- *Concerns that the City is not listening to its residents*
- *Questions and concerns about how the City came up with the proposed General Plan program*
- *Concerns about quality of life*

E5-27

On behalf of WHWRA, thank you, again, for the opportunity to submit our comments.

Attached please find the additional (2) comment letters from our consultants, Sandra Genis of Planning Resources and Tom Brohard of Tom Brohard & Associates, written on behalf of WHWRA and submitted for the record.

Sincerely,



Lauren Meister
President, West Hollywood West Residents Association

Attachments (Letters from Sandra Genis and Tom Brohard)

Cc w/att.: Doug Carstens, Chatten-Brown & Carstens

August 9, 2010

Bianca Siegl, Associate Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: West Hollywood General Plan and Climate Action Plan
Draft Program Environmental Impact Report (SCH No. 2009091124)

Dear Ms. Siegl:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (DPEIR) for the West Hollywood General Plan and Climate Action Plan (SCH No. 2009091124). These comments are submitted on behalf of the West Hollywood West Residents Association.

The DPEIR is intended to address the effects of the adoption and implementation of an updated General Plan and associated Climate Action Plan. Other actions which may be pursued based on the DPEIR (p. 1-3) include:

- Zoning text amendments
- Rezoning of properties
- Approval of specific plans
- Approval of development plans, including tentative maps, variances, conditional use permits, and other land use permits
- Approval of development agreements
- Approval of facility and service master plans and financing plans
- Approval and funding of public improvements projects
- Approval of resource management plans
- Issuance of municipal bonds
- Issuance of permits and other approvals necessary for implementation of the General Plan
- Acquisition of property by purchase or eminent domain
- Transfer or sale of property
- Issuance of permits and other approvals necessary for public and private development projects

E5-28

The DPEIR

The DPEIR is a program EIR intended to address the effects of the adoption of a proposed planning program with more detailed environmental review potentially prepared at the time specific project proposals are reviewed, although as noted above it is anticipated that the PEIR may address issuance of permits and other approvals necessary for public and private development projects. Tiering of environmental review in this manner is consistent with the provisions of the California Environmental Quality Act (CEQA) and is particularly useful when a generalized planning framework is being considered in the absence of any specific project proposals.

As stated in the Guidelines for the Implementation of the California Environmental Quality Act Section 15152(b):

Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects [emphasis added] of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

It is of concern that the DPEIR defers a significant portion of the analyses and identification of mitigation measures to future environmental documents that may or may not ever be prepared, as discussed below.

The DPEIR’s deferral of analysis to the future creates a piecemeal approach.

The approach taken in the DPEIR guarantees that certain impacts not examined in the DPEIR will ultimately be examined in a piecemeal fashion in future environmental reviews—if they are examined at all. CEQA Guidelines caution against examination of projects on a piecemeal basis so that "... that environmental considerations do not become submerged by chopping a large project into many little ones--each with a minimal potential impact on the environment--which cumulatively may have disastrous consequences." (*Bozung v. Local Agency Formation Com.*, *supra*, 13 Cal.3d at pp. 283-284, 99 Cal.Rptr. 745, 492 P.2d 1137). As noted in *San Franciscans for Reasonable Growth v. City and County of San Francisco* ((1984) 151 Cal.App.3d 61, 198 Cal.Rptr. 634) analyzing only "piecemeal development would inevitably cause havoc in virtually every aspect of the urban environment".

An example of this piecemeal approach is seen in the discussion of various public service and utility systems. Any attempt at meaningful analysis of future facilities needs is dismissed as "speculative" (p. 3.12-28, 29, 30, 32, 55). This is despite the fact that enough is known about anticipated future development to prepare detailed traffic analyses.

One is provided little or no information as to whether infrastructure may be inadequate to handle anticipated growth in localized areas. Are the residents to wait until local sewers are overwhelmed? The city is reminded that an environmental document is to be prepared as early as feasible in the planning process (Guidelines for the Implementation of CEQA Section 15004(b)).

E5-29

E5-30

Another example of this piecemeal approach in the DPEIR would be shade and shadow impacts. The DPEIR indicates that “the level of impact would be determined at the project level” (p. 3.1-10). However, adequate information exists to provide a general sense of the potential impacts of the general plan as a whole. Future maximum building height is identified for land use category. Without providing a detailed analysis the EIR could—and should—delineate the perimeter of potential impact areas. Even a simple rule of thumb using three times building height for the winter solstice at 9 am and 3 pm would help.

E5-30
cont.

Analysis at this time is particularly important because the significance of shadow impacts is often based on the length of time a sensitive use is shaded. While one individual project may not shade a sensitive use for an excessive time, several projects together could leave schools and homes essentially in the dark. In addition, as noted on Page 1-3 of the DPEIR, the DPEIR may be utilized for issuance of permits and other approvals necessary for public and private development projects. Thus, there may be no additional analysis regarding level of impact at the project level.

The DPEIR improperly concludes that future impacts will be fully mitigated due to future environmental documentation.

The DPEIR asserts in many cases that no impacts will occur due to future development allowed or necessitated by the proposed plan because future environmental review would be required pursuant to CEQA. Examples are potentially significant impacts related to visual factors (pp. 3.1-8,9), shade and shadow (p. 3.1-10), cultural resources (p. 3.4-20) and geologic hazards (p. 3.5-21-23). However, the City and preparers well know that preparation of an EIR provides no guarantee that all impacts will be avoided or mitigated to a level of insignificance. A Statement of Overriding Considerations may be adopted pursuant to Guidelines Section 15093 in order to allow approval of a project which would create significant impacts.

E5-31

In addition, there is no guarantee that additional environmental review would ever occur. In many circumstances, CEQA (Public Resources Code 21159.24) exempts infill residential projects from further environmental review if CEQA review was previously completed for a community-level plan.

The DPEIR does not provide an accurate and complete project description.

A stable, complete, and accurate project description is the most basic and important factor in preparing a lawful EIR. It is the denominator of the document and, thus, of the public’s and decision-maker’s review. In setting aside the approval of an EIR by the City of Los Angeles for water development facilities in Inyo County, the court stated: “An accurate, stable and finite project description is the Sine qua non of an information and legally sufficient EIR” (*County of Inyo v. City of Los Angeles* (71 Cal.App.3d 193) [139 Cal.Rptr. 401]).

E5-32

It is critical that the project description be as clear and complete as possible so that the issuing agency and other responsible agencies may make informed decisions regarding a proposed project. Without a clear definition of the activities to be undertaken, the EIR becomes useless. A vague or incomplete project description will render all further analyses and determinations ineffectual. As stated in *McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District* (202 Cal.App.3d 1136, 1143; 249 Cal.Rptr. 439), “An accurate project

description is necessary for an intelligent evaluation of potential environmental effects of a proposed activity”.

The amendment includes changes in land use designations for specific areas as well as changes in citywide policies. However, the DPEIR identifies only the new land use designations, providing no map or description of existing designations. Likewise, citywide policy changes are not identified. A strikeout/underline presentation of new policies, deleted policies and altered policies as well as new and deleted land use designations and mapping is essential if decision makers are to make a complete and meaningful assessment of the proposed project. In order to prevent the document from becoming too unwieldy, this could be provided in an appendix.

E5-32
cont.

As presented, members of the general public must ferret out many of the changes on their own. This is contrary to the purposes of CEQA (*Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 357 [182 Cal.Rptr. 317]; *Planning and Conservation League v. Department of Water Resources and Central Coast Water Authority*, 84 Cal.App.4th 315A, [100 Cal.Rptr.2d 173]). While some sections of the analysis present lists of relevant policies, the DPEIR does not indicate if the policies are new policies, old policies, or new versions of old policies.

DPEIR analyses are not based on the maximum buildout permitted under the proposed plan but on an estimate of future growth. This is based on an assessment of “pipeline” projects, vacant sites, knowledge of City staff, and “additional” sites subject to policy changes (p. 2-14), though proposed floor area ratios (FARs) and allowable building heights would apply to numerous other properties. Thus, other properties not included in projected development totals could potentially redevelop at higher intensities as well, potentially resulting in thousands of additional dwelling units and millions of square feet of additional commercial development. It is not clear how growth would be monitored or how the City would address growth in excess of anticipated levels.

E5-33

Perhaps most critically, the project description in the DPEIR fails to discuss numerous potential density bonuses included in the General Plan. While DPEIR presents floor area ratios (FARs) and height limits for the proposed commercial land uses (Table 2-3; p. 2-13) and mentions potential incentives for transit oriented development (LU-2.4), it is silent regarding several other potential density bonus programs, including mixed use (LU-2.6), creative office (LU-2.7) and significant uses or buildings (LU-2.8). These may be cumulative. In addition, as stated in the footnote to Table 3-2 in the Land Use Element (p. 54) “The City may adopt or modify height or density bonuses in the future to further the goals and policies of this General Plan”. The Project description must identify potential maximum square footage, dwelling units, and height in each land use category with and without all possible additional bonuses and/or incentives.

Future growth is presented for a few broad categories citywide. The DPEIR provides no information as to where the additional growth would occur, nor even in which general plan land uses category the growth would occur. A resident has no way of knowing whether his or her neighborhood would experience moderate growth, massive growth or no growth at all.

Even if one wished to estimate additional development in a given area oneself, one could not based only on the information provided in the DPEIR. While the overall acreage of a few land uses is provided, this is not correlated with land use designations or with existing floor area

ratios. The DPEIR must provide a breakdown of acreage by sub area. Clearly this information must exist, inasmuch as it would have been needed as input for the DPEIR traffic modeling.

E5-33
cont.

The DPEIR does not adequately define the existing environmental setting.

Even if the DPEIR had fully described development which would be permitted under the proposed specific plan, one would still not be able to determine the extent to which this differed from development currently in existence. One would not know whether the potential buildout represented a relatively small change or a radical change in a given area, only aggregate growth citywide.

Establishment of an appropriate environmental baseline is a key factor in assessing the environmental impact of a project. As stated in *County of Amador v. El Dorado County Water Agency* (76 Cal.App.4th 936):

Before the impact of a project can be assessed and mitigation measures considered, an EIR must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined.

Section 15125 (a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA) provides the following:

(a) An EIR must include a description of the physical environmental conditions ***in the vicinity of the project*** [emphasis added], as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...

Discussion: Because the concept of a significant effect on the environment focuses on changes in the environment, this section requires an EIR to describe the environmental setting of the project so that the changes can be seen in context. The description of the pre-existing environment also helps reviewers to check the Lead Agency's identification of significant effects...

The DPEIR describes each area in only the most general terms. The EIR must include:

- The number of dwelling units currently developed in each neighborhood along with the prevailing densities in units per acre.
- Square footage of existing commercial development in each of the commercial subareas along with prevailing FARs
- Typical building heights existing in each area
- Identification of any existing structures that would exceed proposed development limits in the general plan and the extent of any potential nonconformity which would, as a worst case, add to maximum total buildout

E5-34

Absent this information, one has no basis upon which to evaluate the actual physical changes that would occur due to the proposed General Plan update.

The DPEIR also provides only minimal information about the areas surrounding the planning area, i.e. outside the City boundary. There is no information as to the type of development in the surrounding communities or the scale and density of that development. One does not know if there will be abrupt changes in scale between the planning area and surrounding areas because one does not know the scale of the surrounding areas. One does not know if roadways in those communities are congested or free flowing. The EIR must map surrounding land uses and describe surrounding communities.

E5-34
cont.

The EIR must examine impacts outside the West Hollywood city boundary.

The DPEIR presents only analyses of impacts within the City of West Hollywood. The proposed project would allow the construction of thousands of additional dwelling units and millions of square feet of commercial development. The scale of the project is clearly of regional significance. Although Santa Monica Boulevard is highly congested for miles around, the analyses stop at the City boundary. Although the draft General Plan document identifies a shortage of parkland in West Hollywood, a shortage which would be exacerbated by the large increase in population contemplated by the plan, no consideration is given to impacts on recreational facilities in other communities.

The city is reminded that “Effects of environmental abuse are not contained by political lines” (Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 118 Cal.Rptr. 249, 529 P.2d 1017). As stated in *Environmental Defense Fund, Inc. v. Coastside County Water Dist.*, 27 Cal.App.3d 695, 704--705, 104 Cal.Rptr. 197 :

E5-35

“The preparation of the EIR demands thoughtful consideration of public interests transcending such necessary elements as always have been present... Those who prepare the EIR may not limit their vision by the boundaries of the district...”

The DPEIR must be revised to address impacts on the communities of Beverly Hills, Los Angeles, and elsewhere due to traffic, noise, air emissions, public service demand and other issues that may affect those communities.

The DPEIR lacks analyses necessary to form conclusions.

DPEIR makes numerous conclusions unsupported by analyses. CEQA does not encourage conclusory statements: “To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.” (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [231 Cal.Rptr. 748, 727 P.2d 1029])

E5-36

Said the court in *Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California* (1988) 47 Cal. 3d 376:

We do not impugn the integrity of the Regents, but neither can we countenance a result that would require blind trust by the public, especially in light of CEQA's fundamental goal that the public be fully informed...

E5-36
cont.

Yet, without analysis the DPEIR states that no cumulative impacts will occur. The DPEIR concludes that there will be no significant impact on transit services (p.3-14.49) without any review of transit capacity or ridership. This is just one example; others are addressed below.

The DPEIR improperly adopts a comparative approach in assessing potential impact.

The DPEIR dismisses potential impacts on the basis that the project would constitute only a small percent of growth in the area, for example impacts on wastewater systems.

This is contrary to the purposes of the CEQA as summed up in *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. In *Kings County*:

The significance of an activity depends upon the setting. (Guidelines, § 15064, subd. (b).) The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin...

Appellants... contend in assessing significance the EIR focuses upon the ratio between the project's impacts and the overall problem, **contrary to the intent of CEQA**. [emphasis added]

The court then quoted Selmi's *Judicial Development of CEQA* as follows:

E5-37

"One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant, assuming threatening dimensions only when considered in light of the other sources with which they interact. Perhaps the best example is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem.

...

"This judicial concern often is reinforced by the results of cumulative environmental analysis; the outcome may appear startling once the nature of the cumulative impact problem has been grasped." (*Selmi, Judicial Development of CEQA* (1984) 18 U.C. Davis L.Rev. 197, 244, fn. omitted.)

The court continued:

We find the analysis used in the EIR and urged by GWF avoids analyzing the severity of the problem and allows the approval of projects which, when taken in isolation, appear insignificant, but when viewed together, appear startling. Under GWF's "ratio" theory, the greater the overall problem, the less significance a project has...

Page 7 of 29

Likewise in *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019 the court stated:

... the relevant issue to be addressed... is not the relative amount of traffic noise resulting from the project when compared to existing traffic noise, but whether any additional amount of traffic noise should be considered significant in light of the serious nature of the traffic noise problem already existing

E5-37
cont.

The DPEIR relies on illusive mitigation measures.

Many of the suggested mitigation measures and policies stated to mitigate impacts will be implemented only where “feasible” or “practical” or “should” or “may” be implemented, yet the DPEIR assumes that impacts will be reduced or eliminated by these measures which may never be implemented. Examples include measures to mitigate impacts on air quality (p. 3.2-35,36), noise (p. 3.9-41), and public services (p. 3.12-27). The DPEIR also relies on future plans or studies to mitigate other impacts including impacts to recreation (p. 3.13-13).

E5-38

The DPEIR relies on tangentially related measures to assure absence of impacts. We are told that public annoyance due to vibration will be reduced due to measure applying only to historic structures (p.3.9-40) . Impacts on emergency access will be mitigated by improved communication (p. 3.14-48). A discussion of potential displacement of existing housing or people indicates that this would not be an issue because new uses would have employ architectural transitions and setbacks (p. 3.11-7).

The geographic range of cumulative impacts must relate to the impact examined

In accordance with Guidelines Section 15130 (b)(3):

Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

E5-39

The DPEIR relies primarily on adopted studies, although some of those are outdated, such as the Urban Water Management Plan. No information is provided for growth elsewhere that has occurred above and beyond levels anticipated in adopted plans. The EIR must be revised to include development in Beverly Hills, Los Angeles, and elsewhere, consistent with the context of each potential impact. For example, development to the east would almost certainly increase traffic on Santa Monica Boulevard seeking to reach the 405 Freeway.

The EIR must present all assumptions

Starting with the project description (Section 2) and running through to the discussion of alternatives (Section 5) the DPEIR relies on unstated assumptions. Thus, one has no way of evaluating the validity of conclusions reached. The project description itself relies on an educated best guess for estimates of future buildout (p. 2-14). While the DPEIR provides a general description as to how the estimate was generated, no specifics are provided. There is a reference to “pipeline projects”, but those are not listed. There is a reference to “knowledge” sites selected by City staff, and “additional” sites subject to policy changes. Not even the sites

E5-40

subject to policy changes are identified, let alone what was considered in selection of “knowledge sites”. The EIR must include assumptions by site or block, other than oracular “knowledge”.

E5-40
cont.

The actual analysis of impacts is similarly lacking in information. A key factor in traffic analysis, for example, is trip generation. Yet no information is provided as to what trip generation rates were applied to the various land uses. Similarly, although the DPEIR presents information on total vehicle miles, and even indicates an average trip length of seven miles for trips in the City (p. 3.14-15), no information is given regarding trip length for trips which extend outside the City. It is not even clear what was assumed for future baseline traffic in the 2035 future buildout year.

E5-41

Without full information as to assumptions and methodology, it is impossible to evaluate the accuracy of conclusions reached.

The DPEIR misstates CEQA requirements

The DPEIR repeatedly indicates that impacts would be considered significant if they exceed certain thresholds of significance, “in accordance with Appendix G of the CEQA Guidelines”. However, the list in Appendix G is an example of a checklist for purposes of an initial study and includes the following

NOTE: The following is a sample form and may be tailored to satisfy individual agencies’ needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and **do not necessarily represent thresholds of significance**[emphasis added].

E5-42

Similarly, the DPEIR asserts that CEQA requires analysis of ground born vibration (p. p. 3.9-24).

E5-43

The DPEIR mistakenly attributes material in the CEQA Guidelines as being part of CEQA itself, and misconstrues that language, specifically stating that analysis of certain issues would be speculative “according to CEQA” (p. 3.12-28,29,35). In any case, neither CEQA nor the Guidelines define what is speculative or not, though the Guidelines (Sec. 15145) indicate that an issue should first be examined and then investigated no further if the analysis would be speculative. The DPEIR in these cases implies, though does not state, that impacts due to infrastructure needed to serve anticipated development will not be discussed because they are speculative. However, 15126.4(a)(1)(D) of the Guidelines states:

E5-44

If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.

Thus, the EIR must examine the impacts of new facilities which would be provided in order to mitigate impacts created by growth pursuant the General Plan update. In any case, the

requirement that General Plan elements be coordinated would command that provision of infrastructure to serve growth permitted under Land Use Element policies be included in the General Plan itself.

E5-44
cont.

Organization of the EIR

The environmental analysis in DPEIR is organized in sections which theoretically separate the existing setting from the analysis of impacts. However, several sections describe the specific plan in the setting section rather than existing conditions. For example, a table indicating future project traffic is included in the existing conditions portion of Section 3.14.

E5-45

Specific Flaws in the DPEIR

In addition to the essential systemic flaws discussed above, the EIR must address the comments and questions below regarding how specific information in the DPEIR is presented. Each of these items is itself, though, so basic that each must be addressed in order for the DPEIR to be considered legally adequate and to provide decision makers and the public with the information needed to evaluate the proposed project and its impacts

Project Description

As stated on Page 2-1, “The purpose of the project description is to describe the project in a way that would be meaningful to the public...”. In that regard, the DPEIR fails. For the resident asking, “How will my neighborhood be different under this General Plan update?”, the DPEIR provides few answers.

The DPEIR presents floor area ratios (FARs) and height limits for the proposed commercial land uses (Table 2-3; p. 2-13) and mentions potential adjustments to these standards for transit oriented development. However, the Land Use Element includes several other programs offering potential density and/or height (Land Use Element p. 54). These include Green Building providing up to an additional 0.1 FAR, affordable housing providing up to a 35 percent bonus, mixed use providing an additional 0.5 FAR and 10 feet in height pursuant to Policy LU-2.6, and Creative Office providing an additional 0.5 FAR pursuant to Policy LU 2.7. In addition, Policy LU-2.8 provides for additional FAR and height for projects that provide expanded or new facilities considered to be of significant importance, providing significant benefits to the City, or offering architectural design of unusual merit.

E5-46

As noted in the Land Use Element (Table 3-2 Footnotes, p. 54) “Where multiple possible bonuses are indicated in a particular designation, individual projects may be able to cumulatively apply each bonus.” Thus, significant increases in height and/or FAR could potentially occur. This must be identified and discussed in the EIR, including identification of maximum height and maximum FAR in each category including all bonuses and incentives.

It is not clear what was assumed in developing estimates of future land use. The DPEIR must indicate whether redeveloped sites were assumed to develop to the General Plan maximum. Assumptions regarding density and height bonuses must also be presented. An appendix should be added including existing and anticipated land use on a site by site or traffic analysis zone (TAZ) by TAZ basis. Since the data has already been developed (p. 2-14), this should not be

Page 10 of 29

difficult.

E5-46
cont.

The use of small scale mapping, using very similar colors for different land use categories does not facilitate information retrieval. While it appears from the mapping that properties in the Melrose area will be designated CN2, that is not discussed in the description of that land use designation (p. 2-12) nor in the description of the Melrose/Beverly District (pp. 2-16,17). An area south of Plummer Park is apparently mapped as CC2, but this is not identified in the text.

E5-47

It is not clear whether any changes in land use not related to the new land use categories are contemplated. Any such changes must be identified.

In addition, the following questions and comments must be addressed:

1. (p. 2-4, 5) What is the relationship of the Climate Action Plan to the General Plan? Is it considered an implementation program for the Infrastructure, Resources, and Conservation Element or is it part of the General Plan itself?
2. (p. 2-5) The discussion of the regional setting must address characteristics of the surrounding area. This must include land use and intensity along with landforms and visual landmarks.
3. (p. 2-12) To how many acres of land do land use designation in Table 2-2 apply?
4. (p. 2-12) Information regarding allowable dwelling units presented for RIB in Table 2-2 does not reflect the full number of units presented in Table 3-2, p. 53, of the Land Use Element. This must be included.
5. (p. 2-12) The DPEIR states that the purpose of the new CC2 designation is

E5-48

E5-49

E5-50

to allow an increase of FAR by 0.5 and an additional one story in height for parcels located along commercial corridors served by high levels of existing and future transit services, which would encourage future development away from residential neighborhoods.

E5-51

This makes no sense. The designation would permit additional commercial development in areas designated for commercial use. Existing residential designation do not permit commercial use. In fact, the general plan update includes additional land use categories, R3C-C and R4B-C, which *would* permit commercial development in residential areas. The above statement must be explained and reconciled with the creation of the R3C-C and R4B-C designations and repeated calls for mixed use in the land use element

6. (p. 2-13) To how many acres of land do land use designation in Table 2-3 apply?
7. (pp. 2-12, 13) Maximum buildout for each category including all potential density and height adjustments must be identified.
8. (p. 2-13) What development, by type and square footage is anticipated for each specific plan area?
9. (p. 2-13) What level of additional FAR and height for TOD sites is anticipated?
10. (p. 2-13) How is “close to major transit nodes defined”?
11. (p. 2-13) Policy LU-2.4 proposes to establish Transit Overlay Districts within 1/3 mile of major bus transfer points and proposed future subway stops (Land Use Element p. 59). Will additional FAR and/or height be permitted before the subway stop locations are finalized and established? What if the actual locations are not as currently proposed? Will additional areas then be subject to additional density and height?

