V. ALTERNATIVES

A. OVERVIEW OF ALTERNATIVES ANALYSIS

1. GUIDANCE AND SETTING FOR ANALYSIS

a. Regulatory Requirements for Identifying and Analyzing Project Alternatives

The identification and analysis of alternatives is a fundamental concept of the environmental review process under CEQA. CEQA Guidelines Section 15126.6 addresses the required discussion of alternatives to proposed projects in an EIR and the intended use of such information. Section 15126.6(a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible.

The CEQA Guidelines further clarify in Section 15126.6(b):

> Because the EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Thus, an EIR for any project that is subject to CEQA review must consider a reasonable range of alternatives to the project which: 1) substantially lessen the project's significant environmental impacts; and 2) that are feasible and may substantially accomplish the proposed project goals.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include:

> [S]ite suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…

The range of alternatives required within an EIR is governed by the "rule of reason." Specifically, CEQA Guidelines Section 15126.6(c) provides that:

> The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The CEQA Guidelines also require the analysis of a "No Project" alternative in addition to any other feasible alternatives identified. According to CEQA Guidelines Section 15126.6(e)(2), the "No Project" alternative should discuss the existing conditions at the time the Notice of Preparation ("NOP") is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved.

The impact analysis, as detailed in *Section IV: Environmental Impact Analysis* of this Draft EIR, concludes that the proposed Project will not cause significant unavoidable impacts after the implementation of Compliance Measures, Project Design Features, and Mitigation Measures, with the exception of significant (temporary) air quality and noise impacts during the construction phase of the Project.

The Applicant is proposing a senior residential community while preserving the existing golf course to serve the Studio City community. The goal of the proposed Project is to establish an attractive residential community oriented toward senior independent housing to benefit the increasingly aging population existing within the area while maintaining the recreational value of the site to accommodate the needs of the surrounding community at large. The Applicant proposes a General Plan/Community 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. The objectives of the Project are stated as follows:

- To develop a residential community in an effort to fulfill a housing demand present in the community;

- To maintain as many recreational/open space uses on the Project Site as possible where they will continue to serve an important role as a recreational and/or open space resource for the new residential community and surrounding neighborhood;

- To establish a residential development that is consistent with the existing density and character of residential developments in the neighborhood, and is aesthetically compatible with the remaining uses on the Project Site and the surrounding neighborhood;

- To use design that will accommodate higher density development and provide convenient connectivity to transit, commercial uses and services, open space/recreation, and the Los Angeles River "corridor";

- To incorporate design elements that further the City's goals toward "green" development and walkability, and that comply with the City's efforts to reinvent and promote connectivity to the Los Angeles River through the River Improvement Overlay (RIO) District guidelines;

- To provide adequate and convenient off-street parking for all uses on the Project Site;

- Community Plan Objective: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area;

- Community Plan Objective: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities; and

- Community Plan Objective: To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.

b. Alternatives Analysis Format and Methodology

CEQA Guidelines Section 15126.6(d) provides that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Under CEQA Guidelines Section 15151, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of the Project alternatives need not be as thorough or detailed as the analysis of the Project itself.

The level of analysis in the following sections is sufficient to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. In addition, each alternative is evaluated to determine whether the Project objectives, identified above and in *Section II: Project Description*, would be substantially attained by the alternative.

The evaluation of each alternative also considers the anticipated net environmental impacts after implementation of feasible Mitigation Measures. The net impacts of the alternatives for each environmental issue area are classified as either having no impact, a less-than-significant impact, or a significant and unavoidable impact. These impacts are then compared to the corresponding impact for the Project in each environmental issue area. To facilitate the comparison, the analysis identifies whether the net incremental impact would clearly be less, similar, or greater than that identified for the Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic Project objectives.

2. ALTERNATIVES SELECTION

a. Potential Project Alternatives Considered but Rejected

(1) Alternative Sites

Section 15126.6(a) of the CEQA Guidelines suggests that an alternate location may be included in the range of reasonable alternatives to a project evaluated in an EIR, when feasible. However, in this case there is no feasible alternative site that could reasonably fulfill many of the basic objectives of the Project. Additionally, as the current Project Site is owned by the Applicant, the selection of an alternate location would require the Applicant to purchase additional property for Project development, which may prove an undue burden on the Applicant.

The analyses in this Draft EIR identified outstanding unmitigatable impacts related to construction phase (short-term) air quality and construction phase (short-term) noise. The unmitigatable construction phase impacts (short-term air quality and noise) appear to be inevitable for any of the alternatives considered and analyzed (with the exception of the No Project Alternative). The selection of alternatives for the Project focused primarily on the following:

- Satisfaction of the Project objectives with particular attention to the provision of housing for the community;
- Community input and preferences;
- Compatibility and consistency with the surrounding community character and development;
- Preservation or creation of recreational/open space uses; and
- Meaningful offset or reduction of proposed Project impacts.

The General Plan, Community Plan, and zoning designations applicable to the Project Site were key considerations, and these factors established limitations on reasonable alternative land uses and locations.The current use of the Project Site as an existing recreational site was also emphasized in designing and selecting alternatives.

A primary intention and objective of the Applicant for the development of the Project is to utilize the advantage offered by the already existing recreational uses and open space on the Project Site (golf course, driving range, and clubhouse). The development of the senior condominium housing units adjacent to the existing recreational uses onsite, would provide a mixed-use "living center" with "built-in" recreational and open space and cross-functional usage on the Project Site. As such, due to the nature of the Studio City Living Senior Center Project as a proposed residential and recreational complex, it is assumed that an alternate location should be associated with existing recreational space and that relocation on vacant or other land not associated with existing recreational space is infeasible. To locate the Project on land not associated with recreational and open space would require the Applicant to develop such recreational and open space to match the character and intent of the Studio City Senior Living Center, which would be infeasible.

The only four suitable recreational spaces within 5 miles of the Project Site with similar characteristics to the Weddington Golf and Tennis Project Site and with sufficient space to accommodate the proposed Project include the Van Nuys-Sherman Oaks War Memorial Park (approx. 65 acres) approximately two miles to the northwest, South Weddington Park (approx. 12.9 acres) approximalely two miles to the east, North Hollywood Park (approx. 47 acres) approximately two miles to the northeast, and Lakeside Golf Course (approx. 117 acres) approximately two-and-a-half miles to the east of the Project Site.

The Van Nuys-Sherman Oaks War Memorial Park, South Weddington Park, and North Hollywood Park are all City-owned property currently used as public parks and green space. The likelihood of the City of Los Angeles to relinquish and sell these properties to the Applicant for private development is very low and subsequently infeasible. The Lakeside Golf Course is privately owned and a portion of the property could be sold to the Applicant for development of senior housing. However, the Lakeside Golf Course site, as well as the three public park sites, do not result in the potential to significantly reduce the Project impacts, including significant impacts to short-term (construction phase) air quality and noise, while still attaining the Project objectives. There is no appreciable change in the conclusions about those alternative sites with regard to the current Project, and it is unrealistic to expect that these location options would better help obtain the objectives of the Project.

An alternative site within the Weddington Golf and Tennis Project Site boundary is another potential option. Relocation to another portion of the Project Site would require demolition of a portion of either the golf course or the driving range, depending on placement of the senior housing complex. However, both the golf course and driving range uses on the Project Site appear to be eligible for the California Register and are therefore considered historic resources under the California Environmental Quality Act (CEQA). In contrast, the existing tennis courts, where the Project is currently proposed to be located, are not considered eligible for the California Register and are not considered an historic resource under CEQA. As such, relocation of the SCSLC complex onto either the golf course or driving range portions of the Project Site may have a more significant impact to cultural/historical and recreational/open space resources on the Project Site. Additionally, relocation of the Project closer to the single-family residential uses on Valley Spring Lane or Bellaire Avenue, as opposed to the Project's currently proposed placement closer to multi-family housing on Whitsett Avenue, may have greater impacts to the sensitive single-family uses in the Project vicinity related to both the construction and operational phases. The relocation of the SCSLC to an alternative site within the existing Project Site offers no appreciable benefits in reducing any environmental impacts.

Therefore, development of the Project in an alternative site location (whether on or off the Project Site) is considered infeasible and is not analyzed further in this Draft EIR.

(2) Alternative Land Uses

As an alternative to the Project, a development could include a mix of land uses other than, or in addition to, typical multi-family senior residential condominiums. Given the existing golf course, driving range, and tennis uses on the Project Site, a reasonable alternative could include the addition of commercial, office, or lodging uses that may complement the existing recreational

complex. However, these alternative uses would not be consistent with the Community Plan; would not further the objectives of the Project; would still require a Zone Change, General Plan Amendment, and conversion of a portion of the Project Site to a new use, as is the case with the proposed Project; and would offer no appreciable benefits in reducing any environmental impacts in comparison to the currently proposed Project. For these reasons, the development of an alternative land use project is considered infeasible and not analyzed further in this Draft EIR.

b. Project Alternatives Selected for Evaluation

The selection of alternatives for the Project focused primarily on Project objectives for housing, land use and zoning compatibility with the surrounding community, open space and recreation preservation, community input, and reduction of overall short-term construction impacts, with particular focus on air quality and noise, which were found to be significant and unavoidable under the proposed Project. Four alternatives (including the "No Project" alternative) are evaluated in this Draft EIR that would lessen some or all of the Project's significant impacts. Since alternatives involving an alternate site have been rejected, the range of alternatives considered for evaluation is focused on different site-specific, residential, or recreational use options. Alternatives selected for evaluation include the following:

- Alternative A: "No Project"
- Alternative B: "Higher Density with Recreation Project"
- Alternative C: "Original Zoning Project"
- Alternative D: "Los Angeles River Natural Park Project"

These four alternatives are described below and summarized in *Table V-1: Summary of Alternatives*. The following sections provide an analysis of each Alternative, including an assessment of the anticipated development impacts, a comparison of each Alternative's impacts relative to the Project, and a determination of each Alternative's ability to meet the Project objectives.

TABLE V-1
SUMMARY OF ALTERNATIVES

PROJECT COMPONENT	PROPOSED PROJECT	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D
Title	Studio City Senior Living Center	Weddington Golf and Tennis Club (Existing)	Higher Density with Recreation Project	Original Zoning Project	L.A. River Natural Park Project
Overview	Development of 200 senior condos within six buildings, demolition of tennis courts, and retention of golf uses.	No new development. Retain all existing uses on the Project Site, including tennis and golf uses.	Development of 250 apartments, onsite relocation of 13 tennis courts, and retention of golf uses.	Development of 95 market-rate condos, 83 single-family homes, and demolition of golf and tennis uses.	Creation of a recreational and open space park that also serves as a wetlands habitat and water treatment complex.
Uses	New senior condos; existing golf course, driving range, and clubhouse	Existing golf course, driving range, clubhouse, and tennis courts	New apartments, reduced golf course and driving range, and reduced tennis courts	New condos and new single-family homes	New recreational/open space/wetlands habitat/water treatment complex
Parking	635 subterranean and surface parking spaces	92 existing surface parking spaces	At-grade or subterranean spaces per City Code.	At grade or subterranean spaces per City Code for condos; Two covered spaces and one on-street space for single-family homes.	Use of existing 391-space public parking garage to the east.
Uses (SF, Units, etc.)	200 senior condos 9-hole golf course 21-tee driving range 4,342 sf clubhouse	9-hole golf course 24-tee driving range 4,342 sf clubhouse 16 tennis courts	250 apartments 5-hole, 10-tee golf course 21-tee driving range 4,342 sf clubhouse 13 tennis courts	95 condos 83 single-family homes	16.11-acre recreational park, wetlands habitat, and water treatment complex
Buildings	Condos: 4-stories/45 feet tall Existing clubhouse: 1-story	Existing clubhouse: 1-story	Apartments: 4-stories/45 feet tall Existing clubhouse: 1-story	Condos: 4-stories/45 feet tall Homes: 1- to 2- stories	Visitor Info Center: 1- to 2-stories

V. ALTERNATIVES

B. ALTERNATIVE A: NO PROJECT

1. ALTERNATIVE DESCRIPTION

The "No Project" Alternative assumes that no changes to the Project Site or existing structures would occur. As such, the existing 9-hole pitch-and-putt golf course, 24-tee driving range, golf clubhouse, 16 tennis courts and related facilities, and surface parking lot would remain on the Project Site and would continue to operate. Implementation of the No Project Alternative would not result in new environmental impacts beyond those identified for currently existing uses on the site; however, the No Project Alternative would not satisfy many of the Project objectives to provide additional housing that is in demand in the community.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

With the No Project Alternative, site conditions would remain unchanged on the Project Site. As such, the aesthetics and views to and from the Project site would remain unchanged from current conditions, resulting in no impacts. Although the proposed Project involves construction of six new four-story buildings on the Project Site, the tall foliage surrounding the Project Site and the existing surrounding development in the vicinity reduce the visibility of these new buildings from various viewpoints in the community, thus resulting in a less-than-significant impact. Because both the No Project Alternative and the proposed Project would not have a significant impact on aesthetics and viewsheds in the community, the potential impact to aesthetic resources under both scenarios would be within the same impact level tier; however, the alternative would have less impact.

b. Air Quality

The No Project Alternative would maintain the Project Site as is currently developed with a golf course, driving range, clubhouse, tennis courts and facilities, and a surface parking lot. No new or additional construction would occur on the Project Site. As such, this alternative would not produce any construction impacts related to air quality. Any operational air quality impacts from the current development would continue to be present, but no new incremental air quality impacts would be produced. In comparison, the proposed Project would result in significant and unavoidable localized impacts due to construction of the Project, but would result in less-than-significant operational impacts with implementation of all required Compliance Measures, PDFs, and Mitigation Measures. Because the operations of both the No Project Alternative and the proposed Project would not have a significant impact on air quality, the potential impact to air quality under both scenarios would be within the same impact level tier. However, the No Project Alternative would not produce any new construction impacts, while the proposed Project would produce significant and unavoidable localized construction impacts due to building and grading for the Project. As such, the No Project Alternative would have a reduced air quality impact in comparison to the Project with respect to localized construction emissions.

c. Biological Resources

The Project Site does not contain any plant or wildlife species that are listed as special-status (i.e., rare, endangered or threatened); however, several species of parakeets and squirrels have established themselves at the site and are recognized to be of local interest. There are also a variety of mature trees onsite, although none are considered as heritage or significant trees from a biological resources perspective (although the trees are a contributing feature to the historical significance of the Project Site).

With the No Project Alternative, site conditions would remain unchanged on the entire Project Site. The nine mature trees proposed for removal under the Project would remain in place, and temporary impacts to animal species during the construction activities would not occur under the No Project scenario, thus resulting in no impacts.

In comparison, the proposed Project would remove the tennis courts and the nine mature trees to accommodate construction of the Project. However, the tennis court area, which is largely paved, does not contain any significant habitat for parakeets or squirrels, and none of the trees proposed for removal are considered to be protected or significant. As such, with implementation of Compliance Measures and Mitigation Measures to avoid potential disturbance of non-protected animal species on the Project Site, the Project impacts to biological resources would be less-than-significant.

Because both the No Project Alternative and the proposed Project would keep the golf course (where the majority of the non-protected animal habitat is present) intact and both would avoid significant impacts during both construction and operation, the potential impact to biological resources under both scenarios would be within the same impact level tier. However, the No Project Alternative would also avoid the removal of any trees, removal of minor vegetation area on proposed Lot 2, and potential disturbance to wildlife during construction activity that would otherwise occur under the proposed Project; therefore, the No Project Alternative would have an overall lesser net impact on biological resources relative to the proposed Project.

d. Cultural Resources

The Weddington Golf Course, which has been in operation since 1956 and is a prominent recreational feature in the San Fernando Valley, is eligible through the California Register as an historic resource. Certain aspects of the golf course and driving range on the Project Site have previously been altered, but the complex, considered as a whole including the golf course, driving range, clubhouse, and golf ball light standards, is eligible. The tennis courts component is not considered historically significant.

Under the No Project Alternative, the golf uses would remain unchanged, thus resulting in no impacts. In comparison, the Project would require removal of the existing tennis courts with minor reconfiguration of the southern perimeter of the golf course and driving range to accommodate the Project. The Project would also remove and relocate some of the golf ball light standards on the Project Site. Although there would be minor alterations to the layout of the golf

course, driving range, and golf ball light standards, these minor alterations would not be detrimental to the overall character or quality of the complex, as a whole, and thus, with implementation of Compliance Measures, PDFs, and Mitigation Measures, the Project would result in a less-than-significant impact on cultural resources.

Because both the No Project Alternative and the proposed Project would keep the potentially historic portion of the Project Site largely intact, the potential impact under both scenarios would be within the same impact level tier. However, the No Project Alternative would also avoid any minor modifications to the driving range and golf course edge that are otherwise needed under the proposed Project; therefore, the No Project Alternative would have an overall lesser net impact on historic resources relative to the proposed Project.

e. Geology, Soils, and Seismicity

The Project Site is located in an area with active geological features, but is not underlain by any known active faults nor is it located within an Alquist-Priolo Earthquake Fault Zone.

Although the Project Site would experience groundshaking due to seismic events and ground motion under the No Project Alternative, the potential for risk to the public would remain unchanged from what currently exists. Under the No Project Alternative, no soil movement or displacement of earth is required.

In comparison, the proposed Project would experience the same groundshaking due to seismic events and ground motion at the Project Site. However, the potential for risk to the public would be increased from existing conditions due to the need to excavate the site for subterranean parking and the addition of six, four-story structures on proposed Lot 2 of the Project Site. However, with implementation of the required Compliance Measures and Mitigation Measures, relating to compliance with seismic building codes and use of Best Management Practices (BMPs) to ensure proper soil compaction, disposal and erosion minimization, all potential impacts would be less-than-significant.

Because the No Project Alternative and the proposed Project would avoid significant impacts during any construction or operational phases, the potential impact to geology under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not involve the addition of new structures and residents that could be exposed to seismic threat, nor would it involve grading or the excavation of earth, the No Project Alternative would have an overall lesser net impact on geology relative to the proposed Project.

f. Greenhouse Gas Emissions

The No Project Alternative would maintain the Project Site as is currently developed with a golf course, driving range, clubhouse, tennis courts and facilities, and a surface parking lot. No new or additional construction would occur on the Project Site. As such, this alternative would not produce any construction impacts related to greenhouse gas (GHG) emissions. Any operational GHG emissions from the current development would continue to be present, but no new incremental GHG emissions would be produced. In comparison, the proposed Project would

increase the GHG emissions at the Project Site during both construction and operation of the Project. However, with implementation of all required Compliance Measures and Project Design Features, the Project would fall within the threshold for GHG emissions, and would be consistent with all applicable adopted plans and policies related to GHG emissions. Because both the No Project Alternative and the proposed Project would not have a significant impact relating to GHG emissions, the potential impact under both scenarios would be within the same impact level tier. However, since the No Project Alternative would avoid producing any new incremental construction and operational greenhouse gases, the No Project Alternative would have an overall lesser net GHG emission impact relative to the proposed Project.

g. Hydrology and Water Quality

Under both the No Project Alternative and the proposed Project scenarios, hydrology conditions related to the area of proposed Lot 1 would remain unchanged since modifications to the golf course and driving range would not occur or would be relatively minimal. On the area of proposed Lot 2, the proposed Project would replace one highly impervious area (e.g., tennis courts, sidewalks, and parking lot) with another impervious development (i.e., senior living residential buildings and courtyard hardscape). However, it is anticipated that the new construction of the proposed Project would incorporate BMPs and various MS4 standards that would ultimately result in a slightly improved condition for hydrology and water quality from surface water runoff because the proposed Project would capture more runoff and process that runoff through a range of water filtration devices.

