

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. LAND USE AND PLANNING

1. INTRODUCTION

The following analysis of land use impacts considers a range of land use issues, including the compatibility of the proposed Project with surrounding land uses, the nature of the entitlements requested, and consistency with applicable plans and policy documents. The land use analysis is based upon a range of local and regional planning documents. The local and regional plans evaluated in this analysis are available online at the noted agency websites. Relevant portions of those plans, including applicable goals, objectives and policies, have been summarized below for discussion of the Project's potential consistency with those plans.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Onsite Land Uses

The Weddington Golf & Tennis Club was historically called the Studio City Golf and Tennis Club. The existing nine-hole, pitch-and-putt golf course was originally constructed and opened for public use in 1955 on a parcel that was originally 17.2 net acres in size. The tennis courts and ancillary facilities were approved and constructed throughout the following years. Buildings that support the operation of the existing golf course and tennis courts include a clubhouse and small tennis house/cashier hut, and maintenance facilities. Parking for the facilities is located in the front yard setback along the Project Site frontage on Whitsett Avenue.

In 2005, a 1.1-acre portion in the southeast corner of the original Project Site was separated from the original 17.2 acres of land and acquired by the City of Los Angeles for public facility uses. The corner is currently developed with City of Los Angeles Fire Station No. 78. As a result, the Project Site is now comprised of 16.1 acres.

The currently existing 16.1-acre parcel is fully utilized for the privately-operated golf course and tennis uses. While the golf course closes generally at dusk, the lighted driving range is open until 11:00 P.M. daily. The tennis courts, which are also lighted for nighttime use, are generally open between 7:00 A.M. and 10:00 P.M. The more intense and active site uses (i.e., tennis courts and driving range), as well as all parking, are located with access from the Whitsett Avenue street frontage.

(2) Local Context and Surrounding Land Uses

The Project Site is located within the Studio City community of the City of Los Angeles, approximately 11 miles northwest of downtown Los Angeles and 11 miles northeast of the Pacific Ocean at Pacific Palisades. The Project area is characterized as urbanized and largely built out with a mix of commercial and residential uses.

The Project Site is currently surrounded by developed properties on all sides. Land uses in the surrounding area are summarized as follows:

North and Northwest (immediate north, across Valley Spring Lane and northwest of Bellaire Avenue) - Land uses to the north and northwest consist of single-family residential properties developed in the early 1940s along a standard street grid pattern with one and two-story ranch style homes.

West (immediate west, across Bellaire Avenue) - Land uses to the west are similar to those toward the north, consisting of a continuation of the 1940s built single-family subdivision.

East and Southeast (immediate east, across Whitsett Avenue and southeast corner of the Property) - Land uses to the east along Whitsett Avenue are a combination of single-family homes and multiple-family residential buildings, as well as a religious facility. Further east (behind the buildings that front along Whitsett) are single-family residential neighborhoods established circa early 1930s. Notched out of the southeast corner of the site is the 1.1-acre Fire Station No. 78 facility.

South and Southwest (adjacent to the Property boundary and nearby along Ventura Boulevard) - The Property is bordered along its southern edge by the Valley Heart Drive right-of-way (largely unimproved) and the Los Angeles River, which consists of a concrete lined flood control channel that extends across the entire area. Further south, on the opposite site of the river, are developed commercial properties of mixed intensity and ages, which front along Ventura Boulevard.

b. Regulatory and Policy Setting

(1) Regional Plans

While the local planning and regulatory documents identified below establish policy at a site-specific level, regional plans establish operational guidelines for development to enhance quality of life and manage resources on a region-wide basis. Regional land use plans and policy documents that address the Project area include the Regional Comprehensive Plan (RCP) administered by the Southern California Association of Governments (SCAG), the Air Quality Management Plan (AQMP) administered by the South Coast Air Quality Management District (SCAQMD), and the Los Angeles County Congestion Management Plan (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). These policy documents are described below.

(a) SCAG Regional Comprehensive Plan

The Project Site is located within the planning area of the Southern California Association of Governments (SCAG), a joint powers agency with responsibilities pertaining to regional issues. SCAG's 2008 Regional Comprehensive Plan (RCP) is a major advisory plan prepared by SCAG that addresses interrelated regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California

region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

The RCP presents a vision of how Southern California can balance resource conservation, economic vitality, and quality of life, and identifies voluntary best practices to approach growth and infrastructure challenges in an integrated and comprehensive way. It also includes goals and outcomes to measure the regions progress toward a more sustainable community. The RCP approaches goals in two ways: (1) Tying together SCAG's role in transportation, land use, and air quality planning; and (2) Recommending key roles and responsibilities for public and private sector stakeholders and inviting them to implement reasonable policies that are within their control.

The RCP recommends integrated resource planning, but does not mandate it. Rather, local governments are asked to consider the RCP's recommendations in General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions. It is presumed that when the recommendations of the RCP are implemented at a local level, broader regional needs that involve planning for open space, efforts to meet federal transportation planning requirements, compliance with State sustainable planning requirements, and adapting a regional response and strategy for meeting climate change mandates that call for reductions in greenhouse gases, will be adequately addressed. Projects that promote the policies of the RCP can be viewed as consistent with the regional planning goals.

Applicable land use related policies of the RCP that may be relevant to the proposed Project are identified and discussed later in this section under the Consistency with Adopted Plans and Policies impact analysis discussion.

(b) *SCAQMD Air Quality Management Plan*

The Air Quality Management Plan (AQMP) is the region's plan for improving air quality in the region and is prepared by the South Coast Air Quality Management District (SCAQMD) and SCAG. The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Although primarily an air quality management document, the AQMP indirectly addresses land use issues as the proximate location, type and intensity of land uses has a direct relationship to the generation of air pollutant emissions. Because the AQMP is derived from growth expectations defined in the RCP, from a land use perspective, development is generally consistent with the AQMP if it is consistent with the regional growth forecasts and policy statements defined through the RCP. Refer also to *Section IV.B: Environmental Impact Analysis - Air Quality* of this Draft EIR for a more detailed discussion of the AQMP.

(c) *MTA Congestion Management Plan*

The Congestion Management Program (CMP) is a State-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990 to address the impact of local growth on the regional transportation system. The County of Los Angeles Metropolitan Transportation Authority (MTA) developed the 2004 Congestion Management Program for Los

Angeles County (July, 2004). The primary purpose of the CMP is to establish procedures for assessing and determining the potential traffic impacts from projects at designated monitoring locations (both intersections and roadway segments) on the CMP highway system. Although primarily a traffic congestion management document, the CMP indirectly addresses land use issues as the proximate location, type and intensity of land uses has a direct relationship to the generation of vehicle trips and traffic congestion. Because the CMP is derived from growth expectations defined in the RCP, from a land use perspective, development is generally consistent with the CMP if it is consistent with the regional growth forecasts and policy statements defined through the RCP. See also *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* of this Draft EIR for a more detailed discussion of the CMP.

(2) *Local Plans and Regulations*

Several local plans and regulatory documents guide development of the Project Site and Project area. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan), a component of the City of Los Angeles General Plan (General Plan), is the primary planning document for the Project Site and area. The Community Plan implements city-wide land use policy standards of the General Plan, as well as establishes specific policies to address the unique character of the Studio City community. The Los Angeles Municipal Code (LAMC) governs land use through building standards and development restrictions determined by the underlying property zoning. In May 2007, the Project Site also became subject to the Los Angeles River Revitalization Master Plan (LARRMP) and its implementation companion document, the River Improvement Overlay (RIO)¹, which guides development throughout the Los Angeles River corridor. These plans and regulatory documents are described below.

(a) *City of Los Angeles General Plan and Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*

The primary land use plan for this area is the City of Los Angeles General Plan. The General Plan is a policy document originally adopted in 1974 that serves as a comprehensive strategy for long-term growth and development in the City. The General Plan responds to State and federal mandates to plan for the future. The City of Los Angeles used population forecasts provided by SCAG for developing the General Plan to ensure consistency with other regional programs.

California State law (Government Code Section 65300) requires that each city prepares and adopts a comprehensive, long-term general plan for its future development. This plan is mandated to include seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. The City of Los Angeles' General Plan is comprised of ten elements, including the seven mandated elements and three optional elements, which include those for air quality and service systems/public recreation. In addition,

¹ The River Improvement Overlay (RIO) is the implementation component of the Los Angeles River Revitalization Master Plan. The RIO was adopted by the Los Angeles Planning and Land Use Management Committee in 2011. A RIO Supplemental Use District, which includes the Project Site, is currently in the approval process with the City of Los Angeles.

the General Plan is comprised of 35 local area plans, known as Community Plans, as well as plans for the Los Angeles World Airport and the Port of Los Angeles.

The General Plan was updated and refined through the adoption of the General Plan Framework Element in 1995, and re-adopted in August 2001. The Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. In many respects, the Framework Element is an evolution of the original General Plan, often referred to as the Centers Concept, which was adopted in 1974 and is now superseded by the Framework Element. However, specific land use designations are determined by the community plans and the Framework Element does not supersede the more detailed community and specific plans, some of which were established prior to the Framework Element.

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, adopted in 1998 and last updated in 2008, is the guiding community plan for the Project Site and surrounding area. The Community Plan identifies goals, objectives and policies related to the different land uses within the planning area. Development on the Project Site is subject to the Community Plan. The intent of the Community Plan is to promote an arrangement of land uses, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live in the community. Major issues addressed in the Community Plan include preservation and protection of single-family neighborhoods and residential properties, enhancement of street frontages and community spaces through quality urban design, and retention and advancement of economic stability.

The Project Site is located within the Studio City area, one of five community subareas comprising the Community Plan. The Community Plan characterizes Studio City as a collection of production and post-production businesses. Properties located along Ventura Boulevard are developed with a mix of pedestrian-oriented storefronts and office structures. Laurel Canyon Boulevard serves as the focal point of Studio City with its intense commercial development at the respective four corners. A portion of the Los Angeles River runs through Studio City. In keeping with the vision stated by residents during citywide workshops and community plan update focus group meetings, the west side of Laurel Canyon, north of Ventura Boulevard could be developed with a Village concept accented toward the Los Angeles River.

According to the Community Plan, the Project Site is currently designated as Open Space (see *Figure II-5: Community Plan Designation in Section II.C: Project Description – Background of this Draft EIR*).

The existing golf course, driving range, tennis courts, and clubhouse at the Project Site are consistent with the existing Open Space land use designation, as these uses provide functional recreational uses. The Community Plan indicates that:

Open Space designations on the Plan map conform to the definition of "Open Space Land" set forth in Article 10.5 of the State of California Government Code and to the City's Open Space Plan; and

Desirable Open Space land is that which possess open space characteristics which should be protected and where additional development controls such as proposed in the Community Plan and City's Open Space Plan are needed to conserve such characteristics. Open space lands may be either publicly or privately owned. Conservation of such characteristics is needed to ensure the usefulness, safety and desirability of adjacent lands and to maintain the overall health, safety, welfare and attractiveness of the community.

The Community Plan identifies two classifications for Open Space: publicly owned and privately owned open space. In the Community Plan, open space is broadly defined as land that is essentially free of structures and buildings and/or is natural in character and which functions in a recreational, scenic, preservation and/or public service manner.

Surrounding properties to the north, east, and west are designated primarily Low and Medium Low Density Residential, and properties to the south are designated Commercial. The Los Angeles River, which runs adjacent to the southern edge of the Project Site, is also designated as Open Space.

The Community Plan includes goals, objectives, and policies (collectively referred to as policy statements) for each major land use category (e.g., Residential or Open Space), and also addresses urban design policies for individual projects and overall community design to ensure compatibility between land uses and implementation of policies. The Community Plan specifically notes the need to preserve single-family neighborhoods and provide for more affordable senior housing.

Specific land use related policies that are applicable to the Project are listed later in this section under the Consistency with Adopted Plans and Policies discussion. Identification of applicable policy statements and consistency discussions for urban design, community services, and transportation are addressed in other topic-specific sections of this Draft EIR. Please refer to *Section IV.A: Environmental Impact Analysis – Aesthetics*, *Section IV.K: Environmental Impact Analysis – Public Services*, and *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*, respectively, in this Draft EIR.

The Project Site has a unique history with regard to its land use designation and associated zoning. As discussed in *Section IV.D: Environmental Impact Analysis – Cultural Resources*, development of the Project Site originated in the context of a developing community of single-family subdivisions. Prior to 1971, the Project Site was zoned R3-1 (Medium Density Residential) along its Whitsett Avenue frontage and R1-1 (Low Density Residential) over the remainder of the site. The residential zoning pattern was established in 1946; however, in 1970, the City changed the land use designation of the Project Site to “Privately Owned Open Space” with a symbol of “golf course private” in acknowledgement of the established (since 1955) golf course and related recreational uses. The following year (1971), the City changed the zone (Ordinance No. 142,584) of the entire Project Site from R1-1 and R3-1 to A1-1XL (Agricultural) to reflect consistency with the revised land use designation change (adopted 1970).

The zone change offered the added benefit of reduced taxes on the property for the lessee/operator of the private golf course because the revised zone allowed opportunity to align the tax valuation of the land with the established uses (rather than its value based on potential uses).

Nonetheless, the Community Plan also recognizes the Project Site as a major development “opportunity site”. Specifically, the Community Plan notes that there has been interest to establish a different use at the site, and acknowledges that transition at the site due to a future alternative development is likely. The Community Plan notes that with a lack of public funding, it is unlikely that the site would convert to a public park. Hence, guidance for potential future alternative development of the site includes: (1) establishment of zoning and allowance for development that is compatible with the surrounding area; and (2) consideration of future development and design features that encourage waterfront access to the Los Angeles River at this location.

City actions on most discretionary projects require a finding that the action is consistent or in conformance with the General Plan. In addition to the required general findings (per the LAMC), decision-makers acting on certain projects in the Community Plan Area would refer to applicable additional findings that the Community Plan identifies as programs, policies, or objectives in Chapter III of the Plan.

(b) Los Angeles Municipal Code (LAMC)

The Project Site is currently zoned A1-1XL. The existing agricultural zone tied to the Project Site is permitted under the existing Open Space General Plan designation.

The A1 (Agricultural) zone permits low intensity uses, including agricultural, community facilities, golf courses (except pitch-and-putt and driving ranges), nurseries, and low-density single-family uses. As noted above, the Project had previously been zoned R3-1 (Medium Density Residential) along its Whitsett Avenue frontage and R1-1 (Low Density Residential) over the remainder of the site. In the 1970’s, the City changed the zoning to A1 to reflect the type of uses and development intensity developed on the Project Site.

Height District No. 1XL (designated by “-1XL” following the land use code), limits building heights to thirty feet and two stories. It also limits the potential floor-to-area ratio to 3:1.

(c) Special Plans

LA River Revitalization Master Plan and River Improvement Overlay

For more than two decades, community activists have sought to formalize plans to revitalize the Los Angeles River. Such plans have been recently coordinated and developed by several agencies with oversight of the River, including the County of Los Angeles and the City of Los Angeles.

In May 2007, the City of Los Angeles adopted the Los Angeles River Revitalization Master Plan (LARRMP), which targets the redevelopment and revitalization of a 32-mile segment of the Los Angeles River and the land uses that surround it. The Los Angeles River presents opportunities to revitalize neighborhoods, to invest in communities, to bring nature to people, and to enhance the quality of life for people and properties proximate to the River. Through implementation of the LARRMP, the City envisions a renewed Los Angeles River with a continuous greenway of interconnected parks and amenities connecting communities along the River.

