



City of Los Angeles

Department of City Planning • Major Projects Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



DRAFT ENVIRONMENTAL IMPACT REPORT

SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA PASS COMMUNITY PLAN AREA

Volume 1 of 1

Sections 0. - VIII.

Studio City Senior Living Center Project

Case Number: ENV-2001-1196-EIR
State Clearinghouse Number: 2002031028

Project Location: 4141 Whitsett Avenue, Studio City, California, 91604

Council District: 2

Project Description: The proposed project includes the construction of a new 200-condominium unit senior housing development with an associated subterranean parking structure, known as the Studio City Senior Living Center (SCSLC), on a site currently used for recreational purposes known as Weddington Golf and Tennis. The existing 16 tennis courts and tennis uses on the site would be removed to accommodate the Project; however, the existing golf course, driving range, clubhouse, and other golf uses would be retained, with modifications. The Project would require several entitlements, including, among others, a Tract Map, Conditional Use Permits for the golf uses and alcohol sales, a Zone Variance, and, on a portion of the site, a General Plan Amendment from Open Space to Medium Residential and a Zone Change from A1-1XL to R3-1.

APPLICANT:
Weddington Golf and Tennis,
LLC

PREPARED BY:
Planning Associates, Inc.

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Major Projects Section

JULY 2014

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LIST OF ACRONYMS AND ABBREVIATIONS

>	Greater than
<	Less than
°F	Degrees Fahrenheit
µg/m ³	Micrograms per cubic meter
101	Ventura Freeway
170	Hollywood Freeway
AB	Assembly Bill
ACS	Aquatic Consulting Services, Inc.
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AFUE	Annual Fuel Utilization Ratio
AFY	Acre-feet per year
A.M.	Morning hours (between 12:00 midnight and 12:00 noon)
APS	Alternative Planning Strategy
AQMP	Air Quality Management Plan
ARG	Architectural Resources Group
ASTM	American Standard Test Methods
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan for the Los Angeles Region
BAT/BCT	Best Available Technology/Best Control Technology
BBSC	Board of Building and Safety Commissioners
Bcf	Billion cubic feet
BMP	Best Management Practice(s)
CAA	(Federal) Clean Air Act
CAAQS	California Air Quality Standards
Cal/EPA	Secretary of California Environmental Protection Agency
CAL-FIRE	California Department of Forestry and Fire Protection

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

CalEEMod	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	California Climate Action Team
CCAA	California Clean Air Act
CCR	California Code of Regulations
CCTV	Closed circuit television
CDFG	California Department of Fish and Game
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cf or CF	Cubic feet
cfs	Cubic feet per second
CGS	California Geological Survey
CH ₄	Methane
CMA	Critical Movement Analysis
CMP	(Los Angeles County) Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO ₂	Carbon dioxide
Community Plan	Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
CPT	Cone Penetrometer Test
CPTED	Crime Prevention Through Environmental Design
CRHR	California Register of Historical Resources
CSMP	Construction Site Monitoring Program
CUB	Conditional Use Permit for Alcoholic Beverages
CUP	Conditional Use Permit
CWC	California Water Code
CWA	(Federal) Clean Water Act

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

dB	Decibel(s)
dBA	Decibel(s), A-weighted
DBE	Design-Based Earthquake
DEIR	Draft Environmental Impact Report
Delta	Sacramento-San Joaquin River Delta
DRP	(City of Los Angeles) Department of Recreation and Parks
DU	Dwelling Unit
DWP	(Los Angeles) Department of Water and Power
DWR	California Department of Water Resources
E.O.	Executive Order
EB	East-bound
EER	Energy Efficiency Ratio
EF	Energy Factor
EIR	Environmental Impact Report
ELGs	Effluent Limitation Guidelines
EMFAC	Emissions Factors model
EMS	Emergency Medical Service
FBI	Federal Bureau of Investigation
FEIR	Final Environmental Impact Report
FPPP	Fire Protection and Prevention Plan
FTA	Federal Transit Administration
Gas Company	Southern California Gas Company
GHG	Greenhouse Gas
GLSF	Gross leasable square feet
GPA	General Plan Amendment
gpd	gallons per day
gpm	gallons per minute
GSF	Gross square footage
HSPF	Heating Seasonal Performance Factor

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

HVAC	Heating, ventilation and air conditioning
HWTP	Hyperion Water Treatment Plant
IRP	Integrated Resources Plan
in/hr	inches/hour
IS	Initial Study
ITE	Institute of Transportation Engineers
IUCN	International Union for Conservation of Nature
IUCN-LC	International Union for Conservation of Nature -Least Concern
IUCN-NT	International Union for Conservation of Nature -Near Threatened
IWRP	Integrated Water Resources Plan
kW	Kilowatt
KwH/yr	Kilowatt hour(s) per year
LA	City of Los Angeles
LAA	Los Angeles Aqueduct
LACDPW	Los Angeles County Department of Public Works
LACFCD	Los Angeles County Flood Control District
LADOT	(City of) Los Angeles Department of Transportation
LADWP	(City of) Los Angeles Department of Water and Power
LAFD	(City of) Los Angeles Fire Department
LAFP	Los Angeles Filtration Plant
LAMC	Los Angeles Municipal Code
LAPD	(City of) Los Angeles Police Department
LAPL	Los Angeles Public Library
LARRMP	Los Angeles River Revitalization Master Plan
LARWQCB	Los Angeles Regional Water Quality Control Board
LA-UWMP	Los Angeles Urban Water Management Plan
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent Noise Level
LID	Low Impact Development

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

LRA	Local Responsibility Areas
LOS	Level of Service
LST	Localized Significance Thresholds
MATES-III	Multiple Air Toxics Exposure Study
MSATs	Mobile Source Air Toxics
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transportation Authority
MGD	Million gallons per day
MM	Mitigation measures
MMP	Mitigation Monitoring Program
MND	Mitigated Negative Declaration
MS4	Los Angeles County Municipal Storm Water System Permit
MTA	Los Angeles County Metropolitan Transportation Authority
MWD	Metropolitan Water District
N ₂ O	Nitrous oxide
NAAQS	National Ambient Air Quality Standards
NB	North-bound
NO	Nitrogen oxide
NO ₂	Nitrogen dioxide
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	(California Governor's) Office of Planning and Research
OSHA	Occupational Safety and Health Administration

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

Pb	Lead
PCE	Passenger Car Equivalency/Equivalent
PDF	Project Design Feature
P.M.	Afternoon hours (between 12:00 noon and 12:00 midnight)
PM _{2.5}	Particulate matter at 2.5 microns
PM ₁₀	Particulate matter at 10 microns
ppd	Pounds per day
ppm	Parts per million
PPV	Peak particle velocity
PRP	Public Recreation Plan
PRC	Public Resources Code
Project	Studio City Senior Living Center Project
psi	Pounds per square inch
QSP	Qualified SWPPP Practitioner
REAP	Rain Event Action Plans
RCP	Regional Comprehensive Plan
RIO	Los Angeles River Improvement Overlay District
RMS	Root mean square
ROG	Reactive organic gases
RPS	(California's) Renewable Portfolio Standard
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB	South-bound
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCRA	Studio City Residents Association
SCS	Sustainable Communities Strategies