Both the No Project Alternative and the proposed Project would keep the pervious golf areas relatively intact, thus keeping approximately 75 percent of the Project Site as permeable area for which hydrology conditions would remain unchanged. Even though Lot 2 is currently nearly 100 percent impermeable surface area (due to concrete coverage by the tennis courts and walkways), the proposed Project, which would replace the courts and walks with buildings and courtyard area, would represent a slightly improved condition over the No Project Alternative scenario because the Project would incorporate LID, BMP and MS4 features that manage runoff rates, direct runoff to infiltration areas, and provide improved water quality character, which are absent under the No Project Alternative. Even though the Project would be a slightly improved scenario, the impacts under both scenarios would be within the same impact level tier.

h. Land Use and Planning

The No Project Alternative would be consistent with the policies and goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan and would not result in land use and planning impacts because all uses on the site would remain unchanged. Both the No Project Alternative and proposed Project would be compliant with the Community Plan Map's designation of the Project Site with a "Private Golf Course" symbol, as both scenarios would retain the entire golf course (with minor modifications to portions adjacent to the Project buildings), driving range, and clubhouse on the Project Site. To be fully consistent with the Community Plan and compliant with the LAMC, the proposed Project would require approval of a General Plan Amendment and Zone Change. However, with implementation of all Compliance Measures, PDFs, and Mitigation Measures, the Project would result in a less-than-significant

land and planning impact. Both scenarios would afford an opportunity for compliance with, and implementation of, the RIO. And both scenarios would be consistent with regional plans and policies (including the RCP and AQMP). Because both the No Project Alternative and the proposed Project would not have a significant impact relating to land use and planning, the potential impact under both scenarios would be within the same impact level tier. However, due to the fact that the No Project Alternative would avoid necessary requests for a General Plan Amendment and Zone Change, the No Project Alternative would have an overall lesser net land use and planning impact relative to the proposed Project.

i. Noise

The No Project Alternative would maintain the Project Site as it is currently developed, with a golf course, driving range, clubhouse, tennis courts and facilities, and a surface parking lot. No new or additional construction would occur on the Project Site. As such, this alternative would not produce any construction impacts related to noise. All existing local operational noise conditions, as shown in *Table IV.I-1: Existing Noise Levels* in *Section IV.I: Environmental Impact Analysis – Noise* of this Draft EIR, will continue to exist and no new incremental noise will be added to the Project Site due to new development. The proposed Project would result in a less-than-significant noise impact to sensitive receptors in the neighborhood due to operational activity, but would result in significant and unavoidable construction impacts due to building and grading for the Project. Because the operations of both the No Project Alternative and the proposed Project would not have a significant impact on noise, the potential impact to noise under both scenarios would be within the same impact level tier. However, with regards to construction, the No Project Alternative would avoid new construction impacts, while the proposed Project would produce significant and unavoidable construction impacts due to construction activities. As such, the No Project Alternative would have a reduced noise impact in comparison to the Project with respect to construction noise.

j. Population and Housing

The No Project Alternative would retain all existing recreational uses on the Project Site and would not propose development of any new residential dwelling units on the Project Site. Because the No Project Alternative would not add permanent residents or change the density of use at the Project Site, there would be no impacts related to population and housing. In comparison, the proposed Project would add an estimated 340 permanent residents (senior citizens) as a result of the development of 200 new residential dwelling units. However, the new residents and housing (and increased Project Site density) would fall within the anticipated growth of the area and would be consistent with all applicable adopted plans and policies, thus resulting in a less-than-significant impact relating to population and housing. Because both the No Project Alternative and the proposed Project would not have a significant impact on population or housing, the potential impact to population and housing under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not involve the addition of new permanent residents and housing units in the Project area, the No Project Alternative would have an overall lesser net impact on population and housing relative to the proposed Project.

k. Public Services – Fire Protection

Under the No Project Alternative, existing uses on the Project Site would not change and fire safety risk, demand for fire protection services, and fire flow (water) service would remain unchanged. The No Project Alternative would have only a temporary daytime population on the Project Site. And the Project Site would continue to be served by Fire Station No. 78, located next door to the Project Site.

The proposed Project would include development of six new buildings to accommodate a 200-unit senior living center on proposed Lot 2, adding an estimated 340 new permanent residents, in addition to the daytime golf course population, and would increase demand for fire and medical service from the LAFD. However, with implementation of all required Compliance Measures and Mitigation Measures, all impacts to fire safety, demand for fire protection services, and fire flow service would be less-than-significant.

Because both the No Project Alternative and the proposed Project would not have a significant impact on fire safety and protection services, the potential impact to fire safety and protection services under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not add new structures or permanent residents that would utilize existing fire protection services, the No Project Alternative would have an overall lesser net impact on fire safety and protection services relative to the proposed Project.

l. Public Services – Police Protection

Under the No Project Alternative, existing uses on the Project Site would not change and the demand for police protection and law enforcement services would remain unchanged, thus resulting in no impacts. The No Project Alternative would have only a temporary daytime population on the Project Site. The Project Site would continue to be served primarily by the North Hollywood Community Police Station, located approximately 2.9 miles from the Project Site, as well as the Studio City substation located approximately 0.5 miles from the site on Ventura Boulevard.

The proposed Project would include development of six new buildings to accommodate a 200-unit senior living center on proposed Lot 2, adding an estimated 340 new permanent residents, in addition to the daytime golf course population, and would increase demand for police services from the LAPD. However, the Project would not significantly worsen the current officer-to-population ratio for the North Hollywood Community Police Station and with implementation of all required Compliance Measures and Mitigation Measures, all impacts to public safety and demand for police protection services would be less-than-significant.

Because both the No Project Alternative and the proposed Project would not have a significant impact on public safety and police protection services, the potential impact to public safety and police protection services under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not add permanent residents that would utilize existing police protection services, the No Project Alternative would have an overall lesser net impact on fire safety and protection services relative to the proposed Project.

m. Public Services – Library

The Project Site is served by the Los Angeles Public Library (LAPL) System, and the closest library to the Project Site is the Studio City Neighborhood Branch Library located at 12511 Moorpark Street.

Under the No Project Alternative, existing uses on the Project Site would not change the current demand for library services in the community because the No Project Alternative has no associated permanent population, thus resulting in no impacts. In comparison, the proposed Project would introduce an estimated 340 new permanent residents creating demand for library services. However, as determined, the Studio City Neighborhood Branch Library, although deemed undersized per the LAPL standards, is able to sufficiently absorb the new permanent residents of the Project without being over-burdened. Further, the two nearest libraries, the North Hollywood Regional Branch and Sherman Oaks Neighborhood Branch Libraries, which are under capacity in terms of size-to-population ratio, can also absorb the new permanent residents. As such, the proposed Project would result in less-than-significant library service impacts.

Because both the No Project Alternative and the proposed Project would not have a significant impact on library services, the potential impact to library services under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not add permanent residents that would utilize existing library services, the No Project Alternative would have an overall lesser net impact on library services relative to the proposed Project.

n. Recreation and Parks

Both the No Project Alternative and the proposed Project would retain the existing 9-hole (3 par) pitch-and-putt golf course, associated driving range, and clubhouse. These existing recreational facilities have been in existence for almost 60 years and provide opportunities for residents of Studio City and other nearby communities to enjoy golf. In addition, the No Project Alternative would retain the remaining 16 lighted tennis courts that would otherwise be demolished and replaced by residential development under the proposed Project. As such, the No Project Alternative would have no impacts on recreational uses in the community

Although a study completed by the City of Los Angeles Department of Parks and Recreation in 2002, which included a survey of 30 tennis facilities within the City of Los Angeles and County of Los Angeles, concluded that decreasing the number of tennis courts due to implementation of the proposed Project may inconvenience current clientele of the Weddington Golf and Tennis Club, no significant impact due to the loss of the 16 courts at the Project Site was indicated. Therefore, the potential impact related to the removal of the tennis courts under the proposed Project would be less-than-significant.

Unlike the proposed Project, which would introduce an estimated 340 new permanent residents creating demand for parks/recreation services, the No Project Alternative scenario has no associated permanent population, thus resulting in no impacts to existing parks and recreational facilities. In fact, the No Project Alternative supplements the City's public park services through

the provision of privately-owned golf and tennis facilities that are made available for public use. In comparison, with implementation of Compliance Measures and PDFs, the amount of new permanent residents from the proposed Project is not significant enough to burden the City's park and recreation system, thus resulting in a less-than-significant impact.

Because both the No Project Alternative and the proposed Project would not have a significant impact on recreation and parks, the potential impact to recreation and parks under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not involve removal of any recreational uses on the Project Site and would not add new permanent residents that may use existing recreational facilities and parks, the No Project Alternative would have an overall lesser net impact on recreation and parks relative to the proposed Project.

o. Transportation and Circulation

The No Project Alternative represents a no project, no development alternative. The No Project Alternative involves continued operation of the Project Site (i.e., existing conditions) without construction of new buildings or changes of use that may impact transportation and circulation around the Project Site and in the area. Thus, the future operating conditions at the study intersections will be the same as those reported for the "Future Cumulative Pre-Project Conditions" analysis in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* of this Draft EIR, and no new incremental impacts would result. The proposed Project, which would add 200 senior dwelling units on the Project Site, would result in less-than-significant transportation and circulation impacts during operation and construction, with implementation of required Compliance Measures. With implementation of additional PDFs and Mitigation Measures, impacts would be reduced even further.

Because both the No Project Alternative and the proposed Project would not have a significant impact on transportation and circulation, the potential impact to transportation and circulation under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not add any construction or operational traffic to the Project area that would use the surrounding street, bicycle, and public transit network, the No Project Alternative would have an overall lesser net impact on transportation and circulation relative to the proposed Project.

p. Utilities – Energy

The No Project Alternative would result in no net change to the uses on the Project Site from that which currently exist. Demand for energy, including electricity and natural gas, would remain unchanged, and as such, the No Project Alternative would result in no new incremental energy resource impacts on the Project Site. The proposed Project would represent an increase in electricity and natural gas demand at the Project Site due to the addition of 200 senior dwelling units on the Project Site. However, the current and projected capacities of the LADWP and SoCalGas to provide electricity and natural gas, respectively, for the construction and operation of the Project would be sufficient and would not require construction of new facilities. Further,

implementation of required Compliance Measures and PDFs would ensure that impacts are reduced. Thus, the Project would result in less-than-significant energy resource impacts.

Because both the No Project Alternative and the proposed Project would not have a significant impact on energy resources, the potential impact to energy resources under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not demand any additional construction or operational electricity or natural gas for the Project, the No Project Alternative would have an overall lesser net impact on energy resources relative to the proposed Project.

q. Utilities – Water

The No Project Alternative would result in no net change to the uses on the Project Site from that which currently exist. Demand for water, including that for potable use and turf irrigation, would remain unchanged, and as such, the No Project Alternative would result in no new incremental water resource impacts on the Project Site. The proposed Project would represent an increase in water demand at the Project Site due to the addition of 200 senior dwelling units on the Project Site. However, the current and projected capacities of the LADWP to provide water for the construction and operation of the Project would be sufficient and would not require construction of new facilities. Further, implementation of required Compliance Measures and PDFs would ensure that impacts are reduced. Thus, the Project would result in less-than-significant water resource impacts.

Because both the No Project Alternative and the proposed Project would not have a significant impact on water resources, the potential impact to water resources under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not demand any additional construction or operational water for the Project, the No Project Alternative would have an overall lesser net impact on water resources relative to the proposed Project.

r. Growth-Inducing

The No Project Alternative does not involve new residential or other development at the Project Site and will retain the Project Site as is currently developed. As such, the No Project Alternative would not result in any new growth at the Project Site or any increased potential for new growth in the community, and therefore would result in no impact. The proposed Project would add permanent residents as well as employees to the area, but would result in a less-than-significant impact related to growth. Because both the No Project Alternative and the proposed Project would not have a significant impact related to growth, the potential impact to growth under both scenarios would be within the same impact level tier. However, because the No Project Alternative would not add any new development, residents, or employees to the Project area, the No Project Alternative would have an overall lesser net impact on growth relative to the proposed Project.

s. Cumulative Impacts

In addition to the proposed Project, the ten Related Projects are expected to be developed in the community or are currently in development. As such, impacts corresponding to those developments are anticipated to occur. However, as the No Project Alternative would not contribute any change to the cumulative conditions of the Related Projects, this alternative would have no significant incremental cumulative impacts. The proposed Project was found to have less-than-significant cumulative impacts in all environmental categories with implementation of all required Compliance Measures, PDFs, and Mitigation Measures. Because both the No Project Alternative and the proposed Project would not have significant cumulative impacts in all environmental categories, the potential cumulative impacts under both scenarios would be within the same impact level tier. However, because the No Project Alternative would maintain status quo for the uses on the Project Site and would not alter any aspects of the built environment in the Project area, the No Project Alternative would have an overall lesser net cumulative impact relative to the proposed Project.

t. Relationship of Alternative to Project Objectives

The No Project Alternative would avoid all of the net incremental impacts to the environment associated with the proposed Project (including those that would be less-than-significant and those that would be beneficial). However, the No Project Alternative would not satisfy most of the Project objectives and Community Plan objectives in the following ways:

- The No Project Alternative would not satisfy the Project objective to fulfill a housing demand present in the community because no housing would be developed under the alternative.

- The No Project Alternative would not satisfy the Project objective to establish a residential development that is consistent with the existing density and character of residential developments in the neighborhood, and is aesthetically compatible with the remaining uses on the Project Site and the surrounding neighborhood, because no housing would be developed under the alternative.

- The No Project Alternative would not satisfy the Project objective to use design that will accommodate higher density development and provide convenient connectivity to transit, commercial uses and services, open space/recreation, and the Los Angeles River "corridor", because no housing would be developed and there would be no modifications to the design of the existing uses at the Project Site under the alternative.

- The No Project Alternative would not satisfy the Project objective to incorporate design elements that further the City's goals toward "green" development and walkability, and that comply with the City's efforts to reinvent and promote connectivity to the Los Angeles River through the River Improvement Overlay (RIO) District guidelines, because no housing would be developed and there would be no modifications to the design of the existing uses at the Project Site under the alternative.

- The No Project Alternative would satisfy the Project objective to provide adequate and convenient off-street parking for all uses on the Project Site because the existing surface parking spaces on the Project Site would be retained for the current uses.

- Community Plan Objective: The No Project Alternative would continue to provide for the preservation of existing housing by not eliminating any existing housing in the community, thus partially satisfying this Community Plan objective. However, the No Project Alternative would not satisfy the Community Plan objective to develop new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area because no housing would be developed under the alternative.

- Community Plan Objective: The No Project Alternative would not satisfy the Community Plan objective to locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities; although, the No Project Alternative would not increase vehicular trips;

- Community Plan Objective: The No Project Alternative would not satisfy the Community Plan Object to promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.

For this reason, and although the impacts of the proposed Project would be avoided or minimized, the No Project Alternative is not considered a feasible alternative to the Project.

u. Comparison of Alternative's Project Impacts

Most impacts resulting from the proposed Project and the No Project Alternative would be within the same impact level tier, as neither trigger significant impacts. The No Project Alternative would have an overall lesser net impact than the proposed Project due to the fact that the Project Site would remain status quo under the Alternative. The hydrology on proposed Lot 2 might be slightly improved over the existing tennis court uses due to implementation of Compliance Measures that are intended to improve stormwater runoff for the Project. However, the proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase, while the No Project Alternative would not result in any new incremental impacts to air quality or noise. As such, the No Project Alternative would represent similar or reduced overall impacts in comparison to the proposed Project. However, none of the potential benefits of the Project objectives, including urban infill of demanded senior housing, would be implemented.

V. ALTERNATIVES

C. ALTERNATIVE B: HIGHER DENSITY WITH RECREATION

1. ALTERNATIVE DESCRIPTION

The "Higher Density with Recreation" Alternative would consist of the development of 250 apartment dwelling units on the Project Site, onsite relocation of 13 existing tennis courts, and reconfiguration of the golf course and driving range uses.

Similar to the design of the proposed Project, the Higher Density with Recreation Alternative would require the Project Site to be subdivided into two lots—Lot 1 for recreational uses to retain the existing A1-1XL zoning for the golf course, driving range, and relocated tennis courts, and Lot 2 for residential uses to be re-zoned as R3-1 (Medium Density Residential) zoning for the 250 apartment units.

Redevelopment of Lot 1 would involve the removal of the southern half of the existing golf course, including golf hole numbers 4, 5, 6, and 7. As such, golf hole numbers 1, 2, 3, 8, and 9 would be retained. This would allow approximately 13 of the 16 existing tennis courts to be relocated to the west, and situated on the southern portion of the existing golf course to be removed. The remaining part of the golf course would be largely maintained in the current configuration; however, the five remaining golf holes would contain two tees each, thus, creating a 10-hole golf course. The driving range would be slightly reconfigured to accommodate the lot subdivision and relocation of the tennis courts. The clubhouse would remain intact and approximately 22 surface parking spaces would be provided on Lot 1 for use by the recreational uses. The remainder of the required parking for the recreational uses would be provided in either subterranean or at-grade structures that are primarily utilized by the proposed apartment complex on Lot 2.

Lot 2 would be developed with 250 market-rate apartment dwelling units taking access from Valleyheart Drive. Because the dwelling units would be apartments, not condominiums, and not specifically restricted to senior citizens, who have more of a need for common recreational and community spaces, more dwelling units would be provided on Lot 2 in comparison to the proposed Project. Although the higher dwelling unit count would slightly reduce the amount of proposed common recreational space in the complex, the 250 market-rate apartment units would better satisfy the Project objectives (in comparison to the Project) by providing more housing in the area and providing more diverse types of housing for prospective residents. The buildings would be a maximum of 45 feet in height. Parking would be provided either in subterranean or at-grade structures per City Code requirements. Open space and private recreational facilities would be provided in accordance with current Code requirements. Residents would also have easy access to the adjacent golf course, driving range, clubhouse, and tennis courts on Lot 1.

The Higher Density with Recreation Alternative would require similar entitlements from the City in comparison to the currently proposed Project. Similar to those entitlements described for the proposed Project, this alternative would primarily require a Tract Map Subdivision to create the recreational and residential lots, Building Line Removal to eliminate an existing 18-foot building

line along Whitsett Avenue, Conditional Use Permit to allow continued operation of the golf course, Zone Variance for over-in-height driving range fencing, Zone Change and General Plan Amendment on Lot 2 from A1-1XL (Open Space) to R3-1 (Medium Density Residential), and Site Plan Review, as required by the LAMC, for the 250-unit apartment complex. Other necessary permits, including haul route approval, from the Departments of Building and Safety, Public Works, and any County of Los Angeles agencies may also be required.

The Higher Density with Recreation Alternative would accomplish many of the Project objectives by providing increased housing and varied housing-types to satisfy demands in the community. This housing would also be in close proximity to commercial uses on Ventura Boulevard, thus promoting walkability. This alternative would also satisfy the objective to retain as many recreational uses onsite as possible as it will maintain a portion of every existing recreational component currently on the Project Site including 13 tennis courts, 5 golf course holes (to contain two tees each), driving range, and clubhouse. During the scoping process for this Draft EIR, many community members insisted on retention of the tennis courts in some way. Similar to the currently proposed Project, this alternative would be consistent with the character, uses, and density of the surrounding community. However, this alternative would remove a large portion of the golf course, as well as some tennis facilities, while also increasing density at the Project Site in comparison to the Project.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

With the Higher Density with Recreation Alternative, the 250 apartment dwelling units would be of similar size, design, and massing as the buildings proposed under the Project. The additional 50 dwelling units under this alternative, in comparison to the 200 dwelling units of the proposed Project, would not significantly change the size and massing of the buildings in comparison to the Project. As such, similar to the proposed Project, which involves construction of six new four-story buildings on the Project Site, the tall foliage surrounding the Project Site and the existing surrounding development in the vicinity would reduce the visibility of the new buildings from various viewpoints in the community, thus resulting in a less-than-significant impact. It is also anticipated that the architectural design of the Higher Density with Recreation Alternative buildings would be similar to the proposed Project and would be consistent with the multi-family buildings already existing in the community along Whitsett Avneue. A Site Plan Review approval through City Planning would ensure that the design, lighting, and glare effects of the buildings would be minimized to a less-than-significant impact. Because both the Higher Density with Recreation Alternative and the proposed Project would have a less-than-significant impact on aesthetics and viewsheds in the community, the potential impact to aesthetic resources under both scenarios would be within the same impact level tier.

b. Air Quality

The Higher Density with Recreation Alternative would have substantially similar air quality impacts as the proposed Project, both construction-wise and operationally. This alternative would have buildings of similar size and massing as the Project and would also likely include a

subterranean parking garage, and as such, would involve a similar building and grading schedule as the Project. Additional surface grading may be required on the southern portion of the existing golf course to relocate 13 tennis courts from their existing locations, however, this additional grading would be minor, and a negligible part of the major grading which would occur for the subterranean parking garage. Regardless, similar to the Project, the construction impacts for the Higher Density with Recreation Alternative would be significant and unavoidable with relation to localized construction emissions.

The Higher Density with Recreation Alternative would operate similar to the proposed Project in that it includes residential dwelling units on the Project Site, situated adjacent to existing recreational uses. The only exception is that 13 tennis courts would be available for use under this alternative, while no tennis courts would exist under the proposed Project. However, the operation of these tennis courts would not have a substantial enough incremental impact to air quality conditions to trigger a significant impact, although a portion of the golf course which contains foliage that may improve air quality, will be removed for the tennis courts. As such, the Higher Density with Recreation Alternative would operate with a less-than-significant impact to air quality.