The LARRMP establishes the creation of the River Improvement Overlay (RIO) as the implementing mechanism. The RIO (approved by the City Planning Commission on February 12, 2009) will establish the RIO Supplemental Use District, which is currently in the approval process with the City.² The RIO Supplemental Use District, which will include the Project Site, will codify and establish development and design guidelines for all properties to be developed within a certain distance from the Los Angeles River. This new District would ensure that all developments proximate to the Los Angeles River are designed in a manner that is compatible with the vision of the River proposed in the LARRMP.

The RIO extends from Topanga Canyon Boulevard, located just west of the headwaters of the Los Angeles River, westerly and then southerly to the point at which it flows out of the City of Los Angeles at 26th Street in the Boyle Heights area. The RIO District is applicable to an area adjacent to the River corridor that is roughly defined as extending 2,500 feet on either side of the River. The entire Project Site and surrounding properties are included within the RIO District.

It is the goal of the RIO to: (1) Promote sustainability of the Los Angeles River, the Greenway, the City of Los Angeles, and the Region; (2) Establish a positive interface between Greenway adjacent property and the River Greenway; and (3) Create active pedestrian streets leading to the River. It is the intent of the LARRMP and RIO that the Los Angeles River Greenway becomes a public thoroughfare that seeks to promote increased levels of activity coupled with an increased awareness of the relationship between the urban lifestyle and the natural environment. Properties that are proximate to the Greenway have the unique opportunity to interface with the River and establish an orientation to both the street frontages and the Greenway. The street network within the RIO plays an important role in enhancing and supporting pedestrian, bicycle, and vehicular mobility as a means of extending the City to the Greenway and vice versa.

The RIO establishes requirements for private property and publicly-owned facilities to comply with design categories addressing watershed, urban design, and mobility alternatives. A project's compliance is evaluated based on an established threshold of points. These requirements are presented in more detail in the impact analysis discussion of this section.

² City of Los Angeles. *Los Angeles River Improvement Overlay (RIO)*, http://cityplanning.lacity.org/Code_Studies/RIOproject/TOCRIO.pdf and <http://cityplanning.lacity.org/> (25 August 2008).

Walkability Checklist

On August 23, 2007, the Citywide Planning Commission approved the Walkability Checklist. The final graphically complete Walkability Checklist was completed in November 2008.³ Guided by the Urban Design Studio, the Citywide Planning Commission adopted the Walkability Checklist and directed that it be applied to all projects seeking discretionary approval, primarily Site Plan Review and Zone Change cases.

The purpose of the Walkability Checklist is to guide City Planning staff, developers, architects, engineers, and all community members in creating enhanced pedestrian movement, access, comfort, and safety—contributing to the walkability of the City.

The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. While the checklist is neither a requirement nor part of the zoning code, it provides a guide for consistency relating with the policies contained in the General Plan Framework. Incorporating these guidelines into a project's design will encourage pedestrian activity and placemaking. The City's philosophy is that a project that is walkable is good for business and the environment, and thus supports overarching city-wide goals for economic vitality and sustainability.

In the context of land use planning, walkability reinforces broader policies targeting the preservation of neighborhoods, connectivity and linkages between key community components, and accessibility. Enhanced walkability also indirectly supports opportunities for transit use and traffic trip demand reduction.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This land use analysis relies on the characterization of onsite and surrounding land uses based on field observations and review of aerial photos. Review of City and regional agency planning documents was completed to identify the policy and land use regulatory setting for the Project Site. A review of the permit history for the Project Site was also completed.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on land use if it would cause any of the following conditions to occur:⁴

- a) Physically divide an established community;

³ City of Los Angeles, Department of City Planning, Urban Design Studio. *Walkability Checklist*, <http://urbandesignla.com/walkability.htm> (November 2008).

⁴ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2011).

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following: The following factors are set forth in the LA CEQA Thresholds Guide for consideration, on a case-by-case basis, of the significance of potential environmental impacts:

Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed Project.

c. Project Impacts

Implementation of the proposed Project will require a General Plan Amendment to change the Community Plan's designation of a portion of the Project Site (proposed Lot 2) from Open Space to Medium Density Residential, and a Zone Change from A1-1XL to R3-1. A number of other development approvals will be required to authorize the SCSLC development. These entitlements are identified more specifically in *Section II: Project Description* of this Draft EIR and summarized below.

Lot 1

To effectively implement the SCSLC development, certain entitlements would be necessary to subdivide the Project Site so that the existing golf course may continue to operate separate from the SCSLC essentially unchanged on Lot 1. Therefore, the Project Applicant seeks a subdivision

to subdivide the 16.1-acre Project Site into two lots of 11.6 acres (Lot 1) and 4.5 acres (Lot 2). To permit the continued, ongoing operation of the Weddington Golf Course (and associated driving range and clubhouse) on Lot 1, the Applicant seeks to obtain a Conditional Use Permit (CUP), a Revocable (encroachment) Permit, and a Zone Variance in order to implement minor physical improvements and maintain the existing golf course and driving range largely consistent with their current configuration.

Subdivision - The Applicant is requesting approval to subdivide the Project Site into two lots, Lots 1 and 2 of a tentative tract map. Lot 1 would be approximately 504,764 square feet (11.6 acres) and Lot 2 would be approximately 196,946 square feet (4.5 acres). To implement the senior housing development, the tentative tract map is also for condominium purposes for 200 residential condominiums with common areas on Lot 2.

Conditional Use Permit - The maintenance and minor reconfiguration of the existing driving range and pitch-and-putt golf course will require a CUP to allow the driving range and golf course in the existing A (Agricultural) Zone (which would remain unchanged for Lot 1), as well as a Revocable Permit to retain existing encroachments in the City's and County's rights-of-way along Valley Heart Drive and the Los Angeles River, respectively. The driving range and golf course will remain largely unaltered, but would undergo minor modifications to accommodate the lot split. A Zone Variance may be required to permit the existing over-in-height driving range fence with minor reconfiguration, if the fence cannot be entitled by the Conditional Use Permit. The number of parking spaces required for the driving range, golf course, and associated clubhouse will be determined by the City of Los Angeles during the Conditional Use approval process.

The CUP for Lot 1 would allow the continued use of that part of the Project Site for golf course, driving range, clubhouse, and other related recreational uses. In accordance with LAMC Section 12.05, golf course uses are permitted by right in the A1 zone; however, driving ranges and golf courses having an average fairway length per hole of less than 125 yards (which qualify as a pitch-and-putt), and golf facilities with nighttime lighting, are conditionally permitted subject to approval of a CUP. If permitted by the City, the CUP for Lot 1 would also incorporate a request for a Zone Variance related to the height and location of fencing (specifically for the driving range), parking, and other site planning modifications as needed.

Zone Variance - The Applicant may request a Zone Variance to permit the existing fence up to 100 feet in height for the driving range in Lot 1, to permit the placement of the fence within the required side yard setback, and to permit the existing surface parking lot within the front yard setback (along Whitsett Avenue). The Zone Variance for these entitlements will only be requested if the City does not permit them to be incorporated as part of the above Conditional Use Permit request.

Revocable/Encroachment Permit - The Applicant is requesting a Revocable or Encroachment Permit to retain existing non-structural golf course encroachments in the City and County right-of-ways. At the southern edge of the Project Site, the City of Los Angeles maintains an unimproved, 40-foot right-of-way for Valley Heart Drive, adjacent to the Los Angeles River. Similarly, the Los Angeles County Flood Control District maintains a variable approximately

150-foot right-of-way for the Los Angeles River. Currently, several southern portions of the existing golf course encroach into Valley Heart Drive and the Los Angeles River right-of-way. These encroachments have existed for the life of the golf course. As part of the Project, the southern portion of the golf course, within Lot 1, will remain unchanged and unaltered. As a result, the Applicant is requesting to retain existing rights within these right-of-ways through a Revocable Permit or Encroachment permit, as necessary, from the City and County of Los Angeles.

Because the nature of the entitlements requested for Lot 1 are tied primarily to implementation of the senior housing development on Lot 2, and the reconfirmation of the CUP and Zone Variance are associated with existing uses that would remain essentially unchanged from existing conditions, the potential environmental effect of entitlements related to Lot 1 are anticipated to be less-than-significant and further analysis is not provided. In accordance with CEQA Guidelines Section 53000 *et al* (Categorical Exemptions), the requested actions tied to Lot 1 would typically be classified as minor land use divisions, minor alterations to the land, and minor improvements to existing facilities, all of which are categories of physical changes that would be considered to have a less-than-significant effect on the environment.

Lot 2

On Lot 2, the Applicant seeks approval of a General Plan Amendment, Zone Change, Site Plan Review, Zone Variance, Tentative Tract Map, and Haul Route to develop a 200-unit senior housing project.

The Project will require a General Plan Amendment to change the Plan's designation of a southeast portion of the Project Site from Open Space to Medium Density Residential, a Zone Change from A1-1XL to R3-1, a Site Plan Review, a Zone Variance for golf course/driving range parking and retail hut in the proposed R3 zone, a Tentative Tract Map for 200 residential condominiums, approval of a Haul Route to export approximately 82,000 cubic yards of earth for subterranean parking and demolition debris from removal of sixteen tennis courts, and other general permits related to construction and implementation. A Conditional Use Permit for alcohol (CUB) is requested for the sale and/or dispensing of alcohol to residents and/or their guests within common area facilities for onsite consumption.

Subdivision - The Applicant is requesting approval to subdivide the Project Site into two lots, Lots 1 and 2 of a tentative tract map. Lot 1 would be approximately 504,764 square feet (11.6 acres) and Lot 2 would be approximately 196,946 square feet (4.5 acres). To implement the senior housing development, the tentative tract map is also for condominium purposes for 200 residential condominiums with common areas on Lot 2.

General Plan Amendment - The Applicant is requesting a General Plan Amendment to change the designation of a portion of the Project Site, within the area proposed as Lot 2, from Open Space to Medium Density Residential and remove the Privately Owned Golf Course symbol, to permit medium-density senior housing land uses. The land use designation for the remainder of the Project Site (Lot 1) would remain unchanged as Open Space (which corresponds to the A1

that would remain for that portion of the Project Site). The Medium Density Residential designation corresponds to the R3 zone.

Zone Change - The Applicant is requesting a Zone Change for a portion of the Project Site, within the area proposed as Lot 2, from A1-1XL to R3-1. The zoning for the remainder of the Project Site (Lot 1) would remain unchanged as A1-1XL. The A1 (Agricultural) zone permits a range of agricultural, recreational, and other low-intensity uses on lots having a minimum size of five acres. The existing golf course, tennis courts, and other recreational and club facilities are “conditionally” permitted in the A1 zone. For Lot 1, as noted above, these uses will be entitled under a CUP request. Multiple-family residential uses, as proposed for Lot 2, are not permitted in the A1 zone; hence a Zone Change to R3 (Multiple-Family Dwelling) would accommodate a density of up to 54 dwelling units per acre (du/ac), which will accommodate the 200 units for the proposed senior housing development (a density of 45 du/ac), and would be consistent with the requested General Plan Amendment land use designation of Medium Density Residential.

Conditional Use Permit (for Alcohol) - A Conditional Use Permit for alcohol (CUB) is requested for Lot 2 to permit onsite cafeterias/cafés within the common area of the SCSLC to sell/dispense alcohol (including wine and beer) for onsite consumption to residents and/or their guests.

Zone Variance(s) - The Applicant is requesting a Zone Variance for the provision of 113 parking spaces for the adjoining golf course/driving range uses in the subterranean parking garage of Lot 2 to be re-zoned as R3 zoning, as well as a Zone Variance for a small self-service retail hut for golf course and driving range uses at the northeast corner of Lot 2.

Site Plan Review - The Applicant is requesting a Site Plan Review for the SCSLC on Lot 2 as the development creates more than 50 dwelling units. The Site Plan Review will confirm the appropriateness of the proposed use and ensure that the development is compatible with the Open Space area in Lot 1, the adjacent Los Angeles River, and the surrounding community.

Building Line Removal - The Applicant requests removal of a building line on the Project Site along Whitsett Avenue, incident to the requested subdivision. Prior to adoption of the current Transportation Element of the General Plan, the City of Los Angeles had intended that Whitsett Avenue be widened to a width that exceeded the standard for its current Secondary Highway⁵ designation. In order to reserve the appropriate right-of-way in anticipation of the future street widening, a “building line”⁶ was recorded against properties abutting Whitsett Avenue. For the Project Site, the building line extends 18 feet into the buildable area of the Project Site. As the building line is now obsolete, and it is highly unlikely that Whitsett Avenue will be widened to the building line, the need for the building line on the Project Site is unnecessary. Further, as constructed, the adjacent Fire Station No. 78 at the northwest corner of Whitsett Avenue and Valley Heart Drive encroaches within the area of the 18-foot building line (currently a 15-foot building line due to a three-foot dedication that was completed during development of the fire station), further supporting the removal of the obsolete building line. The fire station is sited on a parcel that was previously tied to the Project Site.

⁵ The current standard for a Secondary Highway consists of a 90-foot right-of-way. The current right-of-way for Whitsett Avenue along the Property frontage varies from 80 to 82 feet.

⁶ A “building line” establishes an alternate setback distance for which no structures may be located.

Construction Related Permits - Construction of the Project will require that the Applicant obtain the appropriate demolition, grading, building, and service connection permits. In furtherance of obtaining these permits, the Applicant will submit and obtain approval of various informational and engineering documents, including information for truck and hauling routes to be used during the construction phase.

The potential environmental impacts of the requested actions and entitlements for Lot 2 are discussed below.

(1) *Land Use Compatibility*

The Project will require a General Plan Amendment to change the Community Plan's designation of Lot 2 from Open Space to Medium Density Residential and a Zone Change from A1-1XL to R3-1. These entitlement changes are enacting approvals that would allow the land uses to transition from one of primarily open space and recreational uses to medium density residential uses, which would result in a change in how the Project Site interrelates with surrounding land uses. Land use compatibility issues may be experienced relative to a number of compatibility aspects and the Project's characteristics, including: the residential use of the Project Site, the intensity of uses at the Project Site (up to 54 du/ac allowed, 45 du/ac proposed), the scale and massing of the Project structures, the manner in which the development is integrated with the community, and the operational characteristics of the SCSLC.

Also, the determination of land use compatibility includes a review of many environmental and policy factors. The following analysis focuses on a review of the land use policies intended to ensure compatibility of adjacent uses. Analyses of physical factors that are indirectly related to land use compatibility are provided elsewhere in this document. Specifically, discussion of visual compatibility is provided in *Section IV.A: Environmental Impact Analysis – Aesthetics*; air quality issues provided in *Section IV.B: Environmental Impact Analysis – Air Quality*; noise compatibility provided in *Section IV.I: Environmental Impact Analysis – Noise*; and land use impacts associated with traffic and circulation provided in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*.