E5-52

E5-53

E5-54

E5-55

E5-56

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| <p>12. (p. 2-13) Will grants of additional density and height continue to be permitted in areas currently proposed for subway stops, even if final locations differ? If not, would property owners in those areas be deprived of a right, i.e. added density and height, enjoyed by other property in the vicinity and under identical zoning classification?</p> <p>13. (p. 2-13) Where are major bus transfer points currently located in the City?</p> <p>14. (p. 2-13) How long have those transfer points existed at those locations?</p> <p>15. (p. 2-13) What will happen if major bus transfer points change? Will additional areas be subject to additional density and height?</p> <p>16. (p. 2-13) Will grants of additional density and height continue to be permitted in areas currently in the vicinity of major bus transfer points, even if transfer points change? If not, would property owners in those areas be deprived of a right, i.e. added density and height, enjoyed by other property in the vicinity and under identical zoning classifications?</p> | E5-56
cont. |
| <p>17. (p. 2-13) The DPEIR states that the TOD designation is intended to encourage mixed use. Additional FAR of 0.5 is already provided for mixed use. Would TOD sites receive a density bonus for both TOD and mixed use?</p> <p>18. (p. 2-13) What would be the maximum additional FAR and height permitted including bonuses for TOD and all other incentive programs?</p> <p>19. (p. 2-14) Where are “pipeline” sites located? At what FAR? What is the total anticipated new development for “pipeline” sites?</p> <p>20. (p. 2-14) Pipeline sites and anticipated development must be identified and listed. This might be most appropriate in the appendices.</p> <p>21. (p. 2-14) How were “knowledge” sites identified?</p> <p>22. (p. 2-14) What was assumed regarding “knowledge” sites, including density bonuses?</p> <p>23. (p. 2-14) What is the total anticipated new development for “knowledge” sites?</p> <p>24. (p. 2-14) Knowledge sites and anticipated development must be identified and listed. This might be most appropriate in the appendices.</p> | E5-57 |
| <p>25. (p. 2-14) Does the list of vacant sites include all surface parking lots? If not, which ones were included?</p> <p>26. (p. 2-14) What was assumed regarding vacant sites, including density bonuses?</p> <p>27. (p. 2-14) What is the total anticipated new development for vacant sites?</p> <p>28. (p. 2-14) Vacant sites and anticipated development must be identified and listed. This might be most appropriate in the appendices.</p> <p>29. (p. 2-14) Are “additional” sites limited to those in the CN2 and CC2 designation? If not what additional sites are included?</p> <p>30. (p. 2-14) What was assumed regarding “additional” sites, including density bonuses?</p> <p>31. (p. 2-14) What is the total anticipated new development for “additional” sites?</p> <p>32. (p. 2-14) Additional sites and anticipated development must be identified and listed. This might be most appropriate in the appendices.</p> | E5-58 |
| <p>33. (p. 2-14) What was assumed regarding continuance and replacement of nonconforming uses?</p> <p>34. (p. 2-14) Nonconforming sites and development must be identified and listed. This might be most appropriate in the appendices.</p> <p>35. (p. 2-14) What is the total amount of nonconforming development that is anticipated to continue?</p> | E5-59 |
| <p>36. (p.2-14) How will growth be monitored? What if assumptions regarding anticipated growth are exceeded? Will additional land use controls or mitigation measures be adopted?</p> | E5-60 |

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| <p>37. (p. 2-15, 5-5) As shown in Table 5-1, buildout under the existing general plan and anticipated development under the general plan update would differ only a little. In that case, why is additional development capacity being added to the City?</p> <p>38. (p. 2-15) What was assumed regarding application of bonuses and incentives for the expected growth presented in Table 2-4?</p> <p>39. (p.2-15) How much commercial, if any was assumed for the R3C-C and R4B-C designations?</p> <p>40. (p. 2-15) What is the land area and existing and anticipated development, in square feet, for each land use designation?</p> <p>41. (p. 2-15) Does current housing occupancy average 1.6 person per households? What is the source of that figure?</p> <p>42. (p. 2-6) What specific changes in land use designations are proposed for the Melrose/Beverly District?</p> <p>43. (p. 2-16) What is the total land area and existing and anticipated development, in square feet, for each land use designation in the Melrose/Beverly District?</p> <p>44. (p. 2-16) What building heights will be permitted and what heights are typical?</p> <p>45. (p.2-19) What specific changes in land use designations are proposed for the Santa Monica Boulevard West Subarea?</p> <p>46. (p. 2-19) What is the total land area and existing and anticipated development, in square feet, for each land use designation in the Santa Monica Boulevard West Subarea?</p> <p>47. (p. 2-19) What building heights will be permitted and what heights are typical?</p> <p>48. (p. 2-19) What specific changes in land use designations are proposed for the Santa Monica/Fairfax Transit District?</p> <p>49. (p. 2-19) What is the total land area and existing and anticipated development, in square feet, for each land use designation in the Santa Monica/Fairfax Transit District?</p> <p>50. (p. 2-19) What building heights will be permitted and what heights are typical?</p> <p>51. (p. 2-19) What specific changes in land use designations are proposed for the Santa Monica/La Brea Transit District?</p> <p>52. (p. 2-19) What is the total land area and existing and anticipated development, in square feet, for each land use designation in the Santa Monica/La Brea Transit District?</p> <p>53. (p. 2-16) What building heights will be permitted and what heights are typical?</p> <p>54. (p. 2-20) What specific changes in land use designations are proposed for the Sunset Strip Subarea?</p> <p>55. (p. 2-20) What is the total land area and existing and anticipated development, in square feet, for each land use designation in the Sunset Strip Subarea?</p> <p>56. (p. 2-20) What building heights will be permitted and what heights are typical?</p> | <p>E5-61</p> <p>E5-62</p> <p>E5-63</p> |
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Aesthetics

<p>Changes in building scale could alter the nature of established neighborhoods and the human scale character of much of West Hollywood, eliminating the very features that drew residents to West Hollywood in the first place. This section largely defers any real analysis and mitigation of impacts to future environmental reviews that may or may not occur, thereby guaranteeing a piecemeal approach to analysis of aesthetic impacts.</p>	<p>E5-64</p>
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The general plan established a building envelope that must be addressed now, not on a piecemeal basis later. Analyses should be performed based on that building envelope. In addition, certain assumptions regarding future development were apparently made on a site by site basis (p. 2-14).

This should provide adequate information to determine impacts now.

Rendered photographs should be provided from key vantage points, particularly where increased building height would intrude into views of the hills or other visual landmarks. Views from the hills looking down toward the City should also be provided. Impacts on night time views must also be considered. Rendered photographs should be provided for areas where views of commercial structures would intrude into low rise residential neighborhoods.

E5-64
cont.

In addition, the following questions and comments must be addressed:

1. (pp. 3.1-2, 3) The uses of the various areas are described with little information as to their visual character. What is the scale, in height and stories of existing structures in each area? What types of setbacks are provided? This must be included in the EIR. E5-65
2. (p. 3.1-5) The discussion of local plans and policies should address regulation of signage, including digital billboards and wrap around signage. E5-66
3. (p. 3.1-6) What is the maximum height of lighting fixtures? E5-67
4. (p. 3.1-6) What are the standards for sign illumination? E5-68
5. (p. 3.1-6) Do any of the other specific plans include policies related to aesthetic matters? E5-69
6. (p. 3.1-6) How would view corridors be preserved? E5-70
7. (p. 3.1-6) Would a roof top restaurant be considered a “view terrace” adequate for preserving views of the Basin? E5-71
8. (p. 3.1-7) This section misstates the purposes of Appendix G of the CEQA Guidelines, as discussed above. E5-72
9. (p. 3.1-7) Any impacts on views generally available to the public should be considered significant, whether or not they are from a scenic highway. E5-73
10. (p. 3.1-7) Existing landforms should be considered scenic resources for analysis purposes. E5-74
11. (p. 3.1-7) In which areas, specifically, are allowable height and floor area ratio proposed? These must be mapped. E5-75
12. (p. 3.1-7) Why are no scenic vistas identified in the General Plan? E5-76
13. (p. 3.1-7) In which areas, specifically, are increases in allowable height and floor area ratio proposed? These must be identified and mapped. E5-77
14. (p. 3.1-8) In what areas could future development result in taller structures than would be permitted with current FARs? E5-78
15. (p. 3.1-8) Will approval of all “taller structures” be discretionary? If not, how can it be assured by project specific impacts would be identified and mitigated and that they would not block or obscure an existing scenic view? E5-78
16. (p. 3.1-8) How will the SSP, City Code requirements and development standards act to require “view preservations as well, as enhancement of the surrounding streetscape and limiting adverse visual impacts on adjacent uses.” E5-79
17. (p. 3.1-8) In which “certain areas” will visual character be altered. E5-80
18. (p. 3.1-8) Will approval of a density bonus for mixed use be discretionary? If not, how can it be assured by project specific impacts would be identified and mitigated? E5-80
19. (p. 3.1-9) Will approval of a density bonus for transit oriented development be discretionary? If not, how can it be assured that project specific impacts would be identified and mitigated? E5-81
20. (p. 3.1-9) How is a “high degree” of architecture defined? E5-82
21. (p. 3.1-9) How will a high degree of architecture and integration of open space be

guaranteed in new multi-family development?	
22. (p. 3.1-9) Would all future development occurring as a result of the land uses permitted by the General Plan update be subject to discretionary approval? If not, then how would such development be subject to environmental review which would include analysis of visual impacts?	E5-82 cont.
23. (p. 3.1-9) Won't deferral of virtually all analysis to a project by project analysis result in a piecemeal assessment?	E5-83
24. (p. 3.1-9) In what areas would more intense uses intensify existing potentially adverse light and glare impacts?	E5-84
25. (p. 3.1-10) How will the City control digital billboards and wraparound signs on buildings?	E5-85
26. (p. 3.1-10) What is the distance between Griffith Park Observatory and West Hollywood?	E5-86
27. (p. 3.1-10) The DPEIR must map the perimeter of areas potentially shadowed within and around the specific plan area at representative time periods.	
28. (p. 3.1-10) What project level analysis will be performed to ensure that shade and shadow impacts are less than significant?	
29. (p. 3.1-10) The significance of shade and shadow impacts is often assessed by the duration an area would be shadowed. Unless it is due north, a given area would be typically be shadowed by a specific structure for a limited time, although several structures together could result in constant shade. Thus, it can truly be stated that "at the project level of analysis impacts will be less than significant" for individual development, though the same <i>cannot</i> be stated for the impact potentially created by several individual projects developed pursuant to the general plan update when not examined on a piecemeal basis.	E5-87
30. (p. 3.1-10) What types of measures would be placed as conditions of approval to mitigate impacts due to shade and shadow?	
31. (p. 3.1-10) How is it guaranteed that all "individual development projects will be required to undergo specific environmental review"? How is it guaranteed that mitigation measures will not only "be identified to reduce any project specific significant impacts to aesthetics" but that such measures will actually be implemented, even if costly?	E5-88

Air Quality

The following questions and comments must be addressed:

1. (p. 3.2-12) Don't food uses emit odors? This must be addressed, especially for mixed use areas and the residential/commercial interface.	E5-89
2. (p. 3.2-23) Are these policies part of the existing General Plan or the General Plan update? If the latter, they should not be included as part of the existing environmental setting.	E5-90
3. (pp. 3.2-25) How much would Measures 3.2-1 through 3.2-5 reduce air quality impacts? A minor amount? Some assessment of the remaining impact is necessary in order that decision makers may clearly weigh differing values if a statement of overriding considerations is offered for adoption.	E5-91
4. (p. 3.2-30) Because lots are small, with little opportunity for buffering by distance, it is	E5-92

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| <p>highly likely localized significance thresholds for construction emissions would be exceeded, and it cannot be concluded that exposure to TACs from construction equipment would be insignificant. This is of particular concern due to the many seniors residing in West Hollywood. This must be addressed in the EIR.</p> | <p>E5-92
cont.</p> |
| <p>5. (p. 3.2-32) How are idling limits enforced?</p> | <p>E5-93</p> |
| <p>6. (p. 3.2-33) Was any CALINE 4 modeling performed for the proposed project?</p> | <p>E5-94</p> |
| <p>7. (p. 3.2-35) Were all of the measures listed considered to reduce fugitive dust for modeling purposes? The South Coast Air Quality Management District advises that the only mitigation measures acceptable for use with URBEMIS modeling are either watering OR chemical suppressants.</p> | <p>E5-95</p> |
| <p>8. (p. 3.2-35,36) Who will determine what is “feasible”? How will the public know be informed?</p> | <p>E5-96</p> |
| <p>9. (p. 3.2-36) Are the measures listed under Mitigation Measure 3.2-2 required by code? How are they enforced?</p> | <p>E5-97</p> |
| <p>10. (Appendix) The identified modeling assumptions appear to include zero provision of wood-burning fireplaces. Is this accurate?</p> | <p>E5-98</p> |

Biological Resources

<p>This section must address hazards to avifauna from reflective and mirrored surfaces. Loss of mature trees and other vegetation due to redevelopment at higher floor area ratios must also be addressed.</p>	<p>E5-99</p>
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Cultural Resources

This section must address how the potential to achieved increased floor area ratios and building height may stimulate redevelopment and demolition of historic structures. In addition, the following questions and comments must be addressed:

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| <p>1. (p. 3.4-5) The text indicates that 257 historic resources had been documented in the City and 121 were evaluated as having local, state, or national significance, and that the City has 77 locally designated historical resources on file. However, Figure 3.4-1 shows far fewer resources. All historic resources must be described and mapped in the EIR. Although a list is provided in Appendix C, for many of the resources nothing but an address and age is provided, and the historic value is not identified.</p> | <p>E5-100</p> |
| <p>2. (p. 3.4-5) The EIR must identify, describe, and map any historic districts.</p> | |
| <p>3. (p. 3.4-9) This section must identify how provision of the State historic building code may be utilized to encourage preservation.</p> | |
| <p>4. (p. 3.4-13 through 15) This section must address procedures for alteration or demolition of cultural resources as provided under Chapter 19.58 of the Zoning Code.</p> | |
| <p>5. (p. 3.18,19) How would the proposed policies reduce the loss of cultural resources?</p> | <p>E5-101</p> |
| <p>6. (p. 3.18) How are cultural resources protected under existing codes?</p> | |
| <p>7. (p. 3.4-19) Would the outlined policies fully ensure no loss of cultural resources? If not, then impacts are not less than significant.</p> | |
| <p>8. Additional mitigation measures should include use of facade easements and use of the State Historic Building Code which eases requirements for upgrades to current codes which can be prohibitively expensive.</p> | |

Geology, Soils and Mineral Resources

The following questions and comments must be addressed:

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| 1. (p. 3.5-5) When was the last quake recorded on the Hollywood Fault? | E5-102 |
| 2. (p. 3.5-5) Has the maximum potential earthquake for this fault been reliably estimated? | E5-103 |
| 3. (p. 3.5-13) Where in the city would expansive materials be anticipated to exist? | E5-104 |
| 4. (p. 3.5-13) Where in the city would collapsible soils be anticipated to exist? | E5-105 |
| 5. (p. 3.5-18) Is all new development in the FP-1 zone required to conduct a fault location investigation prior to issuance of a building permit, whether or not discretionary approvals are involved? | E5-106 |
| 6. (p.3.5-18) Would maintaining the required distance from the fault render any lots nonbuildable? | E5-107 |
| 7. (p. 3.5-19) This section mischaracterizes Appendix G of the Guidelines. | E5-108 |
| 8. (p. 3.5-21) West Hollywood contains many older structures. What programs exist to encourage retrofitting of older structures for earthquake safety? Such programs should be included in the General Plan. | E5-109 |
| 9. (p. 3.5-22) Will use of pile drivers be required for new construction in areas subject to liquefaction? | E5-108 |
| 10. (p. 3.5-21, 23) How will safety from geologic hazards be ensured in cases where no environmental review is required? | E5-109 |

Hazards and Hazardous Materials

The following questions and comments must be addressed:

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| 1. (p. 3.6-3) The list of schools is not complete. Figure 3.9-2 shows seventeen schools in the area. Private as well as public schools must be listed. | E5-110 |
| 2. (p.3.6-4) What does it mean to be defined as a Moderate Wildfire Hazard Severity Zone? | E5-111 |
| 3. (p. 3.6-14) The Safety Element of the General Plan would be a local plan which one would expect to address hazards. | E5-112 |
| 4. (p. 3.6-16) This section misstates the purpose of Appendix G of the Guidelines. | E5-113 |
| 5. (p. 3.5-16) Thresholds should include impairment of emergency response times below acceptable levels. | |
| 6. (p. 3.6-20) The EIR must identify the specific policies in the proposed General Plan which are aimed at ensuring emergency response readiness. | |
| 7. (p. 3.6-20) The EIR must identify how the programs cited would reduce impacts on the ability to respond to emergencies. This must be explained, particularly how the referenced programs and policies will mitigate impairment of emergency response and evacuation due to traffic congestion. Absent this information it cannot be concluded that impacts on emergency response and evacuation would be less than significant. | E5-114 |
| 8. (p. 3.6-23) Which policies in the General Plan would protect residents from the effects of gas hazards? | E5-115 |
| 9. The EIR must address also impacts from asbestos that may be released during demolition. | E5-116 |
| 10. The EIR must examine how increased traffic will affect evacuation routes. | |
| 11. The EIR must examine how increased traffic will affect emergency response. | E5-117 |
| 12. What alternate mode of transportation could be used to provide emergency response in | |

areas blocked by traffic congestion?

| E5-117
cont.

Hydrology and Water Quality

The following questions and comments must be addressed:

1. (p. 3.7-2) Does high groundwater currently necessitate dewatering for subterranean garages? | E5-118
2. (p. 3.7-15) This section misstates the purpose of Appendix G of the Guidelines. | E5-119
3. (p. 3.7-16) Thresholds of significance should also include impairing the ability to achieve TMDLs in an impaired water body. | E5-120
4. (p. 3.7-18) How does the City require stormwater and accountability for owners of all development construction projects? | E5-121
5. (p. 3.7-19) As allowable FARs increase, how will that affect the ability to infiltrate, filter, or treat an 85th percentile storm runoff pursuant to Order No 01-182? | E5-122
6. (p. 3.7-20) As allowable FARs increase, use of underground parking would become more likely. Would dewatering be needed for such facilities, either during construction or on an ongoing basis? | E5-123
7. (p. 3.7-20) What would be done with groundwater pumped in conjunction with subterranean facilities? |
8. (p. 3.7-20) What is know about the quality of any such water? |
9. (p. 3.7-22) The referenced general plan policies must be identified and listed. | E5-124

Land Use and Planning Programs

Section 15125(d) of the CEQA Guidelines requires that an EIR discuss any inconsistencies between the proposed project and applicable general plans and regional plans. By contrast, the DPEIR devotes considerable effort to identifying policies with which the project could be considered consistent, but fails to discuss potential inconsistencies at all. The EIR must identify any inconsistencies that necessitated the amendments. For example, will growth under the general plan update exceed that anticipated in regional planning efforts? | E5-125

Perhaps one of the most critical aspects of the General Plan update is how it may encourage or facilitate changes in land use. In that regard the following questions and comments must be addressed. |

1. (p. 3.8-2) The EIR must present acreage and development data for each General Plan land use category by area. | E5-126
2. (p. 3.8-3) What is the typical floor area ratio in each commercial area? | E5-127
3. (p. 3.8-4) The State requirement that General Plan elements be coordinated must be addressed. | E5-128
4. (p. 3.8-6) This section misstates the purpose of Appendix G of the Guidelines. | E5-129
5. (p. 3.8-6) Additional thresholds of significance should include creating land use incompatibilities and creating abrupt changes in scale of for adjacent land uses. | E5-130
6. (p. 3.8-7) If existing development has not reached the development potential allowed by existing General Plan designations, why is additional development potential being added in the General Plan update? | E5-131
7. (p. 3.8-7) The EIR must identify where, specifically, increases in height and FAR are | E5-132

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| proposed. | |
| 8. (p.3.8-7) The EIR must identify how the “planned distribution of land uses” will be distributed by geographic area. | E5-132
cont. |
| 9. (p.3.8-11) How would growth that would result in numerous intersections at LOS F increase regional mobility? | E5-133 |
| 10. (p.3.8-11) How would adding additional building height promote “people scaled” communities? | E5-134 |
| 11. (p. 3.8-12) Is growth and traffic anticipated under the General Plan update consistent with that anticipated in the RTP? | E5-135 |
| 12. The DPEIR provides virtually no information about areas outside the City limits rendering it impossible to evaluate impacts on the surrounding area. This must be remedied. | E5-136 |
| 13. The EIR must address potential land use conflicts in mixed use areas. | E5-137 |

Noise

This section discusses noise due to various sources including construction and vehicular traffic. However, there is no discussion of noise or vibration due to light rail, although the General Plan update calls for establishment of rail stops in the city. This must be addressed in the EIR.	E5-138
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In addition, the following questions and comments must be addressed.

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| 1. (p. 3.9-7) What was the distance from the nearest traffic lane at noise monitoring locations? | E5-139 |
| 2. (p. 3.9-15) Noise contours are typically illustrated as narrow lines delineating each dB level, whereas Figure 3.9-4 shows broad areas. Is the blue area stated to be 70 dB in the legend actually areas at 70 dB or louder? Does the green area indicate noise levels between 65 dB and 70 dB? This must be explained. | E5-140 |
| 3. (p. 3.9-20) The EIR must address HUD noise standards pursuant to 24 CFR Part 51. HUD standards could potentially be applicable to individual developments within the City. | E5-141 |
| 4. (p. 3.9-22) The general plan policies referenced must be presented in the EIR so that the public may evaluate their effectiveness in addressing impacts identified therein. | E5-142 |
| 5. (p. 3.9-22) Each of the noise issues listed must be addressed in the EIR. They are not. | E5-143 |
| 6. (p. 3.9-22, 23) What noise limits are specified in the Municipal Code? | E5-144 |
| 7. (P. 3.9-24) How would the construction of taller buildings affect construction noise, both due to necessary construction techniques and elevated activities? | E5-145 |
| 8. (p. 3.9-24) Where does CEQA state that “the potential for any excessive groundborne noise and vibration levels must be analyzed”? | E5-146 |
| 9. (p. 3.9-25) This section misrepresents the purpose of Appendix G of the Guidelines. | E5-147 |
| 10. (p. 3.9-25) Thresholds of significance must include the noise impacts outlined in Mitigation Measure 3.9-1. | E5-148 |
| 11. (p. 3.9-27) As buildings are permitted additional height, how will intervening structures result in lower noise levels? | E5-149 |
| 12. (p. 3.9-28) How would the listed policies reduce impacts of construction noise? | E5-150 |
| 13. (p. 3.9-29) Analyses of traffic noise must address increased buses, consistent with General Plan policies encouraging greater use of transit. | E5-151 |
| 14. (p. 3.9-29) Noise due to light rail must also be addressed when considering | E5-152 |

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| transportation noise. | E5-152
cont. |
| 15. (p. 3.9-35) Parks and playgrounds would be considered noise sensitive uses. How would they be provided with noise reduction measures? | E5-153 |
| 16. (p. 3.9-36) Noise from commercial uses may also affect residences not in mixed use areas but located near the residential/commercial interface. | E5-154 |
| 17. (p. 3.9-37) Vibration due to construction and operation of light rail must be addressed. | E5-155 |
| 18. (p. 3.9-38) How will a mitigation measure which applies only to activities near historic structures reduce all construction vibration impacts to a less than significant level? | E5-156 |
| 19. (p. 3.9-39) While the General Plan update does not propose any major roadway projects, the General Plan update does support establishment of light rail and rail stations in the City. This must be addressed. | E5-157 |
| 20. (p. 3.9-40) It is suggested that the provisions of Mitigation Measure 3.9-1 be incorporated into City CEQA Guidelines. | E5-158 |
| 21. (p. 3.9-41) What is the likelihood that any individual project would be large enough to cause roadway volumes to increase by 25 percent or more? | E5-159 |
| 22. (p. 3.9-36) How will property damage and human annoyance due to vibration be mitigated where no historic structures are involved? | E5-160 |

Paleontological Resources

Will paleontological monitors be present during earth moving activities? If not, how will heavy equipment operators become aware that they are disturbing paleontological resources and know to cease work?	E5-161
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Population and Housing

This section must address jobs/housing balance in light of anticipated housing costs and the anticipated employee profile by income group, including extremely low, very low, low, median, and moderate income. In addition, the following questions and comments must be addressed.	E5-162
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| 1. (p. 3.11-2) Dwelling unit counts must also be presented in Table 3.11-1 or in a separate similar table. | E5-163 |
| 2. (p. 3.11-2) How does population density in West Hollywood compare to the other areas shown in Table 3.11-1? | E5-164 |
| 3. (p. 3.11-3) Under the existing, as opposed to the proposed, General Plan would population also exceed SCAG projections? | E5-165 |
| 4. (p. 3.11-3) Were the detailed projections in 2008 based on actual counts of jobs and housing units? How were employment numbers derived? | E5-166 |
| 5. (p. 3.11-7) The EIR must address the potential for existing low cost housing to be replaced by units with higher rents as sites redevelop. | E5-167 |
| 6. (p. 3.11-7,8) What do the policies presented have to do with displacement of housing or people? | E5-168 |