Because the operations of both the Higher Density with Recreation Alternative and the proposed Project would have a less-than-significant impact on air quality, and both scenarios would produce significant and unavoidable localized construction impacts due to building and grading for either project (with slightly more grading required to relocate the 13 tennis courts in the golf course area), the potential impact to air quality under both scenarios would be within the same impact level tier.

c. Biological Resources

The Project Site does not contain any plant or wildlife species that are listed as special-status (i.e., rare, endangered or threatened); however, several species of parakeets and squirrels have established themselves at the site and are recognized to be of local interest. There are also a variety of mature trees onsite, although none are considered to be heritage or significant trees from a biological resources perspective (although the trees are a contributing feature to the historical significance of the Project Site golf course, driving range, and clubhouse).

With the Higher Density with Recreation Alternative, site improvements would be similar to those under the proposed Project for Lot 2, and approximately 50 percent of Lot 1 would be disturbed to reconfigure the golf course and relocate the tennis courts. Improvements to Lot 1 would require that the existing vegetative cover along the southern portion of the golf course (i.e., adjacent to Valleyheart Drive) be removed and replaced with paved surfaces and improvements to support the tennis courts that would be relocated to that area. This area includes a substantial number of trees (which is the case throughout the entire well-shaded golf course area), including a large cluster of trees in the vicinity of holes 4 and 6, and a row of trees separating the fairways for holes 4 and 7. While this alternative could be designed to retain some of the trees, it is anticipated that many, if not most, of these mature trees would be removed to accommodate construction of the tennis courts and facilitate the ongoing maintenance of those

recreational facilities. New landscaping, including replacement trees, could be incorporated into the design of the tennis court area.

Compared to the proposed Project, which is anticipated to remove only nine mature trees, as well as very limited vegetative cover from Lot 2 (because it is already developed with tennis courts) and Lot 1 (the areas of minor configuration to accommodate the proposed Project), the Higher Density with Recreation Alternative would be more impactful with the removal of approximately five acres of vegetative cover and anticipated removal of an additional 20-50 mature trees from the southern portion of the golf course (Lot 1) area.

Along with the removal of the trees and vegetation, would be the disruption of habitat for the parakeets and squirrels (both species of local interest) that utilize those trees for cover and food. Some of that habitat area would be recaptured once landscaping and new trees are installed around the new tennis court area. Because these species are already well adapted to the urban setting and active uses of the golf course and tennis facilities, it is anticipated that these species and other urban wildlife would adapt and re-establish at the site following construction.

Additionally, because the development area is larger (4.5 acres on Lot 2 and 5-6 acres on Lot 1), it is anticipated that both the duration and extent of construction activity associated with the Higher Density with Recreation Alternative would temporarily disrupt wildlife species to an extent greater than anticipated under the proposed Project. It is expected that Mitigation Measures similar to those recommended for the proposed Project would apply to the Higher Density and Residential Alternative, thus effectively reducing impacts to less-than-significant levels for biological resources.

Because there are no special-status wildlife species identified on the Project Site, and both the Higher Density with Recreation Alternative and the proposed Project would retain significant portions of the golf course (where the majority of the habitat is present), the potential impact to biological resources under both scenarios would be less-than-significant. However, the Higher Density with Recreation Alternative would result in the removal of an estimated additional 20-50 trees, removal or disruption of 5-6 acres of additional vegetation, and a longer/expanded area of construction activity resulting in disturbance to wildlife, than would otherwise occur under the proposed Project; therefore the Higher Density with Recreation Alternative would have an overall slightly greater net impact on biological resources relative to the proposed Project. With implementation of the recommended Compliance Measures and Mitigation Measures (similar to those for the proposed Project), or their equivalent, the impact from this alternative could be reduced to a less-than-significant level, similar to the proposed Project. As such, the biological impacts associated with both scenarios would be within the same impact level tier.

d. Cultural Resources

The character of the Weddington Golf Course (formerly Studio City Golf Course) and the associated driving range (previously altered), clubhouse, and golf ball light standards which have been in operation since 1956 and are collectively a prominent recreational feature in the San Fernando Valley, is potentially eligible through the California Register as an historic resource. The tennis courts component is not considered historically significant. Under the Higher Density

with Recreation Alternative, the golf course would be substantially altered and four of the golf holes removed. While two of the four golf holes (holes no. five and six) are no longer original due to previous alteration to accommodate construction of the tennis courts in the 1970s, the remaining two are the original holes. The driving range and clubhouse would remain generally unchanged, but minor adjustments to the driving range may be implemented to accommodate the new site configuration.

The golf complex is eligible for listing under the California Register based on Criterion 1 and 3:

> *Criterion 1:* it is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
>
> *Criterion 3:* it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

Even as modified under the Higher Density with Recreation Alternative, portions of the golf course would still retain some of the historic features attributable to the golf course: the clubhouse would remain; the collective combination of golf, driving range, and golf ball light standards would be maintained; and the overall ambience of a shaded course nestled within a residential enclave would be respected. While maintaining those key aspects would preserve some of the key historic elements of the 1956 golf course, the overall impacts related to potentially historic resources associated with the golf course would still be significantly adverse.

The Higher Density with Recreation Alternative would involve similar levels of grading and excavation for the subterranean parking as are anticipated with development of the proposed Project. However, unlike the proposed Project, the Higher Density with Recreation Alternative would involve disturbance of about 50 percent of the existing golf course area. Hence, under this alternative, there would be higher potential for disruption of historical, and possibly archaeological and paleontological, resources during grading activities because the spatial area of disturbance is larger than compared to that for the proposed Project. It is anticipated that Compliance Measures and Mitigation Measures similar to those required for the proposed Project, especially measures to avoid full demolition of the golf course, driving range, clubhouse, and golf ball light standards (i.e., retention of significant portions of these uses), would be required for the Higher Density with Recreation Alternative, and thus, potential impacts to historical, archaeological, and paleontological resources would be reduced to less-than-significant.

Even though both scenarios would implement Compliance Measures to monitor for cultural resources during construction, so that appropriate measures could be taken in the event that resources are uncovered during construction activities, the overall net impact with the Higher Density with Recreation Alternative is within the same impact level tier but slightly greater than the cultural resource impact of the proposed Project because a larger footprint would be disturbed under this alternative.

e. Geology, Soils, and Seismicity

Situated at essentially the same location as the proposed Project, the Higher Density with Recreation Alternative would be exposed to geologic and seismic risks similar to those identified for the proposed Project. Because the Higher Density with Recreation Alternative would accommodate a greater number of units and residents, the total population at risk due to seismic events, including the potential for seismic induced liquefaction, would be slightly greater than for the proposed Project. Overall, impacts related to geologic and seismic events for the Higher Density with Recreation Alternative would be essentially identical to those identified for the proposed Project, and it is anticipated that with implementation of Compliance Measures and Mitigation Measures equivalent to those required for the proposed Project, impacts would be reduced to a less-than-significant level.

Although the Higher Density with Recreation Alternative would include 50 dwelling units more than the proposed Project, the volume of earthwork and excavation needed to implement the development on proposed Lot 2 is anticipated to be essentially the same as that identified for the proposed Project. However, additional earthwork would be required to prepare the southern portion of Lot 1 for development of the newly relocated tennis courts. Similar to the proposed Project, it is assumed that LID, BMP, and MS4 techniques and Compliance Measures would be incorporated during grading and construction activities for this alternative to ensure that impacts related to the excavation/import/export of soils and geotechnical engineering considerations for foundation and building stability would be reduced to a less-than-significant level and generally within the same impact level tier as, but slightly greater than, that anticipated under the proposed Project.

f. Greenhouse Gas Emissions

The Higher Density with Recreation Alternative would have substantially similar greenhouse gas emission impacts as the proposed Project, both construction-wise and operationally. This alternative would have buildings of similar size and massing as the Project and would also likely include a subterranean parking garage, and as such, would involve a similar building and grading schedule as the Project. Additional surface grading may be required on the southern portion of the existing golf course to relocate 13 tennis courts from their existing locations, however, this additional grading would be minor, and a negligible part of the major grading which would occur for the subterranean parking garage. Regardless, similar to the Project, with implementation of required Compliance Measures, the construction impacts for the Higher Density with Recreation Alternative would be reduced to a less-than-significant level.

The Higher Density with Recreation Alternative would operate similar to the proposed Project in that it includes residential dwelling units on the Project Site, situated adjacent to existing recreational uses. The only exception is that 13 tennis courts would be available for use under this alternative, while no tennis courts would exist under the proposed Project. These relocated tennis courts would be constructed on an area currently occupied by golf course area, which would require additional earthwork, construction equipment, and construction time under the alternative in comparison to the project. However, the operation of these tennis courts would not have a substantial enough incremental impact to greenhouse gas conditions to trigger a

significant impact. As such, the Higher Density with Recreation Alternative would operate with a less-than-significant impact to greenhouse gas emissions.

Because the operations of both the Higher Density with Recreation Alternative and the proposed Project would be consistent with all applicable greenhouse gas plans and policies, and would have a less-than-significant impact on greenhouse gas emissions during construction and operation, the potential impact to greenhouse gas emissions under both scenarios would be within the same impact level tier. Construction of the alternative would have a slightly greater impact with respect to greenhouse gas emissions, but would remain within the same impact level tier as the proposed Project.

g. Hydrology and Water Quality

Hydrology and water quality impacts under the Higher Density with Recreation Alternative are anticipated to be similar to those identified for the proposed Project. Development and final site conditions on Lot 2 would be essentially identical, as Lot 2 would be developed primarily with 100 percent impermeable surfaces and runoff would be captured for filtration and directed to locations for infiltration. However, development of the 13 newly relocated tennis courts on the southern portion of the existing golf course would generate additional runoff due to the introduction of impermeable surfaces to that area, where none currently exists.

In general, surface flow across the Project Site would continue to flow from a northwest to southeast direction. Any surface water that does not permeate into the ground would drain into the Los Angeles River Channel located to the south and southeast of the site. Due to the relocation of the existing tennis courts from their current location to Lot 1, the Higher Density with Recreation Alternative is estimated to result in more impervious surfaces on the Project Site as compared to the proposed Project, thus resulting in higher surface water flows from the Lot 1 area. Regardless, it is anticipated that those additional flows can be directed either back onto the remaining golf course area or into new filtration systems for filtration/infiltration, thus resulting in less-than-significant impacts.

Similar to the proposed Project, the Higher Density with Recreation Alternative would be expected to implement similar required Compliance Measures including BMPs, LIDs, and MS4s to ensure that hydrological conditions remain relatively similar to those experienced under existing conditions and the proposed Project, and no significant impact would result.

Although the Higher Density with Recreation Alternative would have more impervious surface area than the proposed Project, the incorporation of reasonable Compliance Measures would reduce water runoff quality to acceptable levels. Overall, the net level of impact to hydrology and water quality issues would be reduced to less-than-significant, and would be within the same impact level tier, but slightly greater than the level of impact anticipated under the proposed Project.

h. Land Use and Planning

Both the proposed Project and the Higher Density with Recreation Alternative would be largely consistent with the policies and goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan and would have similar less-than-significant impacts. However, the Community Plan Map designates a "Private Golf Course" symbol on the Project Site. The proposed Project would retain the entire golf course (with minor modifications to portions adjacent to the Project buildings) on the Project Site, thus maintaining consistency with the Community Plan Map, while the Higher Density with Recreation Alternative would remove a portion of the golf course from the Project Site, which would continue to be consistent with the Community Plan Map, but to a lesser extent due to the partial removal. Both would require a General Plan Amendment and Zone Change to construct the multi-family residential units on the Project Site and to maintain consistency with the Community Plan and compliance with the LAMC. The Private Golf Course symbol would be retained on the Community Plan Map under the Higher Density with Recreation Alternative, as the reduced golf course will continue to exist. Both scenarios would afford an opportunity for compliance and implementation of the RIO. The Higher Density with Recreation Alternative would be similarly consistent with regional plans and policies (including the RCP and AQMP) as is the proposed Project. As such, the impacts associated with this alternative versus the proposed Project would be within the same impact level tier with regard to land use compatibility.

i. Noise

The Higher Density with Recreation Alternative would have substantially similar noise impacts as the proposed Project, both construction-wise and operationally. This alternative would have buildings of similar size and massing as the Project and would also include a subterranean parking garage, and as such, would involve a similar building and grading schedule as the Project. Additional surface grading may be required on the southern portion of the existing golf course to relocate 13 tennis courts from their existing locations, however, this additional grading would be minor, and a negligible part of the major grading which would occur for the subterranean parking garage. Regardless, similar to the Project, the construction impacts for the Higher Density with Recreation Alternative would be significant and unavoidable with relation to construction noise.

The Higher Density with Recreation Alternative would operate similar to the proposed Project, with the exception that 13 tennis courts would be available for use under this alternative, while no tennis courts would exist under the proposed Project. However, due to the interior location of the tennis courts within the Project Site, the operation of these tennis courts would not have a substantial enough incremental impact to noise conditions at sensitive receptors to trigger a significant impact. As such, the Higher Density with Recreation Alternative would operate with a less-than-significant impact to noise.

Because the operations of both the Higher Density with Recreation Alternative and the proposed Project would not have a significant impact on noise, the potential impact to noise under both scenarios would be within the same impact level tier. However, there would be slightly greater operational noise under the alternative due to the retention of the noise produced by the tennis

court facilities, which would be eliminated under the Project. Similarly, both scenarios would produce significant and unavoidable construction noise impacts due to building and grading for the Project, which would be slightly greater under the alternative due to the expanded area of grading required for the relocation of the tennis courts on a portion of the golf course.

j. Population and Housing

With a total of 250 multi-family (apartment) dwelling units, the Higher Density with Recreation Alternative would provide 25 percent more units than the proposed Project. Similarly, the total estimated onsite population would be 25 percent greater at 425 residents. Because an additional 50 units would be provided, as compared to the proposed Project, this alternative would better assist in meeting the regional housing needs. However, it is not anticipated that any special needs (i.e., senior housing) would be provided under this alternative.

Because this alternative would be developed within an existing residential community that is already serviced by infrastructure and services, and it would serve to meet existing housing demands, the Higher Density with Recreation Alternative is not anticipated to induce growth in the area. Further, this alternative would not displace existing housing or result in a significant shift or disruption of population because there are currently no permanent residents or dwelling units on the Project Site. Therefore, impacts related to population and housing under the Higher Density with Recreation Alternative would be less-than-significant.

Compared to the proposed Project, impacts of the Higher Density with Recreation Alternative would be within the same impact level tier, but the overall net impact of the alternative would be slightly greater due to the 25 percent increase in dwelling units and projected residents on the Project Site. With regard to the Project objectives, however, this alternative would result in a 25 percent increase in the number of housing units, thus furthering regional housing needs goals; but, the type of units proposed would serve the general population at market-rate pricing and not any type of special needs housing (such as senior housing with the proposed Project).

k. Public Services – Fire Protection

As with the proposed Project, the Higher Density with Recreation Alternative would be served by the LAFD and the nearest fire station to serve the site would be LAFD Station No. 78, located adjacent to the Project Site. A 25 percent increase in the resident population, as well as the continuation of equivalent daytime uses, over the level of that estimated with the proposed Project would result in an incremental increase in demand for fire protection and emergency medical services with the Higher Density with Recreation Alternative.

The LAFD has indicated that the Project Site is adequately served for fire protection and medical emergency responses, and that adequate fire flow service is available even with an increase in residential population on the Project Site. This alternative's 25 percent increase in residents over the proposed Project would not deteriorate the adequacy of the existing LAFD services and fire flow to a point that might cause a significant impact. Residents of the proposed Project, being limited to senior citizens, may require more calls of service from the LAFD compared to a typical resident cross section, as would be occupying the Higher Density with Recreation

Alternative. Regardless, it is expected that the demand for fire protection facilities and staff, and calls for service would be within the same impact level tier under both the proposed Project and the Higher Density with Recreation Alternative. Both would be adequately served and the net impacts considered less-than-significant and within the same impact level tier. However, due to the slight increase in projected permanent residents, the Higher Density with Recreation Alternative would have a slightly greater, but less-than-significant, impact compared to the proposed Project.

l. Public Services – Police Protection

Similar to the proposed Project, the Higher Density with Recreation Alternative would be served by the LAPD for police protection services from the North Hollywood Community Police Station.

A 25 percent increase in the resident population, as well as the continuation of equivalent daytime uses, over the level of that estimated with the proposed Project would result in an incremental increase in demand for police protection and law enforcement services with the Higher Density with Recreation Alternative. Because police services are generally gauged by a comparison of number of sworn officers to the level of population, this alternative would generate a slight incremental increase in the need for police officers relative to the proposed Project. Under this alternative, with an increase of 425 permanent residents at the Project Site, the officer-to-population ratio would be one officer to 735 residents served. The same ratio would result from the proposed Project. As such, both scenarios would result in less-than-significant impacts. Other factors considered for determining adequacy of police services are the rate of calls and police response time, which are dictated by the officer-to-population ratio.

The LAPD has indicated that this Project Site is adequately served for police protection and adequate staff is available from the North Hollywood Community Police Station, as well as local substations, including a substation on Ventura Boulevard in Studio City. It is expected that the demand for police protection and calls for service would be similar under both the proposed Project and the Higher Density with Recreation Alternative. Both would be adequately served and the net impact considered less-than-significant and within the same impact level tier. However, due to the slight incremental increase of permanent residents on the Project Site, the Higher Density with Recreation Alternative would have a slightly greater, but less-than-significant, impact compared to the proposed Project.

m. Public Services – Library

As with the proposed Project, the Higher Density with Recreation Alternative would be served by the LAPL's Studio City Library for library services. Although LAPL standards indicated that this library branch is undersized to serve the size of the population, representatives from the LAPL have indicated that this branch provides adequate library services to the community and could absorb the projected 340 permanent residents of the proposed Project. A project population of 425 permanent residents on the Project Site would not be a substantial enough incremental increase in the population to trigger a significant impact. Further, there are two nearby libraries

in North Hollywood and Sherman Oaks that could provide additional library services to support the additional residents in the community.

Although implementation of the Higher Density with Recreation Alternative would result in a 25 percent increase in the resident population, over the level of that estimated with the proposed Project, both scenarios would result in less-than-significant impacts and would be within the same impact level tier. However, due to the estimated 85 additional residents from this alternative over the proposed Project, this alternative scenario would generate a slightly greater demand for library services, and the net overall impact would be slightly greater than the proposed Project.

n. Recreation and Parks

The Higher Density with Recreation Alternative and the proposed Project would both be required to dedicate parkland/open space/recreational uses per the City of Los Angeles Municipal Code and City of Los Angeles General Plan standards (or pay in lieu fees). Both the Higher Density with Recreation Alternative and the proposed Project would fulfill this dedication requirement through retention of the existing golf course and driving range. Furthermore, open space and private recreational facilities would be implemented into the design of both this alternative and the proposed Project to fulfill Municipal Code requirements.

In addition to the 250-unit apartment complex, the Higher Density with Recreation Alternative would retain (relocate) 13 tennis courts onsite. And although the golf course would be reduced in overall size, a 10-hole facility and the driving range would be retained as well. The golf course would be reduced to five holes; however, the five remaining golf holes would contain two tees each, and thus would create a 10-hole golf course. When compared to the proposed Project, the Higher Density with Recreation Alternative would reduce the new resident population's potential use of surrounding tennis recreational facilities and parks due to the retention of the existing golf course and the retention of 13 of the 16 existing tennis courts. The proposed Project would remove all 16 tennis courts by comparison. The Higher Density with Recreation Alternative, although generating an overall increased demand for park facilities and services due to its estimated 425 new residents (25 percent more residents than the proposed Project), would ultimately have slightly less of an impact on parks and recreation areas when compared to the proposed Project because a greater extent of active recreational components (i.e., the tennis courts) would be retained onsite. Ultimately, under both scenarios, recreational impacts would be considered less-than-significant and within the same impact level tier.

o. Transportation and Circulation

The Higher Density with Recreation Alternative consists of the subdivision of the Project Site into two lots, with Lot 1 used to maintain the existing recreational uses and Lot 2 for residential use to allow for development of 250 apartment dwelling units. A total of 13 of the existing 16 tennis courts will be relocated and reconfigured, the existing golf course will be reduced and reconfigured, and the existing driving range will be slightly modified. Vehicular access for this alternative would be provided via Valleyheart Drive.

Traffic generation for the Higher Density with Recreation Alternative was estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for this alternative is presented in Appendix X: Appendix Table X-1 of *Appendix L: Alternatives Traffic Analyses* of this Draft EIR. As shown in Appendix Table X-1, the Higher Density with Recreation Alternative is expected to generate 123 net new vehicle trips (23 inbound trips and 100 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Higher Density with Recreation Alternative is expected to generate 142 net new vehicle trips (95 inbound trips and 47 outbound trips). Over a 24-hour period, this Alternative is forecast to generate 1,564 net new daily trip ends during a typical weekday (782 inbound trips and 782 outbound trips).