(a) *Change in Land Use*

Although the Community Plan Map currently identifies the Project Site as "Open Space", the Applicant requests a change in land use designation that would designate a portion (4.5 acres) of the 16.1-acre Project Site as "Medium Density Residential". Because findings can be made to support this change, approval of residential uses on a portion of the Project Site would demonstrate that the proposed medium density residential uses would be compatible with the existing low-density, single-family residential neighborhoods to the northeast, north, and west, as well as with the existing medium density developments to the east. The proposed change in land use would be a continuation of the residential land use pattern that is already observed in the area. The reallocation of 4.5 acres of open space would not adversely affect the land balance mix because a substantial area (11.6 acres) of open space would remain and additional opportunities to activate the open space along the Los Angeles River are available. The proposed Project's

land use compatibility (in the context of its land use designation) is best exemplified below under the discussion of the Project's consistency with community-wide land use planning goals, objectives, and policies. See discussion below regarding Consistency with Adopted Plans and Policies.

The proposed Project's physical characteristics would not prevent or substantively impair existing adjacent land uses to continue their function. Adjacent residential land uses would not be altered or physically disrupted due to the development of the SCSLC.

(b) Intensity of Proposed Use

Zoning Compliance - The proposed Project includes a request for a Zone Change from A1-1XL to R3-1, which is consistent with the proposed Medium Density Residential designation. Zoning on Lot 1 would remain unchanged. Specifically, a Zone Change of 4.5 acres to R3-1 is requested to allow development of medium density residential, which would be implemented through the proposed SCSLC Project.

The R3-1 zone allows residential densities up to 54 du/ac. As proposed, Lot 2 would be developed at a density of 45 du/ac, which represents approximately 85 percent of the maximum allowable density. Other properties located along Whitsett Avenue in the Project vicinity are also designated Medium Density Residential and similarly zoned. The majority of those properties are also built out with multiple-family structures of densities comparable to the proposed Project.

Because the Project is consistent with the permitted uses of the R3-1 zone, complies with the adopted development standards, is similar in intensity to other R3-1 zoned properties in the immediate area, and would be appropriately conditioned through a Site Plan Review, the proposed Project would have a less-than significant-impact with regard to zoning compliance.

(c) Scale and Massing of Development

Inappropriate building scale and massing can result in a development that is out of character for the area, and therefore a potentially incompatible use. Appropriate scale, massing and building character are best determined through a development's compliance with applicable development standards, design guidelines and comparison to adjacent property development.

The SCSLC has been designed to comply with the development standards for the R3-1 zone. All proposed development associated specifically with the SCSLC would meet the required setbacks, building height and lot coverage requirements. In addition, the SCSLC design would be in substantial compliance with the Urban Design guidelines of the Community Plan, as well as adopted Community Plan policies and the RIO. The discussion below on land use consistency identifies the Project's compliance with those policies that direct scale and massing in the context of the surrounding development and the community in general. See discussion below regarding Consistency with Adopted Plans and Policies.

Zone Variance(s) - Although the Project would be in substantial compliance with the permitted uses and development standards of the R3-1 zone on Lot 2, several minor Zone Variances may

be needed to allow the golf course components in Lot 1 to remain in place relative to their proximity to the residential lot (e.g., protective fencing related to the driving range). In this case, the Zone Variance request(s) would facilitate a more efficient Project design. Some of these Zone Variances are addressed through the CUP process, while other Zone Variances would be addressed as deviations to the development standards associated with the A1 zone in Lot 1.

Because the findings can be made that the requested site plan and building design variances can be supported without detriment to the environment, approval and implementation of the requested variances related to Project would be less-than-significant.

(d) Community Role and Relationship

Poor site planning can result in a development that lacks connectivity to the surrounding community and overlooks opportunities to reinforce and enhance the community character, therefore resulting in a potentially incompatible or conflicting use. Good site planning, including community linkages and compatible interface with surrounding uses, is best determined through a development's compliance with applicable development standards, design guidelines, context with adjacent property development and ability to demonstrate furtherance of adopted planning goals, objectives, and policies.

The Project has been designed to be consistent with, and implement a broad range of, the community planning goals (from both the General Plan Framework, Community Plan, RIO Checklist, Walkability Checklist, and conservation programs) that provide guidance as to how new development should be integrated within established neighborhoods and communities.

The SCSLC would be integrated into the community in such a manner that existing single-family neighborhoods are protected and linkages to key community components are maintained. The Project design would be in substantial compliance with the Urban Design guidelines of the Community Plan, as well as adopted Community Plan policies and the RIO. The discussion below on land use consistency identifies the Project's compliance with those policies that direct scale and massing in the context of the surrounding development and the community in general. Compliance with adopted policies and recommended guidelines will ensure that the Project is well integrated into the existing community and therefore compatible with adjacent land uses. See discussion below regarding Consistency with Adopted Plans and Policies.

(e) Operational Characteristics

Onsite Uses and Activities - The proposed Project's physical characteristics or associated activities would not prevent or substantively impair existing adjacent land uses to continue their functions. Adjacent residential land uses would not be altered or physically disrupted due to the development of the Project.

The operational characteristics of the Project are anticipated to be similar to those of a typical multi-family development, such as those along Whitsett Avenue. In general, compatibility issues associated with site access and vehicles would be minimized because vehicle access would be limited to a single access from Valley Heart Drive. Further, noise associated with vehicle activity

within the parking area would be minimized because parking would be contained within a subterranean structure.

The proposed Project would incorporate outdoor community uses and recreation areas, thus encouraging outdoor activities within the plaza area and walkway network. With these amenities, coupled with the fact that, in general, the senior residents are anticipated to spend more time at their onsite residences than would be expected in a typical multiple-family development of mixed age groups, day-time activity at the senior living center is anticipated to be at a relatively high level. Land use compatibility issues are not anticipated to affect the surrounding single-family or multi-family neighborhoods, as they are separated and buffered from the Project development by the intervening golf course on the Project Site and Whitsett Avenue (which is over 80 feet wide in the Project vicinity).

Further, a CUP/CUB is requested to allow specific onsite uses for both Lots 1 and 2. In approving any conditional use, the LAMC requires that decision-makers must find that the proposed location will be desirable to the public convenience or welfare, is proper in relation to adjacent uses or the development of the community, will not be materially detrimental to the character of development in the immediate neighborhood, and will be in harmony with the various elements and objectives of the General Plan.⁷ In addition, the decision-maker may make further findings required by the LAMC for specific uses and circumstances.

In approving any conditional use, the decision-maker may impose conditions, which it deems necessary to protect the best interests of the surrounding property or neighborhood, to ensure that the development is compatible with the surrounding properties or neighborhood, or to lessen or prevent any detrimental effect on the surrounding property or neighborhood, or to secure appropriate development in harmony with the objectives of the General Plan.⁸

Construction Activities - Construction activities can be a source of compatibility concerns. Construction of the Project would result in temporary disturbances associated with noise, localized air quality, aesthetics, and traffic, which, as a result, may adversely impact surrounding land uses. Measures to address any adverse impacts related to these physical environments are discussed in their respective sections in this Draft EIR. However, construction impacts would be short-term and would be physically coordinated and scheduled to avoid and/or minimize, to the extent reasonable, disruption of nearby residents, local businesses, and existing onsite uses. Because of the precautions that would be taken to coordinate construction activities, and due to the short-term nature of such activities, potential land use impacts during the construction phase would be less-than-significant.

A haul route or haul route memo during the construction phase will be reviewed and established prior to the initiation of demolition and/or construction to accommodate the export of approximately 82,000 cubic yards of earth and transport of building materials. The potential impacts associated with a future haul route are discussed in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*, and were determined to be less-than-significant.

⁷ LAMC §12.24.E

⁸ LAMC §12.24.F

In summary, with approval of the requested entitlements identified above, development of new senior living residential uses under the proposed Project would be in accordance with zoning regulations and would be a compatible use within the neighborhood. As such, the Project would result in a less-than-significant impact relative to zoning, land use consistency and land use compatibility.

(2) *Consistency with Adopted Plans and Policies*

(a) *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*

As discussed previously, the Community Plan designates the proposed Project site as Open Space. The senior housing Project will require a General Plan Amendment to change the Community Plan’s designation of proposed Lot 2 from Open Space to Medium Density Residential.

The Project would be consistent with the requested residential land use and density designation for the Development Site and would not result in impacts relevant to land use consistency as determined by the adopted Community Plan. However, a project must also be consistent with the related goals and policies of the Community Plan. This section assesses the appropriateness of the change in land use designation from open space to residential purposes and the proposed Project’s consistency with the applicable policy statements contained within the Community Plan. The applicable land use related goals, objectives, and policies of the Community Plan are provided in *Table IV.H-1: Consistency with Community Plan Land Use Goals, Objectives, and Policies*, along with a discussion of the Project consistency with each applicable component.