Public Services

This section does not address emergency medical response. A discussion of paramedic services and impacts on those services must be included. In addition, the following questions and comments must be addressed.	E5-169
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1. (p. 3.12-2) How does the rate of Part I crimes per thousand population compare to that elsewhere in the region?	E5-170
2. (p. 3.12-2) Are paramedic services provided? What is their staffing level and typical emergency response time?	E5-171
3. (p. 3.12-6) Approximately how many school age children reside in West Hollywood?	E5-172
4. (p. 3.12-7) Will construction of the new library result in a reduction in public open space?	E5-173
5. (p. 3.12-8) How was it determined that Beverly Hills provided water equivalent to 8,000 people?	
6. (p. 3.12-8) Is it possible that the water equivalent population for all uses, including commercial uses, would exceed the actual population of the City?	E5-174
7. (p. 3.12-8) Why is a SCAG population estimate for 2000 utilized when an actual head count was performed by the US Census at that time?	
8. (p. 3.12-8) Why is Beverly Hills treating groundwater with reverse osmosis?	
9. (p. 3.12-8) Have any water infrastructure deficiencies, including water pressure problems, been identified in the City of West Hollywood?	E5-175
10. (p. 3.12-13) Do aging waterlines, installed up to 95 years ago, need replacement?	
11. (p. 3.12-13) Could the rate of use of LAA water prior to 2004 be sustained with full implementation of the Lower Owens River Project and all judicial orders?	
12. (p. 3.12-14) Is the San Fernando groundwater basin available for municipal use? Isn't it polluted?	
13. (p. 3.12-14) Wasn't the apportionment of Colorado River based on an unusually wet period? Is it reasonable to anticipate full availability of previous apportionment?	E5-176
14. (p. 3.12-14) Are the projected supplies of SWP water realistic in light of recent judicial actions and adoption of Delta flow criteria by the California Water Resources Control Board?	
15. (p. 3.12-15) Has use of recycled water increased since 2005?	
16. (p. 3.12-16) Have any existing wastewater infrastructure deficiencies, including capacity problems, been identified in the City of West Hollywood?	E5-177
17. (p. 3.12-16) Would the additional sewer projects be needed due to growth under the existing General Plan or the General Plan update?	E5-178
18. (p. 3.12-19) What is the real, nontheoretical limit on how much wastewater an agency may discharge to HTP? Of existing capacity how much is currently utilized or needed by development already approved or reasonably expected to occur in the foreseeable future?	E5-179
19. (p. 3.12-19) Have any existing storm drain deficiencies, including capacity problems, been identified in the City of West Hollywood?	E5-180
20. (p. 3.12-19) Have any existing electric infrastructure deficiencies been identified in the City of West Hollywood?	E5-181
21. (p. 3.12-20) Have any existing deficiencies in the natural gas distribution system been identified in the City of West Hollywood?	E5-182
22. (p. 3.12-21) Is the 35,400 ton figure post MRF?	E5-183
23. (p. 3.12-21) Will Eagle Mountain be available by 2013?	
24. (p. 3.12-25) This section misstates the purpose of Appendix G of the Guidelines.	E5-184
25. (p. 3.12-25) The EIR must also consider additional thresholds of significance including an increase in demand for service which exceeds infrastructure capacity and a degradation of emergency response times below acceptable levels.	E5-185
26. (p. 3.12-26) What type of additional police facilities will be needed? Cannot additional	E5-186

- equipment and personnel work out of existing stations? Would additional jail space be needed?
27. (p. 3.12-27) How would police response times be affected by the proposed project?
28. (p. 3.12-28) Would the increased population and development contemplated under the General Plan update generate any need for new or expanded police stations or facilities?
29. (p. 3.12-28) It is recognized that pursuant to Section 15145 of the **Guidelines**, if a Lead Agency finds, after investigation, that an impact is too speculative for evaluation the potential impact need not be discussed further. However, whether or not additional police facilities would be needed to serve the growth anticipated under the General Plan update is not speculative and should be part of the EIR analysis. In fact, Page 3.12-26 states that additional police facilities will be needed. Specific impacts from a given facility improvement cannot be evaluated, but impacts can be evaluated in a general way, similar to the material presented in Table 3.12-14.
30. (p. 3.12-28) What type of additional fire facilities will be needed? Will an additional station be needed?
31. (p. 3.12-28) Will additional paramedic personnel and facilities be needed?
32. (p. 3.12-29) How will fire and paramedic response times be affected?
33. (p. 3.12-29) It is recognized that pursuant to Section 15145 of the **Guidelines**, if a Lead Agency finds, after investigation, that an impact is too speculative for evaluation the potential impact need not be discussed further. However, Page 3.12-28 states that some type of additional fire protection facilities will be needed. Identification of what additional fire facilities would be needed to serve the growth anticipated under the General Plan update is not speculative and should be part of the EIR analysis. Specific impacts from a given facility improvement cannot be evaluated, but impacts can be evaluated in a general way, similar to the material presented in Table 3.12-14.
34. (p. 3.12-32) Have the City of Beverly Hills and LADWP been provided copies of the General Plan update for their review pursuant to Government Code Section 65352(a)(7)? Have they commented pursuant to Section 65352.5?
35. (p. 3.12-32) It is recognized that pursuant to Section 15145 of the Guidelines, if a Lead Agency finds, after investigation, that an impact is too speculative for evaluation the potential impact need not be discussed further. However, estimates of future growth were developed based on growth expected to occur at specific locations in the City. This information was utilized to estimate future traffic in a given area and identify circulation system deficiencies. Likewise the same land use information can be utilized to estimate future water demand and identify water system deficiencies. Thus, identification of specific water infrastructure projects need not be speculative but is within the scope of this EIR. While detailed impacts may require deferral to a future time, at least the locations at which streets would likely be torn up could be identified.
36. (p. 3.12-35) The EIR assumes that 22.3% of new growth would occur in the Beverly Hills water service area. However, estimates of future growth were developed based on growth expected to occur at specific locations in the City. This information was utilized in traffic modeling and thus has presumably already been entered into a computer. Consequently, it would be possible to actually add up the increase in dwelling units and population which would occur in the Beverly Hills service area. The EIR should utilize this information in its analysis.
37. (p. 3.12-35) Is growth currently anticipated in Beverly Hills at or below estimates in the UWMP? If not, how can it be assumed that excess water would be available?
38. (p. 3.12-35) Can Beverly Hills continue to receive the same level of imported water given

E5-186
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E5-187

E5-188

E5-189

E5-190

constraints on SWP and the Colorado River? This must be considered in the light of recent Delta flow criteria.	E5-190 cont.
39. (p. 3.12-36) What will happen to MWD member agencies after 2025?	
40. (p. 3.12-37) If MWD can only assure adequate water through 2025, how can it be concluded that Beverly Hills has adequate access to water supply to serve future growth under the General Plan update?	
41. (p. 3.12-37) Did the Beverly Hills General Plan amendment include any additional growth not anticipated in the UWMP?	
42. (p. 3.12-41) Can increased conservation continue to be viewed as a potential supply? Much of what was once considered “drought mode” has now become normal. At what point will hard demand be reached below which further reduction in usage rates would be difficult?	
43. (p. 3.12-42) From where will water be transferred?	E5-191
44. (p. 3.12-43) How would desalination production of 133 MGD be possible by the year 2015? Current desal projects include a few small pilot projects, with larger projects in Carlsbad and Huntington Beach encountering financial and regulatory hurdles.	
45. (p. 3.12-43) Has cleanup of MTBE pollution in the Charnock subbasin been completed?	
46. (p. 3.12-43) How does the cost of improving the quality of water from the Hollywood, La Brea and Santa Monica basins compare to the cost of desalination?	
47. (p. 3.12-44) What frequency storm produces 0.45 inch of precipitation?	
48. (p. 3.12-45) Where are out-of-service reservoirs and what is their capacity? Why are the reservoirs out of service?	
49. (p. 3.12-45) Is land available for regional recharge?	
50. (p. 3.12-47) If LADWP were unable to obtain enough water to supply West Hollywood, how would West Basin which relies to a large extent on one of the same sources, i.e. MWD, be able to supply West Hollywood?	
51. (p. 3.12-47) From what basin does West Basin receive groundwater? Has that basin been apportioned? To what extent is the apportionment utilized?	
52. (p. 3.12-48) Biological impacts associated with alternative water supply projects include entrapment and entrainment of marine life by desalination plant intakes unless beach wells or similar devices are used.	E5-192
53. (p. 3.12-52) Of existing capacity at the Hyperion Treatment Plant, how much is currently utilized or needed by development already approved or reasonably expected to occur in the foreseeable future? Absent this information, how can it be concluded that additional capacity exists to serve future growth under the General Plan update?	
54. (p. 3.12-53) While trunk sewers are apparently operating well below design capacity, as shown in Table 3.12-4, would any local lines be at or near capacity as a result of growth under the General Plan update? These must be identified.	E5-193
55. (p. 3.12-55) For which existing energy facilities would capacity be exceeded?	E5-194
56. (p. 3.12-55) What natural gas and electricity consumption rates were assumed?	E5-195
57. (p. 3.12-55) It is recognized that pursuant to Section 15145 of the Guidelines, if a Lead Agency finds, after investigation, that an impact is too speculative for evaluation the potential impact need not be discussed further. However, estimates of future growth were developed based on growth expected to occur at specific locations in the City. This information was utilized to estimate future traffic in a given area and identify circulation system deficiencies. Likewise the same land use information can be utilized to estimate future energy demand and identify distribution system deficiencies. Thus, identification of specific infrastructure projects need not be speculative but is within the scope of this	E5-196

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| EIR. While detailed impacts may require deferral to a future time, at least the locations at which streets would likely be torn up to install new gas lines could be identified as could the general area of the City where new substations would be needed. | E5-196
cont. |
| 58. (p. 3.12-59) Isn't the EIR supposed to assess the impacts of new development on the level of police and fire services provided to the community? Why would such a study occur <i>after</i> adoption of the General Plan update? | E5-197 |

Recreation

Provisions of the Quimby Act (Government Code Section 66477) must be clarified in the EIR. The Quimby Act makes no recommendation as to how much park acreage a community should or should not have, but merely provides a mechanism for requiring park land dedication or payment of in-lieu fees. The Quimby Act authorizes local agencies to adopt ordinances requiring dedication of park land or payment of in-lieu fees by those developing new residential subdivisions. Required dedication is based on anticipated population of the new residential subdivision and assessed on a sliding scale equivalent to three acres to five acres of park land per thousand population, which is the average range for cities in California. A local agency may also adopt other fees based on a documented nexus.	E5-198
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In addition, the following questions and comments must be addressed.

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| 1. (p. 3.13.2) According to Table 3.13-1, the City parks contain only one ballfield. That is extremely low for a city of nearly 40,000 people, even considering the large proportion of seniors in the City. Does the field show signs of over-use? Is the grass worn and the ground packed down? Does the field have artificial turf? | E5-199 |
| 2. (p. 3.13-8) What park land standard or identification of need was used to establish the City's Public Open Space fee? | E5-200 |
| 3. (p. 3.13-8) What has the fee been used for in the past? What are plans for future use of the fee? | E5-201 |
| 4. (p. 3.13-8) Have locations for future parks been identified? | E5-202 |
| 5. Based on NRPA standards and the standard utilized in establishing the City's Public Open Space fee, how many additional acres of parkland would be needed to serve the additional residents in dwellings under the General Plan update? | E5-202 |
| 6. (p. 3.13-9) Additional thresholds of significance should include provision of recreation facilities below acceptable levels based on local population. | E5-203 |
| 7. (p. 3.13-9) Inasmuch as the City of West Hollywood contains very little park land, the assessment of impacts on park facilities must examine impacts on surrounding communities. | E5-204 |
| 8. (p. 3.13-10) What methods are used to increase the supply of parks and open space?. | E5-205 |
| 9. (p. 3.13-11) Is additional land available for recreation uses anywhere in the city? | E5-206 |
| 10. (p. 3.13-11, 13) While the policies and programs listed are admirable, they offer little in the way of concrete action which would actually result in additional recreation opportunities. In the absence of additional mitigation measures, one cannot conclude that no significant impact would occur due to adding nearly seven thousand people to a community providing only 0.41 acres of parkland per thousand people without identifying additional parkland. | E5-207 |

Transportation and Circulation

The General Plan and EIR are highly supportive of alternate modes of transportation, yet no analysis of impacts on transit is provided. The EIR must identify transit available, including location of bus lines, their headways, capacity and existing ridership. The EIR must identify additional demand for transit and whether adequate capacity exists to serve that demand. Any need for additional transit services or facilities must be identified. | E5-208

All intersections analyzed are located within or immediately adjacent to the West Hollywood city limits. The traffic analysis must consider intersections beyond the City limits in Beverly Hills and Los Angeles. Even if the City has no jurisdiction to mitigate impacts outside City boundaries, impacts must still be identified. | E5-209

The accuracy of the traffic analysis is difficult to evaluate. The EIR does not identify trip generation rates utilized, and no intersection worksheets or printouts are included in the appendices. Neither the EIR nor appendices show or describe street and intersection configuration nor identify critical movements, rendering it difficult to evaluate the feasibility of potential mitigation. This is all unusual and must be remedied. | E5-210

In addition, the following questions and comments must be addressed.

1. (p. 3.14-5) The Metropolitan Transportation Authority typically evaluates traffic in terms of a volume to capacity ratio (V/C) such as intersection capacity utilization (ICU). This system along with various LOS must be explained in the EIR. | E5-211
2. (p. 3.14-5) What are the comparative advantages and disadvantages of the V/C versus the average delay approach? | E5-212
3. How was the average delay system selected by the City? | E5-213
4. (p. 3.14-5) Some of the parameters listed, such as vehicle trip generation are inputs for determining LOS. | E5-214
5. (p. 3.14-6) The list of intersections in Table 3.14-4 must be augmented to include all affected intersections, including those in Beverly Hills and Los Angeles. | E5-215
6. (p. 3.14-9) What LOS do the various traffic volumes represent on the different roadway segments? What is the V/C ratio? | E5-216
7. (p. 3.14-6) LOS data must be provided for arterial segments. | E5-217
8. (p. 3.14-15) What is the average trip length for trips with one trip end outside the City? | E5-218
9. (p. 3.14-15) What trip generation rate was assumed for each land use? | E5-219
10. (p. 3.14-15) How are trips counted? Does each trip reflect one trip end or two? Are trips that start or end outside the City counted differently? | E5-220
11. (p. 3.14-16) Additional thresholds of significance would be generation of traffic or transit demand that exceeds capacity of services or facilities. | E5-221
12. (p. 3.14-21) Why is the average delay at the intersection of La Brea and Romaine anticipated to decrease? | E5-222
13. (p. 3.14-34) What did the traffic analysis assume regarding pedestrian activity at intersections? Did the analysis take into account high pedestrian volumes that can sometimes interfere with turning movements? | E5-223
14. (p. 3.14-40) What portion of the traffic volumes shown in Figure 3.14-7 is due to | E5-224

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| development anticipated in West Hollywood under either the existing or updated General Plan and what portion is the 2035 baseline without any increased growth in West Hollywood? | E5-224
cont. |
| 15. (p. 3.14-40) From where was the future, 2035 baseline derived? | E5-225 |
| 16. (p. 3.14-41) What trip generation rate was assumed for each use and land use designation? | E5-226 |
| 17. (p. 3.14-41) The EIR must include a TAZ map and present land use and trip generation by TAZ. | E5-227 |
| 18. (p. 3.14-45) Raw data regarding vehicle trips and vehicle miles traveled may be useful in calculating energy use and vehicle emissions. However, it is not terribly meaningful if used to assess transportation performance in a vacuum without knowing peak hour characteristics, distribution, directionality and roadway configurations. All of that must be presented in the EIR. | E5-228 |
| 19. (p. 3.14-45) Why are vehicle trips and vehicles miles per capita projected to decrease? | E5-229 |
| 20. (p. 3.14-46) Why is traffic at the intersections listed in Table 3.14-8 projected to be more congested under the No Project alternative than under the proposed General Plan update when No Project would result in 228 fewer dwelling units and 190,606 fewer square feet of nonresidential development? | E5-230 |
| 21. (p. 3.14-48) The listed measures do not seem to address delays in emergency response due to gridlock. How would the listed measures alleviate this problem? | E5-231 |
| 22. (p. 3.14-49) How is it concluded absent any analysis whatsoever that no impacts on transit or bicycle transportation would occur? | E5-232 |

Global Climate Change

The following questions and comments must be addressed:

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| 1. (p., 3.15-2) Projections of sea level rise from the California Climate Change Center should be included, though the Blue Ribbon Task Force projections appear to be about the same as those of the Climate Change Center. | E5-233 |
| 2. (p. 3.15-29) How much would each of the identified strategies reduce GHG generation? | E5-234 |
| 3. This section must address how increased shade and shadow due to taller buildings may affect local generation of solar power. | E5-235 |

Maximum Theoretical Buildout

The EIR presents a maximum theoretical buildout, but it does not appear to be the maximum permitted under the Land Use Element. The maximum theoretical buildout assumes only one density bonus, although the Land Use Element indicates that where multiple bonuses are permitted in a particular land use designation, projects may apply the bonuses cumulatively (Land Use Element p. 53). Thus, a project in the CC1 designation may apply a bonus for green building (0.1) plus a bonus for affordable housing (.35) plus one for Mixed Use (0.5). If a maximum is to be presented, it should be the actual maximum.	E5-236
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The information in Table 4-1 is helpful and a similar table should be provided for all other alternatives, with the addition of acreage of land in each designation. It appears, however, that the maximum theoretical buildout actually has less commercial development than is theoretically possible, since only 75% of the base FAR is assumed to be commercial in mixed use areas.	E5-237
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Residential uses are not limited to the 0.5 bonus for residential use plus a bonus for affordable housing. That would likely affect potential trip generation. | E5-238

Nearly all impacts would be more significant under the maximum theoretical buildout. However, that level of development would be possible under the General Plan update. How will the City monitor growth to ensure that growth is more closely aligned with the scenario examined in the EIR? How will impacts be mitigated if growth approaches the maximum theoretical buildout? | E5-239

Cumulative Impacts

In accordance with Guidelines Section 15130 (b)(3):

Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. | E5-240

The DPEIR relies on adopted plans and defines each impact as local, regional, or in the case of climate change, global. No other definition is applied. This is problematic in that differing impacts may apply to a different portion of the community or region and several of the adopted plans are outdated as discussed below. The EIR must be revised to address appropriate geographic areas consistent with the context of each potential impact as discussed below.

1. Aesthetics- The EIR does not indicate how it is that adopted policies will avoid impacts to scenic vistas and thus the conclusion that no impacts will occurred is unsupported. | E5-241

2. Land Use and Planning - Growth under the General Plan update would exceed anticipated growth in SCAG’s RPT and RCP. The EIR must identify other communities in the SCAG region where approved or reasonably foreseeable probable future projects and programs would result in growth in excess of that provided in the RTP and RCP. | E5-242

3. Population and housing- This section should examine the same issues as identified for Land Use, above. | E5-243

4. Public Services and Utilities- Cumulative growth for each service sector should be identified based on service area. For example:

- What additional growth not included in the UWMP would occur in the Beverly Hills water service area? What would be the cumulative effect on Beverly Hills water service and supplies?
 - What additional growth not included in the UWMP would occur in the DWP water service area? What would be the cumulative effect on DWP water service and supplies?
 - What additional growth in southern California will be competing for the 130 MGD of possible desalinated water included in the EIR? To what extent is that hypothetical water “spoken for”?
 - What additional growth in the HPT service area will generate wastewater to HPT? What would be the cumulative effect on HPT?
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It is not enough to merely state that the proposed project utilizes only a small portion of the potential service or utility.

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| 5. Recreation- the EIR must identify additional development which will create demand for local recreation facilities both inside and outside the city of West Hollywood. | E5-245 |
| 6. Transportation and Traffic – It is not at all clear what was examined for traffic on a cumulative basis. Although Table 3.14-5 presents roadway volumes for a 2035 “no project” scenario, it appears that this scenario is development under the existing general plan. It is not clear whether the existing general plan growth was just added to current counts or if a 2035 baseline was developed based on regional transportation plans or anticipated growth in the surrounding communities. If 2035 traffic was simply derived by adding West Hollywood development to existing traffic, then anticipated traffic impacts are probably severely under estimated. | E5-246 |

Growth Inducement

An action can foster growth directly or indirectly. By increasing allowable development the General Plan update would remove a regulatory barrier to increased growth.	E5-247
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Alternatives to the Proposed Project

Straight line growth

Is the straight line growth an actual alternative to the proposed action or merely a different growth projection under the same planning regimen?	E5-248
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No Project/Existing General Plan

The change in development anticipated between the updated and existing General Plan is relatively small, and projected impacts differ only slightly if at all. Why didn't the City just process a site specific amendment for the affected areas? Where, geographically, does development under the two plans differ?	E5-249
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What would be maximum theoretical buildout under the existing General Plan? The EIR must present a comparison of maximum theoretical buildout under both the existing and updated General Plans.	E5-250
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Transit Overlay Zones Only

Would this require down-zoning in certain areas or just a moratorium? How long could a moratorium be imposed?	E5-251
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TDM

As stated in the EIR (p. 5-52) this alternative uses “the same basic land use and policy assumptions as the project” with more aggressive use of TDMs per Table 5-2. Thus overall development would be the same, but traffic generation would be reduced. Is this truly an alternative of merely a projection based on differing assumptions? Couldn't this alternative be combined with any of the others?	E5-252
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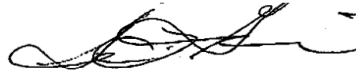
Conclusion

As currently presented, the DPEIR is inadequate to fulfill the purposes of CEQA. The DPEIR	E5-253
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must be revised to reflect all growth permitted under the proposed General Plan update and must be re-circulated pursuant to Guidelines Section 15088.5 in order that the public and decisions makers may be fully informed of the impacts of the proposed project.

E5-253
cont.

Yours truly,

A handwritten signature in black ink, appearing to read 'Sandra L. Genis', with a stylized flourish at the end.

Sandra L. Genis

Tom Brohard and Associates

July 29, 2010

Ms. Lauren Meister, President
West Hollywood West Residents Association
PO Box 691427
West Hollywood, California 90069

SUBJECT: Review of the Public Review Draft Environmental Impact Report (Draft EIR) for the City of West Hollywood General Plan – Traffic Issues

Dear Ms. Meister:

Tom Brohard, P.E., has reviewed Section 2.0 (Proposed Project), Section 3.14 (Transportation and Traffic), Section 5.0 (Alternatives), and other portions of the June 2010 Public Review Draft Environmental Impact Report (Draft EIR) for the City of West Hollywood General Plan prepared by AECOM. Documents including Draft EIR Appendix F, the June 22, 2010 Traffic Study prepared by Fehr & Peers, and its Appendix B, the March 26, 2010 Trip Reduction Impacts Analysis prepared by Nelson\Nygaard, have also been reviewed. Also Chapter 6, Mobility, of the Public Review Draft of the West Hollywood General Plan 2035 has been reviewed.

Further study must be undertaken to properly identify the traffic impacts of the Proposed Project. Application of robust transportation demand management (TDM) strategies to only the highest land use intensities in the Proposed General Plan 2035 masks the true environmental impacts of the Proposed Project and the TDM Alternative, and distorts the Alternatives Analysis. Mitigation of significant traffic impacts in the near term and in the long term is defective as all feasible transportation planning and traffic engineering measures have not been properly considered or analyzed. Mitigation measures that may have been considered at the significantly impacted Robertson Boulevard/Beverly Boulevard intersection have not been disclosed or explained. In addition, replacement of the City's current performance standards is suggested in the Mobility Element of the Proposed General Plan, but no alternatives are proposed or available for public review and comment within the Draft EIR.

E5-254

Until the various issues and concerns raised in this letter are addressed, there is at least a "fair argument" that the Proposed Project may have adverse traffic impacts that have not been properly disclosed, analyzed, and mitigated. Accordingly, the Public Review Draft EIR for the West Hollywood General Plan must be revised and recirculated.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 40 years of professional

E5-255

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engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the Cities of Big Bear Lake and San Fernando. I have extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects. Several recent assignments are highlighted in the enclosed resume.

E5-255
cont.

Project Description and Alternatives

Table 2-4 on Page 2-15 of the Project Description Section of the Draft EIR identifies the expected buildout in Year 2035 that would occur under the Proposed Project, the City of West Hollywood General Plan 2035. The table indicates a development capacity of 28,847 residential units and 13,949,860 square feet of non-residential development in Year 2035.