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

SCSLC	Studio City Senior Living Center
SEER	Seasonal Energy Efficiency Ratio
sf or SF	Square feet
SHRC	State Historical Resources Commission
SO ₂	Sulfur dioxide
SO _x	Sulfur oxide(s)
SUSMP	Standard Urban Stormwater Mitigation Plan
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
Tc	Time of concentration
TDM	Transportation Demand Management
TIA	Traffic Impact Assessment
TIMP	Transportation Improvement and Mitigation Program
TTM	Tentative Tract Map
ULARA	Upper Los Angeles River Area
USEPA	United States Environmental Protection Agency
USFW	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
V/C	Volume-to-capacity (ratio)
Vdb	Decibel notation
VHFHS	Very High Fire Hazard Severity
VMT	Vehicle miles traveled
VOC	Volatile organic compounds
WB	West-bound
WDRs	Waste Discharge Requirements
WECC	Western Electricity Coordinating Council
WMBA	William M. Bray, AIA, Architect & Associates

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

WSA	Water Supply Assessment
ZC	Zone Change
ZV	Zone Variance

0. EXECUTIVE SUMMARY

In accordance with the California Environmental Quality Act (“CEQA”) Guidelines Section 15123, this Draft Environmental Impact Report (“Draft EIR” or “DEIR”) contains a brief summary of the proposed Project, the proposed actions, areas of controversy known to the lead agency and issues to be resolved, and a summary of significant impacts and proposed Mitigation Measures or alternatives that would reduce or avoid those effects. Detailed information regarding the proposed project and its potential environmental effects are provided in the following sections of this Draft EIR.

A. PROJECT SUMMARY

1. LEAD AGENCY AND APPLICANT

The City of Los Angeles is the Lead Agency for the preparation of this Draft EIR; all inquiries regarding the Draft EIR should be directed to the City. Key contacts are as follows:

Lead Agency: City of Los Angeles
Department of City Planning
Major Projects Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Applicant: Weddington Golf and Tennis, LLC
4167 Bakman Avenue
North Hollywood, CA 91602
Attention: Guy Weddington-McCreary

Owner: Weddington Investment Properties, LLC
4167 Bakman Avenue
North Hollywood, CA 91602
Attention: Guy Weddington-McCreary

2. PROJECT DESCRIPTION OVERVIEW

The proposed Project is located within a 16.1-acre property (the “Project Site”) at 4141 Whitsett Avenue, occupied by the Weddington Golf & Tennis Club, a private recreation facility consisting of an existing nine-hole, par-3, pitch-and-putt golf course (“golf course”) and sixteen tennis courts, within the Studio City area of Los Angeles. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, which serves as a guide for development and land uses in the area, designates the land use for the Project Site as Open Space and identifies the Project Site as a private golf course. The Project Site is currently zoned A1-1XL, which indicates agricultural zoning (A1) within an Extra Limited Height District (1-XL) that restricts all buildings and structures to two stories or 30 feet in height.

The Project involves three components: 1) Division of the Project Site into two lots, one for the continuation of the nine-hole golf course on the northern and westerly portion of the Project Site (also referred to as Lot 1) and the other for a new senior condominium development on approximately 4.5 acres within the southeast portion of the Project Site (also referred to as Lot 2); 2) Minor modifications to the golf course and driving range to accommodate the lot split, and 3) Demolition and removal of sixteen existing tennis courts and construction of the new senior housing development, to be known as the Studio City Senior Living Center (SCSLC). Collectively, all of Lot 2 and that portion of Lot 1 (i.e., primarily the southeastern portions adjacent to Lot 2) that will undergo any physical change (i.e., demolition, construction, modification, or reconstruction) for the Project are referred herein as the “Development Site”. A detailed description of the Project is provided in *Section II: Project Description* of this Draft EIR.

The goal of the proposed Project is to establish a residential community oriented toward senior independent housing to benefit the increasingly aging population existing within the area while maintaining the recreational value of the golf course, clubhouse, and driving range uses on the Project Site to accommodate the needs of the surrounding community at large.

The new senior housing will consist of six, 45-foot-high, 4-story buildings, designed as a unified senior community campus. The ground floor of four buildings will provide common areas for senior activities. The six buildings will house a total of 200 senior condominium units and 40,000 square feet of common area. The total floor area is expected to be approximately 336,000 square feet. The senior residential housing will be age-restricted for seniors aged 55 and older. Detailed figures showing the proposed site plan are provided in *Section II: Project Description* of this Draft EIR.

Implementation of the proposed Project would require various approvals from the City of Los Angeles. The Project includes requests for the following entitlements and approvals:

- Tentative Tract Map to subdivide the Project Site in order to create two functional parcels (Lots 1 and 2) for future development and management, as well as for residential condominiums on Lot 2.
- General Plan Amendment to change the Community Plan’s designation of Lot 2 from Open Space to Medium Density Residential.
- Zone Change from A1-1XL to R3-1 on Lot 2.
- Building Line Removal, incident to the subdivision, to remove an obsolete 18-foot building line along Whitsett Avenue.
- Conditional Use Permit to allow the driving range and pitch-and-putt golf course in the existing A (Agricultural) Zone on Lot 1.

- Revocable/Encroachment Permits on Lot 1 to retain existing golf course encroachments in the City's and County's rights-of-way along Valleyheart Drive and the Los Angeles River.
- Zone Variance may be required to permit the existing over-in-height driving range fence with minor reconfiguration on Lot 1, if the fence cannot be entitled by the above Conditional Use Permit.
- Site Plan Review for a development over 50 dwelling units on Lot 2.
- Zone Variance for golf course/driving range parking and the dispensing of golf balls for the driving range in the proposed R3 zone on Lot 2.
- Conditional Use permit for alcohol (CUB) is requested for the sale and/or dispensing of alcohol to residents and/or their guests within common area facilities for on-site consumption on Lot 2.
- Haul Route Permit to export approximately 82,000 cubic yards of earth.
- B-Permit for necessary street, sewer, storm drain, and lighting improvements;
- Grading Permits;
- Demolition Permits;
- Building Permits;
- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

The Project will incorporate many “sustainable” or “green” strategies that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. Implementation of a variety of design and operational features (i.e., Project Design Features [“PDFs”]) into the Project to achieve energy conservation, water efficiency and other sustainable practices, will reduce impacts to noise, air quality, traffic and waste. Specific “sustainable strategies” incorporated into the Project are identified in *Section II.F: Project Description – Project Characteristics* of this Draft EIR.

0. EXECUTIVE SUMMARY

B. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Section 15123 of the CEQA Guidelines requires that an EIR identify areas of controversy and issues to be resolved which are known to the Lead Agency, including issues raised by other agencies and the public. Potential areas of controversy and issues to be resolved by the City's decision-makers include those environmental issue areas where the potential for a significant unavoidable impact has been identified and/or an area where community concerns elevate the project's perceived effects beyond reasonable threshold criteria.

Areas of controversy associated with the Project are made known through comments received during the Notice of Preparation ("NOP") process (see *Section I.A: Introduction – Environmental Review Process* of this Draft EIR), as well as input solicited during the public scoping meeting and an understanding of the community issues in the Project area. Areas of known controversy, including issues raised by some members of the community are: traffic generation and congestion, loss of open space and recreation, dust and air quality impacts, water quality of urban runoff and water supply, land use incompatibility with the surrounding neighborhood, noise impacts, population increase and effect on public services and utility systems, impacts to wildlife habitats, impacts on historical resources, hydrological impacts to the Los Angeles River and access to the river, impacts to views of the mountains, parking impacts, safety concerns due to proximity of the golf course to the senior housing, impacts from loss of trees, impacts to neighborhood character and density, geological impacts, and impacts from shade. The areas of known controversy noted above are analyzed, either directly or as indirect (secondary) effects, in *Section IV: Environmental Impact Analysis*.

