

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. EFFECTS NOT FOUND TO BE SIGNIFICANT

An Initial Study (“IS”) was prepared for a previous iteration of the Project¹ as part of a Mitigated Negative Declaration (“MND”) released by the City of Los Angeles in 2001. Pursuant to CEQA Guidelines Section 15063, the IS for the Project was used to provide the Lead Agency with information on deciding whether to prepare an Environmental Impact Report (“EIR”). The IS initially determined that an MND was sufficient for environmental clearance of the Project; however, due to the public interest in the Project, the City determined that the preparation of an EIR was more appropriate to address various concerns expressed by the community. Subsequently, the project was presented to the public as part of the Notice of Preparation (“NOP”) process for an EIR to be prepared. Community input was received on the Project design and potential environmental impacts to be considered. Over the course of several years, the proposed Project was revised to accommodate public concerns. Numerous changes in the Project design required the release of several NOPs by the City, each of which garnered additional community input. The latest NOP, which substantially describes the current Project, was issued by the City of Los Angeles on April 17, 2008.

Based on the original IS and the NOP public comment process, it was determined that implementation of the Project may, by itself and/or in conjunction with past, present, and reasonably foreseeable future development in the Project vicinity, have a significant environmental effect in the following areas: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology, Soils and Seismicity; Hydrology and Water Quality; Land Use and Planning; Noise; Population and Housing; Public Services; Recreation and Parks; Transportation and Circulation; and Utilities. This EIR analyzes these potential environmental impacts and recommends additional feasible Mitigation Measures to reduce impacts found likely to be significant.

In accordance with CEQA Guidelines Section 15128, other possible effects of the Project, which were determined to not be significant through the IS review and NOP scoping process, are not discussed in detail in this EIR. Those possible effects that did not warrant detailed analysis are identified below. The specific issues, as defined by the IS checklist questions or *L.A. CEQA Thresholds Guide* (“*Thresholds Guide*”) screening criteria², are identified, followed by the impact analysis.

¹ The previous iteration of the Project included a 2-lot subdivision over a 17.2 –acre site for development of 240 senior housing units within six, four-story buildings, reconfiguration of the golf course, driving range, and clubhouse, and retention and onsite relocation of eight existing tennis courts.

² City of Los Angeles, Dept. of Environmental Affairs. *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles.* 2006

Aesthetics (Views, Scenic, Shade/Shadow)

The Project will not:

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.
- Include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest, or northeast.

The Project Site is located in the fully developed Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) Area. This area contains a mix of residential, commercial, and industrial uses within buildings of various sizes and architectural designs. The Project Site is not located within the vicinity of any scenic corridor or scenic highway, including the Mulholland Scenic Parkway Specific Plan. According to the Community Plan, the Project Site is not located within a scenic viewshed.

Development of the Project may increase the visibility of a portion of the Project Site due to increased building height and bulk compared to that of existing development. However, visibility of the Studio City Senior Living Center Project would remain limited because off-site views of the Project would be obstructed by surrounding development and tall foliage.

Primary views of the Project in the immediate area would be from Whitsett Avenue between Valleyheart Drive and Valley Spring Lane. Views of the Project from Valley Spring Lane, Bellaire Avenue, or streets to the south of the Los Angeles River would be fully or partially obstructed by the existing golf course and driving range on the Project Site, heavy foliage, and existing buildings. Views from the Los Angeles River right-of-way would not be available due to current restricted public access.

The Project would not result in the removal of a valued aesthetic feature. A small portion of the southeast part of the golf course, the southern portion of the driving range, and four to five of the golf ball light standards will undergo minor reconfiguration for the Project; however, this reconfiguration will not remove any of these features or uses from the Project Site, thus maintaining the overall character. The minor reconfiguration of the golf course and driving range will largely be unnoticeable from an aesthetic standpoint. All eight of the existing golf ball light standards will continue to be visible on the Project Site, despite minor reconfiguration. The golf course, driving range, and golf ball light standards, which may be considered valued aesthetic features, are not being removed from the Project Site or substantially altered. The golf clubhouse, which may also be considered a valued aesthetic feature, is not being affected by the Project. The tennis courts, including fencing, lighting, and tennis house, as well as a portion of the existing surface parking lot, which are to be removed for the Project, are not designated as and are not valued aesthetic features. Ultimately, the Project Site is not part of a scenic vista and does not contain scenic resources, and therefore, the Project is not anticipated to result in significant impacts to scenic features.