Table 5-1 on Page 5-5 of the Alternatives Section provides a comparison among the alternatives studied in the Draft EIR as follows:

- Buildout of the City's Existing General Plan would result in about 228 fewer residential units, about 190,606 fewer square feet of non-residential development, and about 361 fewer people than General Plan 2035.
- Buildout of the "Two Transit Overlay Areas Only" Alternative would result in about 1,066 fewer residential units, about 656,288 fewer square feet of non-residential development, and about 1,700 fewer people than General Plan 2035.
- Buildout of the "Extensive TDM" Alternative would result in the same number of residential units, the same square footage of non-residential development, and the same number of people as General Plan 2035.

E5-256

Based on the comparison of the alternatives, Page 5-67 of the Draft EIR concludes Alternative 2, the Two Transit Overlay Areas Only Alternative, would "...avoid significant traffic impacts of the project; fewer intersections would operate at unacceptable LOS. This alternative would also achieve most, but not all, of the objectives of the proposed General Plan. Therefore, this alternative is the environmentally superior alternative."

Traffic Issues

Based on the information provided in the Draft EIR for the City of West Hollywood General Plan, my review indicates the following traffic issues and concerns:

- 1) Alternatives Analysis Is Inadequate – As indicated in Table 5-1 on Page 5-5 of the Draft EIR, the Proposed Project and the alternatives studied represent the following levels of buildout development:
 - Proposed General Plan
 - 28,847 dwelling units
 - 13,949,860 square feet of non-residential development
 - 44,182 population
 - Existing General Plan
 - 28,619 dwelling units
 - 13,759,254 square feet of non-residential development
 - 43,821 population
 - Two Transit Overlay Areas Only
 - 27,781 dwelling units
 - 13,293,572 square feet of non-residential development
 - 42,482 population
 - Extensive TDM
 - 28,847 dwelling units
 - 13,949,860 square feet of non-residential development
 - 44,182 population

E5-257

As shown above from Table 5-1, the number of dwelling units, square feet of non-residential development, and the population at buildout is the same under the Proposed General Plan as under the Extensive TDM alternative. In comparison, buildout of the Existing General Plan contains fewer dwelling units, fewer square feet of non-residential development, and lower population than the Proposed General Plan. Development in the Two Transit Overlay Areas Only results in even fewer dwelling units, square feet of non-residential development, and lower population than the Existing General Plan.

Transportation Demand Management (TDM) includes a series of strategies designed to reduce commuter vehicle traffic. TDM is often used as one of a group of mitigation measures to reduce significant traffic impacts. Impacts are reduced by lowering the number of vehicle trips by encouraging, requiring, and/or subsidizing alternative transportation. Impacts are also reduced by measures that avoid travel during congested peak hours.

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Appendix D to the Traffic Study identifies a number of TDM strategies as well as assumptions regarding trip reductions for each of the three land use plans. While a “Robust TDM” Plan should be considered to reduce significant traffic impacts of the three different land use intensities, any such plan can only achieve its goals with an appropriate level of voluntary compliance, periodic monitoring, necessary enforcement and penalties for non-compliance. It is my understanding that several of these key components including periodic monitoring, necessary enforcement, and penalties for non-compliance are not being provided in the City’s current TDM Plan. Without improvement in each of these areas, the anticipated results in the “Robust TDM” Plan will not be achieved. Provisions for periodic monitoring, necessary enforcement, and penalties for non-compliance must be added to the “Robust TDM Plan”.

E5-257
cont.

The Draft EIR identifies and acknowledges a number of significant and unavoidable traffic impacts associated with each alternative that has been studied. Application of “Robust TDM” strategies to only the highest land use intensities in the Proposed General Plan 2035 and not to the other two levels of development masks the true environmental impacts of the highest land uses intensities that have been proposed in the TDM Alternative.

- 2) Mitigation Analyses for Significant Traffic Impacts Are Defective – A total of 42 major signalized intersections were analyzed in the Traffic Study and the results were then carried forward into the Draft EIR for the Proposed Project. As shown in Table 3.14-6 on Page 3.14-21, 15 of these intersections will not be significantly impacted by the Proposed Project. Each of the other 27 intersections are forecast to be significantly impacted by the Proposed Project in either the AM peak hours, the PM peak hours, or in both the AM and PM peak hours. Of the 27 intersections that are significantly impacted by the Proposed Project, only four intersections are proposed to be improved as identified in Mitigation Measure 3.14-1 on Page 3.14-52 of the Draft EIR. Improvements at the remaining 23 intersections are not feasible according to the Draft EIR, and the Proposed Project will create “significant and unavoidable” traffic impacts at each of these 23 intersections.

E5-258

According to the Draft EIR, a few mitigation measures such as relocation of bus stops, traffic signal timing changes, and adding turning lanes were considered at some of these 23 intersections. While identified as experiencing “significant and unavoidable” traffic impacts in both peak traffic hours in Table 3.14-6, the Draft EIR and the Traffic Study do not discuss what, if any, potential mitigation measures were considered at Robertson Boulevard and Beverly Boulevard. Potential mitigation of this significantly impacted location must be disclosed, together with why improvements are not feasible.

In nearly all of the discussions of the individual intersections beginning on Page 3.14-19, the Draft EIR concludes that “Limited right of way makes

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improvements to this intersection infeasible. There is no feasible mitigation for this intersection LOS impact within the existing right of way, and taking of additional right of way for vehicular traffic would be infeasible.” Similarly, Page 19 of the Traffic Study states “The built environment in the study area creates minimal opportunity for physical roadway or intersection widening... Due to limited right of way in the study area, the impacted intersections would remain at unacceptable levels of service with the proposed General Plan, resulting in a significant and unavoidable impact.”

My review indicates other potentially feasible transportation planning and traffic engineering mitigation measures at the 23 intersections identified as “significant and unavoidable” have not been considered. In the near term, these include the following:

- Adopt a “Robust TDM” Plan for all development in the City
- Prohibit left turns during peak hours or at all times
- Prohibit vehicle crossing and/or left turning traffic from minor side streets
- Prohibit curb parking during peak hours or at all times to allow striping of additional through/right turn lanes
- Restripe roadways using narrow lanes so more lanes can be striped
- Relocate bus stops to the far side of the intersection to avoid interference with right turns
- Provide right turn green arrows for striped right turn lanes
- Install state-of-the-art traffic signal system (like the City of Los Angeles) that adjusts timing in response to actual traffic demand and provides an additional 10 percent capacity during peak traffic hours

For the longer term, the City could certainly identify “problem intersections” forecast to experience significant delays together with localized widening strategies to add a lane or lanes in the immediate vicinity of the intersection. As the property at the intersection redevelops over time, the City would then obtain additional right of way as part of the approval of the development so the localized intersection improvement could be constructed. Each of the alternatives studied in the Draft EIR includes a certain level of property redevelopment, and the City should work toward improvements at these “problem intersections” over time. In addition for the longer term, the potential for grade separated intersections should also be considered.

E5-258
cont.

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The California Environmental Quality Act, CEQA, requires that all feasible mitigation measures be studied before concluding that the traffic impacts are “significant and unavoidable.” The Draft EIR and the Traffic Study have failed to evaluate the mitigation measures listed above that are clearly feasible in the near term, that could reduce or eliminate significant traffic impacts, and that would result in few if any secondary impacts. Before concluding that traffic impacts are “significant and unavoidable”, all feasible mitigation measures including application of a “Robust TDM” plan must be analyzed and imposed on the land use plan in the Proposed Project as well as the different alternative land use plans.

E5-258
cont.

- 3) Adoption of Different Performance Standards Cannot Be Deferred – Mitigation measures to offset significant impacts resulting from a proposed project are required by CEQA. Mitigation must be specific and implementation must be timely to offset the impacts identified in the Draft EIR. To determine which impacts are significant, all agencies must have adopted performance standards against which the impacts of a proposed project can be evaluated.

Measure M-5.15 on Page 127 in the Mobility Section of the City of West Hollywood General Plan 2035 states “The City should replace Level of Service (LOS) with performance measures for the City’s transportation system that reflect priorities established in the General Plan.” While the City’s existing LOS criteria were used throughout the Draft EIR to compare the traffic impacts of the different land use plans, no alternatives to the LOS criteria have been proposed or published for public review and comment.

E5-259

The Mobility Section of the Proposed General Plan incorrectly and improperly defers adoption of new performance measures to identify significant traffic impacts of future projects. In turn, this defers mitigation of the traffic impacts that will occur. Specific performance measures are required to evaluate traffic impacts, have not been thoroughly analyzed or detailed in a definitive plan, and such a plan has not been adopted by the City.

The approach to establishing performance measures in the future to identify significant traffic impacts and necessary mitigation is exactly backwards. The development of performance measures to identify significant traffic impacts and the required mitigation must be conducted as part of the Draft EIR, not after project approval. Alternatives to LOS performance measures subject to public review and comment must be developed now, not later.

Further study must be undertaken to properly identify the traffic impacts of the Proposed Project. Application of robust transportation demand management (TDM) strategies to only the highest land use intensities in the Proposed General Plan 2035 masks the true environmental impacts of the Proposed Project and the

E5-260

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TDM Alternative, and distorts the Alternatives Analysis. Mitigation of significant traffic impacts in the near term and in the long term is defective as all feasible transportation planning and traffic engineering measures have not been properly considered or analyzed. Mitigation measures that may have been considered at the significantly impacted Robertson Boulevard/Beverly Boulevard intersection have not been disclosed or explained. In addition, replacement of the City's current performance standards is suggested in the Mobility Element of the Proposed General Plan, but no alternatives are proposed or available for public review and comment within the Draft EIR.

E5-260
cont.

As discussed in this letter, there is at least a "fair argument" that the Proposed Project, West Hollywood General Plan 2035, will have adverse traffic impacts that have not been properly disclosed, analyzed, and mitigated in the Draft EIR. A Recirculated Draft EIR must be prepared to address the issues and concerns raised in this letter and those expressed by others. If you have questions regarding these comments, please call me at your convenience.

E5-261

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard

Tom Brohard, PE
Principal

Enclosure



Letter E5

E5-1

The commenter's suggestions regarding rephrasing and adding to the General Plan Guiding Principles are noted.

E5-2

The commenter's concern that the Draft EIR does not adequately address aesthetics, traffic, parking, infrastructure, air quality, and other sections ("etc.") is noted.

As indicated in Chapter 6.0 of the Draft EIR, changes made to the Draft EIR represent clarifying information or modifications that are not "significant." The Draft EIR does not meet the requirements for recirculation. Per CEQA Guidelines Section 15088.5:

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review... before certification...information can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that: (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it. (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Section 4.1 of the Draft EIR contains a complete analysis of the maximum theoretical buildout scenario, which reflects all growth permitted under the proposed General Plan. Therefore, the Draft EIR does not meet these requirements for recirculation. Furthermore, CEQA Guidelines 15088.5(b) indicates that recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. As indicated in Chapter 6.0 of the Draft EIR, changes made to the Draft EIR represent clarifying information or modifications that are not "significant," as explained above.

E5-3

The commenter's suggestion regarding placing greater emphasis on a "small-town feel" in the proposed General Plan is noted.

E5-4

The commenter's support for the proposed down-zoning of parcels on Doheny Drive and West Knoll Drive is noted.

E5-5

In response to the comment, page 48 of the proposed General Plan will be corrected to read as follows: "R1B allows for: 2 dwelling units per lot on lots of less than 8,499 square feet; 3 units per lot between 8,500 and 11,999 square feet; plus 1 additional unit per lot, for each 3,500 square feet or fraction thereof in excess of 11,999 square feet, with a maximum height of 25 feet and 2 stories."

E5-6

The commenter's concerns with unbundled parking are noted.

E5-7

The commenter's suggestion regarding down-zoning the Sherbourne Triangle is noted.

E5-8

In response to the comment regarding Neighborhood Conservation (NC) Overlay Districts, please refer to page 52 of the proposed General Plan, which describes the NC Overlay as one of the existing Zoning Overlay Districts included on the Zoning Map. The commenter's suggestions regarding additional requirements for the NC Overlay are noted.

E5-9

Please refer to Response to Comment G29-2 for clarification regarding the bonuses allowed in commercial zones. Development bonuses are given for a qualifying development project that contains site-specific or desirable community features and characteristics, such as affordable housing and green buildings. The commenter's opposition to the applicability of multiple bonuses for new development projects is noted. Individual development projects pursuant to the proposed General Plan would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E5-10

In response to the comment regarding green building, all development projects in the City are required to follow the Green Building Ordinance. Projects that achieve more than 90 points pursuant to the Green Building program are eligible for further incentives. The commenter's opposition to green building incentives is noted.

E5-11

In response to the comment, Topical Response #1 and Section 2.0 of the Draft EIR discuss how the growth projections in the proposed General Plan were analyzed by the Draft EIR. The environmental impacts of height modifications and density bonuses, where applicable, were analyzed throughout the Draft EIR. Cumulative impacts were analyzed in Section 4.2 of the Draft EIR. The City retains the discretion to consider new bonus programs in the future. Environmental impacts of any new proposed bonus programs would be evaluated when new programs are proposed.

E5-12

The commenter's opposition to any increase in density or height in the West Hollywood West area is noted.

Please refer to Response to Comment E5-11 regarding height and density bonuses.

In response to the comment regarding proposed General Plan changes to the north side of Melrose Avenue, the commenter's concern regarding traffic, parking, aesthetics, shade and shadow, solar access, public services and utilities, parks, and public safety is noted. Please refer to the Draft EIR for analysis of those issues pursuant to implementation of the General Plan: Section 3.14 for parking and traffic impacts; Section 3.1 for aesthetic, and shade and shadow impacts; Section 3.12 for public services and utilities impacts, including public safety; and Section 3.13 for recreation impacts. The Draft EIR is not required to analyze solar access. However, all development in West Hollywood is required to adhere to existing California legislation on solar access.

E5-13

The commenter's concern to proposed General Plan changes and long-term changes to Melrose Avenue and vicinity is noted. The commenter's question regarding encouraging neighborhood-friendly businesses and scale within the Neighborhood Conservation Overlay is noted. Please refer to the Economic Development Chapter of the proposed General Plan for a discussion of neighborhood serving businesses. In addition, proposed General Plan goals and policies support neighborhood-serving uses; see ED-6 and associated policies.

The commenter's concern with the Draft EIR traffic analysis findings at Melrose Avenue and San Vicente Boulevard, and Melrose Avenue and Huntley Drive is noted.

In response to the comments regarding the intersection level of service (LOS), see Response to Comment E4-5.

The project-specific traffic impacts associated with the PDC Red building, West Hollywood Library, Greenwich, and Cedars can be found in their respective EIRs and/or traffic impact studies. Growth associated with these projects was considered in the analysis of traffic impacts. See Topical Response #1. For projects outside of West Hollywood, the traffic analysis conducted for implementation of the proposed General Plan includes forecasts of regional development surrounding the City of West Hollywood, from the Southern California Association of Governments' (SCAG's) Regional Transportation Plan (RTP).

E5-14

In response to the comment, the land use designations proposed in the General Plan specify a range of land uses allowed within each land use designation. The land uses associated with each proposed land use designation have been analyzed throughout the Draft EIR. The land uses of any proposed development would need to be consistent with the land uses allowed in the proposed General Plan and Zoning Ordinance.

The commenter's concern regarding traffic on Beverly Boulevard pursuant to implementation of the proposed General Plan is noted. Section 3.14 of the Draft EIR analyzed the traffic impacts of implementation of the proposed General Plan, including the intersection of Robertson Boulevard and Beverly Boulevard, and La Cienega Boulevard and Beverly Boulevard. Goal M-7 of the General Plan contains policies to protect and preserve residential neighborhoods from intrusion of nonresidential traffic.

E5-15

See Response to Comment E4-27. The City will continue to work with the residents and business owners in the development of future parking programs such as the Parking Credit Program mentioned in the comment.

E5-16

The commenter's concern regarding the statement on page 46 of the Land Use and Urban Form Chapter of the proposed General Plan regarding billboards is noted. In addition, the commenter's opposition to permitting billboards and tall walls on Beverly Boulevard or any other commercial street other than Sunset Boulevard is noted.

The Draft EIR analyzed the impact of billboards, tall walls, and signage in Section 3.1 of the Draft EIR. In addition, the Land Use and Form Chapter of the proposed General Plan contains goals and policies (see LU-16 and associated policies) to address signage, billboard, and tall-wall issues.

E5-17

The commenter's statement regarding transitional zoning as an important planning tool is noted. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E5-18

The commenter's concern with height increases in the Melrose Triangle areas is noted. Section 3.1 of the Draft EIR analyzed the aesthetic impacts of implementation of the proposed General Plan. Section 3.8 of the Draft EIR analyzed the land use and planning impacts of implementation of the proposed General Plan. Section 3.14 of the Draft EIR analyzed the traffic impacts of implementation of the proposed General Plan, including the intersection of Doheny Drive and Santa Monica Boulevard, and Doheny Drive, Santa Monica Boulevard, and Melrose Avenue. The commenter's concern regarding traffic at these intersections is noted.

The commenter's statement on the proposed General Plan community outreach telephone survey is noted. The Introduction and Overview Chapter of the proposed General Plan and Chapter 2.0 of the Draft EIR describe the extensive public involvement process for the General Plan.

E5-19

The commenter's concern regarding potential reductions in transit services in the City of West Hollywood is noted. The recent reduction in transit service by the City of Los Angeles is a reflection on current economic climate. Metro has not reduced its services through West Hollywood.

E5-20

In response to the comment, the traffic analysis conducted for implementation of the General Plan in Section 3.14 of the Draft EIR and Appendix F does not take into account any trip reductions that could occur if the subway is extended to West Hollywood. Although the General Plan encourages the expansion of both local and regional transit systems, the proposed General Plan and the Draft EIR do not make any assumptions when and if the subway extension would be built. The proposed General Plan clearly identifies any such subway stops in West Hollywood as potential. The City is aware that the subway may not align through West Hollywood but does not preclude other rail systems and major transit improvements along its transit corridors.

E5-21

In response to the comment, the commenter's concern with public transportation attracting additional riders is noted. The phone survey referenced is based on the current transportation

climate. With the increase in congestion forecasted to occur within the City with or without the proposed General Plan, other viable options are being explored to improve mobility.

E5-22

The commenter's concern regarding the proposed General Plan's potential effects on water supply is noted. Section 3.12 of the Draft EIR evaluated the impact on water supply from implementation of the General Plan and explains how water use attributable to implementation of the General Plan was estimated. Because the water supply impact was found to be significant and unavoidable at the program level of analysis, the City Council will determine whether the General Plan's benefits outweigh the project's significant and unavoidable impacts. This analysis is contained in the Findings of Fact for Adoption of a Final Environmental Impact Report for the West Hollywood General Plan document and the Statement of Overriding Considerations, contained in Planning Commission Resolution PC-10-944.

Questions pertaining to cost rates, water priority between new development and existing development, and past usage effects on water rates are beyond the scope of the Draft EIR. However, these questions and concerns will be provided to decision makers for consideration during the final hearings for the proposed General Plan. The City's water providers, the City of Beverly Hills and LADWP, would be able to provide more detailed responses to the questions posed.

Also refer to Response to Comment E4-54, which contains a letter from the Metropolitan Water District (MWD) and the West Basin Municipal Water District dated July 16, 2010. This letter confirms that the MWD and the West Basin Municipal Water District, in cooperation with LADWP, have adequate supply and reliable access to water into the future based on regional water supply planning for all of Southern California.

E5-23

The commenter's concern regarding the generation of solid waste and landfill issues is noted.

The Sanitation Districts of Los Angeles County function on a regional scale and consist of 23 independent special districts serving about 5.7 million people in Los Angeles County. The service area covers approximately 820 square miles and encompasses 78 cities and unincorporated territory within the County of Los Angeles. The Sanitation Districts are responsible for determining the air quality and traffic impacts associated with waste disposal in landfills, as well as gathering public input on siting of landfill facilities. The Sanitation Districts would be able to provide information on these issues as well as the commenter's questions regarding landfill closure and compliance. Section 3.14 of the Draft EIR analyzed the traffic impacts of implementation of the proposed General Plan, which includes the vehicle trips associated with solid waste activities.

The proposed General Plan and Climate Action Plan contain goals and policies to reduce solid waste and increase recycling (see IRC-10 and associated policies, and SW1.1 in the Climate Action Plan).

E5-24

The commenter's concern regarding the light, glare, sun, and shade impacts of taller buildings on Melrose Avenue pursuant to implementation of the General Plan is noted. Section 3.1 of the Draft EIR analyzed the aesthetic impacts, including light, glare, and shade, pursuant to implementation of the proposed General Plan.

E5-25

The commenter's concern regarding standards of significance for shade and shadow, and the desire for stricter thresholds of significance is noted. Section 3.1 of the Draft EIR analyzed the aesthetic impacts, including light, glare, and shade, pursuant to implementation of the proposed General Plan. Consistent with California law, the West Hollywood Municipal Code Section 19.20.170 provides regulations to address solar access. As the General Plan update does not propose any development, the impacts to grass, trees, and landscaping on individual properties would be analyzed during any required environmental review for individual development projects that are proposed.

E5-26

Please refer to Response to Comments E5-254 through E5-261.

E5-27 The comment is noted. Please refer to subsequent responses to comments for detailed responses.

E5-28

This comment makes opening remarks and does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary.

E5-29

The commenter's concern regarding deferral of a significant portion of analysis and identification of mitigation measures to future environmental documents is noted. Please refer to Topical Response #2.

E5-30

The commenter's concern regarding piecemealing is noted. Per CEQA Guidelines Section 15152 "...the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed."

Section 3.21 of the Draft EIR analyzed the public service and utility impacts, including police protection, fire protection, education, libraries, water infrastructure, water supply, wastewater, storm drains, energy, and solid waste, pursuant to implementation of the proposed General Plan. This included an analysis of the adequacy of infrastructure pursuant to implementation of the proposed General Plan and according to growth projections. The environmental impact of construction of police stations, fire stations, schools, and water infrastructure cannot be analyzed in project-level detail in this program Draft EIR because no development or specific locations for development have been proposed. As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

Section 3.14 of the Draft EIR analyzed the traffic impacts of implementation of the proposed General Plan.

The commenter's concern regarding piecemealing of shade and shadow impacts is noted. The commenter's suggestion of delineating the perimeter of potential shade impacts from potential building heights on adjacent properties is beyond the scope of a program-level EIR where no specific projects are proposed.

E5-31

Please refer to Topical Response #2. The commenter's concern regarding deferral of analysis to future proposed projects pursuant to the General Plan is noted. The commenter cites specific examples as visual factors (character), shade and shadow, cultural resources, and geologic hazards. In response to the comment, the level of analysis and references to future project-specific environmental documentation throughout Sections 3.1 through 3.15 of the Draft EIR is commensurate with a first-tier, or programmatic EIR. Per CEQA Guidelines Section 15152 "...the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed." As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Program EIR. If project impacts go beyond those identified in the Program EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA. CEQA (Public Resources Code 21159.24) exempts infill residential projects from further environmental review only if the project will not have project-specific significant effects particular to the project or its site.

E5-32

In response to the comment, the purpose of the Draft EIR is to analyze the environmental impacts of implementation of the proposed General Plan and associated Climate Action Plan. The Draft EIR analyzes the impacts of implementation of the proposed General Plan compared to what is existing "on the ground" today. Except in Section 5.0, analysis of the No Project/Existing General Plan, the Draft EIR does not and is not required to conduct plan-to-plan analysis, i.e., the proposed General Plan is not analyzed against or compared to the existing General Plan.

Section 15124 of the CEQA Guidelines states that "the description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. (a) The precise location and boundaries of the proposed project shall be shown on a detailed map...(b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project. (c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. (d) A statement briefly describing the intended uses of the EIR." Section 2.0 of the Draft EIR meets these requirements.

E5-33

Please refer to Topical Response #1 for a discussion of how growth pursuant to implementation of the General Plan is analyzed in the Draft EIR. Also refer to Section 4.1 of the Draft EIR containing a complete analysis of the maximum theoretical buildout scenario, which reflects all growth permitted under the proposed General Plan.

In response to the comment regarding where growth will occur in the City, Chapter 2.0 of the Draft EIR provides a description (see the descriptions of the commercial subareas) of where growth is likely to occur throughout the time horizon of the proposed General Plan. As noted on page 2-16, most of the City is not anticipated to experience land use change as a result of the General Plan update.

In response to the comment about providing detailed breakdown of acreage by subarea in the Draft EIR, Chapter 2.0 of the Draft EIR provides a general description (see the descriptions of the commercial subareas) of land use changes, height, and character. Please refer to Table 3-2 in the Land Use and Urban Form Chapter of the proposed General Plan for information on acreage by land use designation.