0. EXECUTIVE SUMMARY

C. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

The Los Angeles Department of City Planning and CEQA Guidelines Section 15126.6 require that an EIR describe a range of reasonable alternatives, including a “No Project” alternative, that may potentially attain most of the basic Project objectives and could possibly avoid or substantially lessen any of the significant environmental effects of the Project. The CEQA Guidelines state that only those alternatives necessary to permit a “reasoned choice” are required. Based on the analysis of alternatives, an environmentally superior option must be designated. A complete analysis of Project alternatives, including an explanation of alternatives considered but not evaluated, is provided in *Section V: Alternatives* of this Draft EIR and is summarized below.

Four alternatives, in addition to the Project, were evaluated, and an Environmentally Superior Alternative was identified. These alternatives are summarized as follows:

Alternative A: No Project Alternative. The “No Project” Alternative typically assumes that no changes to a project site or existing structures would occur.

Alternative B: Higher Density with Recreation Project Alternative

Alternative C: Original Zoning Project Alternative

Alternative D: Los Angeles River Natural Park Project Alternative

Environmentally Superior Alternative. The impacts of the four selected alternatives are evaluated in comparison to the impacts of the Project in *Section V: Alternatives*. As required by CEQA, an environmentally superior alternative has been identified. The environmentally superior alternative is the one that results in substantially reduced impacts to either all environmental issue areas or within one or several key environmental issue areas, while still maintaining and satisfying the Project objectives.

Of the alternatives analyzed in this Draft EIR (*Section V: Alternatives*), the No Project Alternative is considered the overall environmentally superior alternative as it would reduce (or avoid) the vast majority of the significant or potentially significant impacts that are anticipated to occur under the Project. However, the No Project Alternative would not substantially satisfy the objectives of the Project.

Aside from the No Project Alternative, the Higher Density with Recreation Project Alternative would also be considered an Environmentally Superior Alternative since it would result in the least Project impacts over any other of the remaining alternatives. This alternative is the only alternative that does not have additional potentially significant impacts beyond those determined for the proposed Project. Most impacts of this alternative would be comparable to the proposed Project with a reduction to recreational impacts, primarily due to the retention of the tennis courts and all recreational components that currently exist on the Project Site. There are slightly greater impacts from this alternative with regards to biological resources, cultural resources,

population and housing, public services, transportation and circulation, and utilities, primarily due to the increase in the number of dwelling units in the alternative; however, all of these impacts would continue to be less-than-significant, and the potentially significant impacts would be identical to the Project (construction related impacts to air quality and noise). Retention of as many recreational uses as possible on the Project Site is a Project objective and has been determined to be an important point for the surrounding neighborhood and community. The Higher Density with Recreation Alternative also satisfies the Project objectives and Community Plan objectives to provide diverse housing in the community.

0. EXECUTIVE SUMMARY

D. SUMMARY OF PROJECT IMPACTS

Section IV: Environmental Analysis of this Draft EIR includes a detailed analysis of the following environmental topics: 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; Recreation and Parks; Transportation and Circulation; Utilities; and Cumulative Effects. A summary of the impacts addressed, and identification of the Mitigation Measures (and Project Design Features which have been incorporated as Mitigation Measures to ensure compliance), is presented below in *Table 0-1: Summary of Environmental Impacts/Mitigation Measures/Level of Significance After Mitigation*.