Summaries of the *V/C* ratios and LOS values during the A.M. and P.M. peak hours are provided in Appendix X: Appendix Table X-4 of *Appendix L: Alternatives Traffic Analyses* of this Draft EIR. As presented in Appendix Table X-4 (refer to columns [2] and [4]), the Higher Density with Recreation Alternative is expected to create significant impacts at the following two locations according to the City of Los Angeles' impact criteria for Existing with Project (existing traffic and Project Alternative B related traffic) as well as Future Cumulative with Project Conditions (with the addition of ambient growth, Related Projects traffic, and Project Alternative B related traffic):

- Int. No. 3: Whitsett Avenue/Moorpark Street
  AM peak hour *v/c* ratio increase of 0.018 [to 1.084 (LOS F) from 1.066 (LOS F)]

- Int. No. 4: Whitsett Avenue/Ventura Boulevard
  PM peak hour *v/c* ratio increase of 0.023 [to 0.963 (LOS E) from 0.940 (LOS E)]

The Los Angeles Department of Transportation would be required to review the final impacts of Project Alternative B and determine what Mitigation Measures would be required to reduce any significant impacts. However, as an example, the recommended Mitigation Measure for Intersection No. 3, Whitsett Avenue/Moorpark Street, may consist of restriping the west leg of the intersection to provide an exclusive right-turn only lane, resulting in one left-turn lane, one through lane, and one right-turn only lane for the eastbound approach. As summarized in Appendix X of *Appendix L* of this Draft EIR, the recommended Mitigation Measure is anticipated to reduce the forecast Project Alternative B related traffic impact at the Whitsett Avenue/Moorpark Street intersection during the A.M. peak hour to less-than-significant levels, to 0.925 (LOS E) from 1.084 (LOS F).

The Mitigation Measure for Intersection No. 4, Whitsett Avenue/Ventura Boulevard, may consist of restriping the east leg of the intersection to provide an exclusive right-turn only lane, resulting in one left-turn lane, two through lanes, and one right-turn only lane for the westbound approach. The improvement is expected to improve operations to 0.859 (LOS D) from 0.963 (LOS E) using the CMA methodology during the P.M. peak hour.

Additionally, as shown in Appendix X: Appendix Table X-7 of *Appendix L* of this Draft EIR, the Higher Density with Recreation Alternative daily trips will not result in any significant impacts at the two study street segment locations. The Higher Density with Recreation Alternative daily

trips will only incrementally affect traffic volumes on the two street segments for the Existing with Project and Future with Project conditions, respectively.

To compare, the Higher Density with Recreational Alternative will produce more operational traffic than the proposed Project, which did not result in any significant traffic impacts; however, the significant operational traffic impacts resulting from this alternative can be mitigated to a less-than-significant level. As such, both the proposed Project and this alternative can result in less-than-significant operational traffic impacts, and thus are within the same impact level tier in impacts. However, due to the fact that the Higher Density with Recreational Alternative would need to be mitigated to reduce significant impacts, this alternative would have a slightly greater overall net impact from operational traffic. With respect to construction traffic impacts, the alternative would have very similar construction traffic impacts as the proposed Project and would remain within the same impact level tier, however, the impacts would be slightly greater under the alternative due to the expanded scope of grading, slightly longer construction/grading period, and additional grading required to relocate the tennis courts on a portion of the golf course.

p. Utilities – Energy

Due to the relocation of the tennis courts to the southern portion of Lot 1, it may be necessary to extend natural gas and electrical infrastructure to this area of the Project Site. It is anticipated that the Applicant would consult with LADWP and the SoCalGas to coordinate the location and sizing of infrastructure extensions and/or relocation for energy services.

The Higher Density with Recreation Alternative would require 25- 35 percent more electricity per month than the proposed Project, thus reflecting the 25 percent increase in proposed residential dwelling units as well as the retention of the electricity used for nighttime lighting of the 13 tennis courts. Natural gas demand under the Higher Density with Recreation Alternative would also be about 25 percent more than for the proposed Project due to the increase in units.

As with the proposed Project, the Higher Density with Recreation Alternative would be developed in accordance with the Los Angeles Green Building Code to reduce energy consumption. While the proposed Project would be designed and intended to accomplish the highest level of LEED (Leadership in Energy and Environmental Design) standard (i.e., the Platinum standard), the City of Los Angeles' Green Building Ordinance (adopted 4/22/08) would only require that the Higher Density with Recreation Alternative comply with at least the minimum LEED Certified level.

Because of the relative increase in units (i.e., 25 percent) in comparison to the proposed Project, the Higher Density with Recreation Alternative is expected to have a greater demand for energy than would the proposed Project for the residential component, and therefore, would have more of an impact on energy resources than the proposed Project. Additionally, because this alternative may not employ the same high standard of LEED and other energy efficient building standards that would be implemented with the proposed Project, the residential component of this alternative would have a greater energy resource impact. Further, additional energy needs for nighttime lighting of the tennis courts would be an additive effect. Finally, it is anticipated that

this alternative could be less energy efficient overall if built only to a LEED Certified rating, which would cumulatively lead to an overall greater use of energy resources. Even so, it is anticipated that with implementation of Compliance Measures and Mitigation Measures, as would be recommended under the proposed Project, the net level of impact would be less-than-significant with regard to LADWP's and SoCalGas' ability to provide sufficient electricity and natural gas to the Project Site. And, while the Higher Density with Recreation Alternative would have a higher energy demand relative to the proposed Project, the potential impact under both scenarios would result in less-than-significant impacts with Compliance Measures, and would be within the same impact level tier.

With respect to construction energy usage, the alternative would have very similar construction energy impacts as the proposed Project and would remain within the same impact level tier, however, the impacts would be slightly greater under the alternative due to the slightly longer construction/grading period from additional grading required to relocate the tennis courts on a portion of the golf course.

q. Utilities – Water

The Higher Density with Recreation Alternative would require 25 percent more water per month than the proposed Project, thus reflecting the 25 percent increase in proposed residential units. However, as with the proposed Project, the projected water demands in the LA-UWMP already take into account existing and projected land uses, including expansion of housing opportunities consistent with the City's Housing Element, such as the Higher Density with Recreation Alternative, which would be accommodated by the LADWP through the year 2035, as set forth in the LA-UWMP.

The relocation of the tennis courts to the southern part of Lot 1 would not require any extension of existing water infrastructure on the Project Site and would not increase demand for water. Tennis courts do not require irrigation and there is already existing water infrastructure where the tennis courts will be relocated beneath the golf course. As such, the relocation of the tennis courts will not create any significant impacts on the Project Site.

Because of the relative increase in dwelling units (i.e., 25 percent) in comparison to the proposed Project, the Higher Density with Recreation Alternative is expected to have a slightly greater demand for water than would the proposed Project for the residential component, and therefore, would have more of an overall net impact on water resources than the proposed Project. While the Higher Density with Recreation Alternative would have a higher water demand relative to the proposed Project, the potential impact under both scenarios would be less-than-significant with Compliance Measures, and would be within the same impact level tier.

With respect to construction water usage, the alternative would have very similar construction water impacts as the proposed Project and would remain within the same impact level tier, however, the impacts would be slightly greater under the alternative due to the slightly longer construction/grading period from additional grading required to relocate the tennis courts on a portion of the golf course.

r. Growth-Inducing

The Higher Density with Recreation Alternative would not result in a measurable increased potential for new growth. Growth-inducing impacts are usually derived from expansion of development and infrastructure into non-urbanized areas. The Project Site is located in an already urbanized area of Los Angeles with existing infrastructure that is either already in place or would require minor expansion to accommodate the alternative. As with the proposed Project, the net growth-inducing effect of the Higher Density with Recreation Project scenario would be less-than-significant and substantially similar to any potential associated with the proposed Project (refer to *Section VI.D: Other Environmental Considerations – Growth-Inducing Impacts*).

s. Cumulative Impacts

The ten Related Projects, similar to the proposed Project, are expected to be developed, and impacts corresponding to those developments are anticipated to occur. Due to the substantially similar amount of dwelling units and projected residents in comparison to the proposed Project, the Higher Density with Recreation Alternative would result in a contribution to cumulative impacts that is substantially similar to that described for the proposed Project. As with the proposed Project, with the implementation of all required Compliance Measures and suggested Mitigation Measures, the alternative's cumulative impacts would be less-than-significant and within the same impact level tier compared to the proposed Project. The ten Related Projects would have to perform analyses as to whether each Related Project would contribute considerably to cumulative impacts.

t. Relationship of Alternative to Project Objectives

The Higher Density with Recreation Alternative would result in comparable and similar impacts for most of the environmental categories associated with the proposed Project. Similar to the Project, the Higher Density with Recreation Alternative would satisfy all of the Project objectives in the following ways:

- The Higher Density with Recreation Alternative would satisfy the Project objective to fulfill a housing demand present in the community because housing would be developed under the alternative.

- The Higher Density with Recreation Alternative would satisfy the Project objective to establish a residential development that is consistent with the existing density and character of residential developments in the neighborhood, and is aesthetically compatible with the remaining uses on the Project Site and the surrounding neighborhood, because multi-family housing, consistent with other multi-family buildings on Whitsett Avenue, and recreational uses would be developed, reconfigured, or retained under the alternative.

- The Higher Density with Recreation Alternative would satisfy the Project objective to use design that will accommodate higher density development and provide convenient

connectivity to transit, commercial uses and services, open space/recreation, and the Los Angeles River corridor, because both multi-family residential buildings and recreational uses would be developed, reconfigured, or retained under the alternative.

- The Higher Density with Recreation Alternative would satisfy the Project objective to incorporate design elements that further the City's goals toward "green" development and walkability, and that comply with the City's efforts to reinvent and promote connectivity to the Los Angeles River through the River Improvement Overlay (RIO) District guidelines, because housing would be developed on the Project Site which would be required to comply with the RIO District guidelines and which would be located in close proximity to existing commercial uses on Ventura Boulevard and transit stops. The alternative would also retain much of the existing golf course and mature trees currently on the Project Site.

- The Higher Density with Recreation Alternative would satisfy the Project objective to provide adequate and convenient off-street parking for all uses on the Project Site because subterranean and surface parking would be provided under the alternative per Municipal Code requirements.

- Community Plan Objective: The Higher Density with Recreation Alternative would continue to provide for the preservation of existing housing by not eliminating any existing housing in the community. The Higher Density with Recreation Alternative would also satisfy the Community Plan objective to develop new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area because additional housing would be developed under the alternative.

- Community Plan Objective: The Higher Density with Recreation Alternative would satisfy the Community Plan objective to locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities because the new housing being developed under the alternative would be developed within walkable or biking distance to commercial services along Ventura Boulevard and near existing transit stops. Recreational uses would also be retained on the Project Site for residents of the new housing.

- Community Plan Objective: The Higher Density with Recreation Alternative would satisfy the Community Plan objective to promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.

This alternative would also be able to preserve all recreational components that currently exist on the Project Site, including part of the golf course, driving range, and tennis court facilities, although these components would be substantially reconfigured. In comparison, the proposed Project would eliminate the entire tennis component on the Project Site. Regardless, the Higher Density with Recreation Alternative would be able to attain all of the Project objectives that could be attained by the Project and may prove more desirable to members of the immediate community that have an interest in retaining the tennis courts on the Project Site.

u. Comparison of Alternative's Project Impacts

The proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. All other impacts would be less-than-significant under the proposed Project with implementation of Compliance Measures, PDFs, and Mitigation Measures. The Higher Density with Recreation Alternative would result in the same significant and unavoidable impacts. For those issues addressed, the Higher Density with Recreation Alternative scenario would result in substantially similar less-than-significant impacts in comparison to the proposed Project with regards to aesthetics; operational air quality; geology, soils, and seismicity; land use and planning; operational noise; and growth-inducing effects. With implementation of Compliance Measures and Mitigation Measures, the Higher Density with Recreation Alternative would also have less-than-significant impacts with regards to biological resources, cultural resources, hydrology and water quality, population and housing, public services, and utilities; however, the overall net impact in these categories would be slightly greater (more impactful) in this alternative than in the proposed Project, primarily due to the increase in Project size by 50 dwelling units and elimination of a portion of the golf course for the 13 relocated tennis courts. The Higher Density with Recreation Alternative would be more beneficial than the proposed Project in that it would satisfy all the Project objectives while also retaining every recreational component (albeit reformatted and resized) that currently exists on the Project Site, especially the tennis court facilities.

V. ALTERNATIVES

D. ALTERNATIVE C: ORIGINAL ZONING

1. ALTERNATIVE DESCRIPTION

The "Original Zoning" Alternative would consist of the re-zoning and re-designation of the land uses on the Project Site to match the zoning and land use designation pattern in the surrounding community, as well as to match the original zoning and land use designation on the Project Site prior to 1971 when the Project Site was down-zoned from R3-1 and R1-1 to A1-1XL to accommodate the golf uses. This proposed re-zoning and re-designation of land uses would allow for development of condominiums and single-family homes on the Project Site.

The Original Zoning Alternative would require the Project site to be subdivided and rezoned to R3-1 (Medium Density Residential) along its Whitsett Avenue frontage and R1-1 (Low Density Residential) over the remainder of the Project Site. The R3-1 zoning would extend along the entire Whitsett Avenue frontage (approximately 733 feet), from the Project Site boundary along Whitsett Avenue to a line approximately 113 feet to the west. The westerly line would align with the right-of-way of the public alley that runs parallel to Whitsett Avenue, north of Valleyspring Lane, which separates the multi-family uses to the east of the alley from the single-family uses to the west of the alley. Under this alternative, the existing golf course, driving range, golf clubhouse, tennis courts, tennis house, and surface parking lot would be removed to develop the Project Site.

The R3-1 zoned area would be developed with 95 market-rate condominium dwelling units taking access from the alley parallel to Whitsett Avenue. The buildings would be a maximum of 45 feet in height. Parking would be provided either in subterranean or at-grade structures per City Code requirements. Open space and private recreational facilities would be provided in accordance with current Code requirements.

The R1-1 zoned area would be developed with 83 single-family homes and a private street system that includes the southerly extension of Beeman Avenue and Babcock Avenue. The lot sizes would vary from approximately 5,000 to 9,000 square feet in area. All proposed dwelling units would conform to the provisions of the R1 zone and the Mansionization Ordinance, and would be compliant with all provisions regarding development along the Los Angeles River. Maximum building heights would be from 28 to 33 feet. Two covered parking spaces and one on-street parking space would be provided for each residence in conformance with Code requirements.

The determination of the number and size of market-rate condominiums and single-family homes was made based upon the overall size of the Project Site, the existing pattern of multi-family and single-family housing development in the immediate vicinity, and the average size of multi-family and single-family housing in the area.

The Original Zoning Alternative would require fewer entitlements from the City in comparison to the currently proposed Project. This Alternative would require a Tract Map Subdivision to

create one lot for the multi-family condominiums in the R3-1 area and 83 lots for the single-family homes in the R1-1 area. A Building Line Removal incident to the Subdivision would also be required to eliminate the existing 18-foot Building Line along Whitsett Avenue. This alternative would require a Zone Change and General Plan Amendment on the Project Site from A1-1XL (Open Space) to R3-1 (Medium Density Residential) and R1-1 (Low Density Residential). A Site Plan Review would also be required per City requirements, as this alternative would result in an increase of more than 50 dwelling units. Finally, this alternative would have to comply with private street, storm drain, and sewer design standards for the new improvements, and would require a B-Permit from the Department of Public Works; Grading, Demolition, and Building Permits from the Department of Building and Safety; and a haul route approval.

The Original Zoning Alternative would accomplish many of the Project objectives by providing increased housing and varied housing-types to satisfy demands in the community. This housing would also be in close proximity to commercial uses on Ventura Boulevard, thus promoting walkability. In comparison to the currently proposed Project, this Alternative would be more consistent in zoning, land use designation, character, and density with the surrounding community. However, this Alternative would not satisfy the Project objective to retain as many recreational uses on the Project Site as possible, as it would eliminate all existing recreational uses on the Project Site.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

According to the Community Plan, there are no significant viewsheds at the Project Site and the Project Site does not fall within a Specific Plan that preserves viewsheds. As such, alteration of the Project Site for this alternative would not conflict with the Community Plan. However, with the Original Zoning Alternative, the aesthetics and visual character of the Project Site would appear very different than that proposed under the Project. This alternative would not have a recreational component and would consist completely of residential units, including 95 condominiums and 83 single-family homes. In general, the Original Zoning Alternative would appear consistent with the surrounding community as the development would match the original zoning on the Project Site, which is consistent with the pattern of zoning and development in the surrounding vicinity. In comparison to the Project, the Original Zoning Alternative would appear more consistent with the character of the surrounding community.

The massing and size of the buildings constructed under this alternative would be consistent with the scale of the community, and as such, would have a less-than-significant impact on the visual character or views in the community. However, the Original Zoning Alternative would eliminate the greenery, open space, and mature trees on the Project Site, which are features that contribute positively to the image of the community. Elimination of the golf and tennis uses and the overall "green" and natural appearance of the Project Site would alter the character of the site itself and change the viewlines and visibility of the site from different viewpoints in the community. As such, the Original Zoning Alternative may have a potentially significant impact with regards to alteration of the character and aesthetics of the Project Site itself. Ultimately, due to the fact that

this alternative would create a site that is more visually consistent with the surrounding neighborhood, but would significantly alter the aesthetic character of the Project Site itself from what currently exists, the Original Zoning Alternative would be within the same impact level tier or have a greater impact on aesthetics and visual resources in comparison to the proposed Project. If Mitigation Measures were imposed in this alternative to retain various tree stands and tree lines that currently exist at the Project Site, impacts could be reduced to a less-than-significant level; however, if all existing trees on the Project Site are replaced with residential structures, there may be a potential significant impact that would not exist with the proposed Project.

b. Air Quality

The Original Zoning Alternative would likely have similar or greater air quality impacts in comparison to the proposed Project, primarily related to construction. This alternative would have smaller multi-family building footprints and lower heights than the proposed Project, and would likely have less grading for subterranean parking. But this alternative would also have a number of single-family homes to be constructed, which are absent in the proposed Project. The amount of construction and demolition activities may "even out" between the Original Zoning Alternative and the proposed Project; however, additional grading would be required on the Project Site to demolish all existing uses and construct the 95 condos and 83 single-family homes over the entire Project Site. Construction on the northern and western parts of the Project Site would more significantly impact the sensitive receptors (single-family homes) on Bellaire Avenue and Valley Spring Lane. This is in contrast to the proposed Project, which would have a large buffer (i.e., the golf course) between the Development Site (area being physically disturbed) and the sensitive receptors on Bellaire Avenue and Valley Spring Lane. Regardless, similar to the proposed Project, the construction impacts for the Original Zoning Alternative would be significant and unavoidable with relation to localized construction emissions.

As a residential project, the Original Zoning Alternative would operate similar to the proposed Project, with the exception that the dwelling units would be more spread over the entire Project Site and the residents would be comprised of more than senior citizens. Additionally, streets would be developed to accommodate the single-family homes. However, these differences from the Project would not create substantial incremental air quality impacts related to the operation of the single- and multi-family homes. The incremental increase in population of an estimated 359 residents compared to the estimated 340 residents under the Project is not a substantial increase in population and would not trigger additional impacts related to traffic beyond the Project's impacts, which would directly affect air quality from mobile sources.

Because the operations of both the Original Zoning Alternative and the proposed Project would not have a significant impact on air quality, the potential impact to air quality under both scenarios would be within the same impact level tier. Similarly, both scenarios would produce significant and unavoidable localized construction impacts due to building and grading for either project, but the Original Zoning Alternative may have greater overall net impacts on air quality due to the increased footprint of construction/demolition, as well as the closer proximity to sensitive receptors on Valley Spring Lane and Bellaire Avenue.

c. Biological Resources

The Project Site does not contain any plant or wildlife species that are listed as special-status (i.e., rare, endangered or threatened); however, several species of parakeets and squirrels have established themselves at the site and are recognized to be of local interest. There are also a variety of mature trees onsite, although none are considered to be heritage, protected, or significant trees from a biological resources perspective (although the trees are a contributing feature to the historical significance of the Project Site).

With the Original Zoning Alternative, site improvements would affect essentially 100 percent of the 16.1-acre Project Site. It is anticipated that improvements that would clear the Project Site in order to accommodate up to 83 single-family dwelling units would require that all ground vegetation and the majority of the over 400 mature trees onsite be removed. It is anticipated that some of the mature trees lining Bellaire Avenue and Valley Spring Lane could be retained, as well as select clusters of trees within the interior portion of the site. It is assumed that new landscaping, including replacement trees, would be incorporated into the residential development design common areas.