E5-34

Please refer to Table 2-4 and 3.0-1 in the Draft EIR for information on dwelling units, nonresidential development, and acreage for existing land uses. The environmental setting is described in the Draft EIR at a level of detail appropriate for analysis of a citywide general plan. As CEQA Guidelines Section 15146 explains, “the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Section 15146 confirms that an EIR for a general plan need not be as detailed as an EIR for a specific development project. Here, the EIR’s description of the environmental setting contains all information necessary to establish the baseline conditions for analysis of all of the General Plan’s environmental impacts.

The commenter states that the Draft EIR must include detailed information regarding dwelling units, densities, existing commercial development, floor area ratios (FARs), typical building heights, and nonconformities by neighborhood or commercial subarea. The Draft EIR is programmatic and is not required to include the information at the level suggested by the commenter, as noted in the paragraph above. Throughout the Draft EIR, the environmental impacts of implementation of the proposed General Plan to surrounding communities are analyzed at a level of detail appropriate for a programmatic EIR. For example, the traffic analysis conducted for implementation of the proposed General Plan includes forecasts of regional development surrounding the City of West Hollywood, from SCAG’s RTP. Additionally, since the City of Beverly Hills and Los Angeles Department of Water and Power (LADWP) provide water to the City of West Hollywood, the water supply analysis in the Draft EIR considers the impacts of implementation of the West Hollywood General Plan on the City of Beverly Hills and the LADWP water service area. Furthermore, refer to the cumulative impact analysis in Section 4.2 of the Draft EIR, specifically Table 4-3, which indicates the geographic scope of the environmental analysis pursuant to implementation of the proposed General Plan. As indicated in the table, most of the EIR considered and analyzed areas outside of the City of West Hollywood in the analysis of cumulative impacts (predominantly at the regional level).

E5-35

The commenter’s suggestion that the Draft EIR be revised to address the impacts of traffic, noise, air emissions, public service demand, and other issues in Beverly Hills, Los Angeles, and elsewhere is noted. Throughout the Draft EIR, the environmental impacts of implementation of the proposed General Plan to surrounding communities are analyzed at a level of detail appropriate for a programmatic EIR. For example, the traffic analysis conducted for implementation of the proposed General Plan includes forecasts of regional development surrounding the City of West Hollywood, from the SCAG’s RTP. Additionally, since the City of Beverly Hills and LADWP provide water to the City of West Hollywood, the water supply analysis in the Draft EIR considers the impacts of implementation of the West Hollywood General Plan on the City of Beverly Hills and the LADWP water service area. Furthermore, refer to the cumulative impact analysis in Section 4.2 of the Draft EIR, specifically Table 4-3, which indicates the geographic scope of the environmental analysis pursuant to implementation of the proposed General Plan. As indicated in the table, most of the EIR considered and analyzed areas outside of the City of West Hollywood in the analysis of cumulative impacts (predominantly at the regional level).

E5-36

The commenter incorrectly states that the Draft EIR does not identify any cumulative impacts with implementation of the proposed General Plan. Section 4.2 of the Draft EIR contains a discussion of cumulative impacts that were identified with implementation of the General Plan.

In response to the comment on transit services, Section 3.14 of the Draft EIR reviews the types of transit services available in the City. Additionally, given the nature of the proposed project and the significance thresholds identified for the analysis of transit service impacts, the Draft EIR found that program-level public transit impacts would be less than significant. .

E5-37

The commenter states that the Draft EIR dismisses potential impacts to the wastewater system on the basis that the project would constitute only a small percentage of growth in the area. The wastewater analysis on page 3.12-52 of the Draft EIR analyzed the total wastewater contribution to the Hyperion Treatment Plant (HTP) pursuant to implementation of the General Plan. The Sanitation Districts of Los Angeles County provided the language on page 3.12-52 that indicates the projected wastewater increase with implementation of the proposed General Plan, in terms of overall capacity of the HTP system, is small and there would be no impact on the facilities and no cause for a restriction to be placed on the ability of Sanitation District No. 4 to discharge. The overall available capacity of the system determines whether the additional increment of treatment capacity represented by General Plan growth is significant—not the ratio of growth to capacity.

The Draft EIR does not analyze impacts based on percentage contribution or the contribution method as suggested.

E5-38

The commenter's concern regarding the language in mitigation measures is noted. Per CEQA Section 15097, "to ensure that the mitigation measures and project revisions identified in the EIR ... are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed, the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program." As part of the adoption of the General Plan and certification of the Draft EIR, the City of West Hollywood is also adopting a mitigation, monitoring, and reporting program.

In response to the comment, to clarify, vehicular-traffic-induced vibration and industrial and commercial operations vibration were found to be less than significant. Construction-induced vibration was found to be significant. Adherence to regulations and implementation of Mitigation Measure 3.9-6 would reduce construction-induced vibration to a less-than-significant level. Bullet point 1 of Mitigation Measure 3.9-6 was revised to apply to sensitive land uses as well as historic structures. This would reduce the potential for human annoyance due to construction-induced vibration. This does not change the analysis or conclusions of the Draft EIR. When individual projects are proposed, they will be reviewed for project-specific construction-induced vibration impacts during any required environmental review. If project-specific impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

In response to the comment on emergency access, this impact was found to be less than significant and no mitigation is required. Page 3.14-48 explains why the impact is less than significant, i.e., adherence to existing regulations, plans, and a variety of General Plan policies.

In response to the comment on displacement of substantial numbers of existing housing or people, this impact was found to be less than significant and no mitigation is required (see page 3.11-7 and 3.11-8). However, page 3.11-7 and 3.11-8 of the Draft EIR were revised to incorporate policies from the Housing Chapter of the proposed General Plan, which are more relevant to displacement.

E5-39

In response to the comment on the geographic scope of cumulative impacts, Table 4.3 in Section 4.0 of the Draft EIR identifies the geographic scope of cumulative impacts for each issue area. In response to the comment regarding the Draft EIR analyzing growth outside of the City's borders, the environmental impacts of implementation of the proposed General Plan to surrounding communities are analyzed at a level of detail appropriate for a programmatic EIR. For example, the traffic analysis conducted for implementation of the proposed General Plan includes forecasts of regional development surrounding the City of West Hollywood, from the SCAG's RTP. Additionally, since the City of Beverly Hills and LADWP provide water to the City of West Hollywood, the water supply analysis in the Draft EIR considers the impacts of implementation of the West Hollywood General Plan on the City of Beverly Hills and the LADWP water service area.

E5-40

Please refer to Topical Response #1 for a detailed explanation of the methodology and results of growth projections for the proposed General Plan, which have been analyzed in the Draft EIR.

E5-41

In response to the comment, an explanation of trip generation rates used in the analysis of traffic impacts is contained in Appendix F of the Draft EIR. Similarly, an explanation of trip lengths used in the analysis of traffic impacts is contained in Appendix F of the Draft EIR. Appendix F also contains detailed explanations of the traffic model used to analyze the impact of implementation of the proposed General Plan, including traffic impacts in 2035.

E5-42

The comment is not entirely clear in meaning. In an attempt to respond to the comment, per CEQA Guidelines 15064.7, "Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative, or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency.

E5-43

In response to this comment, see Response to Comment E5-42. Additionally, CEQA Guidelines Appendix G contains the analysis of exposure of persons to or generation of excessive groundborne vibration.

E5-44

Please refer to Response to Comment E5-30. In addition, Section 3.12 of the Draft EIR includes an analysis of impacts to public services and utilities pursuant to implementation of the proposed General Plan. Furthermore, the proposed General Plan contains numerous goals and policies (e.g., Goal IRC-2 and associated policies) to ensure that adequate public services, facilities, and utilities are provided concurrently with new development.

E5-45

Table 3.14-5 in the Draft EIR presents existing roadway segment volumes and future no project and future proposed project segment volumes. The table is provided here for ease of comparison instead of repeating the same table in the impact analysis section.

E5-46

Please refer to Topical Response #1 and Chapter 2.0 of the Draft EIR for a detailed discussion of how the growth methodology and growth estimates were developed for the proposed General Plan and analyzed throughout the Draft EIR.

Section 15124 of the CEQA Guidelines states that “the description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. (a) The precise location and boundaries of the proposed project shall be shown on a detailed map...(b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project. (c) A general description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. (d) A statement briefly describing the intended uses of the EIR.” Section 2.0 of the Draft EIR meets these requirements.

E5-47

The comment regarding small-scale mapping is noted. The mapping referred to identifies land use designations for the areas mentioned in the comment. Additionally, the General Plan does not propose any change in land use designations that are not identified on the General Plan land use map. The Draft General Plan will change the nomenclature for all land use designations citywide. However, changes to the permitted land uses, heights, and densities in the Draft General Plan are proposed for only 8% of parcels in the City (as indicated on the General Plan Figure 3-4, the Land Use Designations Map).

E5-48

As described on page 159 of the proposed General Plan and page 2-1 of the Climate Action Plan, the Climate Action Plan implements policy IRC-6.3 of the West Hollywood General Plan Infrastructure, Resources, and Conservation Chapter. Although the Climate Action Plan is a standalone document, it is an important implementation program of the proposed General Plan.

E5-49

Page 2-5 of the Draft EIR discusses characteristics of the surrounding area in a level of detail appropriate to a programmatic EIR.

E5-50

Please refer to Table 3-2 in the Land Use and Urban Form Chapter of the proposed General Plan for information on acreage by land use designation. In response to the comment regarding Table 2-2 of Chapter 2.0 of the Draft EIR, this information has been added.

E5-51

In response to the comment regarding the purpose of the CC2 designation, residential development is allowed in all commercial zones in the City through mixed use. Allowing for moderate increases to height and density along commercial boulevards well served by transit is intended to encourage the development of mixed-use buildings, which incorporate residential units, in commercial zones. This is unrelated to the purpose of the R3C-C and R4B-C designations, which allow for small-scale, neighborhood-serving retail and commercial services on limited properties adjacent to commercial zones.

E5-52

Please refer to Table 3-2 in the Land Use and Urban Form Chapter of the proposed General Plan for information on acreage by land use designation.

E5-53

Please refer to Section 4.1 of the Draft EIR for a complete analysis of the Maximum Theoretical Buildout scenario.

E5-54

See Topical Response #1 for information on growth methodology and anticipated locations. Please refer to Chapter 2.0 of the Draft EIR, page 2-15, for a discussion of the types of development envisioned in the commercial subareas. The proposed General Plan Land Use and Urban Form Chapter, Table 3-2, contains the acreage of each proposed General Plan land use category. Additionally, refer to the City's adopted Specific Plans (Sunset Specific Plan, Pacific Design Center Specific Plan, and Movietown Specific Plan) for details on the type and square footage of development anticipated for each specific plan area.

The proposed General Plan and adopted Specific Plan make no commitment that development will occur.

E5-55

The Land Use and Urban Form Chapter of the proposed General Plan, including Table 3-2, and the West Hollywood Municipal Code provide specific information regarding available development bonuses. Additionally, Table 3-2 and Figure 3-4 in the Land Use and Urban Form Chapter provide the height and FARs applicable to the TOD areas. Also refer to Response to Comment E5-57.

E5-56

Proposed General Plan Policy LU-2.4 specifies that modifications to height or density will only be considered for properties within the Transit Overlay after CEQA analysis for rail transit to the City is complete and a program for rail transit to the City is incorporated in the Metro Long Range Transit Program. No changes to allowable height or density standards described in the Transit Overlay will be permitted unless and until the above conditions are met. The location

and extent of the Transit Overlay zones were determined by considering the location of existing major bus routes and transfer points, as illustrated in Figure 6-2 on page 113 of the proposed General Plan, and the subway stop locations proposed by Metro that are being studied as part of the CEQA analysis of the Westside Subway Extension, currently ongoing.

E5-57

In response to the comment, proposed General Plan Policy LU-2.4 specifies that modifications to height or density will only be considered for properties within the Transit Overlay after CEQA analysis for rail transit to the City is complete and a program for rail transit to the City is incorporated in the Metro Long Range Transit Program. No changes to allowable height or density standards for the Transit Overlay will be permitted unless and until the above conditions are met. The exact type and amount of modifications to development standards to be considered for properties within the Transit Overlay would be determined, and any required environmental review completed, once the above milestones are achieved. The policy does not exclude the possibility of the application of multiple development incentives, including mixed use.

E5-58

Please refer to Topical Response #1.

E5-59

The City's Zoning Ordinance contains detailed information on nonconformities. Nonconformities are not addressed in detail in the proposed General Plan; therefore, the Draft EIR does not address nonconformities. However, the existing land use information used in the Draft EIR assumes existing not planned land uses, including nonconforming land uses. Therefore, nonconforming land uses are considered as part of the existing conditions. Refer to Topical Response #1 for a discussion of growth, including future redevelopment and turnover of land uses, which assumes nonconforming land uses.

E5-60

An annual report on General Plan implementation is prepared and presented to the City Council. The Community Development Department continually monitors development activities in West Hollywood. In addition, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E5-61

Please refer to Chapter 5.0 of the EIR for a detailed analysis of the difference between the proposed General Plan and existing General Plan. As illustrated in Table 5-1, the development capacity of the proposed General Plan is generally similar to the development capacity of the existing General Plan. However, the proposed General Plan focuses development in areas close to transit to support the goals and policies proposed in the General Plan.

E5-62

Please refer to Topical Response #1.

E5-63

Please refer to Topical Response #1 and the proposed General Plan and Draft EIR. Table 3-2 and Figure 3-4 in the Land Use and Urban Form Chapter provide detailed information regarding the land uses, density, intensity, and height pursuant to the General Plan. Chapter 2.0 of the Draft EIR provides a general description (see the descriptions of the commercial subareas) of land use changes, height, and character.

E5-64

Please refer to Topical Response #2. The level of analysis performed in Section 3.1 of the Draft EIR is commensurate with a first-tier, or programmatic, EIR. Per CEQA Guidelines Section 15152 “the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.” As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

In response to the commenter’s request to include rendered photographs with the Draft EIR, this is beyond the scope of a first-tier, programmatic General Plan EIR. No specific buildings are proposed that could be rendered. The proposed General Plan allows for a range of building types. To assume a building type at any one location would be speculative.

E5-65

Section 3.1 of the Draft EIR provides a general description, including visual character, of the urban form, structure, and visual character of the City, including the commercial subareas suitable for a General Plan program EIR. Section 3.8 of the Draft EIR provides a general description of the City’s existing land uses. Please refer to the West Hollywood Municipal Code for information on setbacks.

E5-66

Page 3.1-5 of the Draft EIR indicates that signage regulations are located in the West Hollywood Municipal Code. Specifically, sign regulations are found in Sections 19.34 and G-34 of the Municipal Code.

E5-67

This information is beyond the scope of the Draft EIR. Signage regulations are located in the West Hollywood Municipal Code, Sections 19.34 and G-34.

E5-68

This information is beyond the scope of the Draft EIR. Signage regulations are located in the West Hollywood Municipal Code, Sections 19.34 and G-34.

E5-69

In addition to the aesthetic policies described in detail on page 3.1-6 of the Draft EIR, the Movietown Specific Plan contains project-level aesthetic policies. The Pacific Design Center Specific Plan contains very general aesthetic policies. Please refer to the City’s adopted Specific Plans for specific policies related to aesthetics.

E5-70

As indicated on page 3.1-7 of the Draft EIR, there are no designated scenic vistas in West Hollywood; however, there are local viewsheds providing views of the Hollywood Hills and the Los Angeles basin. Page 3.1-8 of the Draft EIR discusses how viewsheds would be preserved, as does the discussion on page 3.1-6 under the Sunset Specific Plan. As indicated on page 3.1-8, there are no scenic resources within a state scenic highway in West Hollywood.

E5-71 As indicated on page 3.1-6 of the Draft EIR, the Sunset Specific Plan contains policies to preserve views of the Los Angeles basin in new development.

E5-72

The comment is noted. Please refer to Response to Comment E5-42.

E5-73

The comment is noted. However, this is not the significance threshold as listed in Appendix G of the CEQA Guidelines, nor the threshold analyzed in the Draft EIR. The analysis of aesthetic impacts from implementation of the General Plan, including view impacts, is contained in Section 3.1 of the Draft EIR pursuant to the CEQA thresholds listed on page 3.1-7.

E5-74

The comment is noted. However, this is not the significance threshold as listed in Appendix G of the CEQA Guidelines, nor the threshold analyzed in the Draft EIR. The analysis of aesthetic impacts from implementation of the General Plan, including landforms, is contained in Section 3.1 of the Draft EIR pursuant to the CEQA thresholds listed on page 3.1-7. Page 3.1-8 provides a description of potential visual character alteration with implementation of the proposed General Plan.

E5-75

Please refer to the Urban Form and Land Use Chapter of the proposed General Plan and Chapter 2.0 of the Draft EIR.

E5-76

The General Plan is not required to identify scenic vistas. However, view preservation and enhancement is discussed in the Sunset Specific Plan. As indicated on page 3.1-7 of the Draft EIR, there are no designated scenic vistas in West Hollywood; however, there are local viewsheds providing views of the Hollywood Hills and the Los Angeles basin.

E5-77

Please refer to the Urban Form and Land Use Chapter of the proposed General Plan and Chapter 2.0 of the Draft EIR.

E5-78

The City's Municipal Code provides details on the approval authority for proposed development projects within the City. As noted in Section 3.1, page 3.1-8, the Sunset Specific Plan, City Code requirements, and development standards would impose conditions on new development, requiring view preservation and enhancement of the surrounding streetscape and limiting adverse visual impacts on adjacent uses. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E5-79

The City's Municipal Code contains specific development standards that limit adverse visual impacts on adjacent uses. For example, refer to Chapter 19.20 for General Property Development and Use Standards for regulations on distance between structures, height measurement, outdoor lighting, screening of equipment, setback measurement and projections into yards, etc. Chapter 19.36 of the West Hollywood Municipal Code also contains standards for specific land uses, such as mixed-use projects. Adherence to these regulations reduces aesthetic impacts to adjacent uses. Additionally, page 3.1-6 of the Draft EIR explains view preservation/enhancement strategies.

E5-80

Page 3.1-8 provides a description of potential visual character alteration with implementation of the proposed General Plan.

In response to the comment on the approval process for mixed-use projects, please refer to the City's Municipal Code for project approval requirements. Please refer to Response to Comment E5-79 and the City's Municipal Code, Chapter 19.46, which contains procedures and standards for Design Review.

E5-81

Please refer to Response to Comment E5-80.

E5-82

A high degree of architecture would be interpreted by the City and the Planning Commission. The City's Municipal Code contains detailed regulations for all proposed development projects, including the inclusion of open space, where required, and architectural detailing.

The City's Municipal Code provides details on the approval authority for proposed development projects within the City. Additionally, as already noted, all projects must adhere to the City's Municipal Code, which includes multiple regulations regarding aesthetics.

E5-83

Please refer to Topical Response #2. The Draft EIR provides a programmatic analysis of the aesthetic impacts of implementation of the proposed General Plan. The commenter's concern regarding piecemealing is noted. Per CEQA Guidelines Section 15152, "the level of detail contained in a first-tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed." As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

E5-84

Please refer to Section 3.1-9, which provides a description of areas where potential light and glare impacts could occur.

E5-85

Chapter 19.34 and G-34 of the City's Municipal Code regulate signage in the City of West Hollywood.

E5-86

This is beyond the scope of information required in the Draft EIR or proposed General Plan.

E5-87

Please refer to Section 3.1, page 3.1-10, for an analysis of shade and/or shadow impacts pursuant to implementation of the proposed General Plan. The Draft EIR is not required to map the perimeter of any areas potentially shadowed pursuant to implementation of the proposed General Plan.

Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval. Since no specific development projects are proposed pursuant to implementation of the proposed General Plan, and no project-level impacts have been identified, no hypothetical mitigation measures will be suggested.

E5-88

The City's Municipal Code provides details on the approval authority for proposed development projects within the City. Additionally, as already noted, all projects must adhere to the City's Municipal Code, which includes multiple regulations regarding aesthetics.

Please refer to Topical Response #2. As specific development projects are proposed that are in conformance with the General Plan, the City will evaluate the project and determine whether project impacts are sufficiently analyzed and mitigated under the Draft EIR. If project impacts go beyond those identified in the Draft EIR, the City is obligated to ensure such impacts are analyzed and mitigated in conformance with CEQA.

Per CEQA Guidelines Section 15097, "to ensure that the mitigation measures and project revisions identified in the EIR ... are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed, the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program." As part of the adoption of the General Plan and certification of the Draft EIR, the City of West Hollywood is also adopting a mitigation, monitoring, and reporting program.

E5-89

Restaurants must comply with South Coast Air Quality Management District regulations for air odor emissions and permitting.

E5-90

The policies on page 3.2-23 are proposed General Plan policies, and are located in the appropriate place in this section of the Draft EIR.

E5-91

The mitigation measures apply all available reductions to the maximum extent practical. As this is a programmatic EIR, quantification is not feasible or practical because construction-based mitigation measure reductions are based on individual development projects and would vary year by year, and project by project.

E5-92

Please refer to Section 3.2 of the Draft EIR for an analysis of impacts to sensitive receptors (which would include seniors, as mentioned by the commenter) from construction-related emissions from toxic air contaminants. As indicated on page 3.2-29, emissions from construction equipment would be reduced over the period of General Plan implementation because of an Environmental Protection Agency rule to reduce emission standards for heavy-duty diesel engines. Additionally, as indicated on page 3.2-30, because the use of off-road heavy-duty diesel equipment would be temporary and diesel particulate matter is expected to disperse quickly, further reductions in exhaust emissions would occur, and construction-related activities would not be expected to expose sensitive receptors to substantial emissions of toxic air contaminants. This impact was found to be less than significant.

E5-93

As idling restrictions are mitigation measures, which are measures above and beyond normal practices, these restrictions would be enforced through the mitigation monitoring and reporting program. The City would be required to ensure all appropriate mitigation measures are implemented and verified.

E5-94

As stated on Page 3.2-33 of the Draft EIR, local carbon monoxide hotspots were assessed using the Sacramento Metropolitan Air Quality Management District (SMAQMD) screening methodology. The SMAQMD screening methodology was developed using EMFAC2007 and Caline4 models.

E5-95

Not all available measures are included in the modeling. However, watering and chemical suppressants are not the only measures available in URBEMIS. All measures identified are considered acceptable by the South Coast Air Quality Management Plan, as identified by the Rule 401 handbook.

E5-96

The City of West Hollywood exercises discretion in determining the feasibility of some of the actions in the mitigation measures. The City's Municipal Code provides specific regulations of noticing procedures. The public has the opportunity for input on most development projects that receive discretionary review.

E5-97

Mitigation Measure 3.2-2 is not part of the City's Municipal Code. Per CEQA Guidelines Section 15097, "to ensure that the mitigation measures and project revisions identified in the EIR ... are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects." This program will be adopted as part of the overall project.

E5-98

The commenter is correct; wood burning fireplaces were not included in the air quality modeling. The South Coast Air Quality Management District, through Rule 445, Wood Burning Devices, states, "no person shall install a permanently installed wood burning device into any new development." Thus, the analysis included dedicated gaseous-fueled fireplaces.

E5-99

Hazards to avifauna from reflective and mirrored surfaces are not required to be addressed in the Draft EIR. None of the significance thresholds used by the City (Appendix G of the CEQA Guidelines) require this analysis. Page 3.3-7 addresses the removal of trees pursuant to implementation of the proposed General Plan.

E5-100

Figure 3.4-1 in the Draft EIR appropriately illustrates the designated historical resources in the City. Additionally, Table 4 in Appendix C lists the designated historical resources in West Hollywood and also describes the significance of each of the designated historical resources. Properties within the North Harper Historic District are located in Figure 3.4-1.

E5-101

In response to the comment regarding the State Historic Building Code, this comment is noted. The State Historic Building Code is referenced in Chapter 19.85 of the West Hollywood Municipal Code.

In response to the comment regarding including procedures for alteration or demolition, these regulations are contained in Chapter 19.58 of the West Hollywood Municipal Code and are not required to be repeated verbatim here.

In response to the comment regarding how policies would reduce the loss of cultural resources, please refer to Section 3.4 of the Draft EIR and General Plan policies that are self-explanatory (e.g., HP-3.4 on adaptive reuse and HP-5.2 relief from some taxes and fees).

In response to the comment on cultural resource protections under existing codes, please refer to the regulatory setting section of Section 3.4 of the Draft EIR.