TABLE IV.H-1

CONSISTENCY WITH COMMUNITY PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
G 1	<i>A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.</i>	<p>Consistent. The Project would be consistent with this goal, as the SCSLC would be designed to promote a safe, secure and high quality environment that would reinforce these attributes for the surrounding residential neighborhoods. Retention of the golf course and major recreational components maintains a sense of “status quo” for the existing community that would buffer the proposed development from existing residential uses to the north and west.</p> <p>The Project would incorporate many design elements, including, but not limited to use of high quality building materials, onsite recreational and shared amenities, and integration of public linkages consistent with the RIO guidelines, that collectively reflect a level of design and quality that is typical of the surrounding community.</p>
O 1-1	<i>To provide for the preservation of existing housing and for the development of new housing to meet the diverse</i>	<p>Consistent. The Project would be consistent with this objective to preserve existing housing and add new housing for diverse populations because the Project</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
	<p><i>economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.</i></p>	<p>would preserve the existing community character through retention of the golf course and by incorporating architecture and landscape design features that are sensitive and non-intrusive to the surrounding residential community. Further, the introduction of 200 new residential units for senior residents would contribute to the diversification of housing opportunities in the Project vicinity because it would target the needs for a select and underserved segment of the population. The Project would result in the establishment of a senior residential community that would fulfill a senior housing void currently present in the community.</p> <p>Ultimately, the Project would establish a medium-density residential community that would be oriented toward senior independent housing and would benefit the increasingly aging population existing within the Studio City area while simultaneously maintaining the current recreational value of the Project Site to accommodate the needs, and retain the character, of the surrounding community at large.</p> <p>See also <i>Section IV.J: Environmental Impact Analysis – Population and Housing</i> of this Draft EIR.</p> <p>Applicable Project Design Features include:</p> <p>PDF: The SCSLC will be age-restricted for seniors aged 55 and older and will target support for a resident population with an average age of approximately 75 years (upon move-in).</p>
<p>P 1-1.1</p>	<p><i>Designate specific lands to provide for adequate multi-family residential development.</i></p>	<p>Consistent. The Project would be consistent with this policy because it would create 200 new multi-family residential units for senior residents. The Project would continue the existing land use trend along this segment of Whitsett Avenue by establishing low to medium density multi-family residential development along the Whitsett Avenue corridor consistent with the existing pattern to the north and east. The change in land use and implementation of the development project would accommodate multi-family residential demand in the area.</p> <p>Ultimately, the Applicant seeks a General Plan Amendment, Zone Change, Subdivision and other related entitlements to create a 200-unit senior residential condominium campus and reconfirm the viability of the Weddington Golf Course.</p>
<p>P 1-1.2</p>	<p><i>Protect existing single-family residential neighborhoods from new, out of scale development.</i></p>	<p>Consistent. The Project would be consistent with this policy because it proposes new development that is consistent in scale with other multi-family development along Whitsett Avenue. Further, the Project would incorporate Project Design Features</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		<p>targeted to form an appropriate transition between neighborhood commercial development to the south, multi-family residential development across Whitsett Avenue (to the east), and nearby single-family residential neighborhoods further north.</p> <p>The height, massing, and setbacks of the SCSLC structures would be consistent with those for existing multi-family residential developments along the east side of Whitsett Avenue. The Project design would ensure that the SCSLC is compatible in scale by complying with required height limitations, incorporating outdoor living area elements, and providing architectural treatment and landscaping that downplays the scale of the development. This is exemplified by the Project being designed as several (six) smaller building components and by placing the parking in a subterranean structure so that the street focus is on the living areas. See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR.</p> <p>Applicable Project Design Features include:</p> <p>PDF: The Project is designed as several (six) smaller building components, rather than one or two larger bulky structures, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the LA River greenway.</p>
P 1-1.3	<p><i>Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.</i></p>	<p>Consistent. The proposed Project would be consistent with this policy because the requested R3-1 zoning and Medium Density Residential land use designation would be consistent with the zoning and Community Plan designations for other residential properties in the immediate vicinity (i.e., across the street toward the east and to the north) along Whitsett Avenue.</p> <p>The Community Plan reflects previously considered appropriate land use patterns for the Project area. For example, the Community Plan Map identifies lands where only single family residential development is permitted and it protects these areas from encroachment by designating, where appropriate, transitional residential densities which serve as buffers.</p> <p>The proposed Project, although consistent with the residential patterns already established in the area, would not physically encroach on surrounding residential areas because it would remain buffered from single-family residential uses to the north and west by the existing golf course, driving range and club house, which would remain intact.</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		<p>Further, as noted in responses to O 1-1 and P 1-1.2 above, incorporation of architectural features that would address the scale and massing of the development and establish community linkages through enhanced access and landscaping elements, would serve to address encroachment concerns on the residential areas.</p> <p>See also <i>Section IV.J: Environmental Impact Analysis – Population and Housing</i> of this Draft EIR.</p>
P 1-1.4	<p><i>Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.</i></p>	<p>Consistent. The Project would be consistent with this policy because it would incorporate relevant Urban Design Guidelines and standards identified in the Community Plan, and because the Project design would incorporate architecture and landscape features that are sensitive and non-intrusive to the surrounding residential community. See also responses to O 1-1, P1-1.2 and P 1-1.3 above. See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR.</p>
P 1-1.5	<p><i>Maintain at least 68% residential land designated for single-family uses.</i></p>	<p>Consistent. The Project would be consistent with this policy because the request to change the land use designation from Open Space to Medium Residential would not change the overall percentage of residential land designated for single-family uses. Rather, the proposed Project would indirectly support retention of single-family uses by reinforcing the residential and low-key neighborhood commercial character of the area immediately surrounding the Project Site.</p> <p>See also responses to O 1-1, P1-1.2, P 1-1.3 and P 1-1.4 above.</p>
P 1-1.6	<p><i>The City should promote neighborhood preservation, particularly in existing single-family neighborhoods, as well as in areas with existing multiple family residences.</i></p>	<p>Consistent. The proposed Project would be consistent with this policy because the proposed land use changes for the 4.5-acre Lot 2 would be consistent with the intent of the Community Plan and would support retention of existing single- and multi-family uses by reinforcing the residential and neighborhood commercial character of the area immediately surrounding the Project Site.</p> <p>See also responses to O 1-1, P1-1.2, P 1-1.3, P 1-1.4 and P 1-1.5 above.</p>
O 1-2	<p><i>To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.</i></p>	<p>Consistent. The Project would be consistent with this policy because it would be conveniently located near a range of services, transportation facilities, and community amenities. The Project Site has pedestrian access to banks, groceries, and restaurants (primarily along Ventura Boulevard) within half a mile. The development would be located within an established community that is currently served by adequate infrastructure and services, including transit facilities.</p> <p>The Project has been designed to encourage pedestrian</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		<p>activity and walkability with pedestrian walkways integrated throughout the Project to facilitate connectivity to the local recreational facilities and public sidewalks and in a pattern intended to promote walkability.</p> <p>The Project Site is adjacent to and accessible from nearby public bus transit stops. Transit access is readily available through the Metro bus service stops along adjacent roadways and serving the Project area.</p>
P 1-2.1	<p><i>Locate higher residential densities near commercial centers, rail transit stations, and major bus routes where public service facilities, utilities and topography will accommodate this development.</i></p>	<p>Consistent. The proposed Project would be consistent with this policy because it would maintain a relationship to the adjacent neighborhood commercial center located immediately south of the site (along Ventura Boulevard) and other retail commercial uses along that corridor, which would be within convenient proximity to SCSLC residents.</p> <p>See also <i>Section IV.J: Environmental Impact Analysis – Population and Housing, Section IV.K: Environmental Impact Analysis – Public Services, Section IV.L: Environmental Impact Analysis – Recreation and Parks; and Section IV.M: Environmental Impact Analysis – Transportation and Circulation</i> of this Draft EIR.</p>
P 1-2.2	<p><i>Encourage multiple residential development in commercial zones.</i></p>	<p>Consistent. The Project would be consistent with this policy because it would indirectly encourage the integration and intensification of residential uses immediately adjacent to commercial areas along Ventura Boulevard. In effect, the Project’s adjacency to a commercial area would (in a broad sense) have the area function as a mixed commercial-residential node.</p> <p>The Project would provide solely for a multi-family residential use within a designated residential zone. However, the Project Site is adjacent to established Neighborhood Commercial uses at the intersection of Whitsett Avenue and Ventura Boulevard, as well as the Ventura Boulevard commercial corridor.</p> <p>See also responses O-2 and P 1.2.1 above.</p>
O 1-3	<p><i>To preserve and enhance the varied and distinct residential character and integrity in existing single- and multi-family neighborhoods.</i></p>	<p>Consistent. The Project would be consistent with this objective because the architectural design and landscape treatment of the new construction and existing building facades would establish a community-friendly scale that would result in an appropriate interface with existing residential neighborhoods to the north, east and west. See also responses G1, O 1-1, P 1-1.2, P 1-1.3, and P 1-1.4 above. See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics and Section IV.J: Environmental Impact Analysis – Population and Housing</i> of this Draft EIR.</p>
P 1-3.1	<p><i>Seek a high degree of compatibility and</i></p>	<p>Consistent. The Project would be consistent with this</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
	<p><i>landscaping for new infill development to protect the character and scale of existing residential neighborhoods.</i></p>	<p>policy because the architectural design and landscape treatment of new construction would establish a community-friendly scale that result in an appropriate interface with existing residential neighborhoods to the north, west, and east.</p> <p>Consistent with the RIO and Urban Design Guidelines, the proposed landscaping concept would provide for enhanced and interesting views along the street (Whitsett) and Greenway (LA River) edges by adding color, depth, volume, and variety to these frontages. As appropriate (and as would be consistent with the RIO and Urban Design Guidelines), landscaping and building orientation would be coordinated to maximize privacy (both onsite and offsite) and buffer undesirable views.</p> <p>Landscaping, lighting, and signage associated with the Project will be designed to address the public interface around the Project perimeter and to address the internal space for the SCSLC residents.</p> <p>The Project would establish a medium-density residential community that would be oriented toward senior independent housing and would benefit the increasingly aging population existing within the Studio City area while simultaneously maintaining the current recreational value of the Project Site to accommodate the needs, and retain the character, of the surrounding community at large.</p> <p>Finally, the Applicant seeks removal of an obsolete 18-foot building line along Whitsett Avenue in order that Project buildings and other site improvements could be integrated with the street frontage.</p> <p>See also responses G1, O 1-1, P 1-1.2, P 1-1.3, and P 1-1.4 above. See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The Applicant will require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.</p> <p>PDF: The Project is designed as several (six) smaller building components, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the LA River greenway.</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
P 1-3.2	<p><i>Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.</i></p>	<p>Consistent. The Project would be consistent with this policy because it would be located within an established community that is served by adequate services, infrastructure, and transit, all of which would be conveniently accessible to the SCSLC.</p> <p>The Project is conveniently located with respect to basic commercial services and public transit opportunities. The Project Site has pedestrian access to banks, groceries, and restaurants (primarily along Ventura Boulevard) within half a mile.</p> <p>The Project would incorporate many design elements, including but not limited to, the use of high quality building materials, onsite recreational and shared amenities, and integration of public linkages consistent with the RIO guidelines, that collectively reflect a level of design and quality that is typical of the surrounding community. The Project design would be consistent with the RIO and the Community Plan’s Urban Design Guidelines, which collectively focus on compatibility and sustainable practices consistent with the area. Consistent with the RIO, the Project’s landscaping would provide for enhanced and interesting views along the street (Whitsett) and Greenway (LA River) edges by adding color, depth, volume, and variety to these frontages. As appropriate (and as would be consistent with the RIO and Urban Design Guidelines), landscaping, building orientation, and vehicular/pedestrian access would be coordinated to maximize privacy (both onsite and offsite), buffer undesirable views/effects, promote sustainability, and facilitate walkability and alternative transportation options.</p> <p>The Project has also been designed to encourage pedestrian activity and walkability with pedestrian walkways integrated throughout the Project to facilitate connectivity to the local recreational facilities and public sidewalks and in a pattern intended to promote walkability.</p> <p>See also responses P 1-1.2, P 1-1.3, P 1-1.4, 1-1.6, O 1-2, P 1-2.1, O 1-3, and P 1-3.1 above.</p> <p>The applicable Project Design Features include:</p> <p>PDF: Pedestrian walkways within the Project will provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south; the Whitsett Avenue street frontage to the east; and the golf course recreational facilities to north.</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors and the public, including lighting and wayfinding signage.
P 1-3.3	<i>Preserve existing views in hillside areas.</i>	N/A. This policy would not be applicable to the proposed Project because the Project Site would be located on relatively level land north of Ventura Boulevard within the Studio City area and would not be within a hillside area.
O 1-4	<i>To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.</i>	Consistent. The proposed Project would be consistent with this objective because the project would establish 200 new residential units for senior residents and would contribute to the diversification of housing opportunities in the Project vicinity that would support the needs of housing for the aged. See response O 1-1 above.
P 1-4.1	<i>Promote greater individual choice in type, quality, price and location of housing.</i>	Consistent. The Project would be consistent with this policy because it would establish 200 new condominium-type housing units for seniors. As an independent senior living facility, the SCSLC Project would be intended as a long-term living environment offering the benefits of home ownership within a community atmosphere, with common everyday services and recreational amenities. The proposed Project would provide an alternative to traditional single-family or apartment living by establishing a housing type that would offer benefits of both forms of housing. Further, the Project would be conveniently located near a range of services, transportation facilities, and community amenities.
P 1-4.2	<i>Promote housing in mixed-use projects in pedestrian oriented areas and transit oriented districts.</i>	Consistent. The Project would be consistent with this policy because it would be located within an established community that is served by adequate services, infrastructure, and transit, all of which would be conveniently accessible to the SCSLC. See also responses O 1-2, P 1-1.1, P 1-1.2, P 1-3.1, P 1-3.2, and P 1-4.1 above.
P 1-4.3	<i>Ensure that new housing opportunities minimize displacement of the residents.</i>	Consistent. The Project would be consistent with this policy because no existing housing would be removed to accommodate the development. Instead, the Project would establish 200 new housing units within an established residential community, thus creating new housing opportunities and furthering accomplishment of the housing goals for the Community Plan Area.
P 1-4.4	<i>Provide for development of townhouses and other similar condominium type of housing units to increase home ownership options.</i>	Consistent. The Project would be consistent with this policy because it would establish 200 new condominium-type housing units for seniors. As an independent senior living facility, the SCSLC Project would support a long-term living environment offering the benefits of home ownership within a community atmosphere with shared common services.

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		<p>The applicable Project Design Features include:</p> <p>PDF: The SCSLC will provide for resident ownership of individual dwelling units and an undivided interest in the residential common areas. Individual resident-occupant ownership (rather than rental arrangement) will be arranged through purchase agreements coordinated by the Project Applicant/Manager. Resale of units will be facilitated and/or monitored through the Project Applicant/Manager to ensure that ownership is reserved for senior residents 55 years and older. For example, when an owner of a dwelling unit passes away or needs to relinquish ownership, the unit will be transferred back (at market value to the owner or beneficiaries) to the Project Applicant/Manager and resold to another senior resident.</p>
O 1-5	<i>To limit the intensity and density in hillside areas.</i>	Consistent. This objective and its related policies would not be applicable to the Project because the Project Site would be located on relatively level land north of Ventura Boulevard within the Studio City area, and would not be within a hillside area.
P 1-5.1	<i>Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.</i>	N/A. See response O 1-5 above.
P 1-5.2	<i>Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within hillside areas.</i>	N/A. See response O 1-5 above.
P 1-5.3	<i>Consider the steepness of the topography and suitability of the geology in any proposal for development within the Plan area.</i>	N/A. See response O 1-5 above.
P 1-5.4	<i>Require that any proposed development be designed to enhance and be compatible with adjacent development.</i>	N/A. See response O 1-5 above.
G 5	<i>A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.</i>	<p>Consistent. The Project would be consistent with this goal because it would retain a significant area of the open space at the Project Site (i.e., the golf course and driving range) and would incorporate common open space elements into the design of the SCSLC Project that are appropriate and functional for the needs of the intended residents. Further, the proposed Project would be consistent with the criteria under the RIO, and thus would directly enhance community connectivity to the LA River through access improvements and urban design elements, and may indirectly facilitate usage and improvements along the adjacent River edge.</p> <p>The Project will support and enhance pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian</p>

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
		<p>conflicts through consolidated driveways and facilitating pedestrian accessibility through the strategic design and placement of pedestrian entrances. Pedestrian activity would be further enhanced through a more varied and extensive landscape treatment (than what currently exists) along Whitsett Avenue that would create a pleasant street experience for pedestrians and encourage improved natural surveillance for a safer environment. Further, the Project will open up and encourage pedestrian access along the Valleyheart Drive easement that would enhance views and access to the street and River.</p> <p>See responses P 1-1.2, P 1-1.4, O 1-2, P 1-2.1, P 1-3.1 and P 1.3-2 above. See also <i>Section IV.L: Environmental Impact Analysis – Recreation and Parks</i> of this Draft EIR.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The Project will include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area would be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing and coordinated events. The common area plaza connecting the six senior living center buildings would function predominately as a common recreational area. The plaza area would include a pool, outdoor lounge area, and a public children’s playground.</p> <p>PDF: The Project has been designed specifically to limit development to Lot 2, thus avoiding disturbance of the potential historic components associated with the golf course on the Lot 1 (i.e., the Golf Course Site).</p> <p>PDF: Pedestrian walkways within the Project will provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south, the Whitsett Avenue street frontage to the east, and the golf course recreational facilities to north.</p> <p>PDF: The Project will include a children’s playground for public use along its southern edge.</p> <p>PDF: The Project buildings and individual dwelling units are designed so that private open spaces (i.e., step-out patios and balconies) are oriented toward the living center perimeter, embracing both the Whitsett Avenue street and LA River development frontages.</p>
O 5-1	<i>To preserve existing open space resources and where possible develop</i>	Consistent. See response to G 5 above.

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION
	<i>new open space.</i>	
P 5-1.1	<i>Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area</i>	Consistent. See response to G 5 above.
P 5-1.2	<i>Accommodate active parklands, and other open space uses</i>	Consistent. See response to G 5 above.
P 5-1.3	<i>Require development in major opportunity sites to provide public open space.</i>	Consistent. See response to G 5 above.

In summary, the Project is consistent with the Community Plan, in part due to the fact that a substantial area of open space would be retained and because development of the Studio City Senior Living Center would further the housing goals and maintain the residential community character.

The proposed Zone Change to R3-1, and the permitted uses to be developed, would be consistent with the proposed Medium Density Residential designation of the Community Plan for Lot 2. The proposed Project is consistent because the Project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). As a result, the Project will result in a less-than-significant impact to land use consistency, as the Project is consistent with applicable policies and programs of the Community Plan.

(b) Los Angeles River Revitalization Master Plan and River Improvement Overlay

As discussed above, the Project Site lies within the proposed RIO District. The RIO establishes design criteria for properties along the Los Angeles River to facilitate sustainability, watershed management, and accessibility. All development projects within the RIO must demonstrate how the site and building design achieve the required number of threshold points for private property and publicly owned facilities. Per the RIO, with the exception of single-family homes, projects are required to achieve a minimum of 20 points (while single-family homes need only achieve a minimum of 10 points). Points are acquired through demonstration of inclusion of River-friendly project components in three separate categories: (1) watershed; (2) urban design; and (3) mobility. Each multi-family residential project must achieve the minimum number of points required per category as follows:

Watershed	10 points
Building Design	5 points
Mobility	5 points

The required RIO site, building design requirements, and point allocations are provided in *Table IV.H-2: Consistency with Draft River Improvement Overlay – Requirements for Private Property*, along with a discussion of qualifying project design features to demonstrate how the proposed Project will comply with and support these criteria.