TABLE 0-1
SUMMARY OF ENVIRONMENTAL IMPACTS/MITIGATION MEASURES/LEVEL OF SIGNIFICANCE AFTER MITIGATION

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
A. AESTHETICS		
<p>The aesthetic characteristics due to implementation of the Project are detailed in <i>Section IV.A: Environmental Impact Analysis – Aesthetics</i> of this Draft EIR and summarized below.</p> <p>Visual Quality and Character. The proposed Project consists of the construction of the 200-unit Studio City Senior Living Center (SCSLC) consisting of six, four-story buildings on the Project Site with associated landscaping, hardscaping, common areas, and amenities. Construction of the senior residential complex will require movement of the existing southern driving range fence approximately 21 feet to the north, thus eliminating three of the 24 existing tee stands, as well as movement of the existing green/hole for golf hole number five approximately 25 feet to the northwest and the tee for golf hole number six approximately 90 feet to the west, thus shortening the fairways for the two holes by the respective distances.</p> <p>The six, four-story buildings proposed for the Project would be similar in size and mass to several existing multi-family residential buildings across the street from the Project Site along Whitsett Avenue. The design of the new buildings would incorporate many of the architectural elements that are present in the surrounding multi-family residential buildings, as well as in the community in general. The architectural style and treatment will be consistent throughout all the buildings in the complex. The proposed subterranean parking structure for the complex will not be visible at or above grade. As such, the proposed Project will be consistent in visual character, architecture, size, height, and massing with the surrounding community</p>	<p>PDF AES-1 The Project shall include an exterior lighting design that will minimize nighttime illumination.</p> <p>MM AES-1 During the construction/demolition phase of the Project, equipment, materials, and temporary facilities (such as construction trailers, staging sites, and portable toilets) shall be stored on the Project Site and screened by temporary construction fencing.</p> <p>MM AES-2 Due to potentially ongoing golf course and driving range operations during the construction/demolition phase of the Project, efforts shall be made by the developer to continue to present an attractive community presence through sufficient screening of construction and responsible cleanup of dirt around the construction site.</p> <p>MM AES-3 To enhance safety, construction areas shall be clearly partitioned and visually segregated from public areas.</p> <p>MM AES-4 Any existing golf ball light standards removed from their current locations shall be retained and relocated so that they remain on the property and continue to be visible to the public, whether they are utilized for lighting purposes or not.</p>	<p>Project impacts during operations, with regard to visual character, views, illumination, and glare, are less-than-significant and do not require Mitigation Measures. During the construction and demolition phase of the Project, aesthetic impacts would be temporary and would be applicable only to uses immediately surrounding the Project Site or with direct view to the Development Site; however, with implementation of the required Compliance Measures and Mitigation Measures, any potential short-term aesthetic impacts related to construction and demolition would be reduced to a less-than-significant level.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>and impacts will be less-than-significant.</p> <p>The minor modifications to the southeastern portion of the golf course turf and the southern portion of the driving range fence will not substantially alter the visual character of the Project Site or the general image of the immediate area. The areas to be modified will continue to be used as turf for golf course purposes and fencing for the driving range. The fairways for golf holes nos. five and six will be shortened; however, the fairways, greens, and tees will be recreated to appear similar to those that currently exist. No stands of trees are anticipated to be affected by the reconfiguration of the two golf hole fairways. The overall visual character and aesthetic of the golf course as a green open space with an abundance of mature trees, used for a nine-hole pitch-and-putt golf course, will remain intact and impacts will be less-than-significant.</p> <p>Although construction-related activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 24 months). The Project Applicant ensures that efforts will be made to continue to present an attractive community presence throughout the duration of the construction activities, and that to enhance safety concerns, construction areas will be clearly partitioned and visually segregated from public areas. Following the completion of construction, proposed Lot 1 of the Project Site, containing the golf course, driving range, and clubhouse would resume the visual character that currently exists, while proposed Lot 2 will maintain a visual character, aesthetics, and architecture that are consistent with the surrounding multi-family residential uses. Therefore, with appropriate Mitigation Measures to screen construction activity to</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>the extent possible, the temporary impacts on the visual character of construction activity on the Project Site would be less-than-significant during the construction phase of the Project.</p> <p>Views. Implementation of the Project would increase visibility of development at the Project Site. The buildings would be taller than all existing development on the Project Site, with the exception of the driving range fence and many tall trees within the golf course, but of similar height and massing to the surrounding residential buildings along Whitsett Avenue. The footprint of the senior housing complex would be similar to the existing footprint of the 16 tennis courts with the intention to preserve the location and configuration of the golf course and driving range to the extent possible.</p> <p>The Project will increase the general height and massing of the site by converting the existing footprint from 16 tennis courts with approximately 12-foot-high fencing into six residential condominium buildings that extend 45 feet high. However, the height and massing of the Project would be consistent with the surrounding multi-family residential buildings, specifically along Whitsett Avenue. The Project will also be buffered from the smaller single-family homes along Valley Spring Lane by the existing greens of the golf course, the driving range, and the clubhouse. As the Project would incorporate many of the architectural elements that are present in surrounding multi-family residential buildings, the Project would appear as a continuation of existing background features. Overall views from surrounding areas would not be significantly impacted due to the existing development and landscaping surrounding the Project Site, which already obscures or limits views to and from the Project Site and the mountains in the</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>distance. Furthermore, the Project Site and surrounding area are not considered scenic resources and do not constitute scenic vistas according to the Community Plan. Although the immediate views of the Project Site would be of the intensified development, the senior housing complex would be visually consistent with the surrounding residential structures. Therefore, less-than-significant impacts to existing viewsheds are anticipated.</p> <p>Light, Glare, and Nighttime Illumination. At 45 feet in height, the senior housing buildings of the Project will not be significantly taller than the surrounding buildings along Whitsett Avenue and thus, the nighttime lighting will not be visible to properties outside of the immediate surrounding area. Views of the Project's nighttime lighting from the single-family residential dwellings on both Valley Spring Lane and Bellaire Avenue would largely be unnoticeable or unseen due to the distance of these properties from the senior housing complex, as well as the intervening tree foliage and stadium-style lighting that currently emanates from the approximately 20-foot-high golf ball light standards for the driving range. Similarly, the Project would not have significant impacts on the already brightly lit Ventura Boulevard due to the intervening effects of tree foliage along the Los Angeles River, as well as nighttime lighting from existing commercial development, big-box retail, and associated parking lots along the corridor. Finally, the Project would not significantly impact residences in the Hollywood Hills and other outlying areas due to the distance of these areas from the Project and the cumulative illumination effect from the intervening commercial development of Ventura Boulevard (i.e., the incremental effect of additional lighting due to the Project would be negligible at these distances). Therefore, no significant adverse nighttime</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>illumination impacts are expected to occur.</p> <p>With regard to glare, the SCSLC building façades will be treated with a combination of stone, cement plaster, and glass for windows and doors. The glass surfaces are not continuous along the façades of the buildings and would be broken up by the cement plaster walls, cultured stone base, balusters, balconies, landscaping, and other architectural detailing, thereby minimizing the potential for glare at ground-level and from early morning or late afternoon sun on the upper levels. Compliance with the LAMC Section 93.0117 (reflective materials design standards), which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact for building material glare. Implementation of the Project would not produce glare that would create a visual nuisance and, therefore, would not result in a significant impact.</p> <p>Consistency with Adopted Plans and Policies. The Community Plan identifies the Project Site as an Open Space land use with a private golf course designation. The Project is consistent with the Community Plan, in part due to the fact that the Project preserves the pitch-and-putt golf course, driving range, and golf clubhouse, which have long been recognized by the community as established uses in this area. Further, the Project is consistent because it furthers the Urban Design policies and guidelines in the Community Plan (i.e., as through physical site improvements) and indirectly supports those policies by not creating obstacles for their realization. The Project implements many of the site planning, building height, pedestrian-orientation, lighting, and landscaping guidelines identified in the Urban Design section of the Community Plan for mutli-family residential uses. Pedestrian-orientation is also addressed in detail in</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p><i>Section IV.M: Environmental Impact Analysis – Transportation and Circulation</i> of this Draft EIR. The Project would result in a less-than-significant impact to aesthetic-related and urban design consistency and compatibility issues in the Project area as demonstrated by the Project’s consistency with applicable policies and programs of the Community Plan.</p> <p>Cumulative Impacts. Development of the Related Projects would incrementally increase the intensity and urbanization of the Project area. However, the surrounding community is already considered to be one of an urban nature and aesthetic. As required by the City of Los Angeles, the project designs of the Related Projects must be reviewed by the Los Angeles City Department of Planning for consistency with applicable City codes and regulations, as well as the Community Plan, prior to final plan approval. With Compliance Measures implemented on the Related Projects, cumulative impacts would be less-than-significant.</p>		
B. AIR QUALITY		
<p>The emissions associated with the construction and operational phases of the Project, and cumulative future emissions, are detailed in <i>Section IV.B: Environmental Impact Analysis – Air Quality</i> of this Draft EIR and summarized below.</p> <p>Construction Activity. Construction of the proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. NO_x emissions would primarily result from</p>	<p>PDF AQ-1 Project shall be located so that the proposed senior housing is adjacent to the existing golf course to allow use of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.</p> <p>PDF AQ-2 The landscaping for the SCSLC shall use water efficient landscaping and native drought tolerant plants.</p> <p>PDF AQ-3 The Project shall attempt to use as many</p>	<p>Implementation of the Mitigation Measures would reduce all project air quality impacts, except for construction-phase localized impacts, to less-than-significant levels.</p> <p>Implementation of the Mitigation Measures related to construction would ensure that fugitive dust emissions would be reduced by approximately 61 percent. However, PM2.5 and PM10 emissions would continue to exceed the localized significance. Therefore, the Project would result in a significant and unavoidable impact related to localized construction emissions.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. The assessment of construction air quality impacts considers each of these potential sources.</p> <p>CalEEMod was used to calculate the daily construction emissions on both a regional scale and local scale.</p> <p>Construction of the Project would result in maximum mitigated (through mandatory compliance with SCQAMD Rule 403) daily regional emissions of approximately 37 pounds per day (“ppd”) of VOCs, 84 ppd of NO_x, 51 ppd of carbon monoxide (CO), less than 1 ppd of sulfur oxides (SO_x), 11 ppd of particulate matter 2.5 microns or less in diameter (PM_{2.5}), and 16 ppd of particulate matter ten microns or less in diameter (PM₁₀). The estimated daily regional emissions associated with each construction phase would not exceed the SCAQMD regional thresholds. Therefore, assuming compliance with SCAQMD Rule 403 for Fugitive Dust, the proposed Project would result in a less-than-significant impact related to regional construction emissions.</p> <p>Construction of the Project would result in maximum mitigated daily local emissions of approximately 37 pounds per day (“ppd”) of VOCs, 61 ppd of NO_x, 37 ppd of carbon monoxide (CO), 10 ppd of particulate matter 2.5 microns or less in diameter (PM_{2.5}), and 15 ppd of particulate matter ten microns or less in diameter (PM₁₀). The estimated daily localized emissions for PM_{2.5} and PM₁₀ would exceed the SCAQMD localized thresholds, inclusive of implementation of all Compliance Measures. Therefore, the Project would result in a significant and</p>	<p>regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.