In response to the comment regarding policies ensuring no loss of cultural resources, impacts are less than significant at the programmatic level of analysis. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval. If project-specific significant impacts cannot be mitigated to reach a less than significant level, an EIR and a statement of overriding considerations would be required before the project could be approved.

In response to the comment regarding additional measures, the comment is noted.

E5-102

Please refer to Appendix F of the Draft EIR for detailed information on the Hollywood Fault.

E5-103

Please refer to Section 3.5 of the Draft EIR, page 3.5-13, and Appendix F of the Draft EIR where the best available information is presented.

E5-104

Please refer to West Hollywood Municipal Code 19.32.020 for precise regulations.

E5-105

This is beyond the scope of the Draft EIR. Lot-specific analysis will be performed as required when specific development projects are proposed. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E5-106

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-107

The comment is noted. Proposed General Plan policy SN-1.1 indicates that the City will follow State guidelines regarding requiring upgrades or minimizing the use of buildings and facilities that are vulnerable to natural or man-made hazards. Implementation Program SN-A.9 of the proposed General Plan contains a program to evaluate and update the City's existing building stock and infrastructure seismic retrofit program for orderly and effective identification of vulnerable buildings/infrastructure, outreach education, support, and enforcement.

E5-108

The use and need for pile drivers is beyond the scope of the Draft EIR. This would be determined as specific construction projects are proposed, in accordance with existing regulations. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E5-109

All development in the City of West Hollywood, whether discretionary or not, would be required to conform to the City's General Plan and existing regulations and laws regarding geologic hazards.

E5-110

The text on page 3.6-3 was modified to refer to Figure 3.9-2 for a list of schools in the City of West Hollywood.

E5-111

Classification of a zone as a moderate, high, or very high fire hazard is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. Each area of the map gets a score for flame length, embers, and the likelihood of the area burning. Scores are then averaged over the zone areas. Final zone class (moderate, high, and very high) is based on the averaged scores for the zone. Please refer to the CAL FIRE website for more detailed information (<http://www.fire.ca.gov/>).

E5-112

The comment is noted.

E5-113

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-114

In response to the comment regarding emergency response readiness, Section 3.6 of the Draft EIR was revised to refer the reader to Section 3.12, page 3.12-27 of the Draft EIR for additional General Plan policies pertaining to emergency response readiness.

In response to the comment on explaining how emergency responsiveness would be addressed, the proposed General Plan policies on page 3.12-27 of the Draft EIR explain, through coordination, facilitation, participation, etc., how emergency response readiness would be addressed.

E5-115

Please refer to the Safety and Noise Chapter of the proposed General Plan for policies that would reduce gas hazards (e.g., SN-1.1 and SN-1.2).

E5-116

The analysis of routine use, transportation, disposal, and release of hazardous materials would apply to asbestos hazards from demolition activities associated with implementation of the proposed General Plan. Additionally, adherence to proposed General Plan policies such as SN-1.2 would reduce asbestos hazards from demolition activities.

E5-117

Section 3.12.1 of the Draft EIR concludes that police and fire protection services and response times are currently adequate and, therefore, no mitigation is needed for improved response times. Section 3.12.5 of the Draft EIR identifies programmatic mitigation measures to improve funding and services. Emergency response times are based on distance and staffing levels and, with sirens and lights deployed, would not be significantly reduced by traffic congestion.

E5-118

The need for dewatering would be determined as individual projects are proposed, as the project necessitates. Adherence to standard dewatering regulations would be required if dewatering is required.

E5-119

In response to the comment regarding thresholds, this comment is noted. Section 3.7 of the Draft EIR, page 3.7-3, discusses impaired water bodies and Total Maximum Daily Loads (TMDLs). The Draft EIR analyzed violation of water quality standards and impacts were found to be less than significant.

E5-120

In response to the comment regarding thresholds, this comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-121

The City's Municipal Code details the permitting process, enforcement, and requirements for development. In particular, Chapter 15.56 contains the regulations for storm water and urban runoff pollution control.

E5-122

As indicated on page 3.7-15 of the Draft EIR, the Municipal NPDES Permit (Order No. 01-182) specifies that all new development and redevelopment projects that fall under specific priority project categories must comply with the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP includes best management practice requirements for site design, source control, and treatment control.

E5-123

The need for dewatering, the use of such water, and the quality of such water would be determined as individual projects are proposed, as the project necessitates. Water quality is discussed in Section 3.7 of the Draft EIR.

E5-124

The referenced General Plan policies are contained on page 3.7-19. The text on page 3.7-22 was revised to include a reference to such policies.

E5-125

The comment is noted. Refer to Topical Response #1 regarding growth projections. Additionally, SCAG provides the City of West Hollywood the framework with which to conduct the consistency analysis between regional planning efforts and the City's proposed General Plan. The required analysis is found on pages 3.8-9 and 3.8-10.

E5-126

The proposed General Plan Land Use and Urban Form Chapter, Table 3-2, contains the acreage of each proposed General Plan land use category.

E5-127

The proposed General Plan Land Use and Urban Form Chapter, Table 3-2, and Table 2-3 in the Draft EIR, contain the FAR of each proposed General Plan land use category.

E5-128

The goals and policies of the proposed General Plan are consistent between chapters, the text is consistent with the figures and tables in the proposed General Plan, and the General Plan meets the requirements of Government Code 65350 et seq.

E5-129

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-130

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Although not directly stated, many of the thresholds used throughout the EIR analyze land use incompatibilities, e.g., aesthetics, noise, land use, etc. Also see Response to Comment E5-42.

E5-131

Please refer to Topical Response #1.

E5-132

The Land Use and Urban Form Chapter of the proposed General Plan explains how the City will accommodate growth, as does Chapter 2.0 of the Draft EIR and Topical Response #1. The proposed General Plan identifies land use designations with associated measures of intensity. These designations are depicted geographically on the General Plan land use map.

E5-133

Table 3.8-4 on page 3.8-11 provides an explanation of the consistency of SCAG policies with the City of West Hollywood's proposed General Plan. Please refer to Section 3.14 of the Draft EIR for the transportation and traffic analysis pursuant to implementation of the proposed General Plan.

E5-134

The commenter's statement regarding building height and "people scaled" communities is noted. The General Plan Land Use and Urban Form Chapter contains numerous goals and policies related to urban form and development patterns (LU-1, LU-4). Regardless of building height, these policies require that new development consider the scale of its urban context, the overall land use pattern, and the existing mix of uses. The General Plan also contains policies that promote human-scaled (people scale) development to provide for an urban environment oriented and scaled to the pedestrian. Additional building height itself would not hinder the creation of people/human scaled communities.

E5-135

Table 3.8-3 provides the required consistency analysis between the SCAG RTP and the proposed West Hollywood General Plan.

E5-136

Throughout the Draft EIR, the environmental impacts associated with implementation of the proposed General Plan to surrounding communities are analyzed at a level of detail appropriate for a programmatic EIR. For example, the traffic analysis conducted for implementation of the proposed General Plan includes forecasts of regional development surrounding the City of West Hollywood, from the SCAG's RTP. Additionally, since the City of Beverly Hills and Los Angeles Department of Water and Power provide water to the City of West Hollywood, the water supply analysis in the Draft EIR considers the impacts of implementation of the West Hollywood General Plan on the City of Beverly Hills and the LADWP water service area. Furthermore, refer to the cumulative impact analysis in Section 4.2 of the Draft EIR, specifically Table 4-3, which indicates the geographic scope of the environmental analysis pursuant to implementation of the proposed General Plan. As indicated in the table, most of the EIR considered and analyzed areas outside of the City of West Hollywood in the analysis of cumulative impacts (predominantly at the regional level).

E5-137

The commenter's concern regarding land use compatibility in mixed use areas is noted. Land use compatibility impacts are discussed in several sections throughout the Draft EIR, including Section 3.1 Aesthetics; Section 3.8 Land Use and Form; and Section 3.9 Noise. Within these sections, land use compatibility is analyzed at a level of detail appropriate for a programmatic EIR. Additionally, refer to proposed General Plan policies throughout the General Plan on land use compatibility and Section 19.36.170 of the Municipal Code. Individual mixed-use development projects pursuant to the proposed General Plan would be reviewed for project-specific impacts, including land use compatibility, during any required environmental review. If

project-specific significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E5-138

The General Plan does not propose light rail or subway in the City of West Hollywood. While the Land Use and Urban Form Chapter identifies potential future stations associated with a potential Red Line subway extension, it is too speculative at this time to assume the exact location, timing, and extent of such stations for analysis in the Draft EIR.

Metro, as the responsible project implementation agency for any actions associated with the potential rail extensions that may traverse the City of West Hollywood, would be required to conduct project-specific environmental review pursuant to CEQA to assess potential impacts related to noise, as well as other environmental issue areas. After CEQA analysis for rail transit to the City is complete and a program for rail transit to the City is incorporated in the Metro Long Range Transit Plan, modifications to the General Plan's permitted density, height, or other development standards may be considered for all properties within the Transit Overlay District. At that time, project-specific noise analysis would be required.

E5-139

The distance from the nearest traffic lane at the selected noise monitoring sites described in Tables 3.9-1 and 3.9-2 varies depending on location; however, noise measurements are generally taken within 50 feet of the nearest travel lane.

E5-140

Figure 3.9-4 and Figure 3.9-5 were revised in the Draft EIR. Please see the legend of the figures for the revisions.

E5-141

In response to the comment, Department of Housing and Urban Development (HUD) standards are not directly applicable, as this project falls under the purview of CEQA. California standards are more stringent than HUD standards, so HUD compliance is implied. In addition, HUD requires verification of compliance at the project level regardless of previous environmental studies.

E5-142

The proposed General Plan policies related to noise are presented in the appropriate areas beginning on page 3.9-28 of the Draft EIR. Copies of the Draft General Plan were made available at the same time and location as the Draft EIR so the documents could be reviewed together as a whole.

E5-143

The breadth of the noise analysis conducted in Section 3.9 of the Draft EIR is based on the thresholds of significance as identified on page 3.9-25.

E5-144

The City of West Hollywood Municipal Code does not provide specific noise level limits. Section 9.08 of the Municipal Code contains general standards and provides specific examples of prohibited noise in the City.

E5-145

The construction of “taller” buildings would not substantially alter the noise levels predicted in the EIR.

E5-146

In response to the comment, refer to CEQA Guidelines Appendix G.

E5-147

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-148

Since the proposed General Plan is not yet adopted, the thresholds contained in Mitigation Measure 3.9-1 are not yet adopted. Therefore, they are not included in the thresholds of significance for analysis of noise impacts. However, the proposed policies, including new noise limits included in 3.9-1, have been assumed in the analysis of the impacts associated with adopting and implementing the proposed General Plan.

E5-149

The reference to intervening structures lowering noise levels was referring to construction noise. As explained on page 3.9-27, noise levels drop off at a rate of about 6 decibels per doubling of distance between the noise source and receptor. However, intervening structures would also result in lower noise levels. These factors generally limit the distance construction noise travels and ensure noise impacts from construction are localized.

E5-150

The applicable policies are self-explanatory on how they would reduce noise levels from construction activities. Examples of policies that reduce noise levels from construction activities include promoting alternative transportation technologies that minimize noise impacts, requiring development projects to implement mitigation measures where necessary, and requiring the inclusion of noise-reducing design features in development projects to address the impact of noise on residential development.

E5-151

As discussed on page 3.9-30 of the Draft EIR, to examine traffic noise impacts, traffic noise levels associated with the proposed General Plan were calculated for roadway segments in the City using the Federal Highway Administration’s (FHWA’s) Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise levels were modeled under existing and future 2035 conditions, with and without implementation of the proposed General Plan. Average Daily Traffic volumes were obtained from the traffic analysis prepared for the Mobility Chapter of the proposed General Plan. Vehicle mix classification (number of vehicles per category) and speeds for local area roadways were based on field observations and the 2008 Annual Average Daily Truck Traffic on the California State Highway System prepared by Caltrans (2009). The vehicle mix classification assumes a static mix of vehicles per category (i.e., cars, motorcycles, buses, etc.). With the increase in the overall total traffic volumes pursuant to the General Plan, the actual number of vehicles per category would increase as well. Therefore, the noise modeling accounts for an increased number of buses that may serve the City of West Hollywood upon implementation of the General Plan.

E5-152

See Response to Comment E5-138.

E5-153

The noise ordinance of the City's Municipal Code addresses noise between adjacent land uses. Since specific land uses are not proposed or available, no impacts were identified at a programmatic level of analysis. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E5-154

The comment is noted. The Draft EIR assumes and addresses impacts from stationary and operational activities on adjacent and surrounding uses in Section 3.9.

E5-155

See Response to Comment E5-138.

E5-156

In response to the comment, to clarify, vehicular-traffic-induced vibration, and industrial and commercial operations vibration were found to be less than significant. Construction-induced vibration was found to be significant. Adherence to regulations and implementation of Mitigation Measure 3.9-6 would reduce construction-induced vibration to a less-than-significant level. Bullet point 1 of Mitigation Measure 3.9-6 was revised to apply to sensitive land uses as well as historic structures. This would reduce the potential for human annoyance due to construction-induced vibration. This does not change the analysis or conclusions of the Draft EIR. When individual projects are proposed, they will be reviewed for project-specific construction-induced vibration impacts. If project-specific impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval.

E5-157

See Response to Comment E5-138.

E5-158

The City does not have adopted CEQA Guidelines for environmental documents; however, projects within the City are analyzed in accordance with CEQA Appendix G Guidelines. However, the provisions in Mitigation Measure 3.9-1, as they are included in the Draft EIR, will be considered for adoption by the decision makers at the hearings for the General Plan.

E5-159

The ease or difficulty of meeting the 25% threshold would depend on the size, density, and land use(s) of a project along with the traffic volumes on nearby roadways. For instance, on a neighborhood street that carries a low volume of traffic, a 25% increase could be a relatively low amount, even with a modest development. Conversely, on a street that has a high volume of traffic, the 25% threshold may not be as easily satisfied. Other factors that affect the calculation are the location of the project, access points, traffic generation, and distribution of the project's trips.

E5-160

See Response to Comment E5-156.

E5-161

Refer to Mitigation Measure 3.10-1. As noted in the mitigation measure, paleontological monitors would be present if paleontological resources are discovered during earthmoving activities. Heavy equipment operators and construction personnel would need to be trained to recognize potential paleontological resources and take appropriate actions if potential paleontological resources are identified during construction activities.

E5-162

Jobs and housing are discussed on page 3.11-3 of the Draft EIR. The detailed information regarding income levels requested by the commenter is not required in the Draft EIR. Please refer to the Housing Chapter of the proposed General Plan for some of this information.

E5-163

Dwelling unit counts are presented elsewhere in the Draft EIR; see Table 2-4 in Chapter 2.0 of the Draft EIR.

E5-164

Specific density comparisons are beyond the scope of the Draft EIR. The City of West Hollywood is described as urban and dense throughout the General Plan and Draft EIR. No further response is necessary because no questions or new information regarding the environmental analysis was raised.

E5-165

Please refer to Table 5-1 for population estimates under the existing General Plan.

E5-166

Please refer to Topical Response #1 for an explanation of how the housing unit projections were derived. Page 3.11-3 of the Draft EIR explains the source of the employment estimates. Employment estimates in 2008 were estimated by using the existing General Plan designations and an estimate of existing development by traffic analysis zone. The 2035 employment estimates were conducted using the same method, using proposed General Plan designations and expected development capacity by traffic analysis zones.

E5-167

Pages 3.11-7 and 3.11-8 analyze the displacement of housing that could occur with implementation of the General Plan. However, the Draft EIR is not required to specifically analyze the displacement of low-cost housing units. The proposed General Plan contains numerous goals and policies to protect low-income housing. Refer to the Housing Chapter of the General Plan.

E5-168

The proposed General Plan policies referenced on page 3.11-8 of the Draft EIR have been revised to reflect policies more germane to displacement issues. Specific policy examples include retaining and maintaining existing affordable rental housing; working to prevent or minimize displacement of existing residents, and encouraging the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households.

E5-169

Emergency medical response (paramedic services) is provided by the Consolidated Fire Protection District by the Los Angeles County Fire Department. Please refer to Section 3.12 of the Draft EIR.

E5-170

This requested comparison is beyond the scope of the Draft EIR. Please refer to <http://www.fbi.gov/ucr/ucr.htm> for detailed crime information.

E5-171

Paramedic services are provided by the Consolidated Fire Protection District by the Los Angeles County Fire Department. Please refer to Section 3.12 of the Draft EIR.

E5-172

This is beyond the scope of the Draft EIR. Please refer to the U.S. Census for detailed information on demographics in West Hollywood.

E5-173

The environmental impacts of the library construction have been previously evaluated in the West Hollywood Park Master Plan Mitigated Negative Declaration. Please refer to that document.

E5-174

The City of Beverly Hills Urban Water Management Plan (UWMP) provided the estimate that it provides water to approximately 8,000 people in the City of West Hollywood. Page 3.12-8 of the EIR explains that equivalent includes water for residential, commercial, industrial, fire fighting, and other water uses. In response to the comment regarding water equivalent population exceeding the actual population, this comment is unclear. Please contact the City of Beverly Hills for questions on why the City treats groundwater with reverse osmosis, and why the UWMP uses SCAG projections.

E5-175

Water pressure deficiencies have been identified for individual development projects in the City. The mixed-use building located at 901 Hancock had to mitigate the water pressure requirement to satisfy fire flow requirements. In response to the question regarding replacement of aging water lines, both LADWP and The City of Beverly Hills Water Department have ongoing maintenance and repair programs that include refurbishment of their water lines to keep aging or damaged infrastructure in working condition.

E5-176

Please refer to the City of Los Angeles Department of Water and Power 2005 Urban Water Management Plan for answers to these questions or contact LADWP.

E5-177

Please refer to Section 3.12 of the Draft EIR, pages 3.12-16 and 3.12-17, for details on wastewater infrastructure deficiencies. As described on page 160 of the proposed General Plan, the City's 1992 Sewer Master Plan identified potential deficiencies and included preparation of a computer model to analyze the operation and capacity of the sewer system. The Sanitation Districts of Los Angeles County confirmed in a letter to AECOM, dated March 12, 2010, that no deficiencies currently exist in the trunk sewer lines serving the City. The City has ongoing programs to annually inspect portions of the sewer network. Please refer to proposed General Plan Goal IRC-8 and related policies regarding ongoing improvements to and evaluation of wastewater infrastructure.

E5-178

The sewer infrastructure projects would likely be required under the existing and the proposed General Plan. Please refer to Section 5.0, Table 5-1, in the Draft EIR for a comparison of the proposed General Plan and the existing General Plan. In addition, the Infrastructure, Resources, and Conservation Chapter of the proposed General Plan contains policies related to ongoing inspection and maintenance of the wastewater system and Implementation Action IRC-A.21 would require updating the Sewer Master Plan to conform to proposed densities and projected growth. The City's wastewater infrastructure is not currently operating at capacity. The Draft EIR analyses impacts to wastewater infrastructure at a programmatic level. Individual future development projects will be studied for potential impacts to the wastewater system, and mitigation measures will be required as necessary.

E5-179

Please contact the Sanitation Districts of Los Angeles County for the limit an agency may discharge to the HTP. Please refer to Section 3.12, page 3.12-18, of the Draft EIR and/or contact the Sanitation Districts for information on how much capacity of the treatment plant is needed for approved development or reasonably expected in the future. Per communication from the Sanitation Districts on May 12, 2010, there is no established limit on how much wastewater an agency may discharge to HTP. The increase in wastewater discharge under the proposed General Plan in terms of the overall capacity of the HTP system is small and the Sanitation Districts have confirmed that there would be no impact on the facilities and no cause for a restriction to be placed on the City's ability to discharge.

E5-180

Any identified wastewater infrastructure deficiencies would be addressed during the Capital Improvements programming process. Refer to proposed General Plan policies in the Infrastructure, Resources, and Conservation Chapter (e.g., Goal IRC-9 and associated policies). No storm drain deficiencies have been identified in the City of West Hollywood pursuant to the proposed General Plan. The City's storm drain system conforms to Los Angeles County Flood Control District standards.

E5-181

No existing electric infrastructure deficiencies were identified in the analysis of energy impacts pursuant to implementation of the proposed General Plan. As indicated on page 3.12-55 of the Draft EIR, Southern California Edison (SCE) provides capacity to meet the electricity load and demand of the City of West Hollywood. SCE works with the City to provide and meet the demand for electricity and electricity infrastructure as growth is proposed.

E5-182

No existing natural gas infrastructure deficiencies were identified in the analysis of energy impacts pursuant to implementation of the proposed General Plan. As indicated on page 3.12-55 of the Draft EIR, Southern California Gas Company (SoCalGas) has facilities to provide natural gas services for the City. Additionally, SoCalGas will provide services for anticipated development in accordance with the company's policies and extension rules on file with the California Public Utilities Commission.

E5-183

The 35,500 solid waste generation figure represents disposal of solid waste, which would not include recycled materials. In response to the comment regarding Eagle Mountain, please contact the Sanitation Districts of Los Angeles County for the specific opening date of the Eagle Mountain Landfill.

E5-184

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42.

E5-185

The comment is noted. The City of West Hollywood has chosen to use CEQA Guidelines Appendix G as its thresholds of significance to analyze environmental impacts, which is within the discretion of the lead agency. Also see Response to Comment E5-42. Section 3.14 of the Draft EIR analyzed the impact of implementation of the proposed General Plan on public services and utilities. The Draft EIR also analyzed the emergency response impact pursuant to implementation of the proposed General Plan in Sections 3.12 and 3.14 and the impact was found to be less than significant.

E5-186

It is anticipated that additional facilities for police operations would be needed over the time horizon of the proposed General Plan, as analyzed in Section 3.12 of the Draft EIR. Specific requirements have not yet been identified, and no specific projects have been proposed. Therefore, no further analysis is required. As indicated on page 3.12-28, construction of police facilities would be subject to CEQA. If project-level significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval. No further response is required.

E5-187

It is anticipated that additional fire protection personnel and facilities would be needed over the time horizon of the proposed General Plan, as analyzed in Section 3.12 of the Draft EIR. Specific requirements have not yet been identified and no specific projects have been proposed. Therefore, no further analysis is required. As indicated on page 3.12-29, construction of fire stations would be subject to CEQA. If project-level significant impacts are identified, applicable mitigation measures will be placed on the project as conditions of approval. No further response is required.

E5-188

The City of Beverly Hills and LADWP were consulted during preparation of the Draft EIR and were also notified that the City of West Hollywood General Plan, Climate Action Plan, and Draft EIR were available for public review. The City of Beverly Hills submitted comments on the Draft EIR.

E5-189

The comment is noted. Water use varies dramatically by specific type of use proposed (e.g., restaurants, dry cleaners, public facilities, etc.) Since no development projects are proposed pursuant to implementation of the proposed General Plan, no specific demand data, location, scope, or time frame for potential water infrastructure projects can be identified or quantified.

E5-190

In response to the comment regarding how future water projections were assumed for the Beverly Hills water service area, since no development is proposed, it is not possible to estimate the precise type of use, number of units, or total population that would be served by the Beverly Hills water service area, as requested by the commenter.

In response to the comment regarding growth in Beverly Hills, please contact the City of Beverly Hills for growth projections. The water analysis in the Draft EIR was prepared according to the most recent available information (i.e., the 2005 UWMP). Section 3.12 of the Draft EIR analyzes any constraints on future water supply.

E5-191

Please refer to the analysis in Section 3.12 of the Draft EIR. The comments regarding potential supply from conservation, water transfers, desalination, MTBE, water-quality improvement costs, storm frequency and rainfall amounts, out of service reservoirs, and regional land availability for recharge are beyond the scope of the Draft EIR. Please contact the Metropolitan Water District of Southern California (MWD) and/or other water providers for such information. Also refer to Response to Comment E4-54, which contains a letter from MWD and the West Basin Municipal Water District dated July 16, 2010. This letter confirms that MWD and the West Basin Municipal Water District, in cooperation with LADWP, have adequate supply and reliable access to water into the future based on regional water supply planning for all of Southern California.

E5-192

Please refer to Section 3.12 of the Draft EIR. As indicated on page 3.12-51, water supply from MWD is more uncertain now than in 2005 given potential climate change impacts and variable hydrology and environmental issues in the Bay-Delta, among other factors. Therefore, implementation of the proposed General Plan would have a potentially significant and unavoidable water supply impact. Thus, the Draft EIR noted the potential uncertainty in future supplies from MWD for the region.