The Project would not introduce light-blocking structures and would not affect any shadow-sensitive use(s) that would be located within a distance of three times the height of the Project buildings. All buildings will be limited to a height of 45 feet and will be comparable in height to the surrounding multi-family residential buildings along Whitsett Avenue. Additionally, the Project Site is already heavily shaded by several stands of mature trees spread throughout the golf course and street frontage, extending up to 50, 60, and 70 feet in height. Therefore, the Project is not anticipated to result in significant impacts to shade/shadow conditions.

The potential significance of the Project's impacts related to visual character, long-range views and lighting is addressed in *Section IV.A: Environmental Impact Analysis – Aesthetics* of this Draft EIR.

Agriculture

The Project will not:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.
- Result in the loss of forest land or conversion of forest land to non-forest use.
- Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project involves construction within a developed area. The Farmland Mapping and Monitoring Program (California Department of Conservation, Division of Land Resource Protection, *Los Angeles County Important Farmland 2010 Map*) does not map the Project Site and therefore does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project Site. The Project Site is not protected by a Williamson Act Contract. The Project Site is not zoned for forest land, timberland, or Timberland Production. The entire Project Site is currently zoned as A1-Agricultural, however, the entire Project Site has been developed and used for recreational purposes (i.e., golf and tennis uses) for over 50 years. The Project Site has not been used for farming purposes for more than a century since the development of Studio City. Therefore, as the Project will not convert any Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, timberland, or land for Timberland Production to non-agricultural or non-forest use, or conflict with existing agricultural/forest land zoning or protected land, no impacts would be expected. Therefore, the Project is not anticipated to result in significant impacts to agricultural or forest land resources and would not require further evaluation.

Biological Resources

The Project will not:

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project Site is located within an urbanized area of the San Fernando Valley. The Project Site and the surrounding area are urbanized and developed with a range of light- and moderate-density residential uses, as well as light- and moderate intensity commercial uses. Vegetation at the Project Site is limited to landscaping and trees associated with existing development. The Project Site is not part of a riparian habitat or other sensitive natural community identified by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, or in any local or regional plans, policies, and regulations. The Project Site is not part of any federally protected wetlands and does not conflict with any existing local, regional, or state habitat conservation plan.

With respect to flora, fauna, and animal life, the Project Site contains many stands of mature trees that were planted as part of the golf course development. The greens and trees within the golf course are not natural and were planted as part of a man-made development. None of the trees on the Project Site, including those to be removed for the Project, are considered “Protected” by any tree preservation ordinance or policy. Animals that are typical of urbanized areas, including rodents and birds, have been observed on the Project Site; however, none of these animal species are specified as candidates, sensitive, or special-status species in any local, regional, State, or federal plans, policies, or regulations. As the Project will primarily impact the tennis courts, the southern portion of the driving range, and a small portion of the southeastern part of the golf course, the majority of the landscaping and trees within the golf course and throughout the Project Site will be retained as they currently exist. The Project Site does not include any natural water sources.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on biological resources. However, due to public concern for specific animal species, habitats, and migratory habits on the Project Site, as expressed through community comments submitted during the NOP process, any potential impacts to specific biological resources, including migratory movements, have been addressed in *Section IV.C: Environmental Impact Analysis – Biological Resources* of this Draft EIR.

Cultural Resources

The Project will not:

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

The Project Site has been previously disturbed and is currently covered with tennis and golf facilities. No archaeological or paleontological sites or resources were identified in a search of pertinent records, maps, and literature.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on archaeological or paleontological resources, since the Project does not occur in an area with known archaeological resources, an archaeological study area, or a fossil site. Further, the City of Los Angeles has adopted standard conditions that require that the grading and excavation activities be monitored for evidence of significant cultural resources. These standard conditions will be implemented as Compliance Measures for the Project.