Compared to the proposed Project, which would remove only nine mature trees and very limited vegetative cover from proposed Lot 2 (landscaped areas around tennis courts) and Lot 1 (minor configuration of golf course and driving range), the Original Zoning Alternative would be substantially more impactful with the removal of essentially all the onsite vegetative cover and anticipated removal of the majority of the estimated 400 mature trees on the Project Site.

Along with the removal of the trees and vegetation, would be the disruption of habitat for the non special-status parakeets and squirrels (both species of local interest) that utilize the site and trees for cover and food. Because this habitat area would essentially be lost and established with urban uses over the entire 16.11-acre Project Site, it is unlikely that the parakeets and squirrels would re-establish at this location, at least not to the extent that they currently rely on habitation of the Project Site.

Also, because the Development Site is larger (16.1 acres for this alternative compared to 4.5 acres for the proposed Project), and the duration and extent of construction activity is longer for the Original Zoning Alternative, there would be a greater potential for the temporary disruption of other wildlife species in the surrounding area, especially along the river edge.

It is expected that Mitigation Measures similar to those included for the proposed Project would apply to the Original Zoning Alternative, thus reducing impacts; however, it is anticipated that for the Original Zoning Alternative, impacts may not be fully mitigated and a residual significant impact to biological resources, due primarily to the loss of 16.1 acres of habitat area, would remain.

Because the Original Zoning Alternative removes the majority of vegetative cover and mature trees from the Project Site, the potential impact to biological resources under this scenario would be substantially greater than for the proposed Project and the residual (after mitigation) impact considered to be potentially significant.

d. Cultural Resources

The Weddington Golf Course (formerly Studio City Golf Course) and associated driving range, and clubhouse, which have been in operation since 1956 and collectively are a prominent recreational feature in the San Fernando Valley, is potentially eligible through the California Register as an historic resource. The tennis court component is not considered historically significant. The golf course is eligible for listing under the California Register based on Criterion 1 and 3:

> *Criterion 1:* it is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
>
> *Criterion 3:* it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

Under the Original Zoning Alternative, all components of the golf course, including the 9-holes, driving range, and clubhouse, would be demolished. The tennis courts would also be removed. Under this alternative, all physical historic feature elements that qualify the golf course component as eligible for listing on the California Register would be removed. It is possible that minor features to commemorate the golf course could be incorporated into the design of the new single-family and multi-family residential developments that would be implemented under the Original Zoning Alternative. For example, the developments could be designed around a "golf theme" or the unique oversized golf-ball light standards could be incorporated into the subdivision landscape. Connection to the history could be made through use of names of historic significance in the development street names. Nonetheless, the historic eligibility features would be lost and the impact to historic resources would be significantly adverse.

The Original Zoning Alternative would involve substantially more grading and excavation than anticipated with implementation of the proposed Project. Similar levels of earth work activity as the proposed Project would be expected for the multi-family (condominium) housing along Whitsett Avenue; however, the area of the single-family homes would also be graded and disturbed to a depth of several feet to accommodate new access roads and building pads for the 83 single-family dwelling units.

Hence, under the Original Zoning Alternative, there would be higher potential for disruption of historical, archaeological, and paleontological resources during grading activities because the spatial area of disturbance is larger than compared to that for the proposed Project. It is anticipated that Compliance Measures similar to those applied for the proposed Project would be required for the Original Zoning Alternative, and thus, potential impacts related to grading activities would be reduced to a less-than-significant level.

Even though both scenarios would implement Compliance Measures to monitor for historical, archaeological, and paleontological resources during construction, so that appropriate measures can be taken in the event that resources are uncovered during construction activities, thus

resulting in less-than-significant impacts, the removal of potentially historical eligibility features (through the California Register) (i.e., the golf course, driving range, clubhouse, and golf ball light standards) may result in adverse significant cultural resource impacts. As the Project Site and existing development are not currently on a historical register or list of historic sights (although potentially eligible), commemoration of the Weddington Golf Course in the housing developments may reduce the potentially significant impacts to a less-than-significant level. As such, the overall net impact with the Original Zoning Alternative is considered similar but greater than the Project because of removal of the golf course, driving range, and clubhouse.

e. Geology, Soils, and Seismicity

Being located at the same Project Site, the Original Zoning Alternative would be exposed to geologic and seismic risks that would be similar to those identified for the proposed Project. However, because the Original Zoning Alternative would occupy the entire 16.11-acre site (as opposed to only the 4.5 acres on proposed Lot 2), slight variations in soil characteristics and water table levels would be anticipated. Although the total number of dwelling units (178 units) under the Original Zoning Alternative would be slightly less than for the proposed Project, the total onsite population would be slightly greater (estimated 359 residents), thus exposing a slightly greater population to risks due to seismic events, including the potential for seismic induced liquefaction.

Overall, impacts related to geologic and seismic events for the Original Zoning Alternative would be similar to those identified for the proposed Project, and it is anticipated that with implementation of Compliance Measures similar to those for the proposed Project, impacts would be reduced to a less-than-significant level.

Although the Original Zoning Alternative would include 22 fewer units than the proposed Project, the volume of earthwork and excavation needed to implement this alternative would be similar to or greater than that for the proposed Project. It is anticipated that the earthwork required for the development of the condominiums along Whitsett Avenue would be essentially the same as that for the proposed Project. Additional earthwork would be required to build the internal roads and residential (single-family) building pads throughout the single-family housing area.

Similar to the proposed Project, it is assumed that LID, BMP, and MS4 techniques and Compliance Measures would be incorporated during grading and construction activities to ensure that impacts related to the excavation/import/export of soils and geotechnical engineering considerations for foundation and building stability for the Original Zoning Alternative, would be reduced to less-than-significant levels, and generally would remain similar to those levels anticipated under the proposed Project. Under this alternative, there is a greater possibility to employ balanced grading onsite (i.e., no export), as earth excavated for the subterranean parking areas (if any) could be used elsewhere on the remainder of the site which would be preparing building pad areas. Under a scenario of balanced cut/fill onsite, the grading impacts may be somewhat less than otherwise anticipated for the proposed Project. Export of the demolished tennis court materials, and organic materials (i.e., trees and brush) would still require export from the Project Site.

Similar to the proposed Project, it is anticipated that all geology and soils impacts (including seismic-related) could be engineered and reduced to less-than-significant levels with incorporation of Compliance Measures. However, because the Original Zoning Alternative would require more earthwork overall, and across a larger area, the overall net impact under this alternative would be within the same impact level tier as, but slightly greater in impact, than for the proposed Project.

f. Greenhouse Gas Emissions

The Original Zoning Alternative would likely have similar or greater greenhouse gas emission impacts in comparison to the proposed Project, primarily related to construction. This alternative would have smaller multi-family building footprints and lower heights than the proposed Project, and would likely have less grading for subterranean parking. But this alternative would also have a number of single-family homes to be constructed, which are absent in the proposed Project. The amount of construction and demolition activities may "even out" between the Original Zoning Alternative and the proposed Project; however, additional grading would be required on the Project Site to demolish all existing uses and construct the 95 condos and 83 single-family homes over the entire Project Site. As such, due to the larger area, longer period, and more intensive amount of construction and demolition required in this alternative, the Original Zoning Alternative would result in incrementally more greenhouse gas emissions than the proposed Project; however, similar to the proposed Project, with implementation of all Compliance Measures related to greenhouse gas emissions, it is anticipated that this alternative would result in a less-than-significant impact.

As a residential project, the Original Zoning Alternative would operate similar to the proposed Project, with the exception that the dwelling units would be more spread over the entire Project Site and the residents would be comprised of more than senior citizens. Additionally, streets would be developed to accommodate the single-family homes. However, these differences from the Project would not create substantial incremental greenhouse gas impacts related to the operation of the single- and multi-family homes. The incremental increase in population of an estimated 359 residents compared to the estimated 340 residents under the Project is not a substantial increase in population and would not trigger additional impacts related to traffic beyond the Project's impacts, which would directly affect greenhouse gas emissions from mobile sources.

Because the construction and operations of both the Original Zoning Alternative and the proposed Project would not have a significant impact on greenhouse gas emissions with implementation of required Compliance Measures, the potential impact to greenhouse gas emissions under both scenarios would be within the same impact level tier. However, the Original Zoning Alternative may have slightly increased overall net impacts on greenhouse gas emissions due to the increased footprint of construction/demolition, the amount of construction equipment required, and the length of the construction period.

g. Hydrology and Water Quality

Implementation of the Original Zoning Alternative would involve removal of the existing recreational uses onsite to develop a small community with 83 single-family residential units and a 95-unit condominium complex. The single-family residential portion of the Original Zoning Alternative would have a private street system. Hydrological flow, although generally expected to remain oriented from northwest to southeast, may be altered internally to generally reflect the new street system. Development and final site conditions for the multi-family buildings along Whitsett Avenue under this alternative would be similar to those for the proposed Project. The multi-family housing area would be developed primarily with 100 percent impermeable surfaces and runoff captured for filtration and directed to locations for infiltration. However, development of the 83 new single-family residential units and related infrastructure would generate additional runoff due to the introduction of impermeable surfaces to the golf course and driving range area where none currently exists.

Implementation of the Original Zoning Alternative would result in a substantially greater percentage of impervious area across the Project Site compared to the proposed Project, thus higher peak volumes of surface runoff are anticipated. Any surface water that does not permeate into the ground would drain into the Los Angeles River Channel located to the south and southeast of the site. However, similar to the proposed Project, it is anticipated that the Original Zoning Alternative would implement BMPs, LIDs, MS4s, and other Compliance Measures to ensure that the net hydrological conditions remain relatively similar to those experienced under existing conditions.

Surface water quality is dependent on the amount of impervious and pervious areas that are located on a site. Project sites with pervious land absorb water quicker and thus reduce surface water contamination from oils and other pollutants. The Original Zoning Alternative would introduce a higher percentage of impervious land onto the Project Site when compared with the proposed Project. The impervious land would allow more collection of oils and pollutants, and when a rain event occurs, surface water quality would be expected to be more degraded compared to that with the proposed Project.

Although the Original Zoning Alternative would develop more impervious surface area than the proposed Project, the incorporation of reasonable and applicable Compliance Measures is anticipated to reduce water runoff quality to acceptable levels. Overall, the net level of impact to hydrology and water quality issues would be reduced to a less-than-significant level, and would be within the same impact level tier as, but slightly greater than, the level of impact anticipated under the proposed Project.

h. Land Use and Planning

Both the proposed Project and the Original Zoning Alternative would be largely consistent with the policies and goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan and would have similar less-than-significant impacts. However, the Community Plan Map designates a "Private Golf Course" symbol on the Project Site. The proposed Project would retain the golf course on the Project Site, thus maintaining consistency with the Community Plan

Map, while the Original Zoning Alternative would remove all golf course uses from the Project Site, which would be inconsistent with the Community Plan Map. Both would require a General Plan Amendment and Zone Change to construct residential units on the Project Site and to maintain consistency with the Community Plan and compliance with the LAMC. The Private Golf Course symbol would be removed on the Community Plan Map under the Original Zoning Alternative. Further, the area of entitlement would be much larger in the Original Zoning Alterative, due to the fact that the entire Project Site would be developed into single-family and multi-family residential units. Both scenarios would afford an opportunity for compliance and implementation of the RIO. The Original Zoning Alternative would be similarly consistent with regional plans and policies (including the RCP and AQMP) as is the proposed Project. The Original Zoning Alternative would also be more consistent with the surrounding pattern of land uses in the neighborhood, with multi-family units along Whitsett Avenue and single-family units along Valley Spring Lane, Bellaire Avenue, and the interior of the Project Site. As such, this alternative would be within the same impact level tier, but slightly greater in impact due to the necessity of removing the Private Golf Course designation symbol on the Community Plan Map under the alternative, which would not occur under the Project.

i. Noise

The Original Zoning Alternative would likely have similar or greater noise impacts in comparison to the proposed Project, related to both construction and operation. This alternative would have smaller multi-family building footprints and lower heights than the Project and would likely have less grading for subterranean parking, but would also have a number of single-family homes to be constructed, which are absent in the Project. The amount of construction and demolition activities may "even out" between the Original Zoning Alternative and the Project; however, additional grading would be required on the Project Site to demolish all existing uses and construct the 95 condos and 83 single-family homes over the entire Project Site. Construction on the northern and western parts of the Project Site would more significantly impact the sensitive receptors on Bellaire Avenue and Valley Spring Lane. This is in contrast to the Project, which would have a large buffer (i.e., the golf course) between the Development Site and the sensitive uses on Bellaire Avenue and Valley Spring Lane. Regardless, similar to the Project, the construction impacts for the Original Zoning Alternative would be significant and unavoidable with relation to localized construction emissions.

As a residential project, the Original Zoning Alternative would operate similar to the proposed Project, with the exception that the dwelling units would be more spread over the entire Project Site, thus spreading the noise impacts closer to the single-family residential units on Valley Spring Lane and Bellaire Avenue. Additionally, streets would be developed to accommodate the single-family homes. Unlike the proposed Project, which preserves the golf course, development that would occur adjacent to Bellaire Avenue and Valley Spring Lane under the Original Zoning Alternative, may increase operational noise impacts for the single-family residents (sensitive receptors) along these streets. Further, additional noise impacts (both stationary and mobile) may be incurred by replacing the golf course with single-family homes. Although the overall noise generated from both the proposed Project and the Original Zoning Alternative may be similar due to the residential nature of both projects, the distribution of the operational noise across the

Project Site and elimination of the golf course as a buffer may adversely impact surrounding sensitive receptors.

The Original Zoning Alternative may have an adverse operational impact, while the proposed Project would not. However, most likely, with implementation of Compliance Measures for each single-family home and the nature of single-family units as minimal noise producers (and being sensitive receptors), the Original Zoning Alternative would result in less-than-significant operational noise impacts on sensitive receptors along Valley Spring Lane and Bellaire Avenue, thus being within the same impact level tier as, but slightly greater than, the operational impacts of the proposed Project. Similarly, both scenarios would produce significant and unavoidable localized construction impacts due to building and grading for either project; however construction noise impacts under the alternative would be greater due to the expanded area of grading, longer construction/grading period, and closer proximity to sensitive receptors on the surrounding residential streets under the alternative.

j. Population and Housing

With a mix of 95 multi-family (condominium) dwelling units and 83 single-family dwelling units, the total number of dwelling units (178 units) under the Original Zoning Alternative would be slightly less than for the proposed Project (200 units). However, the total onsite population would be slightly greater (estimated 359 residents).

This alternative would provide 22 dwelling units less compared to the proposed Project, and as such, the Original Zoning Alternative would be similar, but less effective at meeting regional housing needs than the proposed Project. Also, this alternative is not anticipated to supply any special needs housing (i.e., senior housing).

Because this alternative would be developed adjacent to an existing residential community that is already serviced by infrastructure and services, and it would serve to meet existing housing demands, the Original Zoning Alternative is not anticipated to induce further growth in this area. Nor would this alternative displace existing units or result in a significant shift or disruption of population as there is no permanent population or housing on the current Project Site. As such, impacts would be less-than-significant under this alternative.

Compared to the proposed Project, population and housing impacts of the Original Zoning Alternative would be similar. This alternative would result in an 11 percent decrease in the number of housing units that would be provided, however, the alternative would provide a mix of ownership-oriented products at varied densities. The type of dwelling units that would be built under the Original Zoning Alternative would serve the general population and not any type of special needs housing (such as senior housing with the proposed Project). Additionally, the alternative would represent a minor and negligible increase in residential population in comparison to the proposed Project. Because the Original Zoning Alternative and the proposed Project would not have a significant impact on population and housing, the potential impact to population and housing under both scenarios would be within the same impact level tier, but the alternative would have slightly greater impacts due to the slight increase in estimated residents under the alternative.

k. Public Services – Fire Protection

As with the proposed Project, the Original Zoning Alternative would be served by the LAFD. The nearest fire station to serve the Project would be Station No. 78, located adjacent to the Project Site. Although the total number of new residential units under this alternative would be slightly less than with the proposed Project, the estimated resident population would be slightly greater due to the inclusion of single-family units (estimated 359 residents vs. 340 residents); however, the recreation-use daytime population (from the golf uses) would be removed. The incremental increase in demand for fire protection and emergency medical services with the Original Zoning Alternative would be similar to that anticipated under the proposed Project.

The needs for fire flow and emergency access under the Original Zoning Alternative would be somewhat different than anticipated with the proposed Project. The development would spread over the entire 16.1-acre parcel with access to the single-family units accommodated through an internal road system. Similar to the proposed Project, it is anticipated that as a Compliance Measure, the Site Plan Review and building permit processes for the Original Zoning Alternative would ensure that adequate emergency access and fire hydrant coverage is incorporated into the Project design. Also, through the subdivision and improvement plan review process, improvements necessary to ensure adequate fire flow would be addressed for the multi-family and single-family units.

The LAFD has indicated that the Project Site is adequately served for fire protection and medical emergency responses, and adequate fire flow service is available. With implementation of design requirements by the LAFD, it was determined that the proposed Project's six buildings would be adequately served, thus resulting in a less-than-significant impact. It is expected that the demand for fire protection facilities and staff, and calls for service would be somewhat similar under both the proposed Project and the Original Zoning Alternative and that the single- and multi-family units of this alternative would also adequately be served, thus resulting in a less-than-significant impact. Although this alternative is spread over a larger Project area than the proposed Project, the new internal street system and fire hydrant coverage would be sufficient to accommodate the new dwelling units. Because the Original Zoning Alternative and the proposed Project would not have a significant impact on fire protection services due to implementation of required Compliance Measures and Mitigation Measures, the potential impact to fire protection services under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents and larger project area required, the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

l. Public Services – Police Protection

Similar to the proposed Project, the Original Zoning Alternative would be served by the LAPD for police protection services primarily from the North Hollywood Community Police Station. Although the total number of new residential units under this alternative would be slightly less than with the proposed Project, the estimated resident population would be slightly greater (estimated 359 residents vs. 340 residents); however, the recreation-use daytime population

would be removed. The incremental increase in demand for police protection services with the Original Zoning Alternative would be similar to that anticipated under the proposed Project.

Because police services are generally gauged by a comparison of number of sworn officers to the level of population, this alternative would generate an incremental increase in the need for police officers relative to the proposed Project. Other factors considered for determining adequacy of police services are the rate of calls and police response times, which are directly affected by the officer-to-population ratio.

The LAPD has indicated that the Project Site is adequately served for police protection, and that adequate staff is available from the North Hollywood Community Police Station, as well as local substations, including a substation on Ventura Boulevard in Studio City. It is expected that the demand for police protection and calls for service would be similar under both the proposed Project and the Original Zoning Alternative. With implementation of Compliance Measures, both the proposed Project and this alternative would result in less-than-significant impacts. Because the Original Zoning Alternative and the proposed Project would not have a significant impact on police protection services, the potential impact to police protection services under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents and larger project area required, the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

m. Public Services – Library

As with the proposed Project, the Original Zoning Alternative would be served by the LAPL's Studio City Neighborhood Branch Library for library services. Although LAPL standards indicated that this library branch is undersized to serve the community's population size, representatives from the LAPL have indicated that this branch provides adequate library services and would be able to do so with development of the proposed Project. Since the Original Zoning Alternative would result in only a projected 19 additional residents, the incremental increase over the proposed Project is not anticipated to significantly impact the existing library services, thus resulting in a less-than-significant impact. Furthermore, similar to the proposed Project, this alternative would be expected to pay a mitigation fee (generally $200 per capita based upon the Project population) to the LAPL further reducing the impact.

Because the Original Zoning Alternative and the proposed Project would not have a significant impact on library services, the potential impact to library services under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents, the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

n. Recreation and Parks

Under the Original Zoning Alternative, all existing onsite recreational uses and open space would be removed. In contrast, the proposed Project would retain the golf uses and remove the tennis uses on the Project Site. With the exception of common and private open space areas to be

incorporated within the residential design of the single-family and multi-family uses, the incorporation of public recreational areas would not be provided under this alternative.

Additionally, this alternative would result in a similar but slightly greater population than the proposed Project. With the introduction of single-family residential units and no age restrictions for seniors, it is anticipated that families with children would reside in the development, thus resulting in a greater need for active public recreation and park services. Because no recreation uses would be retained on the Project Site to offset the demand, the overall impact of the Original Zoning Alternative would be greater on park and recreational use services than the proposed Project, thus resulting in a potentially significant impact. With the payment of required in-lieu fees, the impact to park and recreational services under the Original Zoning Alternative could be reduced to a less-than-significant level.