In response to the comment regarding West Basin's groundwater basin sources and apportionment, please contact West Basin Municipal Water District. Also refer to Response to Comment E4-54, which contains a letter from MWD and the West Basin Municipal Water District dated July 16, 2010. This letter confirms that MWD and the West Basin Municipal Water District, in cooperation with LADWP, have adequate supply and reliable access to water into the future based on regional water supply planning for all of Southern California.

The commenter's statements regarding biological impacts associated with alternative water supply projects are noted.

In response to the comment regarding the HTP, please refer to Section 3.12, page 3.12-18, of the Draft EIR and/or contact the Sanitation Districts of Los Angeles County for information on how much capacity of the treatment plant is needed for approved development or reasonably expected development in the future.

E5-193

Please refer to Responses to Comments E5-177 and E5-178. The Draft EIR analyzes impacts to infrastructure at a programmatic level. As specific development projects are proposed pursuant to the General Plan, the City will study and implement any necessary upgrades.

E5-194

Since no development is currently proposed pursuant to the proposed General Plan, capacity issues cannot be identified at the programmatic level of analysis. As indicated on page 3.12-55 of the Draft EIR, individual development projects would be required to evaluate the potential impacts of the proposed project in accordance with CEQA. Mitigation measures would be required to reduce impacts to a less-than-significant level, as necessary.

E5-195

Existing (2008) electricity consumption and natural gas consumption were provided by SCE and SoCalGas, respectively. Projections in 2035 for electricity and natural gas were estimated using average annual increase data from the Department of Energy's Energy Information Administration.

E5-196

The comment is noted. Electricity and natural gas use vary dramatically by specific type of use proposed (e.g., restaurants, dry cleaners, public facilities, etc.) Since no development projects are proposed pursuant to implementation of the proposed General Plan, no specific location, scope, or time frame for potential natural gas infrastructure projects can be identified.

E5-197

The comment is noted. Please refer to Section 3.12 of the Draft EIR for the analysis of police and fire service impacts pursuant to implementation of the proposed General Plan. The intent of this mitigation measure is to provide additional, more precise analysis of the impacts of new development on the level of police and fire services as the development occurs.

E5-198

The Quimby Act states that park fees may not exceed the amount necessary to provide 3 acres of parkland per 1,000 residents unless the jurisdiction's neighborhood and community parks presently exceed that standard, in which case it may adopt the higher existing standard, but not more than 5 acres per 1,000 residents. The Quimby Act further specifies that the dedication of land or payment of a fee may only be imposed as a condition of approval of a tentative map or parcel map. Mitigation Measure 3.13-4 states that the City shall "Study the feasibility of adopting a parkland dedication ordinance to exact and receive parkland fees from new development that does not include subdivision of land or airspace."

E5-199

In response to the comment regarding the ball field at West Hollywood Park, since the Draft General Plan was written, the field has been removed as part of Phase I of the West Hollywood Park Master Plan implementation. During reconstruction of the park, the site of the former ball field is serving as a temporary parking lot. Once park reconstruction is completed, the site will be used as open green space with grass. The ball field will not be replaced.

E5-200

The State Quimby Act permits cities and counties in California to require that developers of subdivisions either dedicate parkland or pay a "Quimby Fee" in lieu of providing land, allowing the City to purchase land for parks. The Quimby Fees in West Hollywood are used for the purpose of developing new or rehabilitating existing park facilities to serve residents. The fees have historically been used for the construction of improvements to existing parks and construction of new parks such as Havenhurst Park, Formosa Park, and Kings Road Park. In the future, fees collected will be used for park acquisition and development (renovation, construction of improvements, etc.).

The Quimby Fee is based on one of the following formulas:

1) Single-family (if new subdivision involved) and Condo projects with less than 5 units	527,440 x [.003 (# of units x 3.4)]
2) Condominiums with 5 or more units	527,440 x [.003 (# of units x 2.1)]
3) Mobile Homes (if subdivision involved)	527,440 x [.003 (# of units x 2.0)]

E5-201

Locations of planned public parkland are not identified unless they are currently owned by the local jurisdiction or have been otherwise committed by the property owner for dedication as a public park. No locations have been identified at this time.

E5-202

The City of West Hollywood has not adopted National Recreation and Parks Association standards for analysis of park needs in the City of West Hollywood. Therefore, these standards are not relevant to analysis of recreational impacts pursuant to implementation of the proposed General Plan.

E5-203

The thresholds of significance identified in Draft EIR, Section 3.13.3, are from Appendix G of the CEQA Guidelines. Provision of insufficient park acreage would not be a physical impact on the environment unless it causes “substantial physical deterioration” of existing park facilities. The Draft EIR concludes that future development from implementation of the General Plan may cause or accelerate substantial physical deterioration and is a potentially significant impact. As indicated on page 3.13-11 of the Draft EIR, these impacts would be mitigated by proposed General Plan policies and implementation of Mitigation Measures 3.13-1 through 3.13-7 (see page 3.13-13).

E5-204

Refer to Section 4.2 of the Draft EIR, for a cumulative analysis of parks and recreational facilities in surrounding communities. As indicated on page 4-21, even though implementation of the General Plan will increase the demand for local and regional parks, the Cities of West Hollywood, Beverly Hills, and Los Angeles have policies and programs in place to maintain and enhance existing parks. Therefore, the potential for physical deterioration of parks in West Hollywood and adjacent jurisdictions is a less-than-significant impact.

E5-205

Methods to increase parklands and open space within the City are identified in the mitigation measures listed in Section 3.13.5 of the Draft EIR.

E5-206

Existing parklands are described in Section 3.13.1 and shown in Figure 3.13-1 of the Draft EIR. No additional available recreational land has been identified within the City.

E5-207

The comment is noted. The Draft EIR found that implementation of the General Plan would result in less-than-significant impacts to increased use and physical deterioration of existing recreational facilities with adherence to General Plan policies and implementation of mitigation measures. The Draft EIR found that implementation of the General Plan would result in less-than-significant impacts to construction or expansion of existing facilities at the programmatic level of analysis. In addition to the policies listed on page 3.13-10 and 3.13-11 of the Draft EIR, the mitigation measures listed on page 3.13-13 contain several programs to increase park space over time.

E5-208

The program level impacts to alternative transportation (which include transit) are expected to be less than significant as stated on page 3.14-49 of the Draft EIR. For a 25-year program-level analysis, it is expected that the future transit system will respond accordingly to the needs of the future transit users.

E5-209

The intersection analysis for the West Hollywood General Plan Update EIR contains intersections in the City of Los Angeles, and intersections shared between the Cities of West Hollywood and Beverly Hills. The study intersections were selected in conjunction with City staff to reflect locations representative of project impacts within and adjacent to the City of West Hollywood.

E5-210

The commenter requests additional information regarding the travel demand model characteristics. Please see the *West Hollywood Travel Demand Model Development Report*, Fehr & Peers, April 2010, in Appendix F of Volume 2 of the Draft EIR. The commenter also requests intersection LOS calculation sheets. Existing conditions and Proposed Project LOS sheets are also provided in Appendix F.

E5-211

The commenter requests additional narrative for the ICU LOS method, provided here:

LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS – ICU METHOD		
Level of Service	Intersection Capacity Utilization (ICU)	Definition
A	0.000-0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601-0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901-1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Adapted from Transportation Research Board

E5-212

The commenter has requested additional documentation regarding the ICU and volume-to-capacity (V/C) intersection methodologies. The City recently adopted the Highway Capacity Manual methodology for signalized intersections (the City already used this method for unsignalized intersections). The City of West Hollywood Staff Report on this subject for the October 19, 2009, Council Meeting contains an in depth discussion of the advantages of using a delay-based methodology versus a V/C methodology. The staff report is included in Appendix F of the Draft EIR.

E5-213

Refer to Response to Comment E5-212.

E5-214

The commenter has requested additional information regarding trip generation. Vehicle trip generation is not a parameter used as a direct input to an LOS calculation in delay-based, nor V/C-based LOS methodologies. Please see Appendix F, *West Hollywood Travel Demand Model Development Report*, Fehr & Peers.

E5-215

The commenter has requested intersection analysis outside the City of West Hollywood. The intersection analysis for the West Hollywood General Plan Update EIR contains intersections in the City of Los Angeles, and intersections shared between the Cities of West Hollywood and Beverly Hills. The study intersections were selected by the traffic consultant in conjunction with City staff to reflect locations representative of project impacts within and adjacent to the City of West Hollywood.

E5-216

The commenter has requested V/C calculations for street segments. V/C ratios and LOS for roadway segments are not a performance measure used by the City of West Hollywood. The West Hollywood General Plan Update EIR reports intersection performance measures used by the City of West Hollywood.

E5-217

Refer to Response to Comment E5-216.

E5-218

In response to a comment regarding average trip length, the average trip length for trips with one end outside the City of West Hollywood is estimated to be 9.5 miles inclusive of the portion that occurs within the City of West Hollywood as determined by the City of West Hollywood travel demand model.

E5-219

The commenter has requested trip generation rates by land use category. Please see Appendix F, *West Hollywood Travel Demand Model Development Report*, Fehr & Peers, April 2010, pages 10-14.

E5-220

The commenter raises questions regarding trip generation. Each trip is counted once. A single trip that starts in West Hollywood and ends in West Hollywood is counted once. A trip that starts in West Hollywood and ends outside West Hollywood is counted once, and a trip that starts outside West Hollywood and ends in West Hollywood is counted once.

E5-221

The commenter has suggested additional thresholds of significance. Comment noted. Refer to Response to Comment E5-42.

E5-222

The commenter requests additional information regarding the La Brea at Romaine intersection, specifically, why the average delay was anticipated to decrease. The LOS calculation for *existing conditions* for the p.m. peak hour did not include the peak hour parking restrictions on La Brea Avenue that allow for one additional northbound travel lane and one additional southbound travel lane. This calculation has been updated. The average control delay for *existing conditions* during the p.m. peak hour is 37 seconds. Delay now increases by 8 seconds between the existing conditions and the proposed project conditions.

E5-223

The commenter requests additional information regarding pedestrian activity at intersections. Pedestrian activity at intersections is included in the delay calculation based on the number of times a pedestrian calls for the pedestrian phase at a traffic signal. Intersections with more pedestrian activity are assumed to have a greater number of pedestrian calls, and therefore greater delay.

E5-224

The commenter requests additional information regarding the nature of forecasted traffic volumes. For the purposes of the General Plan EIR, only reasonable foreseeable future scenarios were analyzed. In all scenarios some growth is assumed for the City of West

Hollywood. The No Project scenario represents the growth under the existing General Plan, while the Proposed Project scenario represents growth under the Proposed General Plan.

E5-225

The commenter requests clarification on the basis of 2035 land use data. All future scenarios include development under one of four General Plan land use scenarios, and growth in the surrounding areas as estimated by the SCAG's 2008 Regional Transportation Plan Forecast for 2035.

E5-226

In response to a comment regarding trip generation rates, please see Appendix F, *West Hollywood Travel Demand Model Development Report*, Fehr & Peers, April 2010, pages 10-14.

E5-227

The commenter requests a Traffic Analysis Zone map. Please see Appendix F *West Hollywood Travel Demand Model Development Report*, Fehr & Peers, April 2010.

E5-228

The commenter requests additional explanation regarding peak hour characteristics, distribution, directionality, and roadway configurations. The City uses intersection LOS as a peak hour performance measure to determine the level of congestion. Forecasted intersection turning movement volumes embody the described characteristics, and the analysis of these volumes in relation to roadway configuration, signal timing, and coordination illustrate the expected level of peak hour congestion. For additional documentation, please see Appendix F, *Travel Characteristics and Traffic Impact Report for the West Hollywood General Plan Update*, and Appendix F, *West Hollywood Travel Demand Model Development Report*.

E5-229

In response to the comment regarding anticipated decreases in vehicle miles per capita, two factors are influential in change. The first is that the change in development and land use diversity allow people to meet their discretionary trip needs closer to their residence, or between different places they go. In some cases this means more people will be able to use non-automobile-related modes to meet their needs. In other cases, it means that people will be able to "park once" and meet their needs. This change would occur both within the City of West Hollywood, and between the City of West Hollywood and nearby areas.

The second factor is the Travel Demand Management TDM program to be implemented with the Proposed Project. This program is designed to encourage transportation alternatives to driving alone. A significant body of research indicates that the programs that would be implemented with the Proposed Project would lower per capita vehicle trip generation and vehicle miles traveled.

E5-230

The commenter requests additional clarification regarding differences between No Project and Project intersection LOS results. For a detailed comparison of traffic conditions under the various land use scenarios, please refer to page 15 and the section Comparing the Scenarios: What Does it All Mean? from the *Travel Characteristics and Traffic Impact Report for the West Hollywood General Plan Update* found in Appendix F.

E5-231

The emergency response impact was found to be less than significant and no mitigation is required. Page 3.14-48 explains why the impact is less than significant, i.e., adherence to existing regulations, plans, and a variety of General Plan policies. Maintaining emergency plans, using new technology, and continuing coordination with law enforcement and emergency services would help reduce the potential impacts on emergency access.

E5-232

The level of analysis conducted for potential transit or bicycle impacts pursuant to implementation of the Draft General Plan was commensurate with the programmatic nature of the Draft EIR and the thresholds of significance with which to analyze these potential impacts. No LOS standards are known to exist to analyze bicycle standards or transit standards in the City of West Hollywood. Furthermore, proposed General Plan policies regarding bike and transit improvement projects would increase measures of effectiveness, and would not result in decreases in measures of effectiveness.

E5-233

As stated by the commenter, the various estimates for planning purposes of sea level rise of 7 to 55 inches are described in the Draft EIR.

E5-234

Please refer to the Climate Action Plan, which includes a detailed analysis and explanation of GHG reductions per the seven reduction strategies as well as statewide reductions. Page 3-49, Table 3-6, in particular, provides a summary of GHG reduction measures.

E5-235

The commenter correctly identifies the potential for taller buildings to reduce solar access to a solar energy system that may exist or be installed in the future on adjacent properties. The analysis of impacts to solar access would need to be addressed on a project level of environmental review. Section 19.20.170 of the Municipal Code contains provisions to protect solar access. The State legislature has adopted Section 65850.5 of the Government Code to require that local agencies not create barriers to installation of solar energy systems. A summary of solar access laws and requirements to prohibit restrictions on solar access is titled "California's Solar Access Laws" and is available at: <http://www.solardepot.com/pdf/CASolarAccessLaws.pdf> (Kurt Newick & Andy Black, accessed August 18, 2010). All future projects would be required to comply with solar access laws.

E5-236

The scenario provided in Table 4-1 of the Draft EIR provides a rational General Plan maximum theoretical buildout scenario for a programmatic level of impact analysis. The theoretical buildout scenario provides an analysis of the worst-case scenario of full, but theoretical development of the General Plan. The theoretical buildout scenario demonstrates residential and nonresidential development levels that could theoretically be achieved by the proposed General Plan. Unlike a forecast, the theoretical buildout scenario does not have a time horizon, such as 2035, nor does it include transportation, demographic, existing land use, or economic assumptions typically used by a forecasted model to provide more realistic land use planning data. Therefore, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units and nonresidential building square feet to allow the buildout estimates presented in Table 4-1 of the Draft EIR.

E5-237

The alternatives presented in Section 5.3 of the Draft EIR are not at a level of detail that would enable preparation of a table similar to Draft EIR Table 4-1. The impact analysis of the alternatives is based on the total dwelling units, nonresidential square feet, and population per Table 5-1 of the Draft EIR. The theoretical buildout in Draft EIR Table 4-1 for commercial development is based on the assumption that the commercial land use designations would build out at 75% commercial and 25% residential. This assumption was used so that the impact of additional residential development in the commercial designations would be adequately analyzed in the Draft EIR.

E5-238

As stated in Response to Comment E5-236, the scenario provided in Table 4-1 of the Draft EIR provides a rational General Plan maximum theoretical buildout scenario for a programmatic level of impact analysis.

E5-239

The objective of the Draft EIR is to conduct a program level of environmental analysis of the potential impacts of a rational maximum theoretical buildout scenario. The scenario provided in Table 4-1 accomplishes this objective, though the future conditions could differ from the estimate. Please refer to Response to Comment E5-236.

An annual report on General Plan implementation is prepared and presented to the City Council. The Community Development Department continually monitors development activities in the City. In addition, individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, specific mitigation measures will be placed on the project as conditions of approval.

E5-240

The geographic scope of the cumulative impact analysis for each environmental topic is specified in Draft EIR Table 4-3.

E5-241

As indicated on page 4-13, and on pages 3.1-7 and 3.1-8 of the Draft EIR, impacts to scenic vistas will be less than significant with adherence to the policies of the Sunset Specific Plan and other regulations. Page 3.1-6 of the Draft EIR provides an explanation on how Sunset Specific Plan policies will reduce view impacts.

E5-242

Please refer to Topical Response #1 for information on proposed General Plan growth projections in relationship to SCAG projections. It would be beyond the scope of the Draft EIR to estimate or evaluate growth projections of other jurisdictions. The traffic report prepared for the Draft EIR (refer to Appendix A of Appendix F) discusses how the traffic model incorporates future growth in the City of West Hollywood and neighboring areas in the City of Los Angeles and portions of the City of Beverly Hills.

E5-243

Please see Response to Comment E5-242.

E5-244

Section 4.2.12 of the Draft EIR contains a complete analysis of water supply and acknowledges the uncertainty of the future water supply imported from MWD. In response to the commenter's

statement that “it is not enough to merely state the proposed project utilizes only a small portion of the potential service or utility,” Section 4.2.12 of the Draft EIR on which the commenter is referring does not contain such a statement. The Draft EIR does not analyze impacts based on percentage contribution or the contribution method as suggested. Please refer to Response to Comment E5-37. Also refer to page 3.12-52 for the analysis of wastewater impacts to the HTP per communications received from the Sanitation Districts of Los Angeles County.

E5-245

A indicated on page 4-21 of the Draft EIR, even though implementation of the General Plan will increase the demand for local and regional parks, the Cities of West Hollywood, Beverly Hills, and Los Angeles have policies and programs in place to maintain and enhance existing parks. Therefore, the potential for physical deterioration of parks in West Hollywood and adjacent jurisdictions is a less-than-significant impact.

E5-246

As identified in Section 4.2.14 of the Draft EIR, the traffic and roadway impacts include the cumulative impact contribution expected from growth and changes to transportation infrastructure in the City and its surrounding region. Also refer to the West Hollywood Travel Demand Model Development Report, Appendix F under the Traffic Analysis Zone System for a discussion of the growth from the surrounding areas incorporated into the West Hollywood traffic model for the proposed General Plan. All future scenarios contain three sources of development growth that may contribute to increased traffic. These sources are (1) pending, approved, and under construction projects, (2) a forecast of potential development under the future scenario (in this case the No Project, or existing General Plan scenario), and (3) forecasts of regional development surrounding the area from SCAG’s RTP.

E5-247

As stated in Section 4.3 of the Draft EIR, the strategy of directing most growth to five commercial subareas through infill, redevelopment, and intensification is consistent with the SCAG RTP and Compass Growth Strategy. The proposed General Plan does not remove a barrier to growth; rather it directs growth to areas where the impacts of that growth can best be accommodated and minimized through a comprehensive strategy for growth.

E5-248

The “straight line growth applied to traffic analysis zones” would be a methodology for estimating traffic based on a growth rate that is applied equally throughout the City. As stated in Section 5.2 of the Draft EIR, this methodology would not represent realistic future traffic conditions in the City. As such, this was not presented as an alternative to be fully analyzed in the Draft EIR.

E5-249

The commenter’s statement that the change in development anticipated between the updated and existing General Plan is relatively small, and projected impacts differ only slightly if at all, is noted. Please refer to the Introduction Chapter of the proposed General Plan for an explanation of the Guiding Principles of the General Plan. The General Plan provides a framework to accommodate future growth through redevelopment, infill, and mixed-use development in five commercial subareas. Focusing additional development opportunities in these areas will reduce vehicular trips and promote walking and transit use because these areas are already developed and adjacent to existing commercial and transit services. In addition, the General Plan proposes an expanded pedestrian and bicycle network to improve walkability and mobility throughout the City. The General Plan and Climate Action Plan also contain numerous policies to reduce

climate change impacts through GHG reduction measures. These policies provide additional benefits to the community such as cleaner air, cost savings, energy savings, and a greener City. The General Plan also contains numerous policies that promote green buildings, green development techniques, and a variety of other strategies to reduce waste, energy use, and water consumption and to reduce the environmental impacts of existing and future development in West Hollywood. The existing General Plan was written in 1988. After 20 plus years, the City needs to articulate its vision in a modern way.

The no project alternative does not propose or contain any of the aforementioned actions. Therefore, site-specific amendments, as suggested by the commenter, would not accomplish the City's goals.

E5-250

There is no requirement under CEQA and its Guidelines to present a theoretical buildout under the existing General Plan. Therefore, no comparison is presented in the Draft EIR. Please see Section 4.1 of the Draft EIR for the maximum theoretical buildout scenario analysis under the proposed General Plan.

E5-251

As described in Section 5.3.2 of the Draft EIR, to achieve this alternative, the City would need to adopt a policy that would stop all growth in the City except for projects in the pipeline as of 2009 and projects in two of the three Transit Overlay areas of the City. The two Transit Overlay areas where growth could occur include La Brea Avenue and Santa Monica Boulevard, and Fairfax Avenue and Santa Monica Boulevard. Growth would not be allowed in the Santa Monica Boulevard West Transit Overlay area. New development in other areas would not be allowed. Should the City Council choose to adopt this alternative during hearings for the proposed project, the City would need to determine the type of policies or ordinances necessary to enact to stop all growth outside of the two Transit Overlay areas.

E5-252

As described in Section 5.3.3 of the Draft EIR, an Extensive TDM Program would impose additional and more aggressive TDM policies to shift more trips from private automobiles to other modes of transportation. This is a valid stand-alone alternative but could also be combined with any of the other alternatives.

E5-253

No further response is necessary because no questions or new information regarding the environmental analysis was raised. Please refer to Response to Comment E5-2.

E5-254

The commenter states that mitigation measures for "all feasible transportation planning and traffic engineering measures have not been properly considered or analyzed" relating to the Robertson Boulevard/Beverly Boulevard intersection. However, no specific facts are provided to support the commenter's opinion. These are considered introductory and/or summary comments that are addressed in subsequent responses as appropriate.

E5-255

No response is necessary because no questions or new information regarding the environmental analysis was raised.

E5-256

No further response is necessary because no questions or new information regarding the environmental analysis was raised.

E5-257

Inclusion of compliance monitoring and enforcement for TDM strategies. Effective and ongoing compliance monitoring and enforcement are necessary to ensure the desired traffic-reducing effects of some TDM strategies included in the Preferred General Plan alternative. However, many of the TDM strategies included in the Preferred General Plan alternative do not require the establishment of compliance monitoring and enforcement protocols (e.g., transit, pedestrian, and bike system improvements and changes to parking requirements). Other TDM strategies can be self-enforcing and require very little additional administrative resources from the public or private sector (e.g., requiring businesses to submit proof of compliance with applicable state or local parking cash-out regulations at the same time that the businesses normally renew their business license). For those TDM strategies that require monitoring and enforcement to be effective, the Preferred General Plan alternative explicitly commits the City to pursue implementation of all feasible measures to ensure compliance.