Portions of the Weddington Golf and Tennis Club appear to be eligible for the California Register and are therefore a historic resource under CEQA. Specifically, the character-defining features of the Project Site that define why it is significant and when it was significant include: The 9-hole pitch-and-putt golf course, composed of fairways, greens, and tees (5th & 6th holes previously altered); the park-like setting created by extensive trees and open space; the golf clubhouse; the driving range (previously altered); the putting green in front of the golf clubhouse; and the golf ball light standards. The tennis courts to be demolished for the Project were constructed outside of the period of significance of the site and are therefore not considered historic features. As the Project will require minor modifications to portions of the existing golf course, driving range, and golf ball light standards, the impacts on historical resources are addressed in *Section IV.D: Environmental Impact Analysis – Cultural Resources* of this Draft EIR.

Hazards and Hazardous Materials

The Project will not:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where the Project would result in a safety hazard for people residing or working in the Project area.
- Be within the vicinity of a private airstrip, where the proposed Project would result in a safety hazard for people residing or working in the Project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Hazardous Materials – The Cortese List of hazardous materials sites, compiled pursuant to Government Code Section 65962.5 does not list the Project Site as having a hazardous materials problem needing cleanup. As such, there are no soils onsite having any known contamination. The Project is not expected to exceed maximum regulatory requirements for hazardous materials and as a primarily residential project is not expected to release hazardous materials into the environment within the Project Site or adjacent areas. As the Project Site does contain a golf course, similar to any typical golf course, a pest management program is currently implemented, and will continue to be implemented after development of the Project. The pest management program requires the use of chemical pesticides, including Heritage Fungicide, Chipco 26 GT Fungicide, Daconil Weather Stik, and Dow AgroSciences Fore Rainshield (all sprayed or spread as of 2011).

Pesticide use as part of a pest management program has been implemented for the golf course for the life of the golf course operation. The chemicals are applied as sparingly as possible. Chemicals are not applied on a routine basis, rather, as necessary to control pest and fungus problems. All safety standards and requirements are adhered to, as provided by the County of Los Angeles Agriculture Commission. Chemical spraying is mostly required on the golf course to control fungus on the greens year round and to control the “cut worm” problem that arises in the spring season. Chemicals are never sprayed on the fairways or on the trees within the golf course. All grassy areas are fertilized, as needed, with products that are comparable to widely available household fertilizers used on residential properties.

Since the golf course will be retained, the pest management program will continue to be in operation after the development of the Project; however, the golf course operator will continue to adhere to the safety requirements imposed by the County of Los Angeles Agriculture Commission, which will ensure that the program will not impact residents within the senior housing complex. The residents in the SCSLC will be buffered from the golf course by landscaping, trees, and the existing driving range, and as currently practiced, the sporadic chemical spraying will be conducted very early in the morning or at the end of the day when all patrons/players for the golf course are gone. As a result, the Project will neither create a significant hazard to the public from use of hazardous materials nor be affected by any significant hazards from the use of hazardous materials on the Project Site.

Airport Safety – The Project Site is not located within an airport land use plan and is not within two miles of a public use airport, or in the vicinity of a private airstrip. Therefore, the Project is not anticipated to result in significant airport safety hazard impacts and will not require further evaluation.

Emergency Response Plans – The Project Site is not considered to be a disaster response, relief, or assembly center by the City or County of Los Angeles. The Project Site does not contain and will not contain medical facilities that would be required during an emergency. The nearest emergency room is located at the Sherman Oaks Hospital, 4929 Van Nuys Boulevard, Sherman Oaks, California 91403, approximately three miles to the west of the Project Site. During emergencies, residents of the Project and patrons of the golf uses would be encouraged to utilize Sherman Oaks Hospital for expedited emergency care and treatment.