</p> <p>PDF AQ-4 The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.</p> <p>PDF AQ-5 The Project shall use natural light as the primary source of light in dwelling units. Lighting systems will be controllable to achieve a maximum efficiency.</p> <p>PDF AQ-6 The Project shall use exterior lighting that would minimize nighttime illumination.</p> <p>PDF AQ-7 The SCSLC energy performance goal shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions, and greenhouse gas emissions.</p> <p>PDF AQ-8 The SCSLC shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.</p> <p>PDF AQ-9 The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.</p> <p>PDF AQ-10 The Project shall achieve LEED Platinum, Gold, or Silver status.</p>	<p>Implementation of the Mitigation Measure related to operation would ensure that interior air supply is filtered at an acceptable level and will ensure that the air quality impacts during the operational phase of the Project remain at less-than-significant levels.</p> <p>Pursuant to CEQA Guidelines Sections 15092 and 15093, in the event that 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 any benefits of the Project.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>unavoidable impact (albeit temporary) related to localized construction emissions.</p> <p>Long-Term Operation. Long-term Project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicle trips generated by the Project residents and guests would be the predominate source of long-term Project emissions. CalEEMod was used to calculate operational mobile and area source emissions. Localized CO emissions were calculated utilizing the USEPA's CAL3QHC dispersion model and the CARB's EMFAC 2007 model.</p> <p>Operation of the Project would result in total daily regional emissions (cumulatively and at Project buildout in 2016) of approximately 21 ppd of VOC, 23 ppd of NO_x, 90 ppd of CO, less than one ppd of SO_x, one ppd of PM_{2.5}, and 17 ppd of PM₁₀. Daily regional operational emissions are anticipated to be less than the SCAQMD regional significance thresholds under both existing and future cumulative conditions and, as such, would result in a less-than-significant impact.</p> <p>Regarding localized air quality, CO concentrations in the future are expected to be lower than existing conditions due to stringent State and federal mandates for lowering vehicle emissions. Although traffic volumes would be higher in the future, both without and with the implementation of the proposed Project, CO emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems, as well as from normal turnover in the vehicle fleet. Based on the traffic study, the only intersection that requires a localized CO analysis is Whitsett Avenue/Riverside Drive (A.M. Peak Hour) under Existing With Project Conditions. The USEPA</p>	<p>MM AQ-1 Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.</p> <p>MM AQ-2 The construction contractor shall use at least one or more of the following measures at each vehicle egress from the Project Site to a paved public road, in order to effectively reduce the migration of dust and dirt offsite:</p> <ul style="list-style-type: none"> • Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; • Pave the surface extending at least 100 feet and at least 20 feet wide; • Utilize a wheel shaker/ wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or • Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. <p>MM AQ-3 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</p> <p>MM AQ-4 Construction activity on unpaved surfaces shall be suspended when wind speed</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>CAL3QHC micro-scale dispersion model was used to calculate CO concentrations. One- and eight-hour CO concentrations would be approximately 3 and 2.4 ppm at worst-case sidewalk receptors, respectively. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the study intersection. Therefore, the proposed Project would result in a less-than-significant impact related to operational localized air quality impacts.</p> <p>The Project would not expose sensitive receptors to significant emissions of TAC as a result of activities associated with Project operations, and impacts associated with TAC emissions during operations would be less-than-significant. The Project would not expose people to objectionable odors.</p> <p>Consistency with Adopted Plans and Policies. The 2007 Air Quality Management Plan (AQMP) was prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. The AQMP includes short-term control measures for stationary and mobile sources developed by the SCAQMD. As detailed in <i>Section IV.B: Environmental Impact Analysis – Air Quality</i>, the proposed Project would not interfere with implementation of these control measures. Therefore, the proposed Project would result in a less-than-significant impact related to the AQMP.</p> <p>Cumulative Impacts. A significant impact would occur if the proposed Project resulted in a cumulative net increase in any criteria pollutant above threshold standards. The proposed Project would not result in a significant regional impact during construction or operation. However, the proposed Project would result</p>	<p>exceed 25 miles per hour (such as instantaneous gusts).</p> <p>MM AQ-5 Ground cover in disturbed areas shall be replaced as quickly as possible.</p> <p>MM AQ-6 The Project shall include heating, ventilation, and air conditioning (HVAC) systems equipped with air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13. Filtration shall be applied to process both return and outside air that is to be delivered as supply air.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>in significant localized PM_{2.5} and PM₁₀ impacts during short-term construction activities. As the Project results in localized significant impacts during construction relative to particulate matter, it is anticipated that Related Project development would also result in significant localized impacts. While Compliance Measures and Mitigation Measures would reduce air quality impacts, cumulative construction emissions would exceed SCAQMD localized significance thresholds. Therefore, the proposed Project would result in a cumulatively considerable impact related to construction air quality. However, this impact would be temporary and short-term during the construction period of the Project and Related Projects.</p>		
<p>C. BIOLOGICAL RESOURCES</p>		
<p>The biological impacts due to development of the Project are detailed in <i>Section IV.C: Environmental Impact Analysis – Biological Resources</i> of this Draft EIR and summarized below.</p> <p>Animal Species. Based on biological surveys conducted in 2007 and 2008, the existing Project Site, and specifically the golf course, contains a variety of wildlife (reptiles, birds, and mammals) that have adapted to normal golf course operations. Although the proposed senior housing development located on Lot 2 and currently containing tennis courts has no specific habitat area, the surrounding golf course provides suitable mature trees, brush, and vegetative cover used by existing wildlife species. The proposed Project will not remove any of the stands of large mature trees or brush that would contain potential bird nesting habitat and squirrel nesting areas, and as such, these habitats will remain intact. However, since the Project footprint would be contiguous to these existing habitat areas, resident bird and wildlife species would</p>	<p>BIO-1 Biological monitoring of all construction activities shall be performed during the regular nesting season (February 1 through September 1). If birds begin to nest during construction, these nest areas shall be marked and a 50-foot buffer/avoidance zone shall be established to protect nesting/fledgling birds. Any nesting birds within this zone shall be avoided until such time that all young have fledged and the nest is no longer active, or until the nest is observed to have been abandoned for a sufficient period of time to preclude egg viability. Heavy equipment (dozer, backhoe, trucks, excavator, and pile driver) used for Project construction shall avoid working within this 50-foot buffer area. Alternatively, excavation, grading, fill, pile driving, or any other construction activity requiring the use of heavy equipment shall be conducted outside the typical nesting season.</p>	<p>Project impacts during operations, with regard to the biological life on the Project Site, are less-than-significant, primarily because the Development Site is largely void of suitable habitat for wildlife species. Further, with implementation of the Compliance Measures as required and the Mitigation Measures, all potential and short-term construction impacts related to biological resources would be reduced to less-than-significant levels.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>need to be protected during construction.</p> <p>Exotic Parakeets. The exotic parakeets observed on the Project Site are not protected by State or federal regulations, but are of interest to the general public in the area. As most of the proposed construction is planned to occur within the existing footprint of the tennis court complex and immediately adjacent area (comprising the Development Site), which generally lack suitable nesting and foraging habitat for the bird species observed onsite, it is likely that proposed construction activities within the Project Site will have negligible impacts to birds generally occurring within the golf course. As such, the Project will have a less-than-significant impact to the exotic parakeet population and bird population in general.</p> <p>Squirrels. Neither fox squirrels nor the California ground squirrels occurring onsite are special-status species, and are not provided any special State or federal regulatory protection. As all of the proposed construction is planned to occur within the Development Site, which generally lacks suitable burrowing, nesting, and foraging habitat for the squirrel species observed on the Project Site, it is anticipated that proposed construction will have negligible impacts to squirrels occurring on the golf course. In addition, it should be noted that fox squirrels are exotic to California (native to the eastern portion of the United States), and the ground squirrel population occurring on the Project Site is presently managed by golf course landscape and maintenance personnel in order to minimize damage caused by these burrowing mammals to the golf course fairway and green areas. Since most of the large mature stands of trees on the golf course will be left intact, any fox squirrel nests will be left intact during construction. Therefore, impacts are less-than-significant and no</p>	<p>MM BIO-2 If additional trees, beyond those proposed in the EIR, are removed as a necessity for grading and construction operations, especially those trees which form a part of a large, established stand or canopy, or trees which appear visually unique, then the Project Applicant or developer shall preserve the trees, if healthy, for re-planting elsewhere onsite, to the extent possible.</p> <p>BIO-3 New trees integrated into the Project should be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. As such, the proposed Project tree program shall incorporate the following:</p> <ul style="list-style-type: none"> • As recommended by Cal-IPC (California Invasive Plant Council-www.caHpc.org), the following trees should be avoided: Tree-of-Heaven (<i>Ailanthus altissima</i>), Single Seed Hawthorn (<i>Crataegus monogyna</i>), Russian Olive (<i>Elaeagnus angustifolia</i>), Blue Gum (<i>Eucalyptus globulus</i>), Myoporum (<i>Myoporum laetum</i>), Black Locust (<i>Robinia pseudoacacia</i>), Chinese Tallow Tree (<i>Sapium sebiferum</i>), Brazilian Pepper Tree (<i>Schinus terebinthifolius</i>), Scarlet Wisteria (<i>Sesbania punicea</i>) & Sa It Cedar (<i>Tamarix</i> sp.). 	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>specific recommendations for protecting these animals are required.</p> <p>Trees. It is the intention of the proposed Project to preserve the majority of the trees primarily on the golf course of the Project Site. However, of the total 47 trees surveyed within the Development Site (area of physical disturbance on the Project Site), 38 trees will be retained and nine trees removed.</p> <p>Due to the fact that the Project Site does not support any indigenous, native to California (California “native” bay, oak, sycamore, and/or walnut) trees, there are no anticipated impacts to native trees. However, the nine trees to be removed to accommodate the Project meet the definition of “of size” trees per the City of Los Angeles’ Tree Protection Guidelines. The removal of the nine trees compared to an overall total (approximately) 430 trees on the Project Site, represents a potential loss of approximately 2 percent of the total trees onsite. Further, this represents about 19 percent removal of the total “of size” trees at the Project Site. Since only a small percentage of the onsite trees are being removed to accommodate the Project and no protected indigenous trees, native to California, are being removed, the Project will have a less-than-significant impact on trees.</p> <p>Cumulative Impacts. A significant impact to biological resources is typically based on consideration of the Project’s impact on known sensitive species and/or the loss of valued habitat. Due to the fact that the proposed Project would not affect any rare, threatened, or endangered species, nor result in the removal of any special or native habitats, the resultant cumulative impact is also considered less-</p>	<ul style="list-style-type: none"> • As recommended by Cal-IPC, the following trees are discouraged to be planted in California: Acacia (<i>Acacia dealbata</i>, <i>A. decurrens</i>, & <i>A. melanoxylon</i>), Edible Fig (<i>Ficus carica</i>), Mayten (<i>Maytenus boaria</i>), Olive (<i>Olea europaea</i>), Canary Island Date Palm (<i>Phoenix canariensis</i>), California Pepper Tree (<i>Schinus californica</i>) & Mexican Fan Palm (<i>Washington robusta</i>). • As recommended by Cal-IPC, the following trees are encouraged: Strawberry Tree (<i>Arbutus</i> sp.), Eastern Redbud (<i>Cercis canadensis</i>), Chinese Fringe Tree (<i>Chionanthus retusus</i>), Japanese Blueberry Tree (<i>Elaeocarpus decipiens</i>), Bronze Loquat (<i>Eriobotrya deflexa</i>), Nichol’s Willow-Leafed Peppermint (<i>Eucalyptus nicholii</i>), Crape Myrtle (<i>Lagerstroemia</i> sp.), Tulip Tree (<i>Liriodendron tulipifera</i>), Dawn Redwood (<i>Metasequoia glyptostroboides</i>), Sweet Michelia (<i>Michelia doltsopa</i>), Tupelo (<i>Nyssa sylvatica</i>), Burr Oak (<i>Quercus macrocarpa</i>), Southern live Oak (<i>Quercus virginiana</i>), Japanese Snowdrop Tree (<i>Styrax japonicus</i>), Bald Cypress (<i>Taxodium distichum</i>) & Water Gum (<i>Tristania laurina</i>). 	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