TABLE IV.H-2
CONSISTENCY WITH DRAFT RIVER IMPROVEMENT OVERLAY –
REQUIREMENTS FOR PRIVATE PROPERTY

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
5.1	WATERSHED CATEGORY			
5.1.1	Watershed-Stormwater Management			
5.1.1(a)	Divert at least 75% of roof runoff into rain gardens, french drains, bioretention ponds, swales, cisterns or other onsite practices that would prevent flows from exiting the site.	<p>The following practices will ensure that the Project complies with this measure.</p> <p>As a Compliance Measure, the Project Applicant will be required to implement a SUSMP, which shall outline the stormwater treatment measures or post-construction Best Management Practices (BMPs) required to control pollutants associated with storm events up to the ¾-inch precipitation level. Compliance with SUSMP will ensure proper diversion of roof runoff.</p> <p>As a Compliance Measure, the Project will comply with the Low Impact Development (LID) Standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater.</p> <p>The Project’s stormwater management features will focus on meeting or exceeding the goals of the General Permit, as well as, SUSMP and LID.</p> <p>As a Compliance Measure and in compliance with the SUSMP for the management of post-construction stormwater run-off, the Project will promote evapotranspiration and infiltration by increasing the overall footprint of landscaped areas and promoting the use of native and/or drought tolerant plants.</p> <p>As a Compliance Measure and in compliance with the SUSMP for the management of post-construction stormwater run-off, the Project will design post-construction structural or</p>	3	3

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		treatment control BMPs to either treat or infiltrate stormwater runoff. Stormwater treatment facilities and systems shall be designed to meet the requirements of the SUSMP manual. The applicable Project Design Features include: PDF: The Project will employ rooftop or roof perimeter BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of the peak flow for small storm events and the overall runoff volume via inter-event evapotranspiration. Rooftop BMPs incorporated into the Project design include planters and landscaping on the ground-level, rooftop portion of the new subterranean parking structure.		
5.1.1(b)	Design hardscape spaces, including driveways and parking areas, to incorporate the detention, retention and/or filtration of runoff using a bioswale, cistern, french drain, and/or other water collection system that will prevent at least 75% of runoff from leaving the site.	The Project will not or cannot implement this measure.	3	0
5.1.1(c)	Design and install a green roof that is partially or completely covered with drought tolerant vegetation and soil, or a growing medium, planted over a waterproofing membrane. The roof area dedicated as a green roof shall cover no less than 50% of the roof area.	The Project will not or cannot implement this measure.	3	0
5.1.1(d)	Daylight the portion of a stream that flows through the property. (When applicable and only feasible if flood protection is maintained.)	The Project Site does not have any portion of a stream running through it.	5	0
5.1.1(e)	Remove the concrete from sides and/or bottom of a stream that flows through the property. (When applicable and only feasible if flood protection is maintained.)	The Project Site does not have any portion of a stream running through it.	5	0
5.1.2 Watershed-Landscaping				
5.1.2(a)	Select plants identified as California Friendly by the Metropolitan Water District's Be Water Wise program.	The Project will incorporate landscaping that utilizes plants identified as California Friendly. The following practice will ensure compliance with this measure.	1	1

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		<p>As a Compliance Measure, the City of Los Angeles Tree Protection Guidelines and landscape requirements will require that new landscaping, including trees, be integrated into the new construction area, and would require at a minimum a 1:1 replacement for any tree removed. The Applicant will be required to submit a Landscape Plan for City review and approval. Such review will ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>		
5.1.2(b)	Select indigenous native plants, per the County's Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.	<p>New trees integrated into the Project will be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. Hence, the Project tree program will attempt, when feasible, to incorporate recommendations of the Cal-IPC (California Invasive Plant Council-www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>	3	3
5.1.2(c)	Contract with a licensed landscape architect to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.	<p>New trees and plants integrated into the Project will be selected by a licensed landscape architect to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the</p>	2	2

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		<p>transitioning character or the Los Angeles River interface. Hence, the Project tree program will attempt, when feasible, to incorporate recommendations of the Cal-IPC (California Invasive Plant Council- www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>		
5.1.2(d)	Contract with a garden designer to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.	This measure is applicable only to single-family development.	-	-
5.1.2(e)	Remove existing exotic weedy plants such as identified by the California Invasive Plant Council (CAL-IPC). Examples of include the Mexican fan palm (<i>Washingtonia robusta</i>) and fountain grass (<i>Pennisetum setaceum</i>).	The Project will not or cannot comply with this measure.	2	0
5.1.2(f)	Complete a class related to native plant gardening at a local nursery or college.	<p>The applicable Project Design Feature includes:</p> <p>PDF: The Applicant will require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.</p>	1	1
5.1.3 Watershed-Water Conservation				
5.1.3(a)	Develop and implement a strategy to establish native and/or other drought tolerant species that do not require regular irrigation.	<p>The Project will incorporate landscaping that utilizes plants identified as native and/or drought tolerant.</p> <p>As a Compliance Measure, the City of Los Angeles Tree Protection Guidelines and landscape requirements will require that new landscaping, including trees,</p>	2	2

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		<p>be integrated into the new construction area, and would require at a minimum a 1:1 replacement for any tree removed. The Applicant will be required to submit a Landscape Plan for City review and approval. Such review will ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The landscaping for the SCSLC will use water efficient landscaping and native drought tolerant plants.</p>		
5.1.3(b)	Install a high-efficiency "smart" irrigation system.	<p>The applicable Project Design Features includes:</p> <p>PDF: The Project will install a high efficiency irrigation system and have its design reviewed by the City as part of the required Landscape Plan review.</p>	1	1
5.1.3(c)	Utilize gray water or recycled stormwater for at least 50% of irrigation needs.	PDF: The Project will implement a system that utilizes subterranean water storage boxes and above-ground planters to recapture or reclaim water for at least 50% of the irrigation needs of the Project.	2	2
5.1.3(d)	Utilize gray water or recycled stormwater for 100% of irrigation needs.	The Project will not or cannot comply with this measure.	3	0
5.1.4 Watershed-Hardscape				
5.1.4(a)	Use hardscape materials (impervious or pervious) on no more than 50% of the site area exclusive of building footprint. The balance of the area shall be planted with native and/or drought tolerant species.	The Project will not or cannot comply with this measure.	2	0
5.1.4(b)	Use porous paving instead of traditional impervious materials for at least 75% of all hardscape areas.	The Project will not or cannot comply with this measure.	2	0
5.1.4(c)	Select hardscape materials as defined and recommended by the LARMP Landscaping Guidelines on pages 40-41 of Part II-LAR Planting Guidelines found at http://ladpw.org/wmd/watershed/LA/LAR-Planting-guidelines	The Project will not or cannot comply with this measure.	1	0

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
	webversion.pdf. River rock and decomposed granite are especially recommended.			
5.1.5 Watershed-Landscape/Hardscape Maintenance				
5.1.5(a)	Prepare and implement a maintenance manual and/or program that follows the Landscape Maintenance Guidelines defined on page 48, Part II-LAR Planting Guidelines of the LARMP Design Guidelines. This includes information about supplemental irrigation, extended maintenance, pruning, weeding and supplemental mulch.	The Project will not or cannot comply with this measure.	1	0
5.1.5(b)	Prepare a maintenance manual and/or program for parking lots and structures that establishes regular and ongoing procedures to maintain the surfaces free of chemical residues and debris.	The Project will not or cannot comply with this measure.	1	0
5.1.5(c)	Prepare and implement a maintenance manual and/or program that uses best management practices to provide sustainable organic horticulture, making pesticides and chemical fertilizers unnecessary.	The Project will not or cannot comply with this measure.	2	0
5.1.6 Watershed- Open Space				
5.1.6(a)	Provide a rear-and/or side-yard easement adjacent to the River. The easement area shall be used to maximize open space for native landscaping, create active plazas or courtyards and/or provide additional pedestrian amenities visible and accessible from the River. One point will be accrued for every 1% of easement relative to the overall property depth.	The Project will not or cannot comply with this measure.	1 per each 1%	0
5.2 URBAN DESIGN				
5.2.1 Urban Design-Connectivity				
5.2.1(a)	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the street and is open and easily accessible during business hours.	The Project provides three primary pedestrian accesses to the development, including a main access directly from Whitsett Avenue (between buildings 1 and 2) and secondary access points at the northeast corner (adjacent to the driving range/golf parking lot) and southwest corner (at the public playground and adjacent to the LA River easement) of Lot 2. Incidental	Required	Consistent

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		<p>pedestrian access is also provided from the subterranean parking structure with multiple elevator corridors direct to each residential building above and a connection to the northeast corner (golf course) access.</p> <p>The Project has been designed to encourage pedestrian activity and walkability with pedestrian walkways integrated throughout the Project to facilitate connectivity to the local recreational facilities and public sidewalks and in a pattern intended to promote walkability.</p> <p>Landscaping, lighting and signage associated with the Project will be designed to address the public interface around the Project perimeter and to address the internal space for the SCSLC residents.</p> <p>Finally, the Applicant seeks removal of an obsolete 18-foot building line along Whitsett Avenue in order that the Project buildings and other site improvements can be integrated with the street frontage.</p> <p>The applicable Project Design Features includes:</p> <p>PDF: Pedestrian walkways within the Project will provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south; the Whitsett Avenue street frontage to the east; and the golf course recreational facilities to north.</p> <p>PDF: Project landscaping in the vicinity of the parking garage driveway and the public playground along the south edge, and at the golf course/driving range secondary pedestrian access at the northeast corner of Lot 2, will be designed to assist in the easy identification of, and access to, these areas.</p>		

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
5.2.1(b)	Configure the entrance to be fully accessible per the American Disabilities Act (ADA), such that the auxiliary entrance (such as a ramp next to the main path to the primary entry) for persons with mobility limitations would not be necessary.	<p>The three primary pedestrian accesses to the development are established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the SCSLC to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure will be served by multiple elevator corridors offering direct access to each residential building above.</p> <p>Before obtaining a building permit for the Project, the Applicant will be required to undergo review and approval by the Department of Building and Safety for compliance with ADA requirements.</p> <p>See also responses 5.3.1(a) and (b) below.</p>	Required	Consistent
5.2.1(c)	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the greenway and is open and easily accessible during business hours.	The Project will not or cannot comply with this measure.	1	0
5.2.1(d)	Design, build, and provide for the on-going maintenance of a permanent pedestrian easement (paseo) to the Greenway that is publicly accessible during daylight hours and is open to the sky. Easement should be a minimum 7' in width and provide visible connections between the street and the River.	The Project will not or cannot comply with this measure.	3	0
5.2.1(e)	Design the paseo to include amenities such as: outdoor dining and seating areas; tables for board and card games; sun and shade; landscaping; sculptures and fountains.	The Project will not or cannot comply with this measure.	1	0
5.2.1(f)	Create convenient access between the River and the property that is available for public and/or private use, where a property line is coterminous with the River.	<p>See responses 5.2.1(a), 5.2.1(b) and 5.2.1(c) above.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and</p>	2	2

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		adorned to provide a “friendly” walking environment for residents, visitors and the public, including lighting and wayfinding signage.		
5.2.2 Urban Design-Vehicle Parking				
5.2.2(a)	Site parking such that no parking is located between the building(s) and the street. .	The applicable Project Design Feature includes: PDF: The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking would not be located between the buildings and the street and/or River.	Required	Consistent
5.2.2(b)	Screen surface parking that is visible from the Greenway and/or street, with a landscaped barrier and/or green screen.	The Project will provide new landscaping treatment along the Whitsett Avenue frontage that would enhance the visual interest along the street corridor and would screen the existing surface parking lot adjacent to the driving range. Additionally, the applicable Project Design Feature includes: PDF: The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking would not be located between the buildings and the street and/or River.	Required	Consistent
5.2.2(c)	Site parking such that no parking is located between the building(s) and the River.	The applicable Project Design Feature includes: PDF: The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking would not be located between the buildings and the street and/or River.	2	2
5.2.2(d)	Screen ground floor parking behind active uses/services that are accessible from either the street and/or Greenway.	See responses 5.2.1(a) through 5.2.1(f) and 5.2.2(a) through 5.2.2(b) above. The Project is consistent with this criteria, which is further exemplified because the Project is designed as several (six) smaller building components interconnected by an active outdoor plaza area that visually pulls the street/greenway focus toward the living areas and diminishes focus on the subterranean structure (which is already	2	2

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		screened through its placement underground).		
5.2.3 Urban Design-Continuous Street Frontage				
5.2.3(a)	Site buildings no further from the street than required by the prevailing code. If there is no setback requirement, site building between 0' and 5' from street.	The Applicant seeks removal of an obsolete 18-foot building line along Whitsett Avenue in order that Project buildings and other site improvements could be integrated with the street frontage.	Required	Consistent
5.2.3(b)	Provide vehicle access to and from the site with as few driveways as possible. Where feasible, utilize side streets and/or alleys for vehicular access.	The applicable Project Design Feature includes: PDF: Vehicle access for the new development in the Project will be from a single driveway leading to the subterranean parking area that will be provided from Valleyheart Drive (which will extend from Whitsett Avenue).	1	1
5.2.3(c)	Design the width of each driveway to meet and not exceed the standard width identified as necessary to accommodate vehicles.	The applicable Project Design Features includes: PDF: The Project will minimize the number of driveways needed to serve the site and the driveways will be designed to accommodate the anticipated demand for each driveway.	1	1
5.2.4 Urban Design-Scale and Character				
5.2.4(a)	Design the building such that the roofline within 10' of the building edge does not exceed the height of any building on an abutting property by more than 10'.	The Project will not or cannot comply with this measure.	1	0
5.2.4(b)	Design the building so that it does not exceed the height of any building on an abutting property by more than 10'.	The Project will not or cannot comply with this measure.	2	0
5.2.4(c)	Adaptively reuse an existing building.	Lot 2 is developed with 16 tennis courts and tennis facilities (which would be demolished) and does not have any existing structures for adaptive reuse.	2	0
5.2.4(d)	Design any fence or screen in the setback area(s) adjacent to the Greenway to be no greater than 42 inches in height.	In order to maintain security, safety and privacy, fencing along the greenway frontage of the Project will exceed 42 inches in height. The Project will not or cannot comply with this measure.	1	0
5.2.5 Urban Design-Transparency				
5.2.5:	Design facades visible from the Greenway and/or street such that a percentage of the surface area			

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
	incorporates transparent features, as follows:			
5.2.5(a)	Ground level retail: at least 50% transparency.	Applies only to commercial and public facility projects.	-	-
5.2.5(b)	Ground level offices and other commercial uses: at least 35% transparency.	Applies only to commercial and public facility projects.	-	-
5.2.5(c)	Multi-family residential, industrial and public facility uses: at least 25% transparency.	The Project will not or cannot comply with this measure.	2	0
5.2.5(d)	Upper floors: at least 20% transparency.	The Project will not or cannot comply with this measure.	1	0
5.2.6 Urban Design-Visibility				
5.2.6(a)	Locate and design the building to protect views of surrounding urban landmarks and natural features to and from the Greenway and/or street.	The Project will not or cannot comply with this measure.	1	0
5.2.6(b)	Design landscape, signage and architectural elements so that they do not obstruct pedestrian movement or views from the Greenway and/or street.	The Project will not or cannot comply with this measure.	1	0
5.2.7 Urban Design-Site Lighting				
5.2.7(a)	Include permanent attachments to site lighting so that the light sources are not visible from a public right of way and any off-site glare is prevented.	The Project will provide lighting throughout the site that will distribute light evenly across the Property and shall be positioned to prevent harsh glares on public right-of-ways or adjacent properties. The applicable Project Design Feature includes: PDF: The proposed Project would include exterior lighting that would minimize nighttime illumination.	Required	Consistent
5.2.7(b)	Provide site lighting that distributes light evenly and avoids harsh shadows and glare.	See response 5.2.7(a).	1	1
5.2.7(c)	Provide site lighting that is integrated into the architecture.	See response 5.2.7(a).	1	1
5.2.8 Urban Design-Visual Clutter				
5.2.8(a)	Design trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street.	As a Compliance Measure, the Project design integrates trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street. Trash/recycling bin storage areas will be incorporated within the subterranean parking area with bins ported to	Required	Consistent

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		Valleyheart Drive for pick-up. Any trash enclosure area not entirely screened within the parking structure will be screened from view by the general public through architecturally treated enclosures and/or landscaping.		
5.2.8(b)	Screen from public view all exterior rooftop and ground-level mechanical equipment, which includes HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes.	As a Compliance Measure, the Project design will screen from public view all exterior rooftop and ground-level mechanical equipment, including HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes. Rooftop equipment will be located within rooftop wells and screened by the perimeter mansard roof treatment. Ground level equipment will be screened with architectural enclosures and/or landscaping as appropriate. Building mounted equipment (such as antennas) will be incorporated into the architectural treatment of the building façade to blend and reduce visibility from the street, river greenway and golf course views.	Required	Consistent
5.2.8(c)	Limit building or site signage to address identification, business and operational identification, and the name of the building.	The applicable Project Design Feature includes: PDF: The Project will provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information. See also responses 5.2.1(a), 5.2.6(b) and 5.3.1(b).	1	1
5.2.8(d)	Design security features to deter criminal activity but maintain a positive image for the community. Design security grills so that they are recessed completely into pockets that conceal the grill when they are retracted. Design the pockets to be integrated into the design of the building.	The Project will support and enhance pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through the strategic design and placement of pedestrian entrances. Pedestrian activity would be further enhanced through a more varied and extensive landscape treatment (than what currently exists) along Whitsett Avenue that would create a pleasant street experience for	1	1