Using *Thresholds Guide* screening criteria, it was determined that implementation of the Project would not require new or expanded emergency plans to be written, because of Project activities and location. The Project will incorporate all required Los Angeles Fire Department conditions regarding fire lanes, hydrants, and building design (stairwells, exits, posting of emergency instructions), as well as all site design elements in compliance with the Los Angeles Building Code and all seismic regulations.

The Project will not encroach outside the boundaries of the Project Site. Development of the Project may involve temporary lane obstructions or traffic detours during the construction phase, but would not substantially affect area roadways or other significant transportation corridors. The Project would not involve any permanent changes in transportation corridors that might interfere with an emergency response or evacuation plan. Therefore, the Project is not anticipated to result in significant emergency response impacts and will not require further evaluation.

Wildland Fires – The Project Site is located in a relatively flat, urbanized area. Using *Thresholds Guide* screening criteria it was determined that the Project Site is not within a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access. Several existing fire hydrants are available on surrounding streets, including at the intersection of Valleyheart Drive and Whitsett Avenue; across the street from the Project Site along Whitsett Avenue; and at the intersections of Valley Spring Lane with Whitsett Avenue, Babcock Avenue, and Teesdale Avenue. City of Los Angeles Fire Station No. 78 is also directly adjacent to the Project Site. As part of Los Angeles Fire Department requirements, the senior housing complex will incorporate onsite fire hydrant hook-ups for the six proposed buildings and will have complete fire lane access through the courtyard. Therefore, the Project is not anticipated to result in significant impacts associated with wildland fires and would not require further evaluation.

Hydrology and Water Quality

The Project will not:

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Inundation by seiche, tsunami, or mudflow.

Groundwater – Existing development does not currently directly extract from or recharge to groundwater resources, and permeable surface area is limited to the existing golf course, driving range, putting green, and landscaped areas on proposed Lot 1. Urban runoff from the tennis courts on proposed Lot 2 and the surface parking lot is directed to the stormwater system. With the proposed Project, there would be no change to groundwater resources as the proposed Project will not alter the existing golf course and does not propose to extract from or recharge to groundwater facilities. Further, the permeability of the Project Site will not be substantially increased, and conveyance of groundwater to local recharge and spreading facilities will not be impaired or substantially altered. Even with the implementation of surface materials that are more pervious, the net change to groundwater infiltration would be negligible. The proposed Project would not result in impacts related to groundwater supplies or recharge and further analysis is not required.

Indundation – Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. Seiches are oscillations generated in enclosed bodies of water which can be caused by ground shaking associated with an earthquake. Review of the County of Los Angeles Flood and Inundation Hazards Map (Leighton, 1990) indicates the Project Site does not lie within the mapped tsunami inundation boundaries or within the mapped inundation boundaries due to a seiche or a breached upgradient reservoir. Additionally, the probability of a seismically-induced mudflow or landslide occurring on the Project Site is considered to be low due to the general lack of elevation difference in slope geometry across or adjacent to the Project Site.³

The potential significance of the Project's impacts related to water quality, site drainage, runoff, and flood hazards is addressed in *Section IV.G: Environmental Impact Analysis – Hydrology and Water Quality* of this Draft EIR.

³ *Geotechnical Engineering Investigation*, prepared by Geotechnologies, Inc., December 14, 2011.

Land Use and Planning

The Project will not:

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Project Site is located in an urbanized area and surrounded by single- and multi-family residential and commercial uses. The Project Site is not located in or near any natural community conservation area and is not associated with any habitat conservation plan. The Project Site is included within the Los Angeles River Improvement Overlay District (RIO); however, the RIO District and Plan are concerned primarily with establishment of a positive interface and connection between the Los Angeles River and adjacent properties along the river, including pedestrian orientation and realization of recreational opportunities. The Project would not be in conflict with the RIO Plan. Therefore, the Project is not anticipated to result in significant impacts due to conflict with any applicable habitat conservation plan or natural community conservation plan.