than-significant.		
D. CULTURAL RESOURCES		
<p>The impacts to potential historical resources due to implementation of the Project are detailed in <i>Section IV.D: Environmental Impact Analysis – Cultural Resources</i> of this Draft EIR and summarized below.</p> <p>California Register. For CEQA purposes, a historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources or a qualified local register. The Weddington Golf and Tennis Club has not been previously listed on or determined eligible for the CRHR (California Register of Historical Resources) or the NRHP (National Register of Historical Resources), nor has it been designated as a City of Los Angeles Historic-Cultural Monument. The Project Site was not evaluated for National Register or Los Angeles Historic-Cultural Monument eligibility; however, the evaluation of significance under the California Register establishes a reasonable benchmark for national and local eligibility.</p> <p>After analysis and evaluation of all parts of the Project Site, the Weddington Golf and Tennis Club appears to be eligible for the CRHR under criteria one and three:</p> <p>Criterion 1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.</p> <p>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.</p>	<p>PDF CUL-1 In order to physically distinguish and differentiate between the two proposed parcels, appropriate landscaping, such as the placement of trees or shrubs at the parcel boundary to act as a natural screen between the two properties, shall be used to create a buffer between Lot 1 and Lot 2.</p> <p>MM CUL-1 To the extent feasible, all of the golf ball light standards, which are located in the existing surface parking lot and are a character defining feature, shall be retained in place. If any light standard must be moved, it shall be retained and relocated to an unaffected portion of Lot 1.</p> <p>MM CUL-2 Any modifications to the Project design and layout shall be reviewed to confirm compliance with the <i>Secretary of the Interior’s Standards</i>.</p> <p>MM CUL-3 Any treatments that could cause damage to historic materials shall require review by a qualified professional in order to ensure conformance with the <i>Secretary of the Interior’s Standards</i>.</p>	<p>Since the Project has been designed to avoid significant impacts to the eligible historic components of the Weddington Golf and Tennis Club, as established per the <i>Secretary of the Interior’s Standards for Rehabilitation</i>, and Mitigation Measures have been required to ensure that all golf ball light standards are retained onsite and building materials will not be deteriorated, the Project will not result in a significant adverse effect under CEQA and thus impacts are less-than-significant. Implementation of the Compliance Measures and additional PDFs and Mitigation Measures would ensure that impacts remain less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Secretary of the Interior’s Standard for Rehabilitation. Under CEQA, resources that meet the criteria for listing on the California Register and National Register of Historic Places are considered historic resources. The Weddington Golf Course appears to be eligible for the California Register under Criterion 1, as a privately-owned community recreation (golf) center built to serve the growing community of Studio City in the mid-1950s; and under Criterion 3, as a property that embodies the distinctive characteristics of a type as a typical example of a post-war community golf course. Therefore, the Weddington Golf and Tennis Club appears to be significant at the local level and an historic resource under CEQA.</p> <p>The tennis courts and facilities (including the small tennis house) were constructed outside of the period of significance for the site, and so are not considered potentially historic features of the Project Site.</p> <p>If the Weddington Golf Course uses are removed completely from the Project Site, a significant impact to cultural resources could result. Ultimately, because the Project has been designed to avoid significant impacts to the eligible historic components of the Weddington Golf and Tennis Club, as established per the <i>Secretary of the Interior’s Standards for Rehabilitation</i>, it will not result in a significant adverse effect under CEQA and thus impacts are less-than-significant. Although, the Project may slightly alter two southern golf holes, the southern fence of the driving range, and relocate certain golf ball light standards in the surface parking lot, these uses would not be completely removed from the Project Site. The overall character, size, and appearance of the site would remain essentially unchanged. Further, the two golf holes being altered, as well as the driving range</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>have previously been altered to accommodate the tennis courts in the 1970s. These minor modifications to the golf uses would not trigger a significant impact.</p> <p>Implementation of Compliance Measures and Project Design Features would ensure that impacts remain less-than-significant.</p> <p>Consistency with Adopted Plans and Policies. The Project is consistent with the objectives and policies of the Community Plan, which encourages private owners of historic properties/resources to conserve the integrity of such resources. Because the Project is proposed to be developed on Lot 2, removing only the non-historic tennis courts, altering small portions of the golf course at holes/tees that were already previously altered, and retaining/relocating the “character-defining” golf ball light standards to an unaffected portion of the Project Site, the integrity of the Weddington Golf Course, including its potential historic eligible components of the golf course, clubhouse, and driving range, will remain intact.</p> <p>Cumulative Impacts. The Project will not have an incremental effect on historic resources.</p>		
E. GEOLOGY, SOILS AND SEISMICITY		
<p>The geological impacts due to implementation of the Project are detailed in <i>Section IV.E: Environmental Impact Analysis – Geology, Soils, and Seismicity</i> of this Draft EIR and summarized below.</p> <p>Seismic Hazards and Groundshaking. No known active or potentially active faults underlie the Project Site. Nor is the Project Site located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, impacts related to ground rupture would be less-than-significant.</p>	<p>MM GEO-1 In order to mitigate against the effects of liquefaction, the Project structures shall be supported on a mat foundation, which shall be designed to resist one inch of differential settlement that could result due to seismic shaking.</p> <p>MM GEO-2 In order to reduce differential settlement between the shallow and deep foundations, the developer shall create a compacted fill blanket. In areas of the shallow</p>	<p>Based on implementation of Compliance Measures and application of standard rules and regulations of the City of Los Angeles (i.e., Building Code and the Uniform Building Code), development of the proposed Project would result in less-than-significant geological impacts relating to structural integrity during a seismic or other geologic event.</p> <p>In addition, implementation of Mitigation Measures MM GEO-1 through MM GEO-71, or their equivalent as provided in the final approved</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Although the Project Site is not located in an area identified as an Alquist-Priolo Earthquake Fault Zone nor does a known active or potentially active fault underlie the Project Site, the Project would still be exposed to moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults that are located nearby. It is assumed that the proposed Project would be developed in accordance with the California Building Code Seismic Parameters to reduce the potential for building loss, and human injury or death. With implementation of all required Compliance Measures, impacts related to seismic activity would be less-than-significant. In addition, implementation of reasonable Mitigation Measures, or their equivalent as provided in the final approved Geotechnical and Soils Report, would further reduce the risk of building loss, and human injury or death during a strong seismic ground shaking event.</p> <p>Landslides and Soil Stability. The probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the general lack of elevation difference and slope geometry across and adjacent to the Project Site. Building loss or human injury or death involving landslides are not expected to occur on the Project Site; therefore impacts would be less-than-significant.</p> <p>Lateral spreading is the most pervasive type of liquefaction-induced ground failure. Saturated cohesionless sediments that underlie the Development Site (area of physical disturbance on the Project Site), and would have the greatest potential for liquefaction-induced ground failure, have a corrected $(N_1)_{60}$ that is greater than 15. Therefore, the potential for lateral</p>	<p>foundations, all existing fill materials shall be removed and recompacted. Where existing fill materials are shallower than four feet in depth, all soils shall be removed to a minimum of three feet below the proposed foundations and recompacted as controlled fill prior to foundation excavation.</p> <p>MM GEO-3 Foundations for small outlying structures not tied to the main structure, such as property line walls or maintenance sheds, shall be supported on conventional foundations bearing in native earth materials.</p> <p>MM GEO-4 Fill material, including any fill material generated during demolition of existing structures on the Development Site, shall be removed during the excavation of the subterranean parking level and removed from the Project Site. Where not removed by the proposed excavations, this material and any fill material generated during demolition shall be removed and recompacted as controlled fill prior to foundation excavation. All existing fill materials and any disturbed geologic materials resulting from grading operations shall be removed and properly recompacted prior to foundation excavation.</p> <p>MM GEO-5 A water-cement ratio of 0.5 shall be maintained in the poured concrete used for development of the Project. And minimum concrete strength for moderate sulfate exposure shall be a minimum of 4,000</p>	<p>Geotechnical and Soils Report, would further reduce the risk of building loss, and human injury or death during a strong seismic ground shaking event. The Mitigation Measures would reduce all potential significant impacts related to liquefaction or ground failure of the underlying soils (and subsequent building collapse) during a seismic event to less-than-significant levels. With implementation of the Compliance Measures and required Mitigation Measures, or their equivalent as provided in the final approved Geotechnical and Soils Report, impacts related to seismic activity, geology, and the potential for building loss and risk of human injury or death, would be less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>spread is considered remote at the Development Site and impacts would be less-than-significant.</p> <p>The existing fill material and upper native soils on the Development Site are not suitable to support the proposed Project's foundations, floor slabs, or additional fill. If the Project were to be developed on this native soil and existing fill material, there would be potential for collapse of the buildings associated with the proposed Project. Removal and replacement of engineered and recompacted fill would be required to ensure a stable base for onsite development. Implementation of Mitigation Measures would reduce the potential for building collapse due to unstable soils to a less-than-significant level.</p> <p>Soils and Local Geotechnical Issues. Based on field testing results, the Development Site is not located on expansive soils as defined in Table 18-1-B of the 1994 Uniform Building Code. However, as noted above, the existing fill materials and upper native soils are not suitable to support the proposed Project's foundations, floor slabs or additional fill. Excavation for the proposed subterranean parking lot would remove the unsuitable materials on the Development Site. Additionally, implementation of Mitigation Measures would ensure that these soils do not negatively affect the development of the Project buildings and would reduce impacts to less-than-significant.</p> <p>Consistency with Adopted Plans and Policies. City General Plan and Community Plan policies encourage adequate disaster preparedness and service planning to support the community in the event of a major disaster. Because the Project would be developed in accordance with all applicable and required building requirements and Compliance Measures, the potential for serious damage to buildings, or the risk to life and</p>	<p>pounds per square inch (psi).</p> <p>MM GEO-6 All vegetation, existing fill, and soft or disturbed geologic materials shall be removed from the areas to receive controlled fill. Any vegetation or associated root system located within the footprint of the Development Site shall be removed during grading. The excavated areas shall be carefully observed and monitored by a geotechnical engineer prior to placing compacted fill.</p> <p>MM GEO-7 Any existing or abandoned utilities located within the Development Site shall be removed or relocated as appropriate.</p> <p>MM GEO-8 Any at-grade portions of proposed structures within the Development Site shall be excavated to a minimum depth of three feet below the bottom of all foundations. The excavations shall extend at least five feet beyond the edge of the foundations or for a distance equal to the depth of fill below the foundations, whichever is greater. All positions of the proposed structure shall be accurately located so that the limits of the graded area are accurate and the grading operation proceeds efficiently.</p> <p>MM GEO-9 Subsequent to the surface soil removals, the exposed grade shall be scarified to a depth of six inches, moistened to optimum moisture content and recompacted in excess of the minimum required comparative density.</p>	