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		<p>pedestrians and encourage improved natural surveillance for a safer environment. Further, the Project will open up and encourage pedestrian access along the Valleyheart Drive easement that would enhance views and access to the street and River.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors, and the public, including lighting and wayfinding signage.</p>		
5.2.8(e)	Underground the utility lines leading to the project site. One point will be accrued for every 100 feet of lines that are undergrounded.	The Project will not or cannot comply with this measure.	1 per 100’	0
5.3 MOBILITY				
5.3.1 Mobility-Alternatives				
5.3.1(a)	Provide transit passes for residents and/or employees for the first year of the building’s operation.	PDF: The Project Applicant or SCSLC Management will make transit passes available for residents and/or employees for the first year of the development’s operation. Transit passes will be coordinated to match services that are most appropriate for residents of the SCSLC, including services that can accommodate residents who utilize mobility assistance devices and para-transit services.	1	1
5.3.1(b)	Allocate a permanent location, accessible and visible to the users of the building for local transit and para transit information (times, routes, rates) on bulletin boards, kiosks and/or sign boards. The information provided shall be maintained as current and up to date.	<p>The Project Site is adjacent to and accessible from nearby public bus transit stops. Transit access is readily available through the Metro bus service stops along adjacent roadways and serving the Project area.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project will include display and distribution of transit information for both residents and visitors.</p>	1	1
5.3.1(c)	Provide facilities for securing bicycles for at least 5% of the regular building occupants. For each	As a Compliance Measure, and in accordance with the “Bicycle Parking Ordinance” (Ordinance No. 182,386),	1	1

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
	additional 5% accommodated, an additional point will be rewarded, for a maximum of 3 points.	the Project will provide long-term bicycle parking at a rate of one per dwelling unit and short-term bicycle parking at a rate of one per ten dwelling units, which results in 200 long-term bicycle parking spaces and 20 short-term bicycle parking spaces. Long-term bike parking will be provided in lockable storage rooms in each building and bike racks will be provided near the public entrance of the Project for short-term bike parking.		
5.3.1(d)	Provide facilities for securing bicycles for at least 15% of building occupants.	The Project will not or cannot comply with this measure.	2	0
5.3.1(e)	Provide onsite locker facilities for bicyclists.	As a Compliance Measure, and in accordance with the "Bicycle Parking Ordinance" (Ordinance No. 182,386), the Project will provide long-term bicycle parking at a rate of one per dwelling unit and short-term bicycle parking at a rate of one per ten dwelling units, which results in 200 long-term bicycle parking spaces and 20 short-term bicycle parking spaces. Long-term bike parking will be provided in lockable storage rooms in each building and bike racks will be provided near the public entrance of the Project for short-term bike parking.	1	1
5.3.1(f)	Provide onsite changing/shower facilities for employees.	This criterion is not applicable to residential development projects.	-	-
5.3.1(g)	Allocate at least 2% of parking spaces onsite for a third party shared car program.	The applicable Project Design Feature includes: PDF: The Project design for the parking structure layout will allocate 2% of the residential (i.e., excluding the overflow golf) parking spaces for use by a third party shared car (or equivalent) program.	1	1
5.3.1(h)	Organize and provide a van and/or carpool service for employees	This criterion is not applicable to residential development projects. It is anticipated that a limited number of employees and service providers would visit the SCSLC facility on a regular basis to support the common use areas and as private service to Project residents. The strategic location of the Project, in close proximity to a range of public transit options, would offer a	-	-

ID NO.	RIO CATEGORY AND ACTION MEASURE	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	AVAILABLE POINTS	PROJECT POINT CREDIT
		variety of transportation modes for residents, visitors and employees/service providers associated with the Project.		

In summary, the proposed Project would meet the minimum point threshold requirements for each of the three RIO categories (i.e., watershed, urban design, and mobility), as well as the overall point threshold minimum of 20 points. Further, the SCSLC development would exceed the minimum required points as follows:

<u>Category</u>	<u>Minimum Required</u>	<u>Project Accumulated</u>
Watershed	10 points	15 points
Urban Design	5 points	12 points
Mobility	5 points	5 points
Total	20 points	32 points

Because the Project exceeds the minimum required threshold points, the Project would be deemed to be in compliance with the RIO. Because the Project would be consistent with the RIO, it would also be consistent with the LARRMP because the Project either directly contributes toward the furtherance of LARRMP policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for the realization of those policies. The Project will result in a less-than-significant impact to land use consistency and compatibility in the Project area due to conflicts with policies and programs of the LARRMP and RIO.

(c) *Los Angeles Walkability Checklist*

As discussed above, the Walkability Checklist is intended as a development guide for all new development projects to encourage pedestrian activity, appropriate urban form, and placemaking. The purpose of the Walkability Checklist is to facilitate the creation of enhanced pedestrian movement, access, comfort, and safety—contributing to the walkability of the City.

The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. While the checklist is neither a requirement nor part of the LAMC, it provides a guide for consistency relating with the policies contained in the General Plan Framework. The City encourages that each of the implementation strategies on the Walkability Checklist be considered in a proposed project. However, each project will have its unique tailored approach, and not all will be appropriate in every proposed project.

The Project is consistent with the intent of the Walkability Checklist because its design incorporates a substantial number of elements identified in the checklist, thus enhancing the

Project’s overall consistency with the City’s General Plan Framework and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan.

This section assesses the Project’s consistency with the applicable guidance criteria contained within the Walkability Checklist. The walkability guidelines are provided in *Table IV.H-3: Consistency with Walkability Checklist*, along with a discussion of the Project consistency with each applicable component.

TABLE IV.H-3
CONSISTENCY WITH WALKABILITY CHECKLIST

CHECKLIST CRITERIA	CONSISTENCY DISCUSSION
A. SIDEWALKS - <i>Support ease of pedestrian movement and enrich the quality of the public realm by providing appropriate connections and street furnishings in the public right of way.</i>	
<ol style="list-style-type: none"> 1. Create a continuous and predominantly straight sidewalk and open space. 2. Create a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting). 3. Provide adequate sidewalk width that accommodates pedestrian flow and activity yet is not wider than necessary. 4. Utilize street furnishings to create a consistent rhythm (i.e., consistent height of light poles or consistent shade pattern of trees). 5. Incorporate closely planted shade-producing street trees. They may be interspersed with existing or proposed palms. 6. Plant parkways with ground cover, low-growing vegetation or permeable materials that accommodate both pedestrian movement and car doors. 	<p>Consistent. The Project landscaping concept would provide for enhanced and interesting views along the street (Whitsett Avenue) by adding color, depth, volume and variety to this street frontage. The Project includes sidewalk and streetscape improvements that are integrated with the balance of the Project and which address pedestrian safety concerns. The Project will comply with all City of Los Angeles Department of Public Works requirements for sidewalks, parkways, street lighting, and street trees in the public right-of-way along the Whitsett Avenue frontage of the Project Site.</p> <p>The applicable Project Design Features include:</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors, and the public, including lighting and wayfinding signage.</p> <p>PDF: The Project will provide new landscaping treatment along the Whitsett Avenue frontage that would enhance the visual interest along the street corridor and would screen the existing surface parking lot adjacent to the driving range.</p>
B. CROSSWALKS / STREET CROSSINGS - <i>Pedestrian safety is the primary concern in designing and managing street crossings. Crossings that are safe, easy to use and well-marked support active, pedestrian-friendly environments and link both sides of the street physically and visually.</i>	
<ol style="list-style-type: none"> 1. Incorporate such features as white markings, signage, and lighting so that pedestrian crossings are visible to moving vehicles during the day and night. 2. Improve visibility for pedestrians in crosswalks by installing curb extensions/bump outs and advance stop bars, and eliminating on-street parking spaces adjacent to the crossing. 3. Emphasize pedestrian safety and comfort at crosswalks with devices such as pedestrian crossing signals, visible and accessible push buttons for pedestrian actuated signals and dual sidewalk ramps 	<p>Consistent and/or Not Applicable. The Project would not include any street crossings or crosswalks as the entire Project would be located within a single block area that does not traverse a public street. However, the Project would minimize the number of driveways along the Whitsett Avenue street frontage; therefore, pedestrian safety would be enhanced because the potential for pedestrian/vehicular conflicts along the public sidewalk adjacent to the street right-of-way would be minimized. Further, through the provision of internal pedestrian linkages connecting three faces of the</p>

<p>that are directed to each crosswalk.</p> <p>4. Create the shortest possible crossing distance at pedestrian crossings on wide streets. Devices that decrease the crossing distance may include a mid-street crossing island, an area of refuge between a right-turn lane and through lane, a curb extension/bump out and a minimal curb radius.</p>	<p>development complex, pedestrian activity can be directed toward areas where vehicular conflict is avoided.</p> <p>In <i>Section IV.M: Environmental Impact Analysis - Transportation and Circulation</i>, two Mitigation Measures, MM TRF-11 and MM TRF-12, have been imposed to reduce Project impacts by providing pedestrian access from the Project Site to nearby transit stops. These Mitigation Measures require the installation of high-visibility crosswalks at the west leg of the Whitsett Avenue/Valleyheart Drive intersection (i.e., across Valleyheart Drive) and across the west leg of the Whitsett Avenue/Valley Spring Lane intersection (i.e., across Valley Spring Lane). These crosswalks will be highly visible and will implement all pedestrian safety and ADA measures required by the City of Los Angeles Department of Public Works. The crosswalks will also improve pedestrian safety in the area by marking pedestrian crossings where no markings or highly faded markings currently exist.</p> <p>The applicable Project Design Features include:</p> <p>PDF: Vehicle access for the SCSLC will be from a single driveway leading to the subterranean parking area that will be provided from Valleyheart Drive (which will lead from Whitsett Avenue).</p> <p>PDF: The Project minimizes the number of driveways needed to serve the site and the driveways will be designed to accommodate the anticipated demand for each driveway.</p> <p>PDF: The three primary pedestrian accesses to the development are established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the SCSLC to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure will be served by with multiple elevator corridors offering direct access to each residential building above.</p>
<p>C. ON-STREET PARKING - <i>On-street parking is often desired in residential and commercial areas for its convenient access to street front entrances. Residents, shoppers, and businesses are amenable to limited slowing of traffic as a trade-off for the economic benefits of on-street parking.</i></p>	
<p>1. Provide angled or parallel on-street parking wherever possible.</p> <p>2. Eliminate street parking within pedestrian crossings.</p>	<p>Consistent and/or Not Applicable. As required by the City of Los Angeles, all required parking for all uses on the Project Site after Project development will be provided as off-street parking. No on-street parking is proposed, as it is the discretion of the City of Los Angeles Department of Transportation (in coordination with the Fire Department) to require or provide public on-street parking spaces along the street frontages of the</p>

	<p>Project Site. The Project provides parking convenient for all residents and visitors within the subterranean parking structure. Multiple pedestrian access options between the vehicle parking area and Project buildings and use areas are incorporated into the Project design. A convenient surface parking lot adjacent and parallel to the street frontage is provided on the adjacent proposed Lot 1, in front of the driving range area.</p>
<p>D. UTILITIES - <i>The disruption of views and visual pollution created by utility lines and equipment should be minimized.</i></p>	
<ol style="list-style-type: none"> 1. Place utilities underground whenever possible. 2. Place utilities in the landscape areas and away from crosswalks or sidewalks. 3. Buffer equipment with planting in a manner that contributes to the quality of the public streetscape. 4. Eliminate conflicts between utilities and access to building entrances. 	<p>Partially Consistent. The practicality of undergrounding of utilities will be evaluated during the Site Plan Review and Building Plan Check process. The Applicant has made no current commitment to underground utility lines. However, the visibility of any aboveground facilities and visual clutter (e.g., equipment and maintenance facilities) would be screened from the public views through landscaping, thoughtful site planning and architectural treatments.</p> <p>As a Compliance Measure, the Project design integrates trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the L.A. River greenway or the street. Trash/recycling bin storage areas will be incorporated within the subterranean parking area with bins being ported to Valleyheart Drive for pick-up. Any trash enclosure area not entirely screened within the parking structure will be screened from view by the general public through architecturally treated enclosures and/or landscaping.</p> <p>As a Compliance Measure, the Project design will screen from public view all exterior rooftop and ground-level mechanical equipment, including HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes. Rooftop equipment will be located within rooftop wells and screened by the perimeter mansard roof treatment. Ground level equipment will be screened with architectural enclosures and/or landscaping as appropriate. Building mounted equipment (such as antennas) will be incorporated into the architectural treatment of the building façade to blend and reduce visibility from the street, river greenway, and golf course views.</p> <p>The applicable Project Design Feature(s) would include:</p> <p>PDF: The Project design incorporates subterranean parking that shall be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or River.</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks shall be appropriately landscaped and adorned to provide a “friendly” walking environment for</p>

	<p>residents, visitors and the public, including lighting and wayfinding signage.</p>
<p>E. BUILDING ORIENTATION - <i>Use the relationship between building and street to improve neighborhood character and the pedestrian environment.</i></p>	
<ol style="list-style-type: none"> 1. Design grade level entrances from the public right-of-way for pedestrians. 2. Create primary entrances for pedestrians that are easily accessible from transit stops, with as direct a path as possible to the transit stop. 3. Make primary entrances to buildings visible from the street and sidewalk. 4. Maintain at least one entrance from the public way at retail establishments with doors unlocked during regular business hours. 5. Incorporate transitions from the sidewalk to the front door such as grade separation, landscaping, and/or porches at individual entrances to residences. These methods should not negatively impact the overall street wall. 6. Comply with Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances. Alternate approaches for persons with mobility limitations (such as a ramp next to the main path to the primary entry) should not be necessary. 7. Incorporate passageways or paseos into mid-block developments, particularly on long blocks, that facilitate pedestrian movement through the depth of the block to the front of the next parallel block. Pedestrians need not walk the circumference of a block in order to access the middle of the next parallel block or alley or parking behind the block. 8. Activate mid-block passageways or paseos so that they are visually interesting and safe spaces. 9. Provide direct access to building entrances from sidewalks and streets. (Not applicable to residential development project.) 10. Locate buildings at the front property line or at the required setback to create a strong street wall. Where additional setback is necessary, that area can be used to create an “outdoor room” adjacent to the street, incorporating seating or water features for example. 11. Use architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall. 	<p>Consistent. The building development and street interface would be addressed in a variety of ways. The SCSLC Project would be designed to promote a safe, secure, and high quality environment that would reinforce these attributes for the surrounding residential neighborhoods. The proposed Project would incorporate many design elements, including but not limited to use of high quality building materials, onsite recreational and shared amenities, and integration of public linkages consistent with the RIO Guidelines, that collectively reflect a level of design and quality that is typical of the surrounding community.</p> <p>The Project would be designed to avoid grade separations between the public sidewalk, internal walkways/paseos, building entrances, and other onsite features. While the Project design necessitates below-grade parking, pedestrian access to this area would be facilitated with multiple elevator corridors and a walkable-grade walkway along the entrance driveway.</p> <p>Consistent with the RIO and Urban Design Guidelines, the proposed landscaping concept would provide for enhanced and interesting views along the street (Whitsett Avenue) and greenway (L.A. River) edges by adding color, depth, volume, and variety to these frontages. As appropriate (and as would be consistent with the RIO and Urban Design Guidelines), landscaping and building orientation would be coordinated to maximize privacy (both onsite and offsite) and buffer undesirable views.</p> <p>In <i>Section IV.M: Environmental Impact Analysis - Transportation and Circulation</i>, two Mitigation Measures, MM TRF-11 and MM TRF-12, have been imposed to reduce Project impacts by providing pedestrian access from the Project Site to nearby transit stops. These Mitigation Measures require the installation of high-visibility crosswalks at the west leg of the Whitsett Avenue/Valleyheart Drive intersection (i.e., across Valleyheart Drive) and across the west leg of the Whitsett Avenue/Valley Spring Lane intersection (i.e., across Valley Spring Lane). These crosswalks will be highly visible and will implement all pedestrian safety and ADA measures required by the City of Los Angeles Department of Public Works. The crosswalks will also improve pedestrian safety in the area by marking pedestrian crossings where no markings or highly faded markings currently exist.</p>