Because the Original Zoning Alternative and the proposed Project would not have a significant impact on park and recreational services with or without mitigation incorporated, the potential impact to these services under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents and removal of existing recreational uses on the Project Site, the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

o. Transportation and Circulation

The Original Zoning Alternative consists of the re-zoning and re-designation of the land uses on the Project Site to allow for development of 95 market-rate condominiums and 83 single-family homes. The existing golf course, driving range, clubhouse, tennis courts, tennis house, and surface parking lot on the Project Site would be removed to accommodate this alternative. Vehicular access for this alternative would be provided via an alley parallel to Whitsett Avenue (for the multi-family condominiums) and roadway street extensions on Babcock Avenue and Beeman Avenue south of Valley Spring Lane (for the single-family homes).

Traffic generation for the Original Zoning Alternative was estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for this alternative is presented in Appendix X: Appendix Table X-2 of *Appendix L: Alternatives Traffic Analyses* of this Draft EIR. As shown in Appendix Table X-2, the Original Zoning Alternative is expected to generate 47 net new vehicle trips (-13 inbound trips and 60 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Original Zoning Alternative is expected to generate 16 net new vehicle trips (30 inbound trips and -14 outbound trips). Over a 24-hour period, this alternative is forecast to generate 200 net new daily trip ends during a typical weekday (100 inbound trips and 100 outbound trips).

Summaries of the *V/C* ratios and LOS values during the A.M. and P.M. peak hours are provided in Appendix X: Appendix Table X-5 of *Appendix L* of this Draft EIR. As presented in Appendix Table X-5 (refer to columns [2] and [4]), no significant impacts would result under this alternative for Existing Conditions and Future Cumulative with Project Conditions, similar to that for the proposed Project. As no significant impacts are expected from the Original Zoning Alternative, no traffic Mitigation Measures would be required for the study intersections.

Additionally, as shown in Appendix X: Appendix Table X-8 of *Appendix L* of this Draft EIR, which measured impacts on two street segments in the Project area, the Original Zoning Alternative is anticipated to result in a significant impact along Valley Spring Lane between Babcock Avenue and Whitsett Avenue. This is due to the development of the entire Project Site as opposed to a portion. In order to mitigate this impact, the Project Applicant would need to contribute funds to the Neighborhood Traffic Management Program. The funds would be used to implement traffic management measures to protect the neighborhood, thus resulting in a less-than-significant impact. This alternative's daily trips would only incrementally affect traffic volumes on the other street segment for the Existing with Project Conditions and Future Cumulative with Project conditions, respectively, thus resulting in a less-than-signficant impact.

To compare the two, the Original Zoning Alternative would generate slightly less traffic than the proposed Project, and both the proposed Project and the Original Zoning Alternative would result in less-than-significant traffic impacts. Because the Original Zoning Alternative and the proposed Project would not have a significant impact on transportation and circulation, the potential impact to transportation and circulation under both scenarios would be within the same impact level tier. However, the traffic pattern of the Original Zoning Alternative would be more distributed among new streets built for the alternative, as well as along Bellaire Avenue and Valley Spring Lane, and as such, the overall net impact would be slightly greater under this alternative, specifically because of the increased distribution of traffic to the smaller surrounding residential streets. With respect to construction traffic impacts, the alternative would have similar construction traffic impacts as the proposed Project and would remain within the same impact level tier, however, the impacts would be slightly greater under the alternative due to the expanded scope of grading and building, longer construction/grading period, and additional grading and building required to develop the entire Project Site as opposed to a portion, as is proposed for the Project.

p. Utilities – Energy

Because the Original Zoning Alternative would establish residential development throughout the entire 16.11-acre Project Site, it would be necessary to extend natural gas and electrical infrastructure to the entire Project Site. It is anticipated that the Project Applicant or owner would consult with LADWP and SoCalGas to coordinate the location and sizing of infrastructure extensions and/or relocation for energy services.

Although the total number of new residential units under the Original Zoning Alternative would be slightly less than with the proposed Project, the energy demand overall is estimated to be slightly higher due to the type of units (i.e., multi-family condominium and single-family units) and greater number of onsite residents (i.e. 359 project residents) due to larger household sizes within the single-family units.

As with the proposed Project, the 95-unit multi-family component of the Original Zoning Alternative would be developed in accordance with the City's Green Building Code to reduce energy consumption. However, while the proposed Project would be designed voluntarily by the Applicant to accomplish the highest level of LEED (Leadership in Energy and Environmental

Design) standard (i.e., the Platinum standard), there is no requirement that the construction of this alternative exceed the Green Building Ordinance minimum LEED Certified level. The 83 single-family dwelling units would need to comply only with State Title 22 and Title 24 energy efficiency requirements.

The Original Zoning Alternative is expected to have a greater demand for energy than would the proposed Project for the residential component, and therefore, would have more of an impact on energy resources than the proposed Project. Additionally, because this alternative may not employ the same high standard of LEED and other energy efficient building standards that would be implemented with the proposed Project, the Original Zoning Alternative may have a greater impact. It is anticipated that this alternative could be less energy efficient overall if built only to a LEED Certified rating, which would cumulatively lead to an overall greater use of energy resources as well. Even so, it is anticipated that with implementation of required Compliance Measures, the net level of impact under this alternative could be less-than-significant.

Development of the Original Zoning Alternative would require that the entire golf course and driving range be removed (and replaced with housing). Because of the higher amount of energy required to operate irrigation systems necessary to maintain the turf area of the 16.1-acre course, significant energy savings (primarily electricity) could be realized with the implementation of this alternative over existing conditions. However, due to the number and type of units being provided under the Original Zoning Alternative, it is anticipated that the net change in electricity demand would increase when compared to the proposed Project. While the Original Zoning Alternative would have a higher energy demand relative to the proposed Project, the overall energy use is anticipated to be less-than-significant with implementation of Compliance Measures.

Because the Original Zoning Alternative and the proposed Project would not have a significant impact on energy resources with implementation of Compliance Measures, the potential impact to these resources under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents and the need to expand infrastructure extensions to an area of the Project Site which currently does not have such connections (beneath the existing golf course), the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

With respect to construction energy usage, the alternative would have similar construction energy impacts as the proposed Project and would remain within the same impact level tier with incorporation of Compliance Measures and Mitigation Measures; however, the impacts would be greater under the alternative due to the longer construction/grading period from additional grading and building required to redevelop the entire Project Site.

q. Utilities – Water

Due to the construction of 83 single-family homes primarily over the existing golf course area, it may be necessary to extend water infrastructure to this area of the Project Site. There are likely existing water connections used to irrigate the golf course, but additional connections would be required for the dwelling units. It is anticipated that the Project Applicant or owner would

consult with LADWP to coordinate the location and sizing of infrastructure extensions and/or relocation for water services.

The Original Zoning Alternative would require more water per month than the proposed Project due to the development of single-family homes. However, as with the proposed Project, the projected water demands in the LA-UWMP already take into account existing and projected land use development, including expansion of housing opportunities consistent with the City's Housing Element, which would be accommodated by the LADWP through the year 2035. As such, with implementation of required Compliance Measuers, impacts under both the Original Zoning Alternative and the proposed Project would be less-than-significant.

Because the Original Zoning Alternative and the proposed Project would not have a significant impact on water resources, the potential impact to these resources under both scenarios would be within the same impact level tier. However, due to the slight increase in projected residents and additional infrastructure expansion on the Project Site relative to the proposed Project, the Original Zoning Alternative would result in a slightly greater overall net impact over the proposed Project.

With respect to construction water usage, the alternative would have similar construction water impacts as the proposed Project and would remain within the same impact level tier with incorporation of Compliance Measures and Mitigation Measures; however, the impacts would be greater under the alternative due to the longer construction/grading period from additional grading and building required to redevelop the entire Project Site.

r. Growth-Inducing

The Original Zoning Alternative would not result in a measurable increased potential for new growth. Although this alternative would have a slight increase in population growth in comparison to the proposed Project, due to the fact that it includes single-family homes, and residential units are not restricted to senior citizens, the incremental increase would not induce a significant impact. Additionally, since none of this alternative's dwelling units are anticipated to be restricted for senior citizens, it is anticipated that the number of employees would be significantly reduced in comparison to the proposed Project. As the Project Site is readily accessible from area freeways, local roadways, and mass transit (buses), any employees are anticipated to commute to the Project in favor of moving to the area. Furthermore, growth-inducing impacts are usually derived from expansion of development and infrastructure into non-urbanized areas. The Project Site is located in an already urbanized area of Los Angeles with existing infrastructure that is either already in place or would require minor expansion to accommodate the alternative. Finally, this alternative would result in a larger increase in short-term construction employment opportunities due to the larger area of construction and number of single-family homes. However, short-term construction jobs are not anticipated to induce unanticipated new population growth because the construction process is temporary and those jobs would end once development is completed.

Therefore, no significant growth-inducing impact would occur under this alternative. As with the proposed Project, the net growth-inducing effect of the Original Zoning Project scenario would

be less-than-significant and substantially similar to any potential associated with the proposed Project (see *Section VI.D: Other Environmental Considerations – Growth-Inducing Impacts*).

s. Cumulative Impacts

The ten Related Projects, similar to the proposed Project, are expected to be developed, and impacts corresponding to those developments are anticipated to occur. Due to the substantially similar amount of dwelling units and projected residents, the Original Zoning Alternative would result in a contribution to cumulative impacts that is substantially similar to that described for the proposed Project. As with the proposed Project, with the implementation of all required Compliance Measures and Mitigation Measures, the alternative's cumulative impacts would be less-than-significant and within the same impact level tier as the proposed Project. The ten Related Projects would have to perform analyses as to whether each Related Project would contribute considerably to cumulative impacts.

t. Relationship of Alternative to Project Objectives

The Original Zoning Alternative would result in comparable and similar impacts for most of the environmental categories associated with the proposed Project. Similar to the proposed Project, the Original Zoning Alternative would satisfy most of the Project objectives, especially those dealing with housing creation. However, this alternative would not satisfy the Project objective to retain as many recreational uses on the Project Site as possible, since the Original Zoning Alternative removes all recreational uses on the Project Site. In comparison, the proposed Project would eliminate the entire tennis component on the Project Site, but would retain all golf uses, including the golf course, driving range, and clubhouse. As such, the Original Zoning Alternative would be able to attain most, but not all, of the Project objectives that could be attained by the Project in the following ways:

- The Original Zoning Alternative would satisfy the Project objective to fulfill a housing demand present in the community because both multi-family and single-family housing would be developed under the alternative.

- The Original Zoning Alternative would satisfy the Project objective to establish a residential development that is consistent with the existing density and character of residential developments in the neighborhood because the pattern of multi-family and single-family dwellings on the Project Site would mimic the existing pattern in the neighborhood. However, the Original Zoning Alternative would not satisfy the Project objective to establish a residential development that is aesthetically compatible with the remaining uses on the Project Site because all existing uses would be removed under the alternative.

- The Original Zoning Alternative would partially satisfy the Project objective to use design that will accommodate higher density development and provide convenient connectivity to transit, commercial uses and services, open space/recreation, and the Los Angeles River "corridor", because both the multi-family and single-family dwellings would be developed in compliance with RIO District guidelines and in close proximity to

commercial uses on Ventura Boulevard and existing transit stops, but all existing recreational uses on the Project Site would be removed.

- The Original Zoning Alternative would partially satisfy the Project objective to incorporate design elements that further the City's goals toward "green" development and walkability, and that comply with the City's efforts to reinvent and promote connectivity to the Los Angeles River through the River Improvement Overlay (RIO) District guidelines, because housing would be developed on the Project Site which would be required to comply with the RIO District guidelines and which would be located in close proximity to existing commercial uses on Ventura Boulevard and existing transit stops. However, since the existing golf course would be removed under the alternative, the Project Site would have less open space, foliage, and green space in comparison to existing conditions and the proposed Project.

- The Original Zoning Alternative would satisfy the Project objective to provide adequate and convenient off-street parking for all uses on the Project Site because subterranean and surface parking, as well as individual garages and driveways would be provided for the multi-family and single-family dwellings under the alternative per Municipal Code requirements.

- Community Plan Objective: The Original Zoning Recreation Alternative would continue to provide for the preservation of existing housing by not eliminating any existing housing in the community. The Original Zoning Alternative would also satisfy the Community Plan Objective to develop new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area because additional housing would be developed under the alternative.

- Community Plan Objective: The Original Zoning Alternative would satisfy the Community Plan Objective to locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities, because the new housing under the alternative would be developed within walkable or biking distance to commercial services along Ventura Boulevard and near existing transit stops. However, all recreational facilities would be removed, thus making recreational facilities less accessible under the alternative in comparison to the Project.

- Community Plan Objective: The Original Zoning Alternative would satisfy the Community Plan objective to promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background because both single-family and multi-family dwelling unit types would be provided under the alternative.

u. Comparison of Alternative's Project Impacts

The proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. All other impacts would be less-than-significant under the proposed Project with implementation of all Compliance Measures, PDFs, and Mitigation Measures. The Original Zoning Alternative would result in the same or slightly greater

significant and unavoidable impacts to air quality and noise during the construction phase due to the increased footprint of construction, but may also result in potential significant impacts with respect to aesthetics, biological resources, and cultural resources, primarily due to the removal of the existing golf course uses in favor of residential units. For those issues addressed, the Original Zoning Alternative would have substantially similar less-than-significant impacts as the proposed Project with regards to land use and transportation and circulation. The alternative scenario would also have less-than-significant impacts in comparison to the proposed Project with regards to the other environmental categories including geology, hydrology, population and housing, recreation and parks, public services, and utilities; however, the overall net impact in these categories would be slightly greater (more impactful) in this alternative than in the proposed Project, primarily due to the increase in Project population by roughly 19 residents and elimination of all recreational uses currently on the Project Site. The Original Zoning Alternative would be more beneficial than the proposed Project in that it would satisfy the community's desire (and certain Project objectives) for single-family housing, but it would also be less beneficial in that this alternative would remove every recreational component that currently exists on the Project Site.

V. ALTERNATIVES

E. ALTERNATIVE D: LOS ANGELES RIVER NATURAL PARK

1. ALTERNATIVE DESCRIPTION

The "Los Angeles River Natural Park" (L.A. River Natural Park) Alternative was developed in response to local stakeholder organizations in the community. This alternative proposes to create the "L.A. River Natural Park" on the Project Site. The details of the project in this alternative were provided by the proposals for the L.A. River Natural Park drafted by Mia Lehrer and Associates and Psomas, funded by the Santa Monica Mountains Conservancy and Save L.A. River Open Space, and dated April 2010, included as *Appendix P: Los Angeles River Natural Park Proposal* of this Draft EIR. The comparative analysis in the following sections has been completed as a response to the proposal and to ensure that the proposal be considered as a viable alternative to the Project due to support from local stakeholder organizations in the community.

The Los Angeles River Natural Park Alternative consists of the creation of a wetlands habitat water treatment complex that would capture and clean urban water runoff from approximately 200 acres of the Los Angeles River's surrounding tributary area, while also providing passive recreational and open space facilities for the community, and increased public access to the Los Angeles River and trail/bicycle network.

This alternative would require the removal of the golf course on the Project Site, as well as the removal, reconfiguration, relocation, and reconstruction of the existing driving range and tennis court facilities. Ultimately, the driving range and 12 of the 16 existing tennis courts would be retained onsite. This alternative would also require the purchase and acquisition of the property (which is currently privately owned) by the City of Los Angeles or other public entity in order to carry out the plan.

Recreational Component: The recreational components of this alternative include a Los Angeles River entry plaza; visitor information center; picnic areas; seating areas; 12 tennis courts; a golf driving range; bicycle parking; natural habitat; an entrance for a pedestrian/bicycle trail network; improved pedestrian/bicycle trails/bridges on and off-site from the Project Site; and links to off-site pedestrian/bicycle networks beyond the Project Site, including a link to an off-site parking garage approximately 500 yards to the east.

Water Quality Treatment Component: The water treatment components of this alternative include a number of Best Management Practices (BMPs), primarily the removal and onsite grading of the existing golf course to create an open water habitat, marsh habitat, riparian transitional habitat, upland habitat, vegetated swales, overflow retention/detention/infiltration basins, ponds/dry ponds, streams, vegetated pre-treatment/trash interception areas, and other natural habitat to capture, convey, and treat urban runoff for either infiltration, detention/retention, or release into the Los Angeles River. Secondary BMPs would include infrastructure to be constructed above and below ground on the Project Site to help direct urban runoff to the Project Site, pre-treatment of runoff before entering the natural habitats, and detention/retention overflow on the Project Site during excessive floods, which would also

provide irrigation for the natural habitats during dry seasons. These secondary BMPs and infrastructure would include storm drains, catch basins, a subsurface detention facility, pump houses, hydrodynamic separators, continuous deflective separators, diversion structures, overflow outlet structures, and a water storage tank to be installed underneath the reconstructed driving range.

This alternative would also use onsite solar panels to generate enough electricity and give it back to the grid to offset the Project Site's annual power usage for the various onsite facilities (i.e., grid neutrality).

As an A1 zoned site, this alternative would require re-zoning of the Project Site to the OS (Open Space) zone to accommodate the recreational, natural habitat, and water management uses proposed. This alternative may also require a Conditional Use Permit (under LAMC Section 12.24 U.19) to allow development of certain recreational uses and water treatment facilities on the Project Site. This alternative would require the City of Los Angeles or other public agency to purchase and acquire the land from the owner. Once acquired, the City of Los Angeles would be responsible for obtaining all entitlements (as necessary), permitting, and possibly coordinating with the County of Los Angeles, U.S. Army Corps of Engineers, Santa Monica Mountains Conservancy, California Department of Fish and Game, and Regional Water Quality Control Board.

The L.A. River Natural Park Alternative has the potential to accomplish some Project objectives by maintaining and creating open space and recreational uses on the Project Site, as well as improving connectivity with the Los Angeles River. This alternative would also reduce water runoff pollution. However, this alternative would not satisfy several Project objectives to provide housing that is in demand in the community, and would require the City of Los Angeles to secure funds to purchase and acquire the Project Site from the owner.

The anticipated impacts analyzed in this section are based upon the materials and details available from the project concept proposal, summarized here but presented in more detail as *Appendix P* of this Draft EIR. The L.A. River Natural Park is analyzed as an alternative to the Project because it is a known concept within the community and is supported by various local stakeholders in the community.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

Conceptual drawings created by the proponents of the L.A. River Natural Park Alternative were used to perform the following analysis. With the L.A. River Natural Park Alternative, the aesthetics and visual character of the Project Site would appear significantly different from that proposed under the Project. This alternative would not have a residential component and would consist completely of recreational or water treatment facilities. In general, the amount of green space, open space, and recreational uses created on the Project Site under this alternative would be fairly similar to what currently exists on the Project Site, and in that respect, would result in a less-than-significant impact to aesthetic resources. However, the L.A. River Natural Park

Alternative would likely eliminate much of the mature trees currently on the golf course (which contribute positively to the image of the community) to create the proposed wetlands habitat and install many of the proposed water treatment facilities. Eliminating the taller, mature trees on the Project Site may alter the character of the site itself and change the viewlines and visibility of the site from different viewpoints in the community. As such, the L.A. River Natural Park Alternative may have a potentially significant impact with regards to alteration of the character and aesthetics of the Project Site itself. Although this alternative would remove the existing golf course on the Project Site, the L.A. River Natural Park Alternative would maintain a "green", open space look for the community, similar to existing conditions, with a strong aesthetic tie to the adjacent Los Angeles River, and as such, may offset the aesthetic impacts from removal of the existing mature vegetation and golf course, thus resulting in less-than-significant aesthetic impacts. If Mitigation Measures were imposed in this alternative to retain various tree stands and tree lines that currently exist at the Project Site, impacts could be further reduced.

b. Air Quality

It is anticipated that the L.A. River Natural Park Alternative may have greater air quality impacts in comparison to the proposed Project related to the construction phase, but similar or lesser air quality impacts than the proposed Project related to the operational phase.

Since this alternative removes all existing development on the Project Site (including the driving range, which appears will be removed to install water treatment facilities underneath and then re-installed in roughly the same location), as well as undertakes major grading over the entire Project Site to create the wetlands habitat proposed and install the water treatment facilities on the site, it is anticipated that the grading will be more substantial than under the proposed Project. Furthermore, construction on the northern and western parts of the Project Site would have more impacts on the sensitive receptors (single-family uses) along Bellaire Avenue and Valley Spring Lane. This is in contrast to the proposed Project, which would have a large buffer (i.e., the golf course) between the Development Site and the sensitive receptors on Bellaire Avenue and Valley Spring Lane. Regardless, similar to the proposed Project, the construction impacts for the L.A. River Natural Park Alternative would be significant and unavoidable in relation to localized construction emissions. The significant and unavoidable impacts would be greater in this alternative than the proposed Project.