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<p>property, would be reduced to less-than-significant levels. Additionally, if the Project is required to incorporate the Mitigation Measures of the preliminary Geotechnical and Soils Report in <i>Appendix D</i> of this Draft EIR, impacts would be further reduced. Consequently, the potential to interfere with Citywide disaster response is minimized. The proposed Project would be consistent with adopted General Plan Safety Element Goal 1 (and its related objectives and policies) and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan recommended actions for natural disasters and emergency preparedness; therefore, impacts related to plans and policies affecting geotechnical issues would be less-than-significant.</p> <p>Cumulative Impacts. Geological and soil hazards are generally considered to be site-specific issues and thus do not have potential to be cumulatively considerable. Implementation of Compliance Measures and Mitigation Measures would adequately mitigate against geological and soil hazards to ensure that building loss and human injury or death due to the proposed Project is reduced to the extent practically feasible and to a less-than-significant level. Other Related Projects would be required to complete similar geotechnical investigations to determine site-specific geological hazards and provide adequate Mitigation Measures to reduce building loss or human injury or death. Furthermore, each Related Project would be required to abide by development standards and Compliance Measures in the Los Angeles Municipal Code's Building Code and the Uniform Building Code to reduce impacts associated with geological and soil hazards. Cumulative geotechnical impacts associated with concurrent development of the Project and Related Projects are not anticipated and would be less-than-significant.</p>	<p>MMGEO-10 All fill shall be mechanically compacted in layers not more than eight inches thick. All fill shall be compacted to at least 90 or 95 percent of the maximum laboratory density for the materials used. The maximum density shall be determined by a qualified professional using test method ASTM D 1557-07 or equivalent.</p> <p>MMGEO-11 Any imported material shall be observed and tested by the representative of the geotechnical engineer prior to use in fill areas. Imported materials shall contain sufficient fines so as to be relatively impermeable and result in a stable subgrade when compacted. Any required import materials shall consist of geologic materials with an expansion index of less than 50. The water-soluble sulfate content of the import materials shall be less than 0.1 percentage by weight.</p> <p>MMGEO-12 Imported materials shall be free from chemical or organic substances which could affect the Project structures. A competent professional shall be retained in order to test imported materials and address environmental issues and organic substances which may effect development at the Development Site.</p> <p>MMGEO-13 Utility trenches shall be backfilled with controlled fill. The utility shall be bedded with clean sands at least one foot over the crown. The remainder of the backfill may be onsite soil compacted to 90 or 95 percent of the laboratory maximum density. Utility trench backfill shall be</p>	