	<p>Several Project Design Features address these criteria issues, including:</p> <p>PDF: Buildings oriented along the Whitsett Avenue frontage incorporate common area/community use areas in the ground-floor space so that larger window openings and architectural transparency features visually link interior gathering areas with the active streetscape.</p> <p>PDF: The Project shall be designed as several (six) smaller building components, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the L.A. River greenway.</p> <p>See compatibility discussion for the RIO (within the land use discussion above) for further explanation and listing of relevant Project Design Features addressing public corridors and community linkages and design treatment of the Project's interface with those components.</p> <p>Mobility would be an important aspect of the SCSLC design, with full ADA essentials in compliance with City of Los Angeles ADA requirements. Specifically, the Project would incorporate this Project Design Feature:</p> <p>PDF: The three primary pedestrian accesses to the development are established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the SCSLC to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure will be served by with multiple elevator corridors offering direct access to each residential building above.</p>
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F. OFF-STREET PARKING AND DRIVEWAYS – *The safety of the pedestrian is primary in an environment that must accommodate pedestrians and vehicles.*

<ol style="list-style-type: none"> 1. Maintain continuity of the sidewalk. 2. Locate parking behind buildings rather than directly exposed to the adjacent major street. (Not applicable to residential development project.) 3. Use alleys to access the parking behind the building. If no alley is available, create access to parking from a side street, wherever possible. (Not applicable to residential development project.) 4. Accommodate vehicle access to and from the site with as few driveways as possible. (Not applicable to residential development project.) 5. Limit the width of each driveway to the minimum required. (Not applicable to residential development 	<p>Consistent. See discussion and PDFs under <i>B. Crosswalks/Street Crossings</i>, above for discussion of Project driveways; and <i>C. On-Street Parking</i>, above for discussion of compatible and convenient parking provisions.</p> <p>See also compatibility discussion for the RIO (within the land use discussion above) for further explanation and listing of relevant Project Design Features addressing placement of parking areas and safety of pedestrians.</p>
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<p>project.)</p> <ol style="list-style-type: none"> 6. Incorporate architectural features on parking structure facades that respond to the neighborhood context and that contribute to “placemaking”. 7. Limit parking in the front setback of the building to within allowed driveways. 8. Mitigate the impact of parking visible to the street with the use of planting and landscape walls tall enough to screen headlights. 9. Illuminate all parking areas and pedestrian walkways. 10. Reconstruct abandoned driveways as sidewalks. 11. Reconstruct sub-standard driveways to meet current ADA requirements. 12. Use architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall. 	
<p>G. ONSITE LANDSCAPING - <i>Contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way.</i></p>	
<ol style="list-style-type: none"> 1. Provide canopy trees in planting areas in addition to the street trees. 2. Provide planting that complements pedestrian movement or views. 3. Provide planting that complements the character of the built environment. 	<p>Consistent. The Project would be designed to promote a safe, secure, and high quality environment that would reinforce these attributes for the surrounding residential neighborhoods. The Project design would incorporate outdoor living area elements, and provide architectural treatment and landscaping that downplays the scale of the development and blends with the character of the built environment.</p> <p>The Project would incorporate relevant Urban Design Guidelines and Standards identified in the Community Plan, including architecture and landscape features that are sensitive and non-intrusive to the surrounding residential community. See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR.</p> <p>The Project would retain the existing golf course on Lot 1 of the Project Site, thus maintaining many existing and mature canopies and stands of trees throughout the golf course.</p> <p>Consistent with the RIO and Urban Design Guidelines, the proposed landscaping concept would provide for enhanced and interesting views along the street (Whitsett) and Greenway (LA River) edges by adding color, depth, volume, and variety to these frontages. As appropriate (and as would be consistent with the RIO and Urban Design Guidelines), landscaping and building orientation would be coordinated to maximize privacy (both onsite and offsite) and buffer undesirable views.</p> <p>See also compatibility discussion for the RIO (within the land use discussion above) for further explanation and listing of relevant Project Design Features addressing</p>

	<p>landscape features.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children’s playground.</p> <p>PDF: The Applicant shall require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.</p> <p>PDF: The Project shall be designed specifically to limit development to the Development Site, including Lot 2 and small southeastern portions of Lot 1, thus avoiding disturbance of any potential historic components on the Project Site.</p>
<p>H. BUILDING FAÇADE - <i>Use the design of visible building facades to create/reinforce neighborhood identity and a richer pedestrian environment.</i></p>	
<ol style="list-style-type: none"> 1. Incorporate different textures, colors, materials, and distinctive architectural features that add visual interest. 2. Add scale and interest to the building facade by articulated massing. 3. Reinforce the existing facade rhythm along the street with architectural elements. 4. Discourage blank walls. Architectural features, enhanced materials, fenestration, planting, lighting, and signage may contribute to a more pedestrian friendly streetscape. (Not applicable to residential development project.) 5. Include overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain. 6. Contribute to neighborhood safety by providing windows at the street that act as “eyes on the street”. 7. Devote 75% of facades for ground floor retail uses to pedestrian entrances and pedestrian-level display windows. (Not applicable to residential development project.) 8. Utilize the building wall for security between the structure and the street, eliminating the need for fences at the street. (Not applicable to residential development project.) 	<p>Consistent. See discussion and PDFs under <i>E. Building Orientation</i>, above for discussion of building design and relationship to the public realm and surrounding community.</p> <p>The architectural style and treatment will be consistent throughout all the buildings in the SCSLC complex. Primarily, the building façades will be treated with a combination of cultured stone, cement plaster, and glass as shown in <i>Figure II-8: Elevations and Sections of Section IV.A: Environmental Impact Analysis – Aesthetics</i>. Also, the Project will be designed in accordance with LAMC Section 91.6306, addressing graffiti removal and deterrence.</p> <p>See also <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR.</p> <p>The proposed Project incorporates architectural building and site plan transparency features. Building facades along the Whitsett Avenue street frontage (including building facades that are interior to the site but visible from the public right-of-way), and those building facades visible from the LA River greenway, are designed to incorporate various transparency features (including large window areas, private open space oriented toward the Project perimeter, and use of low-</p>

	<p>rise privacy walls and wrought iron balusters for private open space patios/balconies). Further, the Project site plan addresses transparency through wide spacing between building placement and incorporation of the plaza area/outdoor living space throughout the entire center complex.</p> <p>See also compatibility discussion for the RIO (within the land use discussion above) for further explanation and listing of relevant project design features addressing building architecture.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The Project buildings and individual dwelling units shall be designed so that private open spaces (i.e., step-out patios and balconies) are oriented toward the Project perimeter, embracing both the Whitsett Avenue street and L.A. River development frontages.</p>
<p>I. BUILDING SIGNAGE AND LIGHTING - <i>Strengthen the pedestrian experience, neighborhood identity and visual coherence with the use of building signage and lighting.</i></p>	
<ol style="list-style-type: none"> 1. Include signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance. 2. Provide adequate lighting levels to safely light the pedestrian path. 3. Utilize adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage. 4. Use fixtures that are “dark sky” compliant. 	<p>Consistent. Landscaping, lighting, and signage associated with the Project will be designed to address the public interface around the Development Site perimeter and to address the internal space for the SCSLC residents.</p> <p>The applicable Project Design Features include:</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors, and the public, including lighting and wayfinding signage.</p> <p>PDF: The Project will provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information.</p>

In summary, the Project is consistent with the Walkability Checklist guidelines, in part due to the fact that it would be conveniently located within an established community with existing pedestrian access to commercial, services, transit, and recreational facilities. In addition, the surrounding community offers a safe and pleasant environment for non-destination recreational walking. Because the Project meets the intention of the Walkability Checklist, it is further demonstrated that the Project is substantially consistent with the General Plan.

(d) Other Local Programs

Although not directly related to the proposed uses under the Project, the increase in land use density could indirectly affect the balance of other local and regional land uses related to parks, recreation and similar land-based related services. Unlike many other public services, parks and

recreational services are dependent not only on funds to support park services, but also the provision of adequate recreational and open space dedicated land uses.

The Project Site is currently developed with private recreational facilities, including a 9-hole golf course, driving range, clubhouse, and 16 tennis courts and related facilities. The proposed Project would result in the removal of 16 tennis courts and related facilities on 4.5 acres of privately-owned/operated active recreational facilities. The Project includes the provision of additional private recreation and common open space areas (both indoor and outdoor) within the Studio City Senior Living Center facility.

Impacts to parks and recreation facilities, including the effect on land area required for recreation and open space uses, is addressed in *Section IV.L: Environmental Impact Analysis – Recreation and Parks* of this Draft EIR.

(e) *SCAG Regional Comprehensive Plan (RCP)*

Because the Project requests the development of 200 dwelling units, it does not qualify as a regionally significant project, which is defined by a threshold minimum size of 500 dwelling units (per CEQA Guidelines Section 15206).

SCAG’s 2008 RCP serves as an advisory document to local agencies in the Southern California region. The RCP presents a vision of how the region can balance resource conservation, economic vitality, and quality of life, and identifies voluntary best practices to approach growth, infrastructure, and sustainability. Although the RCP recommends integrated resource planning, it does not mandate it.

Recommendations of the RCP may be implemented at a local level through individual development projects. Projects that promote the policies of the RCP can be viewed as consistent with the regional planning goals.

Applicable land use related policies of the RCP that may be relevant to the proposed Project are provided in *Table IV.H-4: Consistency with Applicable SCAG Regional Policies*, along with a discussion of the project consistency with each applicable component.

TABLE IV.H-4
CONSISTENCY WITH APPLICABLE SCAG REGIONAL POLICIES

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
LAND USE AND HOUSING		
LU Goal	Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy: <ul style="list-style-type: none"> • Focusing growth in existing and emerging centers and along major transportation corridors. • Creating significant areas of mixed-use development and walkable, “people-scaled” communities. 	<p>Consistent. The Project will help accomplish this goal because it promotes the successful integration of land use and transportation while also being sensitive to critical elements of the community.</p> <p>The Project can be characterized as infill development. The Project Site is located within an established urban area that offers a mix of uses.</p>

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
	<ul style="list-style-type: none"> • Providing new housing opportunities, with building types and locations that respond to the region’s changing demographics. • Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations. • Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots. • Preserving existing, stable, single-family neighborhoods. • Protecting important open space, environmentally sensitive areas and agricultural lands from development. 	<p>The Project would be conveniently located near residential neighborhoods, commercial retail and services, recreation facilities, and public transit corridors (i.e., Ventura Boulevard), thus allowing for reduced commuting distances and facilitating opportunity for walkability. The proposed Project would be located within close proximity to other key community services, thereby adding to efficient development densities and community connectivity within Studio City. Bus transit service is also available nearby, along Ventura Boulevard.</p> <p>The Project offers new housing opportunities for senior citizens. The development would be integrated amongst a mixed-density residential community and designed in a manner that respects and preserves the character of the surrounding single-family and multi-family neighborhoods.</p> <p>The proposed Project would preserve existing housing and add new housing for diverse populations. The existing community character would be retained through preservation of the golf course and by incorporating architecture and landscape design features that are sensitive and non-intrusive to the surrounding residential community, thus contributing to the pedestrian-friendly scale. Further, the introduction of 200 new residential units for senior residents would contribute to the diversification of housing opportunities in the Project vicinity because it would target the needs for a select and underserved segment of the population. The Project would result in the establishment of a senior residential community that would fulfill a senior housing void currently present in the community.</p> <p>The Project design incorporates a number of design features that address the site’s connectivity to the surrounding community, thereby enhancing walkability and creating a pedestrian-friendly environment. The Project would be consistent with the City’s proposed RIO Ordinance and adopted Walkability Checklist. See <i>Table IV.H-2</i> and <i>Table IV.H-3</i>, respectively, above, for consistency discussion and identification of specific Project Design Features.</p>
Policy LU-6.2	Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green	Consistent. The Project is consistent with this policy because it will incorporate green building measures. For example, the proposed Project

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
	Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	would be designed to achieve LEED certification, and thus will support regional and City goals to develop a sustainable community. The applicable Project Design Features include: PDF: The Project energy performance goal will be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions, and greenhouse gas emissions. PDF: The Project will achieve LEED Platinum, Gold, or Silver status. PDF: The Project design will incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.
OPEN SPACE – NATURAL LANDS		
Policy OSN-14	Developers and local governments should implement mitigation for open space impacts through the following activities: <ul style="list-style-type: none"> • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA’s Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP’s significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. 	<p>Consistent. The Project is consistent with this policy, as it would retain the Project Site as a recreational and community open space feature, including the existing golf course, driving range, and clubhouse on proposed Lot 1.</p> <p>Additionally, the infill and intensification of residential uses at the Project Site would reduce development pressures in non-urban or other more environmentally sensitive areas within the region; thus, the infill development is an alternative that avoids or reduces impacts to regional open space resources on natural lands.</p> <p>Finally, City mandates to establish and comply with implementation of the Los Angeles RIO District will further ensure that the Project collaborates with the protection/advancement of biological resources and watershed associated with the Los Angeles River greenway corridor.</p> <p>See also consistency discussion for <i>LU Goal</i>, above.</p>

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
	<ul style="list-style-type: none"> • Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects. 	
OPEN SPACE – COMMUNITY OPEN SPACE		
Goal OSC	<p>Enhance the region’s parks, trails and community open space infrastructure to support the aesthetic, recreational and quality-of-life needs, providing the highest level of service to our growing region by:</p> <ul style="list-style-type: none"> • Creating new community open space that is interconnected, accessible, equitably distributed, provides public health benefits, and meets the changing and diverse needs of communities; • Improving existing community open space through urban forestry and other programs that provide environmental benefits. 	<p>Consistent. The Project is consistent with this policy as it would retain the Project Site as a recreational feature and community open space and would be infill within an established community. Further, because the Project would be built at a medium density, the land area footprint relative to the number of units (compared to single-family development as an alternative) would be reduced, thus allowing for the retention of a greater area of community open space.</p> <p>The Project will indirectly support community recreational needs by retaining a valued community recreational and open space feature (i.e., the golf course), providing onsite recreational amenities for the Project residents (e.g., lap pool, community activity rooms, and children’s playground) and establishing community linkages to the L.A. River and local recreational facilities. Further, the Project would not adversely impact park and recreational facilities located in the Project area.</p> <p>The Project would indirectly support open space enhancement goals targeting urban forestry by retaining the golf course substantially in its current state (which includes over 300 shade trees) and incorporation of new trees and landscaping (that would be compatible with the LA River environment) into the Project design.</p>
Policy OSC-9	Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	<p>Consistent. Recent City efforts to establish and comply with implementation of the Los Angeles RIO District would ensure that the Project collaborates with the protection/advancement of biological resources and watershed associated with the Los Angeles River greenway corridor. The Project would comply with the RIO Ordinance by incorporating numerous required design elements and Project Design Features that establish visual and physical accessibility to the Los Angeles River.</p>
Policy OSC-10	Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	<p>Consistent. See discussion for <i>LU Goal and Policy OSN-14</i>, above.</p>
Policy OSC-11	Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate	<p>Consistent. See discussion for <i>Policy LU-6.2</i>, above.</p>