Regarding operations, as the L.A. River Natural Park Alternative has no residential component and will contain mostly recreational uses on the Project Site, the operational air quality impacts from this alternative can be more likened to the existing air quality impacts produced by the recreational uses currently on the Project Site, which are less than the proposed Project. However, this alternative is intended to be a regional public park that will attract visitors from different parts of the region (beyond the surrounding community), and as such, the amount of traffic from visitors of the site versus the residential/recreational traffic generated by the proposed Project will likely be comparable and similar. As such, the air quality impacts from mobile sources generated by this alternative will likely be similar under both scenarios.

Because the operations of both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact on air quality during operations, the potential impact to air

quality under both scenarios would be within the same impact level tier. Similarly, as stated earlier, both scenarios would produce significant and unavoidable localized construction impacts due to building and grading for either scenario. However, due to the larger grading footprint of the alternative and the removal of golf uses on the Project Site relative to the proposed Project, the L.A. River Natural Park Alternative would result in a slightly greater overall net impact over the proposed Project.

c. Biological Resources

The Project Site does not contain any plant or wildlife species that are listed as special-status (i.e., rare, endangered or threatened); however, several species of parakeets and squirrels have established themselves at the site and are recognized to be of local interest. There are also a variety of mature trees onsite, although none are considered to be heritage, protected, or significant trees from a biological resources perspective (although the trees are a contributing feature to the character and historical significance of the Project Site).

With the L.A. River Natural Park Alternative, site improvements would affect essentially 100 percent of the 16.11-acre Project Site. It is anticipated that improvements to clear the Project Site and install the water filtration and park facilities would require that all ground vegetation and the majority of the estimated 400 mature trees onsite be removed. It is not likely that any of the mature trees lining Bellaire Avenue and Valley Spring Lane or select clusters within the Project Site interior would be retained due to the fact that this alternative intends to revegetate the Project Site with native species compatible with a natural river setting.

It is assumed that new landscaping, including replacement trees, would be incorporated into the new park site and that these would consist of native plant species selected to assist with water filtration, habitat establishment, and river environment objectives for this alternative. Specifically, the water quality treatment component of the L.A. River Natural Park Alternative would include an open water habitat; marsh habitat; riparian transitional habitat; upland habitat; vegetated swales; overflow retention/detention/infiltration basins; ponds/dry ponds; streams; vegetated pre-treatment/trash interception areas; and other natural habitat to capture, convey, and treat urban runoff for either infiltration, detention/retention, or release into the Los Angeles River.

Compared to the proposed Project, which would remove only nine mature trees and very limited vegetative cover from Lot 2 (the landscaping around the tennis courts) and Lot 1 (minor configuration of golf course and driving range areas adjacent to Lot 2), the L.A. River Natural Park Alternative would initially have more substantial impacts than the proposed Project, with the removal of essentially all the onsite vegetative cover and anticipated removal of the majority of the estimated 400 mature trees on the Project Site. However, once the site has been revegetated with native species compatible with the river's edge, it is expected that the site would have an overall habitat value that is substantially improved from that of either the proposed Project or existing conditions.

Along with the removal of the trees and vegetation (and eventual revegetation), there would be disruption of habitat for the non-protected parakeets and squirrels (both species of local interest,

but not special-status) that utilize the site and trees for cover and food. Because this habitat area would essentially be lost and established with a park use over the entire 16.11-acre site, it is likely that the parakeets and squirrels may re-establish at this location; however, because the vegetation would replace what is largely non-native ornamental trees with native species, the resultant environment may not be as conducive to supporting the parakeets and squirrels of local interest. There would also be a greater variety of both native and non-native species competing for use of the site habitat.

Additionally, because the L.A. River Natural Park Alternative would extend into the golf course area, as well as offsite of the Project Site to incorporate the area south of the Project Site (including Valley Heart Drive and the Los Angeles River edge), the extent of construction activity would be somewhat longer and greater for the L.A. River Natural Park Alternative than for the proposed Project. Thus, there would be a greater potential for the temporary disruption of other wildlife species in the surrounding area, especially along the river edge.

Because the L.A. River Natural Park Alternative would remove the majority of vegetative cover and mature trees from the Project Site, the potential impact to biological resources under this scenario in the short-term would be substantially greater than for the proposed Project and the residual (after mitigation) short-term impact considered potentially significant. However, because the L.A. River Natural Park Alternative would establish new habitat over the majority of the site, with plant species that are both native and compatible with the river edge, it is anticipated that the long-term impact of this alternative on biological resources would be substantially improved from that under the proposed Project or existing conditions. Nonetheless, the parakeet and squirrel species of local interest, which are not special-status or protected, would be significantly impacted by the loss of their current habitat.

d. Cultural Resources

The Weddington Golf Course (previously Studio City Golf Course), which has been in operation since 1956 and is a prominent recreational feature in the San Fernando Valley, is eligible through the California Register as an historic resource. The tennis court component is not considered potentially historically significant. The golf course, driving range, clubhouse, and golf ball light standards are collectively eligible for listing under the California Register based on Criterion 1 and 3:

> *Criterion 1:* it is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
>
> *Criterion 3:* it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

Under the L.A. River Natural Park Alternative, all golf components, including the 9-hole golf course, driving range, clubhouse, golf ball light standards would be demolished. The tennis courts would also be removed. Under this alternative, all physical historic feature elements that qualify the golf component as eligible for listing on the California Register would be removed. It

is possible that minor features to commemorate the golf course could be incorporated into the design of the L.A. River Natural Park Alternative; however, strong design ties to the golf course would most likely be incompatible with the natural environment and river setting envisioned under the L.A. River Natural Park scenario. The river park development could, however, incorporate interpretive displays and information kiosks into the park setting to document the golf course and its potentially historic significance, which may reduce impacts to a less-than-significant level. Nonetheless, the historic eligibility features would be lost.

The L.A. River Natural Park Alternative would involve substantially more grading and excavation than anticipated with implementation of the proposed Project. As envisioned, the alternative would incorporate a series of water features and infiltration basins on the Project Site. Of all the alternatives, the L.A. River Natural Park Alternative would likely involve the greatest volume of earth movement, but it may be possible to retain a portion of the cut/fill onsite through balanced grading.

Under the L.A. River Natural Park Alternative there would be higher potential for disruption of potentially underground historical, archaeological, and paleontological artifacts during grading activities because the spatial area of disturbance is larger and to a greater depth than compared to that for the proposed Project. It is anticipated that Compliance Measures similar to those applied for the proposed Project would be required for the L.A. River Natural Park Alternative, and thus potential impacts to potential underground historical, archaeological, and paleontological resources would be reduced to less-than-significant.

Both the proposed Project and L.A. River Natural Park Alternative would implement Compliance Measures to monitor for the discovery of potential underground historical, archaeological, and paleontological artifacts during construction, so that appropriate measures can be taken in the event that resources are uncovered during construction activities. The loss of the potentially historic components of the Project Site under the alternative would have a potentially significant impact in comparison to the less-than-significant impact of the proposed Project; however, commemoration of the Weddington Golf Course and its history may effectively reduce the impact to a less-than-significant level. Therefore, because both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact with implementation of Compliance Measures and Mitigation Measures, the cultural resource impact under both scenarios would be within the same impact level tier. However, due to the larger footprint of construction/grading, as well as the removal of the potentially historic uses on the site, the L.A. River Natural Park Alternative would have a greater overall net impact relative to the proposed Project.

e. Geology, Soils, and Seismicity

Under the L.A. River Natural Park Alternative, all golf components on the Project Site, including the 9-hole golf course, driving range, clubhouse, and golf ball light standards would be demolished. The tennis courts would also be removed. The concept of this alternative is to create a park setting with lakes/ponds and varied landscape features throughout that would function as a natural water quality treatment system for urban runoff from the community. Implementation of this alternative would require the entire site to be graded and large amounts of soil to be

excavated, imported, exported, and compacted. Therefore, it is anticipated that the L.A. River Natural Park Alternative would involve substantially more grading and excavation than anticipated with implementation of the proposed Project. Of all the alternatives, the L.A. River Natural Park Alternative would likely involve the greatest volume of earth movement, but it may be possible to retain a portion of the cut/fill onsite through balanced grading.

The baseline regional geological and seismic setting under the L.A. River Natural Park Alternative would be similar to that described for the proposed Project. However, substantially more geotechnical engineering would be required to implement the water basins and infiltration systems. Once completed, the L.A. River Natural Park Alternative could pose a greater risk for seismic-related impacts, and incidents of liquefaction and seiche may increase due to the large volumes of standing water that would be held in the man-made ponds. However, similar to the existing conditions, this alternative does not generate a permanent population onsite, only a daytime population of visitors, and as such, there would be no risk to any permanent resident population.

Similar to the proposed Project, it is anticipated that the L.A. River Natural Park Alternative would be developed using BMPs, LIDs, and other Compliance Measures to reduce human injury or death and the loss of buildings during a seismic event. It is anticipated that adequate engineering and Mitigation Measures could be employed to further ensure that all impacts related to geology and soils (including seismic concerns) would be reduced to less-than-significant levels. Therefore, because the L.A. River Natural Park Alternative and the proposed Project would not have a significant geological impact with implementation of Compliance Measures and Mitigation Measures, the geological impacts associated with both scenarios would be within the same impact level tier. However, due to the need for additional Mitigation Measures and site engineering to ensure that the water infiltration devices do not compromise the existing geology and soils underneath the Project Site, the L.A. River Natural Park Alternative would have a slightly greater overall net impact relative to the proposed Project.

f. Greenhouse Gas Emissions

The L.A. River Natural Park Alternative would likely have similar or greater greenhouse gas emission impacts in comparison to the proposed Project, primarily related to construction. This alternative would have fewer proposed buildings (i.e., the park visitor center as opposed to six buildings under the proposed Project) and would likely have no grading for subterranean parking. However, additional grading would be required on the Project Site to demolish all existing uses and construct the L.A. River Natural Park over the entire Project Site. As such, due to the larger area, longer period, and more intensive amount of construction and demolition required in this alternative, the L.A. River Natural Park Alternative would result in incrementally more greenhouse gas emissions than the proposed Project; however, similar to the proposed Project, with implementation of all Compliance Measures related to greenhouse gas emissions, it is anticipated that this alternative would result in a less-than-significant impact.

As a recreational and water quality treatment project, the L.A. River Natural Park Alternative would operate more similar to the existing uses than to the proposed Project. As such, without substantial buildings, operation of the L.A. River Natural Park would emit a similar level of

greenhouse gases as existing conditions. Additional greenhouse gas emissions may come from stationary sources, such as water filtration machinery, as well as mobile sources, such as traffic to and from the regional park, since the park is intended to attract patrons from the entire region. Therefore, the operational greenhouse gas emission impacts from the water filtration machinery and regional visitors may "even out" with the impacts from the permanent residents of the proposed Project, and as such, greenhouse gas impacts under both scenarios would be considered less-than-significant with implementation of all required Compliance Measures.

Because the construction and operations of both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact on greenhouse gas emissions with implementation of required Compliance Measures, the potential impact to greenhouse gas emissions under both scenarios would be within the same impact level tier. However, the L.A. River Natural Park may have greater overall net impacts on greenhouse gas emissions due to the increased footprint of construction/demolition, the amount of construction equipment required, and the length of the construction period.

g. Hydrology and Water Quality

The premise of the L.A. River Natural Park Alternative is to reduce hydrological and surface water quality impacts along the Los Angeles River corridor and in the surrounding community. This alternative would remove all existing onsite recreational and urban uses, and implement, instead, an engineered natural water quality treatment system maintained in a park setting. The water quality treatment system of the L.A. River Natural Park Alternative would include an open water habitat; marsh habitat; riparian transitional habitat; upland habitat; vegetated swales; overflow retention/detention/infiltration basins; ponds/dry ponds; streams; vegetated pre-treatment/trash interception areas; and other natural habitat to capture, convey, and treat urban runoff for either infiltration, detention/retention, or release into the Los Angeles River. Other treatment measures for the L.A. River Natural Park Alternative would include infrastructure to be constructed above and below ground on the Project Site to help direct urban runoff to the Project Site, pre-treat runoff before entering the natural habitats, and detain/retain overflow on the Project Site during excessive flooding.

Collected runoff is anticipated to include not only runoff generated onsite, but runoff from the adjacent and upstream street system that would be diverted to this site for natural filtration and treatment prior to release into the Los Angeles River. This alternative would capture and clean urban water runoff from 200 acres of the Los Angeles River's surrounding tributary area, while also providing passive recreational and open space facilities for the community. This would also provide irrigation for the natural habitats during dry seasons. Additional infrastructure would include storm drains, catch basins, a subsurface detention facility, pump houses, hydrodynamic separators, continuous deflective separators, diversion structures, overflow outlet structures, and a water storage tank to be installed underneath the existing driving range to be replaced and reconfigured.

With implementation of the L.A. River Natural Park Alternative, it is expected that hydrological and surface water quality will be vastly improved compared to implementation of the proposed Project, as well as under existing conditions. This alternative would also be expected to provide

an overall benefit to the quality of the Los Angeles River. Therefore, similar to the proposed Project, the L.A. River Natural Park Alternative would have a less-than-significant impact with regards to hydrological and surface water quality issues. Because both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact on hydrology and water quality at the Project Site or surrounding area, the hydrological and water quality impacts under both scenarios would be within the same impact level tier. Due to the nature of the alternative scenario, the L.A. River Natural Park Alternative would have a lesser overall net (negative) impact relative to the proposed Project, and will prove more beneficial to hydrology and water quality in the area. However, the alternative may have a slightly greater, but less-than-significant impact during construction of the hydrological facilities due the larger area of construction and longer construction period associated with developing the entire Project Site as opposed to a small portion of the site, as under the proposed Project.

h. Land Use and Planning

Both the proposed Project and the L.A. River Natural Park Alternative would be consistent with different goals and policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan and would have similar less-than-significant impacts. The proposed Project would better satisfy the housing goals in the Community Plan while the L.A. River Natural Park Alternative would better satisfy the open space/recreational facility goals in the Community Plan.

Although the Community Plan designates the Project Site for Open Space, which would be consistent with the uses proposed in the alternative, the Community Plan Map specifically designates a "Private Golf Course" symbol on the Project Site. While the proposed Project would retain the golf course on the Project Site, thus maintaining consistency with the Community Plan Map, the L.A. River Natural Park Alternative would remove the entire golf course from the Project Site, which would be inconsistent with the Community Plan Map, regardless of the fact that the alternative would replace the golf course with different open space/recreational uses. The alternative may require a General Plan Amendment to remove the Private Golf Course symbol shown on the Project Site on the Community Plan Map.

Also similar to the Project, the alternative may require a Zone Change from A1 to OS (Open Space) zoning, as well as a concurrent Conditional Use Permit to develop the proposed recreational, natural habitat, and water management uses. However, with removal of the golf uses on the Project Site and elimination of any residential component, the alternative would likely eliminate the need for any Zone Variance entitlements or Subdivision approvals.

Both scenarios would afford an opportunity for compliance and implementation of the RIO. The L.A. River Natural Park Alternative would be similarly consistent with regional plans and policies (including the RCP and AQMP) as is the proposed Project. Therefore, because both the L.A. River Natural Park Alternative and the proposed Project would not have significant land use compatibility impacts, but would still require a General Plan Amendment, Zone Change, and Conditional Use Permit, both scenarios would be within the same impact level tier.

i. Noise

It is anticipated that the L.A. River Natural Park Alternative may have greater noise impacts in comparison to the proposed Project related to construction, but similar or lesser noise impacts than the Project related to operation.

Since this alternative removes all existing development on the Project Site (including the driving range which appears will be removed to install water treatment facilities underneath and then re-installed in roughly the same location), as well as undertakes major grading over the entire Project Site to create the wetlands habitat proposed and install the water treatment facilities on the site, it is anticipated that the grading will be more substantial than under the proposed Project. Furthermore, construction on the northern and western parts of the Project Site would more significantly impact the sensitive receptors (single-family uses) on Bellaire Avenue and Valley Spring Lane. This is in contrast to the proposed Project, which would have a large buffer (i.e., the golf course) between the Development Site and the sensitive uses on Bellaire Avenue and Valley Spring Lane. Regardless, similar to the proposed Project, the construction impacts for the L.A. River Natural Park Alternative would be significant and unavoidable with relation to construction and grading noise. The significant and unavoidable impacts would be greater under the L.A. River Natural Park Alternative.

Regarding operations, as the L.A. River Natural Park Alternative has no residential component and will contain mostly recreational uses on the Project Site, the operational noise impacts from this alternative can be more likened to the existing noise impacts produced by the recreational uses currently on the Project Site, which are less than the proposed Project. Although this alternative is intended to be a regional public park that attracts visitors from different parts of the region, the amount of traffic from visitors of the site versus the residential/recreational traffic generated by the proposed Project will likely be comparable and similar. And as such, with implementation of any required Compliance Measures, the operational noise impacts from mobile sources will likely be less-than-signficant under both scenarios. Any water treatment facilities on the Project Site may cause additional, non-substantial noise impacts under the alternative.

Because the operations of both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact on noise, the potential operational impact to noise under both scenarios would be within the same impact level tier. Similarly, both scenarios would produce significant and unavoidable construction impacts due to building and grading for either project. However, the L.A. River Natural Park may have greater overall net impacts from construction noise due to the increased footprint of construction/demolition, the amount of construction equipment required, the location of construction activities relative (closer) to sensitive receptors, and the length of the construction period.

j. Population and Housing

Similar to existing conditions on the Project Site, the L.A. River Natural Park Alternative would not involve the development of any residential uses at the Project Site. Population generated by

uses on the Project Site would be limited to daytime visitors and employees who would reside elsewhere within the City of Los Angeles or other surrounding communities.

The L.A. River Natural Park Alternative would not contribute toward the ability to meet regional housing needs, and in particular special needs housing such as housing for seniors, as is the case with the proposed Projcect. However, because the Project Site is already designated as Open Space (non-residential), it is not anticipated that housing opportunities overlooked at this site would have a significant impact on the region's ability to provide adequate housing. As such, similar to the proposed Project, under the L.A. River Natural Park Alternative, impacts related to population and housing would be less-than-significant.

Because both the L.A. River Natural Park Alternative and the proposed Project would not have significant impacts on population and housing, the impacts under both scenarios would be within the same impact level tier. However, since the Project Site currently does not support residential housing and the alternative scenario will not add new residents to the Project Site that require housing, the population and housing impacts under the L.A. River Natural Park Alternative would have slightly less overall net impacts relative to the proposed Project. Construction impacts related to development of new housing on a portion of the Project Site (leaving the majority of the site untouched), versus impacts related to development of recreational and water management uses without housing, over the entire Project Site, would favor the proposed Project, in that construction impacts under the alternative would be slightly greater, but still less-than-significant, due to a larger construction/grading area and longer construction period required under the alternative.

k. Public Services – Fire Protection

Similar to the proposed Project, the L.A. River Natural Park Alternative would be served by the LAFD. The LAFD's Fire Station No. 78, located adjacent to the Project Site would be the first responder to fire and emergency medical incidents occurring onsite.

Implementation of the L.A. River Natural Park Alternative would not include the development of residential uses, but instead would include development of a naturalized park with open space and runoff water treatment capabilities, as well as reconfiguration and relocation of the existing driving range and 12 of the existing tennis courts. Future use of the park under this alternative from a fire protection standpoint would be similar to the existing conditions with the Weddington Golf and Tennis Club. However, it is possible that the number of daytime visitors drawn to the site may be greater than what currently exists due to the intended regional draw of the L.A. River Natural Park Alternative as a regional public park. Overall, the demand for fire protection services and fire flow capacity would be substantially similar to that under existing conditions (No Project Alternative), and would be less than that anticipated with the proposed Project. The overall net level of impact for fire protection services and fire flow would remain less-than-significant and within the same impact level tier as the proposed Project because the area is already adequately served and no net change in the permanent residential population of the area is anticipated.

l. Public Services – Police Protection

Implementation of the L.A. River Natural Park Alternative would not include the development of residential uses, but instead would include the development of a naturalized park with open space and runoff water treatment capabilities, as well as reconfiguration and relocation of the existing driving range and 12 of the existing tennis courts. Future use of the park under this alternative from a police protection standpoint would be similar to the existing conditions with the Weddington Golf and Tennis Club. However, it is possible that the number of daytime visitors drawn to the site may be greater than what currently exists due to the intended regional draw of the L.A. River Natural Park Alternative as a regional public park. Overall, the demand for police protection services would be similar to that under existing conditions (No Project Alternative), and would be less than that anticipated with the proposed Project. The overall net level in impact for police protection services would remain less-than-significant and wihtin the same impact level tier as the proposed Project because the area is already adequately served and no net change in permanent residential population in the area is anticipated.

m. Public Services – Library

The Project Site is served by the Los Angeles Public Library (LAPL) System, and the closest library to the site is the Studio City Neighborhood Branch Library located at 12511 Moorpark Street. The L.A. River Natural Park Alternative would not result in any new residential uses that would generate demand for library services. This alternative's uses on the Project Site would not change substantially from recreational and open space uses that currently exist, and thus the demand for library services under the L.A. River Natural Park Alternative would remain relatively unchanged. Unlike the proposed Project, which would introduce an estimated 340 new permanent residents creating demand for library services, the L.A. River Natural Park scenario has no associated permanent population, thus resulting in less-than-significant library service impacts.