Mineral Resources

The Project will not:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

According to the Los Angeles Citywide General Plan Framework, the Project Site is not located in an area containing significant mineral deposits, nor is it in an area of current or historical aggregate mining and is not within the limits of an active or historic oil field.^{4 5} The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area for which no mineral resource recovery is identified in this Plan. The proposed construction is also limited to two levels of subterranean construction, which reduces the potential for encounter with mineral resources. Because the Project Site is not known to support mineral resources, and the proposed Project does not directly involve the extraction of mineral resources, the Project is anticipated to result in no impact to mineral resources and will not contribute to a potential cumulative impact to mineral resources. Further analysis of mineral resources is not warranted.

⁴ Figure GS-1: Areas Containing Significant Mineral Deposits in the City of Los Angeles. Los Angeles, City of. 2001. *Los Angeles Citywide General Plan Framework EIR*. Agoura Hills, CA: Envicom Corporation. 26 January 2012 <<http://cityplanning.lacity.org>>.

⁵ Figure GS-6: Oil Field and Oil Drilling Areas in the City of Los Angeles. Los Angeles, City of. 2001. *Los Angeles Citywide General Plan Framework EIR*. Agoura Hills, CA: Envicom Corporation. 26 January 2012 <<http://cityplanning.lacity.org>>.

Noise (Airport)

The Project will not:

- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where the Project would expose people residing or working in the Project area to excessive noise levels.
- Be within the vicinity of a private airstrip, where the Project would expose people residing or working in the Project area to excessive noise levels.

Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not located within an airport land use plan, or within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The closest airport is Burbank (Bob Hope) Airport, a public facility, located approximately 4.6 miles northeast of the Project Site. The Project would not expose people residing within the Project Site to excessive noise levels from an airport, and as such, is not anticipated to result in significant impacts associated with airport noises. Further analysis is not warranted.

The determination of potential significance of impacts related to other noise issues are subject to further evaluation and have been addressed in *Section IV.I: Environmental Impact Analysis – Noise* of this Draft EIR.

Population and Housing

The Project will not:

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The Project Site is currently developed with golf and tennis facilities, and is located in a fully developed urban area. There is no permanent resident population on the Project Site. Also, there are no housing units currently located on the Project Site that might be displaced, forcing the displacement of substantial numbers of people. As such, using *Thresholds Guide* screening criteria, it was determined that the Project will not result in an impact to population due to the displacement of existing housing in the area or the displacement of substantial numbers of people. Further analysis is not warranted.

The determination of potential significance of impacts related to population growth issues are subject to further evaluation and have been addressed in *Section IV.J: Environmental Impact Analysis – Population and Housing*.

Public Services

The Project will not:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:
 - Schools

Schools – The Project Site is located in the Los Angeles Unified School District, Board of Education District 3. The Project Site is currently developed with golf and tennis facilities.

The *Thresholds Guide* screening criteria for schools asks: Would the Project result in a net increase of 75 residential units, 100,000 square feet of commercial floor area, or 200,000 square feet of industrial floor area?

The Project will involve the development of 200 residential dwelling units. However, all dwelling units will be developed and sold to senior citizens, restricting residents to 55 years of age or older. The Project Applicant anticipates the average age of residents upon move-in will be approximately 75 years of age. Residents under the age of 55 years will not be allowed to live permanently in the dwelling units and thus will not include children that might impact school capacities for elementary, middle, and high schools in the area. The Project will not include any commercial or industrial floor area. Therefore, the Project is not expected to involve growth-inducing impacts associated with schools and would not require further evaluation.

Transportation and Circulation (Air Traffic)

The Project will not:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks

Air Traffic – The Project Site is not located within an airport land use plan or within two miles of a public use airport, or in the vicinity of a private airstrip. As such, the Project would have no impact on air traffic patterns. Therefore, the Project is not anticipated to result in significant impacts to air traffic patterns and would not require further evaluation.