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
	pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	
Policy OSC-12	Developers and local governments should promote water-efficient land use and development.	Consistent. See discussion for polices WA-9 through WA-13, and WA-32, below.
Policy OSC-13	Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	Consistent. See discussion for Goal OSC and Policies OSN-14 and OSC-9, above.
WATER		
Policy WA-9	Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	Consistent. The Project incorporates a broad range of best management practices (BMPs) aimed at protecting water resources, managing the watershed and conserving water through reduced use and application. Efficient use of water resources will assist with minimizing the cumulative concerns of climate change on water supplies and water quality. See responses to Policies WA-12, WA-27 and WA-32, below.
Policy WA-10	Developers and local governments should include conjunctive use as a water management strategy when feasible.	Consistent. Project stormwater runoff will be diverted to onsite planters and adjacent pervious areas for infiltration, thereby helping to reduce landscape irrigation needs. Effective use of BMPs for stormwater management will provide conjunctive use of urban infill development and water management strategies.
Policy WA-11	Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	Consistent. See response to <i>LU Goal</i> above. The Project is an infill development located in an established community where infrastructure is already in place to serve the urban environment. Except for minor upgrades necessary to facilitate service connections to the Project Site, no new infrastructure systems are anticipated with the proposed Project.
Policy WA-12	Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	Consistent. See response to Policy WA-9, above. Recent City efforts to establish and comply with implementation of the proposed Los Angeles RIO District, which targets water conservation and sound watershed management practices, may ensure that the Project makes efficient use of exterior water use. Further, the Project will be required to comply with the City’s Water Conservation Ordinance.
Policy WA-13	Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government’s ‘no net loss’ wetlands policy should be applied to all of these	Consistent. The Project Site does not contain any wetlands or similar water-reliant habitats. However, the Project Site abuts the Los Angeles River. Recent City mandates to establish and comply with implementation of the Los Angeles

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	land resources.	RIO District will ensure that the Project collaborates with the protection/advancement of biological resources and watershed associated with the Los Angeles River greenway corridor.
Policy WA-27	Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	<p>Consistent. To the extent feasible, the Project maximizes the use of pervious surface areas within the development. However, because the Project buildings will be placed over a subterranean parking structure, runoff will be diverted to adjacent pervious areas for recharge. In general, the Project design to incorporate two levels of parking area under the building/plaza area footprint would greatly reduce the potential impervious area by eliminating the need to provide a comparable area for surface parking. Additionally, due to the fact that the area of proposed Lot 2 is currently made up of impervious surface area (i.e., tennis courts), the impervious surface area of the Project will maintain the status quo of impervious surface area and will not substantially increase impervious surface area on the Project Site.</p> <p>See Table IV.H-2 above for consistency discussion and identification of specific Project Design Features incorporated and consistent with the RIO District watershed management strategies.</p>
Policy WA-32	Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	<p>Consistent. The Project is consistent with this policy because the project design and site planning incorporate a range of design elements, Compliance Measures, and PDFs that minimize pollutant runoff, manage runoff volumes, introduce runoff back into the natural environment, and minimize use of potable water. A discussion of the specific Compliance Measures and best management practices (BMPs) to be incorporated into the Project, and the water quality results, is provided in <i>Section IV.G: Environmental Impact Analysis – Hydrology and Water Quality</i> of this Draft EIR.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The landscaping for the SCSLC will use water efficient landscaping and native drought tolerant plants.</p> <p>See also discussion under Energy goals and policies, below.</p>
ENERGY		
Policy EN-8	Developers should incorporate and local governments should include the following land use principles that	Consistent. See response <i>LU Goal and Policy LU-6.2</i> , above.

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	<p>use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips. 	
Policy EN-10	<p>Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Product_s.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy. 	<p>Consistent. The Project is consistent with this policy because it will incorporate green building measures and will achieve LEED certification.</p> <p>Site location of the proposed senior housing adjacent to the existing golf course will allow utilization of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.</p> <p>See also response to <i>Policy LU-6.2</i>, above.</p> <p>The applicable Project Design Features include:</p> <p>PDF: The Project will utilize natural light as the primary source of light in all dwelling units. Lighting systems will be controllable to achieve maximum efficiency.</p>
Policy EN-11	<p>Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure</p>	<p>Consistent. See <i>Section IV.N.1: Environmental Impact Analysis – Utilities: Energy</i> of this Draft EIR for preliminary estimates on energy resources demand and coordination with energy service providers.</p>

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	improvements necessary for project construction should be completed according to the specifications of the energy provider.	
Policy EN-14	Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	Consistent. The Project will help reduce single-occupancy vehicle trips, as well as vehicle trips overall. Bicycle parking and storage facilities will be provided onsite per the City of Los Angeles Bicycle Parking Ordinance. A kiosk will be provided onsite that will provide information on public transit options and public transit passes may be made available to Project residents during the Project’s first year of operation.
AIR QUALITY		
Goal	Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.	Consistent. This Draft EIR demonstrates that the Project is consistent with applicable regional and local plans, and that Project-related impacts have been mitigated to minimize conflicts. Air quality issues are discussed in <i>Section IV.B: Environmental Impact Analysis – Air Quality</i> .
SOLID WASTE		
Policy SW-14	<p>Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: <ul style="list-style-type: none"> ○ Development of indoor recycling program and space. ○ Design for deconstruction. 	<p>Consistent. The Project is consistent with this policy because it will incorporate green building measures. For example, the proposed Project would be designed to achieve LEED certification, and thus will support regional and City goals to develop a sustainable community. Also, in compliance with the Construction and Demolition (C&D) Waste Recycling Ordinance, the Project will recycle and/or salvage non-hazardous construction and demolition debris.</p> <p>Additional relevant Project Design Features to minimize solid waste effects include:</p> <p>PDF: The Project will contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.</p>

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION
	<ul style="list-style-type: none"> ○ Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	

In summary, the proposed Project is consistent with the RCP because the Project either directly contributes toward the furtherance of the RCP policies or indirectly supports the RCP policies by not creating obstacles for their realization. The Project will result in a less-than-significant impact to land use consistency, as the Project will not create any conflict with policies and programs of SCAG’s regional plans, including the RCP.

(e) Other Regional Programs

Other regional plans that address land use in the Project area include the Los Angeles County Congestion Management Plan (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA) and the Air Quality Management Plan (AQMP) administered by the South Coast Air Quality Management District (SCAQMD). However, because the policy statements in both the AQMP and the CMP are derived from assumptions and growth expectations defined in the RCP, development that is generally consistent with the RCP would be consistent also with the AQMP and CMP. Because the Project is consistent with the RCP, it is also consistent with these other regional programs with regard to land use considerations. Both the AQMP and the CMP include additional policy statements that are directed toward achieving physical reductions in air pollutant emissions and traffic congestion, and those aspects are considered separately under the technical analyses related to air quality and traffic. See also *Section IV.B: Environmental Impact Analysis – Air Quality* and *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* of this Draft EIR for a more detailed discussion of the AQMP and CMP on aspects other than land use.

d. Cumulative Impacts

The Project will result in a less-than-significant land use impact. The Project is consistent with the proposed Medium Density Residential designation of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan. Even though a General Plan Amendment is proposed, these changes to the Community Plan are not anticipated to result in a direct or indirect potential land use impact. The proposed Project is consistent with other applicable land use plans such as the RCP, LARRMP and RIO. The Project will not encroach onto other properties nor divide an established community.

Section III: General Overview and Environmental Setting of this Draft EIR provides a list of projects that are planned or are under construction in the project area, known as Related Projects. Development attributable to past, present and probable future projects would be development planned for as a part of the local land use projections of the City of Los Angeles and part of the existing baseline.

The majority of cumulative development would be consistent with the underlying land use and zoning designations, thus not requiring a General Plan Amendment. As a result, those Related Projects are considered consistent with the General Plan. City review of those projects will require that they demonstrate consistency with the General Plan and relevant community plan policies.

Since the proposed Project and other developments planned for the area are consistent with the overall existing and planned land use patterns in the area, cumulative impacts in this regard are not expected. As discussed above, the proposed Project is compatible with existing uses immediately surrounding the site.

The identified Related Projects are not located immediately adjacent to the Project Site such that they could not, in relation to the Project Site, divide an established community. Additionally, land use impacts due to conflict with applicable plans such as the General Plan are typically site specific and will be identified during environmental analysis for each specific Related Project. Cumulative land use impacts are less-than-significant. No cumulatively considerable impact is anticipated as a result of the Project when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The proposed Project will ultimately be required to comply with applicable rules and regulations, including zoning and related development standards. Although the Project seeks a minor deviation from some of the building standards, adoption of the required findings would assure that the Project remains in substantial compliance with the LAMC.

In addition, the Project has been designed in such a manner to incorporate Compliance Measures to ensure that the site plan, building features and architecture, operational characteristics, and ongoing maintenance of the Project reinforce the goals, objectives, and policies of the City's General Plan, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, and other relevant planning programs, so that impacts of the Project are less-than-significant. Compliance Measures incorporated within and considered for the evaluation of potential land use impacts of the proposed Project include:

- The City of Los Angeles Tree Protection Guidelines and landscape requirements shall require that new landscaping, including trees, be integrated into the new construction area, and shall require at a minimum a 1:1 replacement for any tree removed. The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review shall ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.
- The Project Applicant shall be required to implement a SUSMP, which shall outline the stormwater treatment measures or post-construction Best

Management Practices (BMPs) required to control pollutants associated with storm events up to the $\frac{3}{4}$ -inch precipitation level.

- The Project shall comply with the Low Impact Development (LID) Standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater.
- The Project's stormwater management features shall focus on meeting or exceeding the goals of the General Permit, as well as, SUSMP and LID.
- In compliance with the SUSMP for the management of post-construction stormwater run-off, the Project shall promote evapotranspiration and infiltration by increasing the overall footprint of landscaped areas.
- In compliance with the SUSMP for the management of post-construction stormwater run-off, the Project shall design post-construction structural or treatment control BMPs to either treat or infiltrate stormwater runoff. Stormwater treatment facilities and systems shall be designed to meet the requirements of the SUSMP manual.
- The Project design shall integrate trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street. Trash/recycling bin storage areas shall be incorporated within the subterranean parking area with bins being ported to Valleyheart Drive for pick-up. Any trash enclosure area not entirely screened within the parking structure shall be screened from view by the general public through architecturally treated enclosures and/or landscaping.
- The Project design shall screen from public view all exterior rooftop and ground-level mechanical equipment, including HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes. Rooftop equipment shall be located within rooftop wells and screened by the perimeter mansard roof treatment. Ground level equipment shall be screened with architectural enclosures and/or landscaping as appropriate. Building mounted equipment (such as antennas) shall be incorporated into the architectural treatment of the building façade to blend and reduce visibility from the street, river greenway, and golf course views.
- The Project shall provide lighting throughout the site that shall distribute light evenly across the property and shall be positioned to prevent harsh glares on public rights-of-way or adjacent properties.
- The Project shall provide long-term and short-term bicycle parking in accordance with the Bicycle Parking Ordinance (Ordinance No. 182,386).

- Exterior lighting shall be directed onsite to minimize nighttime illumination and light spillover onto neighboring properties.
- The three primary pedestrian accesses to the development shall be established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the Project to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure shall be served by with multiple elevator corridors offering direct access to each residential building above.
- New trees integrated into the Project shall be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. Hence, it is required that the Project tree program incorporate recommendations of the Cal-IPC (California Invasive Plant Council-www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential land use and planning impacts.

- PDF LU-1: The landscaping for the SCSLC shall use water efficient landscaping and native drought tolerant plants.
- PDF LU-2: The Project shall make use of stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.
- PDF LU-3: The Project shall install a high efficiency irrigation system and have its design reviewed by the City as part of the required Landscape Plan review.
- PDF LU-4: The Project shall include display and distribution of transit information for both residents and visitors.
- PDF LU-5: The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs of the Project.
- PDF LU-6: The Project design incorporates subterranean parking that shall be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or River.

- PDF LU-7: Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that shall be provided from Valleyheart Drive (which shall lead from Whitsett Avenue).
- PDF LU-8: The Project minimizes the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.
- PDF LU-9: The Applicant shall require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.
- PDF LU-10: The Project shall include a children's playground for public use along its southern edge.
- PDF LU-11: Pedestrian walkways within the Project shall provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south; the Whitsett Avenue street frontage to the east; and the golf course recreational facilities to north.
- PDF LU-12: Pedestrian walkways within the Project and the adjacent sidewalks shall be appropriately landscaped and adorned to provide a "friendly" walking environment for residents, visitors and the public, including lighting and wayfinding signage.
- PDF LU-13: Project landscaping in the vicinity of the parking garage driveway and the public playground along the south edge, and at the golf course/driving range secondary pedestrian access at the northeast corner of Lot 2, shall be designed to assist in the easy identification of and access to these areas.
- PDF LU-14: Buildings oriented along the Whitsett Avenue frontage shall incorporate common area/community use areas in the ground-floor space so that larger window openings and architectural transparency features shall visually link interior gathering areas with the active streetscape.
- PDF LU-15: The Project buildings and individual dwelling units shall be designed so that private open spaces (i.e., step-out patios and balconies) are oriented toward the Project perimeter, embracing both the Whitsett Avenue street and L.A. River development frontages.
- PDF LU-16: The Project shall be designed as several (six) smaller building components, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the L.A. River greenway.

- PDF LU-17: The Project shall provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information.
- PDF LU-18: The Project design for the parking structure layout shall allocate 2% of the residential (i.e., excluding the overflow golf) parking spaces for use by a third party shared car (or equivalent) program.
- PDF LU-19: The Project shall be designed specifically to limit development to the Development Site, including Lot 2 and small southeastern portions of Lot 1, thus avoiding disturbance of any potential historic components on the Project Site.
- PDF LU-20: The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.

c. Mitigation Measures

Without the appropriate land use entitlements for the Project Site, the Project would result in a significant land use impact. However, with implementation of the following Mitigation Measure and all required Compliance Measures, the Project would not result in any significant land use compatibility or land use plan consistency impacts. To ensure the Project is consistent with these assumptions, the follow Mitigation Measures are required:

- MM LU-1: The Project shall obtain the appropriate approvals, including zone change, zone variances, site plan review, and conditional use permits, prior to commencing Project development. Attainment of such approvals shall in turn ensure that the Project is in full compliance with local codes, procedures and regulations.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the Compliance Measures, PDFs, and Mitigation Measures, the proposed Project would not result in significant land use compatibility or land use plan consistency impacts on a project-level or cumulative basis; it would not result in significant unavoidable impacts.