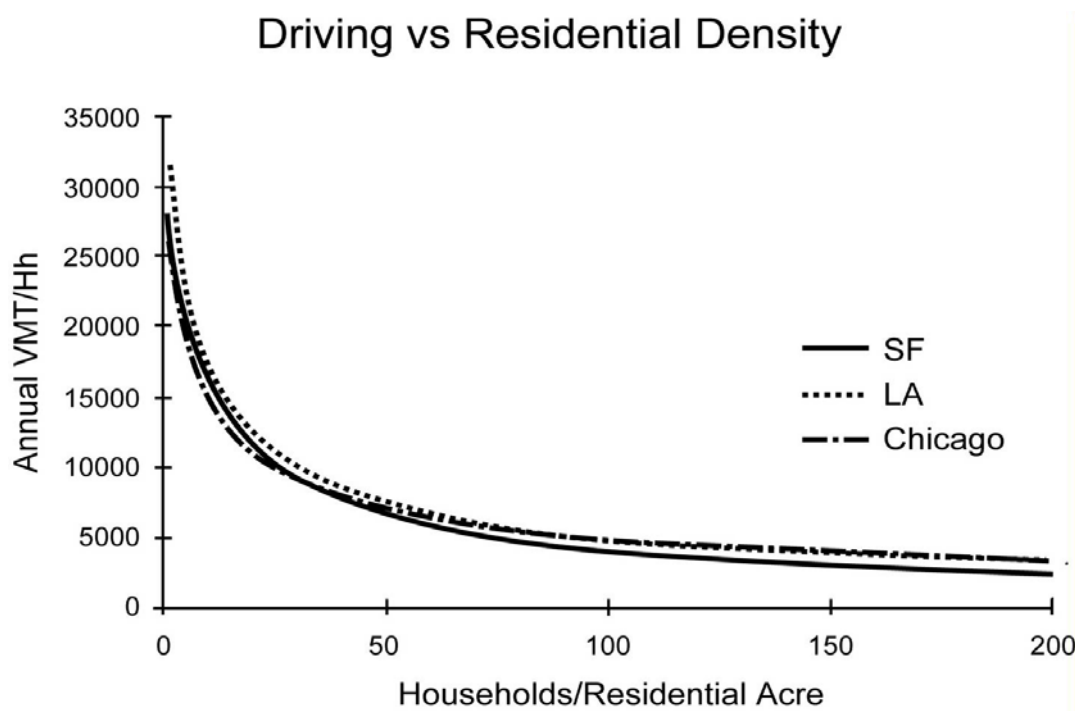
Application of “Robust TDM Plan” only to the General Plan alternative with the highest projected land use intensities. The most aggressive package of traffic-reducing TDM strategies were applied to the General Plan Alternative with the highest growth projections. This was done to understand if this package of TDM strategies would be sufficient to fully or partially mitigate potential traffic impacts associated with the higher growth General Plan alternatives. However, the statement that this methodology “masks the true environmental impacts of the highest land uses intensities” assumes that denser land uses would *ipso facto* be more environmentally harmful, and this assumption is demonstrably false. There are two relevant responses:

- Empirical research has demonstrated that increasing density within a context that has mixed uses and moderate to good transit service results in reduced vehicle trips and vehicle miles traveled (VMT).¹ This is because mixing uses at moderate densities puts more potential origins and destinations within walking/bicycling distance and makes improvements to transit service operationally and financially feasible. Figure 1 below demonstrates this relationship for three metropolitan regions (including the Los Angeles metro area) and shows that slight increases to density (i.e., increasing from low density to moderately dense) can significantly reduce VMT.

¹ For example, see *Using Residential Patterns and Transit to Decrease Auto Dependence and Costs*, John Holtzclaw, June 1994. Accessed at www.smartgrowth.org/library/cheers.html in August 2010.

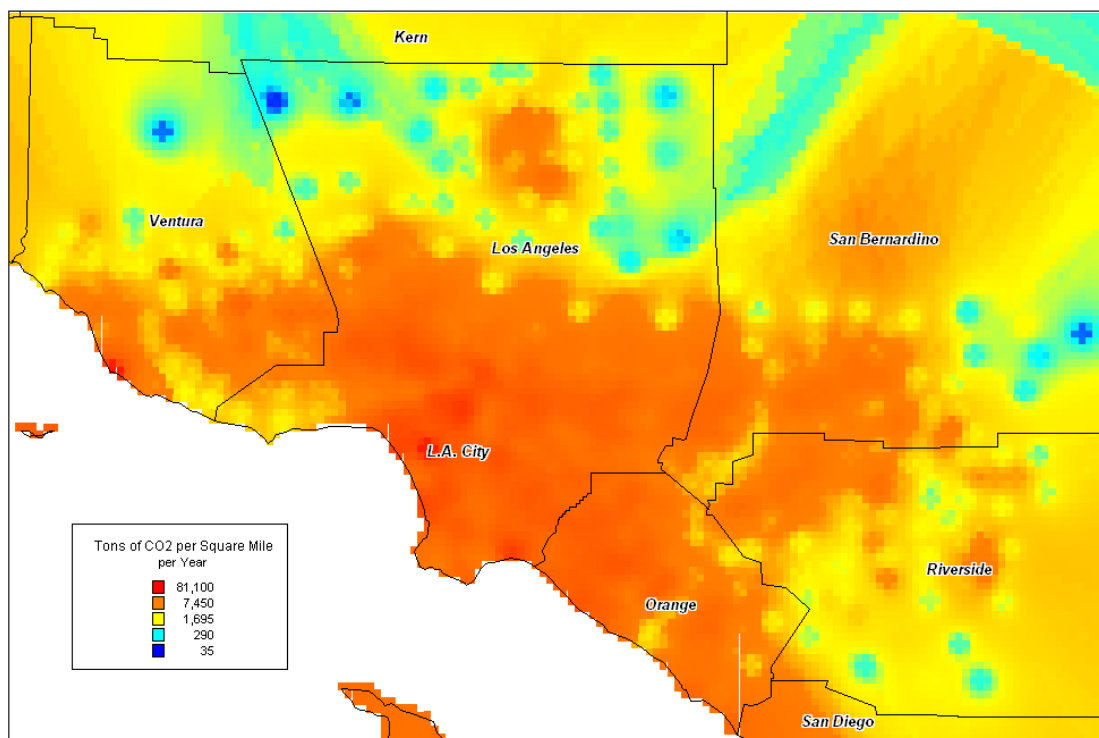
- While increasing density results in greater environmental impacts on per square mile basis (in terms of resources consumed and pollutants emitted), increased density actually reduces environmental impacts on a per person or per household basis. In other words, from an environmental perspective it is better for the Southern California region's population and job growth to occur in moderately dense urban communities that are well served by transit like West Hollywood than in lower density suburban environments where transit service is not as good. The maps in Figure 2 below illustrate this relationship showing Southern California regional GHG emissions on a per square mile and per household basis. These maps suggests that persons living in a moderate- to high-density community would have a smaller impact on climate change and other environmental impacts than if they were to live in a lower density community.

Figure 1 Increasing density can help reduce vehicle miles traveled



Source: *A Vision of Energy Efficiency*, Dr. John Holtzclaw, 1994. Accessed at www.sierraclub.org/sprawl/articles/energy-efficiency-vision.pdf in August 2010.

Figure 2 Increasing density can help reduce per capita greenhouse gas emissions



E5-258

The commenter requests potential mitigation measures for the Robertson Boulevard at Beverly Boulevard intersection. This intersection currently operates at LOS E during the a.m. peak hour and is expected maintain LOS E operations with buildout of the proposed General Plan (increase in average delay of 14 seconds). During the p.m. peak hour, this intersection currently operates at LOS C and is expected to degrade to LOS D with buildout of the proposed General Plan (increase in average delay of 16 seconds). The increase in delay at this location is primarily due to heavy traffic volumes along Beverly Boulevard in the westbound direction during the a.m. peak hour and in the eastbound direction during the p.m. peak hour. Left-turn pockets are provided at each approach to the intersection. Limited right-of-way makes improvements to this intersection infeasible.

The commenter further states that the mitigation analysis for significant traffic impacts is defective. The EIR traffic study analyzed *all* feasible mitigation measures at significantly impacted locations. Pages 3.14-19 through 3.14-34 provide a thorough discussion of impacted intersections, detailing site-specific characteristics and constraints. Also, please see pages 19 through 27 of Appendix F, *Travel Characteristics and Traffic Impact Report for the West Hollywood General Plan Update*.

The commenter states that other “potentially feasible transportation planning and traffic engineering mitigation measures ... have not been considered.” However, the commenter does not provide any mitigation measures specific to individual study intersections, but instead provides a number of general mitigation suggestions. These suggested mitigations are *not* feasible to mitigate identified significant impacts, for the following five reasons:

1. *The suggested mitigations are already included in the plan or mitigation measures.* For instance, the Project already proposes the implementation of a robust TDM plan, and suggests restriping wherever possible.
2. *The suggested mitigations have already been implemented* and thus it is not possible to further implement them (for example, restriping for narrower lanes, prohibiting left turns at peak hours, and relocating bus stops).
3. *The suggested mitigations conflict with the community's other goals* of creating a pedestrian-friendly environment and supporting the economic viability of existing and proposed businesses (expanding right-of-way, prohibiting curb parking, green right-turn arrows, and restricting residents' movements out of their neighborhoods via minor street left-turn prohibitions).
4. *The suggested mitigations will cause ancillary impacts* at other locations (prohibiting left turns, thereby redirecting traffic).
5. *The suggested mitigations are based on a less sophisticated LOS calculation methodology.* The 10% capacity increase applied in the City of Los Angeles for intersections operating under the ATSC/ATCS system is used with a methodology that does not take into account specific signal timings and intersection coordination plans. The methodology used for the West Hollywood General Plan Update EIR already takes into account these factors.

E5-259

The commenter states that no alternatives to the LOS criteria have been proposed or published for public review and comment. The City adopted the current intersection Level of Service Significant Impact Criteria in October of 2009. These criteria were used to determine significant traffic impacts for the West Hollywood General Plan EIR.

As noted by the commenter, policy M-5.15 of the proposed General Plan states that the City should replace LOS with performance measures for the City's transportation system that reflect priorities established in the General Plan. Additionally, policy M-6.3 states that the City will consider implementing multimodal performance measures for analyzing the impacts of new development.

No alternative performance measures have been developed or adopted by the City. Therefore, the Draft EIR has correctly used currently adopted standards to analyze traffic and transportation impacts pursuant to implementation of the proposed General Plan. If and when the City adopts new performance standards to analyze traffic and transportation impacts, development projects would use the adopted performance standards to determine whether significant impacts occur.

E5-260

This comment is a summary of previous comments. Please see Responses to Comments E5-257, E5-258, and E5-259.

E5-261

This comment is a summary of previous comments. Please see Responses to Comments E5-257, E5-258, and E5-259.



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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ALHAMBRA, CALIFORNIA 91802-1460

E6

August 9, 2010

IN REPLY PLEASE
REFER TO FILE **LD-1**

Ms. Bianca Siegl, Associate Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Ms. Siegl:

**DRAFT ENVIRONMENTAL IMPACT REPORT
WEST HOLLYWOOD GENERAL PLAN AND
ASSOCIATED CLIMATE ACTION PLAN
CITY OF WEST HOLLYWOOD**

Thank you for the opportunity to review the Draft Environmental Impact Report for the West Hollywood General Plan and Associated Climate Action Plan. The proposed project serves as a blueprint or policy guide for determining the appropriate physical development and character of the City and establishes an overall development capacity. Expected buildout of land uses by 2035 could result in an increase of 4,274 dwelling units and approximately 2,613,128 square feet of nonresidential building floor area over existing conditions. The project area is entirely within the City of West Hollywood.

The following comments are for your consideration and relate to the environmental document only.

Hazards–Flood/Water Quality

- Table ES-1. Environmental Impacts and Mitigation Measures
3.7 HYDROLOGY AND WATER QUALITY, pages ES19–ES20

As discussed in analysis of environmental impacts, elaborate that No mitigation is required with adherence to and implementation of permits, proposed regulations, and policies of the proposed General Plan, in addition to requiring new construction to comply with Federal, State, and local regulations governing water quality and pollution prevention.

E6-1

Ms. Bianca Siegl
August 9, 2010
Page 2

- 3.7.1–EXISTING ENVIRONMENTAL SETTING, page 3.7-1
SURFACE WATER HYDROLOGY AND DRAINAGE, 2nd Paragraph: "Storm drainage infrastructure in the City is jointly owned and operated by the City of West Hollywood and the County of Los Angeles."

E6-2

Clarify how both cities own and operate said structures. Storm drain infrastructure is either owned by the City or the Los Angeles County Flood Control District.

If you have any questions regarding the flood/water quality comments, please contact Ms. Lizbeth Cordova at (626) 458-4921 or by e-mail at lcordova@dpw.lacounty.gov.

We request the opportunity to review any subsequent Environmental Impact Report, including traffic impact studies, on a project-by-project basis. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works


DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

JY:ca

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Letter E6

E6-1

Page 3.7-17 of the Draft EIR explains that the City has implemented a variety of programs and policies aimed at reducing the amount of waste that is carried to the ocean and released into the environment. Page 3.7-19 of the Draft EIR explains that impacts related to pollutants associated with impervious surfaces are reduced primarily by City implementation of Regional Water Quality Control Board waste discharge permits (NPDES) and through preparation and implementation of a Storm Water Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan, including identification of required best management practices for both construction and postconstruction discharges. As indicated on page 3.7-19, adherence to and implementation of permits, existing City programs and practices, proposed General Plan policies, and existing water conservation and drought-tolerant landscaping regulations, water quality impacts would be less than significant and no mitigation would be required.

Regarding flood hazards, no areas of the City are located within a 100-year floodplain. Additionally, as stated on page 3.7-22 of the Draft EIR, the Safety and Noise Chapter of the General Plan contains policies to reduce flood hazards. As stated on page 3.7-22, adherence to policies and regulations would reduce program-level impacts to less than significant and no mitigation would be required.

E6-2

The Draft EIR has been modified to read as follows: "Storm drainage infrastructure in the City is owned and operated by the City of West Hollywood or the County of Los Angeles." This does not change the analysis or conclusions of the Draft EIR.

E7



COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 9, 2010

File No: 04-00.04-00



Ms. Bianca Siegl, Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Dear Ms. Siegl:

West Hollywood General Plan and Associated Climate Action Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) for the subject project on June 28, 2010. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments:

- Previous comments submitted by the Districts in correspondence dated October 7, 2009 (copy enclosed), to your agency, still apply to the subject project.
- SECTION 3.12 PUBLIC SERVICES AND UTILITIES *Wastewater page 3.12-18 (last paragraph)* "Previously, Sanitation District No. 4 (i.e., the City of West Hollywood and small portions of the Cities of Beverly Hills and Los Angeles) had specific entitlement for a wastewater discharge of approximately 6.6 MGD and paid fees for this amount regardless of usage. Under the new system, Sanitation District No. 4 pays a contracted amount equal to a discharge of approximately 5.9 MGD." Although it is accurately documented that there was a specific entitlement for District 4 of 6.6 MGD, under the current system, District 4 pays for the equivalent of actual flow on an annual basis, which is on the order of 5 MGD.

E7-1

E7-2

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar
Enclosure

Doc #: 1647423.1





COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

October 7, 2009

File No: 04-00.04-00

Ms. Bianca Siegl, Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216

Dear Ms. Siegl:

City of West Hollywood General Plan Update

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on October 5, 2009. The City of West Hollywood (City) is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. E7-3
2. Wastewater flow from some areas of the City is conveyed through local sewer lines, Districts' trunk sewers, and City of Los Angeles (CLA) sewers, while wastewater flow from other areas is conveyed through local sewer lines and CLA sewers only. All wastewater flow from the City is treated by the CLA Hyperion Treatment System. Information regarding sewerage service for the City should also be directed to the City of Los Angeles' Department of Public Works. E7-4
3. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate proposed projects. Payment of a connection fee is required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. E7-5

Doc #: 1378902.1

Recycled Paper 

4. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

E7-6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin



Ruth I. Frazer
Customer Service Specialist
Facilities Planning Department

RIF:rf

Letter E7

E7-1

The commenter's indication that previous correspondence submitted to the City regarding wastewater infrastructure still applies to the City is noted.

E7-2

Page 3.12-18 of the EIR has been corrected as following: "Under the new system, Sanitation District No. 4 pays for the equivalent of actual flow on an annual basis, which is approximately 5 MGD." This does not change the analysis or conclusions of the Draft EIR.

E7-3

This information was previously incorporated into the EIR on page 3.12-18.

E7-4

This information was previously incorporated into the EIR on page, 3.12-17 and 3.12-18.

E7-5

This information was previously incorporated into the EIR on page 3.12-16.

E7-6

Correspondence subsequent to the letter dated October 7, 2009, between the City and the Sanitation Districts of Los Angeles County (see page 3.12-52) on May 12, 2010, indicated adequate capacity to serve the wastewater discharge requirement of the City of West Hollywood with implementation of the proposed General Plan.

E8



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330



P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

August 11, 2010

Bianca Siegl, Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Blvd.
West Hollywood, CA 90069

Dear Ms. Siegl:

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), DRAFT GENERAL PLAN AND DRAFT CLIMATE ACTION PLAN, MIXED USE RESIDENTIAL AND COMMERCIAL DEVELOPMENT; LA BREA AVENUE AND SANTA MONICA BLVD., WEST HOLLYWOOD (FFER #201000127)

The Draft Environmental Impact Report, Draft General Plan and the Draft Climate Action Plan have been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

- 1. The Public Review Draft Program Environmental Impact Report, Volume 1, Fire Safety Section on page 3.6-14, states; LACFD serves almost 4 million residents, 1.1 million housing units, 58 district cities, 2,296 total square miles, 72 miles of beach area, and 31 miles of public beach. This is incorrect. Please update the above sentence to read; LACFD serves 4.2 million residents, 1.2 million housing units, 58 district cities, 2,305 total square miles, 72 miles of beach area, and 31 miles of public beach. We have no other comments.

E8-1

LAND DEVELOPMENT UNIT:

- 1. The development of proposed projects must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants.
2. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

E8-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

Table listing unincorporated areas and cities served by the Fire Department, including Agoura Hills, Artesia, Azusa, Baldwin Park, Bell, Bell Gardens, Bellflower, Bradbury, Calabasas, Carson, Cerritos, Claremont, Commerce, Covina, Cudahy, Diamond Bar, Duarte, El Monte, Gardena, Glendora, Hawaiian Gardens, Hawthorne, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Canada-Flintridge, La Habra, La Mirada, La Puente, Lakewood, Lancaster, Lawndale, Lomita, Lynwood, Malibu, Maywood, Norwalk, Palmdale, Palos Verdes Estates, Paramount, Pico Rivera, Pomona, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, Santa Clarita, Signal Hill, South El Monte, South Gate, Temple City, Walnut, West Hollywood, Westlake Village, and Whittier.

3. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches.
4. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade; in such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, should be no more than 17%. Grade breaks shall not exceed 10% in 10 feet.
5. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flow and hydrants are addressed during the subdivision tentative map stage.
6. Fire sprinkler systems are required per city ordinance.
7. Commercial developments may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, their relationship to other structures, property lines, and types of construction used.
8. Fire hydrant spacing for all proposed developments other than single-family dwellings shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
 - e. A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
9. The development of structures proposed for industrial use may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, their relationship to other structures, property lines, and types of construction used.

E8-2
cont.

10. For all occupancies other than single-family dwellings, fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid block.
 - e. A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
11. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.
12. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to, and within 30 feet of, an exterior wall on one side of the proposed structure.
13. Driveway width for non-residential developments shall be increased when any of the following conditions exist:
 - a. Provide 34 feet in width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
 - b. Provide 42 feet in width, when parallel parking is allowed on each side of the access roadway/driveway.
 - c. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plans.
 - d. For streets or driveways with parking restrictions, the entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

E8-2
cont.

14. The development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of the buildings, their relationship to other structures, property lines, and types of construction used.
15. High-density residential fire hydrant requirements, fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced fire hydrant.
 - c. When cul-de-sac depth exceeds 200 feet, hydrants will be required at the corner and mid-block.
 - d. Additional hydrants will be required if the hydrant spacing exceeds specified distances.
16. High-density residential turning radii shall not be less than 32 feet, this measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.
17. High-density residential access, all on-site driveways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The 28 foot width does not allow for parking, and shall be designated as a fire lane, and have appropriate signage. The centerline of the on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.
18. High-density residential access width, the 28 feet in width shall be increased to:
 - a. 34 feet in width when parallel parking is allowed on one side of the access way.
 - b. 36 feet in width when parallel parking is allowed on both sides of the access way.
 - c. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plans.
 - d. For streets or driveways with parking restrictions, the entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

E8-2
cont.

19. When serving land zoned for residential uses, having a density of more than four units per net acre:
 - a. A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.
 - b. The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.
 - c. A fire department approved turning area shall be provided at the end of a cul-de-sac.
20. Single-family detached homes shall require a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration. Two family dwelling units (duplexes) shall require a fire flow of 1,500 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration. When there are five or more units taking access on a single driveway, the minimum fire flow shall be increased to 1,500 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration.
21. Single-family detached homes shall require a minimum fire hydrant spacing of 600 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
 - b. No portion of a structure should be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
 - c. When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
 - d. Additional hydrants will be required if hydrant spacing exceeds specified distances.
22. Single-family detached homes, a Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.
23. Single-family detached homes Fire Department access shall provide a minimum unobstructed width of 28 feet, clear-to-sky and be within 150 feet of all portions of the exterior walls of the first story of any single unit. If exceeding 150 feet, provide 20 feet minimum paved width "Private Driveway/Fire Lane" clear-to-sky to within 150 feet of all portions of the exterior walls of the unit. Fire lanes serving three or more units shall be increased to 26 feet.
24. Single-family detached homes minimum required access width, streets or driveways within the development shall be provided with the following:
 - a. Provide 36 feet in width on all streets where parking is allowed on both sides.
 - b. Provide 34 feet in width on cul-de-sacs up to 700 feet in length. This allows parking on both sides of the street.

E8-2
cont.

- c. Provide 36 feet in width on cul-de-sacs from 701 to 1,000 feet in length. This allows parking on both sides of the street.
 - d. For streets or driveways with parking restrictions, the entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
 - e. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.
25. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.
26. All access devices and gates shall meet the following requirements:
- a. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.
 - b. Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d. All limited access devices shall be of a type approved by the Fire Department.
 - e. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.
27. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.
28. The County of Los Angeles Fire Department, Land Development Unit comments are only general requirements. Specific fire and life safety requirements will be addressed at the building and fire plan check phase. There may be additional requirements upon submittal for plan check review.
29. When developing the infrastructure and, when actual construction is proposed, the project still comply with requirements regarding construction, water mains, access, fire flows, and fire hydrants.

E8-2
cont.

Bianca Siegl, Senior Planner
August 11, 2010
Page 7

30. The Statutory Responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department.

We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

E8-2
cont.

31. Submit proposals for all street vacations (closures) to the County of Los Angeles Fire Department, Land Development Unit for review and approval. The proposal shall be submitted through the Department of Public Works.
32. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit, Inspector, Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

E8-3

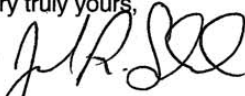
HEALTH HAZARDOUS MATERIALS DIVISION:

1. Health Hazardous Materials Division has no objection to the proposed General Plan.

E8-4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:ss

Letter E8

E8-1

The statistics regarding the Los Angeles County Fire Protection District were updated at the request of the commenter. This does not change the analysis or conclusions of the Draft EIR.

E8-2

This comment provides approximately six pages of requirements, many of which are contained in City Building Codes, for development proposals in the City. New development would be required to adhere to these requirements. The comment does not raise any issues related to the adequacy of environmental analysis conducted in the Draft EIR. No further response is necessary because no question or new information regarding the environmental analysis was raised.

E8-3

This comment provides information about the responsibilities of the County of Los Angeles Fire Department, Forestry Division. The comment is noted.

E8-4

The comment is noted.

E9



Arnold Schwarzenegger
Governor August 10, 2010

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Cathleen Cox
Acting Director



Bianca Siegl
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: West Hollywood General Plan Program EIR and Associated Climate Action Plan
SCH#: 2009091124

Dear Bianca Siegl:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 9, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

E9-1

State Clearinghouse Data Base

SCH# 2009091124
Project Title West Hollywood General Plan Program EIR and Associated Climate Action Plan
Lead Agency West Hollywood, City of

Type EIR Draft EIR

Description The proposed project analyzed in the EIR is the adoption and implementation of the West Hollywood General Plan and associated Climate Action Plan. The West Hollywood General Plan serves as a blueprint/policy guide for determining the appropriate physical development and character of the City and establishes an overall development capacity. As an implementation action to the goals and policies within the General Plan, the Climate Action Plan (CAP) includes measures intended to reduce greenhouse gas emissions within City operations and the community at-large.

Lead Agency Contact

Name Bianca Siegl
Agency City of West Hollywood
Phone 323-848-6475
email
Address 8300 Santa Monica Boulevard
City West Hollywood **State** CA **Zip** 90069

Project Location

County Los Angeles
City West Hollywood
Region
Lat / Long
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways No
Airports No
Railways Metro Red Line Subway
Waterways No
Schools Multiple
Land Use Urban development in a built out community.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 06/25/2010 **Start of Review** 06/25/2010 **End of Review** 08/09/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter E9

E9-1

This letter acknowledges receipt of the Draft EIR for the West Hollywood General Plan for review by the State Clearinghouse. The comment acknowledges that the City has complied with the State Clearinghouse review requirements for the West Hollywood General Plan Draft EIR pursuant to CEQA. No formal response is required.