The potential significance of the Project's impacts related to other traffic, transportation, and access issues, is addressed in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

B. SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires that an EIR discuss significant environmental effects that cannot be avoided if the proposed project is implemented. Based upon the analysis in *Section IV: Environmental Impact Analysis*, with implementation of Compliance Measures, Project Design Features, and Mitigation Measures, the Project will not result in a significant environmental effect with regard to the issues analyzed herein, except for significant unavoidable impacts related to:

- Construction (short-term) air quality impacts related to PM₁₀ and PM_{2.5}
- Construction (short-term) noise impacts at sensitive receptors

Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires that an EIR discuss irreversible environmental changes due to the proposed Project. Irreversible environmental changes will not occur as a result of Project implementation. The Project Site has been committed to urban use for many years, and as a recreational facility since at least 1955. The Project uses are consistent and compatible with City planned land uses originally designated for the Project Site. Thus, development of the Project Site is not considered a new commitment to urban development and does not represent the conversion of undeveloped land.

Construction of the Project will require the consumption of natural resources and renewable and nonrenewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for Project-generated vehicle trips. The commitment of resources associated with the Project is consistent with planned future development within the City of Los Angeles. Moreover, the use of natural resources represents a very small percentage of the resources to be utilized by development Citywide.

Additionally, the Project will provide public benefits through development of independent senior housing, which is currently deficient in the community. There is no particular justification for avoiding or delaying the development of the additional, needed senior housing.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

D. GROWTH-INDUCING IMPACTS

How the Proposed Project Could Foster Growth

Section 15126(d) of the CEQA Guidelines requires that an EIR “discuss the growth inducing impact of the proposed Project, including ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

The Project is not expected to generate growth in the area beyond the intensification of the Project Site. Development of the 200 senior condominiums will result in an increase in population for the surrounding community by an estimated 340 senior residents. As the Project is geared towards senior citizens, the Project will not foster new population (i.e., new babies), but rather shift 340 seniors from other locations into the Project area. Many of these 340 senior residents may already come from the Community Plan Area surrounding the Project. The additional residential population is not substantial and as discussed throughout this Draft EIR, will not have significant impacts on the Project area. Additionally, the additional housing units required to be provided in the community for the new permanent residents, will be provided by the Project itself.

It is not expected that any significant number of employees will move to the area specifically because of the Project. As the Project Site is readily accessible from area freeways, local roadways, and mass transit (buses), most employees are anticipated to commute to the Project in favor of moving to the area. No significant growth inducing impact would occur.

The Project will result in an increase in short-term construction employment opportunities. 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.

It is anticipated that the Project will be adequately serviced by existing extensions of the electrical, water, sewer, and natural gas utility systems existing on or near the Project Site. No additional infrastructure of this nature would be constructed that could generate additional population growth in the Project area.

Development and construction of the Project will add new residents and employees to the area and create short-term construction jobs, and as such, surrounding land uses and businesses may experience secondary effects through stimulated economic activity and growth due to an increased need for commercial support services in the general vicinity of the Project Site due to the incremental increase in the number of residents and employees from the SCSLC. Although the Project would directly provide minor residential and employment growth at the Project Site, and indirectly stimulate economic growth in the surrounding area, such growth is not outside the scope of what has been anticipated and planned for in the Community Plan Area. Thus, no significant growth inducing impacts are anticipated.

Cumulative Development Impacts

The Related Projects (see *Section III: General Overview and Environmental Setting*) are both new and infill projects that will similarly add to the physical and economic revitalization of the Studio City area. Cumulative impacts relating to each environmental issue discussed in this Draft EIR are addressed under the individual impact analysis sections (see *Section IV: Environmental Impact Analysis*). The City will require the preparation of an EIR for those Related Projects that the City anticipates will have potentially significant environmental impacts. Those EIRs must similarly discuss cumulative impacts and growth inducing effects. Individual Project Mitigation Measures may be required in order to reduce environmental impacts. The Project and the Related Projects are not expected to generate unwanted or unplanned growth inducing effects. With respect to the Related Projects that are infill developments, the City's General Plan Framework favors infill development, and such land use arrangements are generally considered to have less of an effect on the environment by preserving unplanned or premature lands from development on the urban fringe or in more remote and rural location.