Because both the L.A. River Natural Park Alternative and the proposed Project would not result in a significant impact to library services, the impacts related to library services under both scenarios would be less-than-significant and within the same impact level tier. However, the proposed Project would be required to pay a mitigation fee to the LAPL or provide library services within the Project due to the fact that LAPL standards designate the Studio City Neighborhood Branch Library as undersized to serve the community's population size. The L.A. River Natural Park Alternative would not add permanent residents or change the density of the Project Site, and thus, the alternative scenario would not be required to implement any library-related Mitigation Measures, having slightly less overall net impacts relative to the proposed Project.

n. Recreation and Parks

Implementation of the L.A. River Natural Park Alternative would result in the removal of the 9-hole pitch-and-putt golf course, but would retain and reconfigure/relocate the existing 24-stall driving range and 12 of the 16 existing tennis courts. This alternative would create the L.A. River Natural Park over the entire Project Site and along City and County Los Angeles River

frontage, resulting in a 21-acre park site. This alternative would consist of the creation of a wetland habitat water treatment complex while also providing passive recreational and open space facilities for the region. The L.A. River Natural Park Alternative would allow increased public access to the Los Angeles River frontage and the existing trail and bicycle network. Under the alternative, the recreational component would include a broad range of public uses, including: creation of the Los Angeles River entry plaza; visitor information center; picnic areas; seating areas; 12 tennis courts; a golf driving range; bicycle parking; natural habitats; an entrance for a pedestrian/bicycle trail network; improved pedestrian/bicycle trails/bridges on and off-site of the Project Site; and links to off-site pedestrian/bicycle networks beyond the Project Site. Implementation of the L.A. River Natural Park Alternative would alleviate the uses of surrounding recreational and parkland areas while providing a recreational experience along the Los Angeles River corridor, intended for regional usage.

It is anticipated that the L.A. River Natural Park Alternative would involve dedication of the entire site (21-acres) for recreational and parkland use. Per these considerations, the L.A. River Natural Park Alternative would have substantially less impact on park and recreational demand and supply than would the proposed Project. However, to implement the alternative, the existing recreational uses on the Project Site would be removed (golf course, clubhouse, and a portion of tennis courts) or reconfigured (most of the tennis courts and the driving range) on the site. The redevelopment of the site for the alternative would be a temporary disruption in the provision of recreational uses on the site during the construction period, which may result in an increase in usage of other recreational uses in the City and a potential significant impact during construction. The proposed Project would not have such a disruption since the golf course, driving range, and clubhouse would remain open during construction. Additionally, the permanent loss of the entire existing golf course may permanently increase usage of other golf courses in the area and the City, although the driving range and tennis uses would be retained and reconfigured on the site. After the construction period, due to the creation of new recreational uses, as well as the retention of some golf and tennis uses on the Project Site, the overall net impact of the alternative scenario would be less-than-significant and would reflect a positive beneficial recreational impact for the community.

Therefore, because both the L.A. River Natural Park Alternative and the proposed Project would not have a significant impact on parks and recreational uses, the impacts under both scenarios would be within the same impact level tier. Due to the benefit of the L.A. River Natural Park Alternative as additional park and recreational space, the alternative scenario would have a substantially less overall net operational impact relative to the proposed Project. The alternative may result in a temporary significant impact during the construction period due to the complete elimination and closure of all recreational uses on the Project Site during construction; however, it is anticipated that the existing recreational uses in the community and City would be able to absorb the recreational demand, resulting in a greater, but still less-than-significant impact relative to the proposed Project.

o. Transportation and Circulation

For the purposes of this alternative's comparative analysis, an independent traffic analysis was performed to estimate the potential traffic impacts that may result from the L.A. River Natural Park Alternative.

The L.A. River Natural Park Alternative consists of a water quality treatment component and a recreational component. The water quality treatment component will consist of the creation of a wetlands habitat water treatment complex. The recreational component will include passive recreational and open space facilities for the community including increased public access to the Los Angeles River and trail/bicycle network. This alternative would require the removal of the entire existing golf course on the Project Site. The existing driving range and 12 existing tennis courts will be reconfigured and reconstructed and/or relocated onsite. Approximately 391 existing parking spaces will be designated for use in a public parking garage located roughly 500 yards east of the Project Site on the north side of Ventura Boulevard. The public parking garage will be improved to be visible from both Ventura Boulevard and the Los Angeles River. It is anticipated that a new pedestrian bridge crossing the Los Angeles River from the Project Site will connect the Project Site to Ventura Boulevard.

Traffic generation forecasts for the L.A. River Natural Park Alternative were estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for this alternative is presented in Appendix X: Appendix Table X-3 of *Appendix L: Alternatives Traffic Analyses* of this Draft EIR. As shown in Appendix Table X-3, the L.A. River Natural Park Alternative is expected to generate four net new vehicle trips (-4 inbound trips and 8 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the L.A. River Natural Park Alternative is expected to generate 52 net new vehicle trips (28 inbound trips and 24 outbound trips). Over a 24-hour period, this alternative is forecast to generate 1,000 net new daily trip ends during a typical weekday (500 inbound trips and 500 outbound trips).

Summaries of the *V/C* ratios and LOS values during the A.M. and P.M. peak hours are provided in Appendix X: Appendix Table X-6 of *Appendix L* of this Draft EIR As presented in Appendix Table X-6 (refer to columns [2] and [4]), the L.A. River Natural Park is expected to create a significant impact at the following location according to the City of Los Angeles' impact criteria for Existing with Project Conditions (existing traffic with the alternative's related traffic) as well as Future Cumulative with Project Conditions (with the addition of ambient growth, Related Projects traffic, and this alternative's related traffic):

- Int. No. 4: Whitsett Avenue/Ventura Boulevard
  PM peak hour *v/c* ratio increase of 0.026 [to 0.966 (LOS E) from 0.940 (LOS E)]

The Los Angeles Department of Transportation would be required to review the final impacts of Project Alternative B and determine what Mitigation Measures would be required to reduce any significant impacts. However, as an example, the recommended Mitigation Measures for Intersection No. 4, Whitsett Avenue/Ventura Boulevard may consist of restriping the east leg of the intersection to provide an exclusive right-turn only lane, resulting in one left-turn lane, two through lanes, and one right-turn only lane for the westbound approach. As summarized in

Appendix Table X-6, the recommended Mitigation Measure is anticipated to reduce the forecast alternative related traffic impact at the subject study intersection during the P.M. peak hour to a less-than-significant level, to 0.855 (LOS D) from 0.966 (LOS E).

Additionally, as shown in Appendix X: Appendix Table X-9 of *Appendix L* of this Draft EIR, the L.A. River Natural Park daily trips will not result in any significant impacts at the two study street segment locations. The L.A. River Natural Park daily trips will only incrementally affect traffic volumes on the two street segments for the Existing with Project and Future Cumulative with Project Conditions, respectively.

In comparison, the LA River Natural Park Alternative would produce more traffic impacts than the proposed Project (due to altered traffic distribution on smaller streets in the Project area), which did not result in any significant traffic impacts; however, the significant traffic impacts resulting from this alternative could be mitigated to a less-than-significant level.

Because both the L.A. River Natural Park Alternative and the proposed Project would not have significant transportation and circulation impacts with implementation of reasonable Mitigation Measures, the impacts under both scenarios would be within the same impact level tier. However, due to the need to mitigate traffic impacts caused by the alternative scenario, which is unnecessary under the proposed Project, the L.A. River Natural Park Alternative would have a slightly greater overall net impact relative to the proposed Project.

Additionally, the traffic impacts during the temporary construction period for the alternative project would be slightly greater than the impacts from the proposed Project due to the extended construction period to redevelop the entire Project Site, the larger area of construction, and the possible increase in construction vehicles necessary to develop the alternative uses. With implementation of Compliance Measures and Mitigation Measures, it is anticipated that construction traffic impacts would be reduced to a less-than-significant impact; however, the alternative's impact would be greater than that for the proposed Project.

p. Utilities – Energy

It is anticipated that the L.A. River Natural Park Alternative would be designed as an energy-efficient, sustainable green facility. Under this alternative, the majority of the 16.11 acres of irrigated turf area would be removed (only the driving range to remain with reconfiguration), thus eliminating the energy demand associated with water processing and pumping to maintain the turf area. Instead, the turf area would be replaced with a series of detention ponds and water filtration systems. Source waters are anticipated to come from approximately 200 acres of upstream area, arriving by gravity flow, thus minimizing the need for water pumps. Overall, the L.A. River Natural Park Alternative would require less energy demand than the existing uses on the Project Site. Further, because this alternative would not incorporate new residential development like the proposed Project, and new park-related support structures will be small scale and low-energy demand in nature, the L.A. River Natural Park Alternative would require less energy compared to the proposed Project. The overall level of net operational impact with this alternative would be less-than-significant and less than that resulting from the proposed Project. The alternative would be within the same impact level tier as the proposed Project.

During the construction period, electricity demand from certain construction equipment, such as lighting and power tools, would be higher under the alternative due to the larger area of demolition and construction, the longer construction period, and the possibly larger amount of construction equipment required to redevelop the entire Project Site, as opposed to only a portion being redeveloped under the Project. As such, the overall level of net construction impact with this alternative would be less-than-significant, but greater than that resulting from the proposed Project. The alternative would be within the same impact level tier as the proposed Project.

q. Utilities – Water

The L.A. River Natural Park Alternative concept would act as a water treatment, retention, and infiltration site for urban runoff. As such, this alterative would be self-sustaining with regards to water usage and consumption. If the alternative is self-sustaining, then the project would have a minimal demand on water provided by the LADWP. Further, the alternative would not have water demand associated with residential uses since there will be no residential uses developed, unlike the proposed Project. As such, although both the proposed Project and the L.A. River Natural Park Alternative would have less-than-significant impacts on water resources, the overall net impact of the L.A. River Natural Park Alternative would be lesser than the impact from the proposed Project.

r. Growth-Inducing

The L.A. River Natural Park Alternative would not result in a measurable increased potential for new growth. As with the proposed Project, the net growth-inducing effect of the L.A. River Natural Park Alternative would be both less-than-significant and less than any potential for growth associated with the proposed Project, due mainly to the fact that this Alternative does not introduce new permanent residents into the area. Furthermore, growth-inducing impacts are usually derived from expansion of development and infrastructure into non-urbanized areas. The Project Site is located in an already urbanized area of Los Angeles with existing infrastructure that is either already in place or would require expansion to accommodate the alternative.

s. Cumulative Impacts

The ten Related Projects would be expected to be developed and impacts corresponding to those developments are anticipated to occur. There is no residential component and no permanent population would be added to the area, and thus, the L.A. River Natural Park Alternative would likely result in a contribution to cumulative impacts that is substantially similar to or slightly less than that described for the proposed Project, thus resulting in a less-than-significant cumulative impact with implementation of Compliance Measures and Mitigation Measures.

t. Relationship of Alternative to Project Objectives

The L.A. River Natural Park Alternative would result in comparable and similar impacts for many of the environmental categories associated with the proposed Project. However, this alternative would not satisfy most of the Project objectives that deal with housing creation and

housing diversity in the community. This alternative would also eliminate the golf course, which currently exists on the Project Site, in favor of other recreational uses.

The L.A. River Natural Park Alternative would not be able to satisfy most of the Project objectives that could be attained by the Project in the following ways:

- The L.A. River Natural Park Alternative would not satisfy the Project objective to fulfill a housing demand present in the community because no housing would be developed under the alternative.

- The L.A. River Natural Park Alternative would not satisfy the Project objective to establish a residential development that is consistent with the existing density and character of residential developments in the neighborhood, and is aesthetically compatible with the remaining uses on the Project Site and the surrounding neighborhood, because no housing would be developed and all existing uses on the Project Site would be removed and/or reconfigured under the alternative.

- The L.A. River Natural Park Alternative would not satisfy the Project objective to use design that will accommodate higher density development and provide convenient connectivity to transit, commercial uses and services, open space/recreation, and the Los Angeles River "corridor", because no housing would be developed under the alternative.

- The L.A. River Natural Park Alternative would satisfy the Project objective to incorporate design elements that further the City's goals toward "green" development and walkability, and that comply with the City's efforts to reinvent and promote connectivity to the Los Angeles River through the River Improvement Overlay (RIO) District guidelines, because the Project Site would be developed with recreational, natural habitat, and water management open space uses that are designed with connectivity to the adjacent Los Angeles River.

- The L.A. River Natural Park Alternative would satisfy the Project objective to provide adequate and convenient off-street parking for all uses on the Project Site because a sufficient amount of parking spaces would have to be provided on the Project Site per Municipal Code requirements, unless a reduced amount of parking was approved through an entitlement. Additionally, the alternative would provide links to off-site pedestrian/bicycle networks beyond the Project Site, leading to an existing, off-site public parking garage approximately 1,500 feet to the east for use by visitors to the Project Site.

- Community Plan Objective: The L.A. River Natural Park Alternative would continue to provide for the preservation of existing housing by not eliminating any existing housing in the community, thus partially satisfying this Community Plan objective. However, the L.A. River Natural Park Alternative would not satisfy the Community Plan objective to develop new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area because no housing would be developed under the alternative.

- Community Plan Objective: The L.A. River Natural Park Alternative would not satisfy the Community Plan objective to locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities, because no housing would be developed under the alternative and traffic impacts would be slightly greater than the proposed Project.

- Community Plan Objective: The L.A. River Natural Park Alternative would not satisfy the Community Plan Object to promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background, because no housing would be developed under the alternative.

u. Comparison of Alternative's Project Impacts

The proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. All other impacts would be less-than-significant under the proposed Project with implementation of Compliance Measures, PDFs, and Mitigation Measures. The L.A. River Natural Park Alternative would result in the same or greater short-term significant and unavoidable air quality and noise impacts due to the larger amount and larger area of grading and construction activities required, but may also result in potential significant impacts with respect to biological resources and cultural resources, primarily due to the removal of the golf uses in favor of the park/water treatment facility. For those issues addressed, the L.A. River Natural Park Alternative would result in less-than-significant impacts in comparison to the proposed Project with regards to geology, operational air quality, and transportation/circulation; however, the overall net impacts under the alternative would be slightly greater in those categories when compared to the proposed Project. The L.A. River Natural Park Alternative would also result in similar or lesser less-than-significant impacts with regards to hydrology and water quality, land use and planning, population and housing, recreation and parks, public services, and utilities, primarily due to the fact that the alternative does not introduce new permanent residents or residential units in the area.

The L.A. River Natural Park Alternative would have the same open space/recreational benefit as the existing Weddington Golf and Tennis Club with the added benefit of water treatment, retention, and infiltration; however, the existing golf course and tennis uses would be completely removed to accommodate this alternative. The proposed Project would only remove the existing tennis courts, but would retain the existing golf uses. The L.A. River Natural Park Alternative would also require funding from public resources, whereas, the proposed Project would continue to be privately owned and operated. Finally, this alternative would not satisfy several Project objectives regarding housing and would not satisfy the community's desire to retain some or all of the existing recreational uses on the Project Site. Ultimately, more details must be released by the proponents of the L.A. River Natural Park before environmental findings and comparisons can be conclusive.

V. ALTERNATIVES

F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify the environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the EIR must identify an environmentally superior Alternative among the remaining Alternatives.

Based on the analysis of the Draft EIR, the proposed Project is anticipated to result in significant unavoidable impacts related to:

- Construction (short-term) air quality impacts related to PM_{10} and $PM_{2.5}$
- Construction (short-term) noise impacts at sensitive receptors

A detailed description of each alternative and the potential impacts associated with each is provided above.

Of the Alternatives analyzed in this Draft EIR, the No Project Alternative is considered the overall environmentally superior alternative as it would reduce and/or avoid the majority of the impacts (even those that would be less-than-significant) that would occur with the implementation of the proposed Project. However, the No Project Alternative would not substantially satisfy the objectives of the Project.

In accordance with the CEQA Guidelines, a second alternative must be established as environmentally superior when the No Project Alternative is the primary superior alternative. The comparative evaluation indicates that the Higher Density with Recreation Alternative would also be environmentally superior. The Higher Density with Recreation Alternative is the only alternative that would not result in additional potentially significant impacts beyond those determined for the proposed Project. The Original Zoning Alternative is anticipated to result in additional significant impacts to existing Biological Resources on the Project Site due to elimination of all existing uses and natural features on the site, including several mature stands of trees. The Los Angeles River Natural Park Alternative is anticipated to result in additional significant impacts to existing Biological Resources during construction, and although all existing natural features would be eliminated, new natural features would be developed to help re-establish natural habitats. Comparatively, the proposed Project would have less-than-significant Biological Resources impacts (with mitigations), as it retains the golf course area. Primarily, the Higher Density with Recreation Alternative would result in far less impacts than the other two alternatives with regard to aesthetics, biological resources, and cultural resources. The Higher Density with Recreation Alternative would also satisfy all eight of the Project Objectives as opposed to the Original Zoning Alternative, which would satisfy 6.5[1] Project Objectives and the L.A. River Natural Park Alternative, which would satisfy 1.5 Project Objectives.

[1] The 0.5 refers to a Project Objective that is partially satisfied, as some Project Objectives contain multiple intentions.

TABLE V-2
ALTERNATIVES COMPARISON TO THE PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY, SOILS, AND SEISMICITY	GREENHOUSE GAS EMISSIONS	HYDROLOGY AND WATER QUALITY	LAND USE AND PLANNING	NOISE	POPULATION AND HOUSING	PUBLIC SERVICES: FIRE PROTECTION	PUBLIC SERVICES: POLICE PROTECTION	PUBLIC SERVICES: LIBRARY	RECREATION AND PARKS	TRANSPORTATION AND CIRCULATION	UTILITIES: ENERGY	UTILITIES: WATER	GROWTH INDUCING	CUMULATIVE IMPACTS	PROJECT OBJECTIVES SATISFIED (# OUT OF 8)
CONSTRUCTION PHASE (SHORT-TERM)																					
A	No Project	—	∞	—	—	—	—	—	—	∞	—	—	—	—	—	—	—	—	—	—	N/A
B	Higher Density with Recreation Project	¤	♦	●	●	●	●	●	¤	♦	●	●	●	●	—	●	●	●	¤	¤	N/A
C	Original Zoning Project	●	♦	♣	●	●	●	●	●	♦	●	●	●	●	●	●	●	●	¤	¤	N/A
D	L.A. River Natural Park Project	●	♦	♣	●	●	●	●	¤	♦	●	—	—	—	●	●	●	—	—	¤	N/A
OPERATIONAL PHASE (LONG-TERM)																					
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1/8
B	Higher Density with Recreation Project	¤	●	●	●	●	¤	●	¤	●	●	●	●	●	—	●	●	●	¤	¤	8/8
C	Original Zoning Project	●	●	♣	●	●	¤	●	●	●	●	●	●	●	●	●	●	●	¤	¤	6.5/8
D	L.A. River Natural Park Project	●	¤	—	●	●	¤	—	¤	¤	—	—	—	—	—	●	—	—	—	—	1.5/8

Key:
¤ = Net incremental impact is equivalent to that identified for the Project
● = Net incremental impact is greater than that identified for the Project, but remains less than significant (either with mitigation or not) and within the same impact level tier as the Project
♦ = Net incremental impact is greater than that identified for the Project and thus remains a significant impact and within the same impact level tier as the Project
♣ = Net incremental impact is greater than that identified for the Project and becomes a significant impact
— = Net incremental impact is less than that identified for the Project and thus remains a less than significant impact (either with mitigation or not) and within the same impact level tier as the Project
√ = Net incremental impact is less than that identified for the Project, but remains a significant impact and within the same impact level tier as the Project
∞ = Net incremental impact is less than that identified for the Project, and becomes a less than significant impact
#/8 = Indicates the number of Project Objectives met and satisfied by the alternative, out of eight Project Objectives identified in the Draft EIR.
N/A = Not applicable to category