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	<p>tested by a qualified professional in accordance with ASTM D-1557-07.</p> <p>MMGEO-14 Pumping (yielding or vertical deflection) of the high-moisture content soils at the bottom of the excavation may occur during operation of heavy equipment. Where pumping is encountered, angular minimum ¾-inch gravel shall be placed and worked into the subgrade. The exact thickness of the gravel would be a trial and error procedure, and shall be determined in the field. It would most likely be on the order of one to two feet thick.</p> <p>MMGEO-15 Rubber tire construction equipment shall not attempt to operate directly on the pumping subgrade soils prior to placing the gravel. Direct operation of rubber tire equipment on the soft sub-grade soils will likely result in excessive disturbance to the soils, which in turn could result in a construction schedule delay. Extreme care shall be utilized to place gravel as the sub grade becomes exposed.</p> <p>MMGEO-16 When rain is forecast, all fill that has been spread and awaits compaction shall be properly compacted prior to stopping work for the day or prior to stopping due to inclement weather. These fills, once compacted, shall have the surface sloped to drain to an area where water can be removed.</p> <p>MMGEO-17 Temporary non-erosive drainage devices shall be installed to collect and transfer excess water from the graded work area.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	<p>Drainage shall not be allowed to pond anywhere on the Development Site, and especially not against any foundation or retaining wall. Drainage shall not be allowed to flow uncontrolled over any descending slope.</p> <p>MMGEO-18 When delayed due to periods of rainfall, resumption of grading activity shall be held until Development Site has been reviewed by a qualified geotechnical monitor. Any soils saturated by the rain shall be removed and aerated so that the moisture content will fall within three percent of the optimum moisture content.</p> <p>MMGEO-19 Surface materials previously compacted before the rain shall be scarified, brought to the proper moisture content and recompacted prior to placing additional fill, as determined appropriate by a qualified geotechnical monitor.</p> <p>MMGEO-20 If abandoned seepage pits are encountered during grading, options to permanently abandon seepage pits shall include complete removal and backfill of the excavation with compacted fill, or drilling out the loose materials and backfilling to within a few feet of grade with slurry, followed by a compacted fill cap. If the subsurface structures are to be removed by grading, the entire structure shall be demolished. The resulting void may be refilled with compacted soil. Concrete and brick generated during the seepage pit removal may be reused in the fill as long as all fragments are less than six inches in</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	<p>longest dimension and the debris comprise less than 15 percent of the fill by volume. All grading shall comply with the recommendations of the approved Geotechnical Report.</p> <p>MMGEO-21 Compliance with the design concepts, specifications or recommendations during construction shall be reviewed by a qualified geotechnical monitor during the course of construction. Any fill which is placed shall be observed, tested, and verified if used for engineered purposes.</p> <p>MMGEO-22 In compliance with credit requirements for LEED Certification, demolition debris shall be crushed onsite in order to reuse it in the ongoing grading operations. Onsite recycled demolition debris shall be limited to concrete, asphalt and other non-deleterious materials. All deleterious materials shall be removed including, but not limited to, paper, garbage, ceramic materials and wood.</p> <p>MMGEO-23 For structural fill applications, the materials shall be crushed to two inches in maximum dimension or smaller. The crushed materials shall be thoroughly blended and mixed with onsite soils prior to placement as compacted fill. The amount of crushed material shall not exceed 20 percent. The blended and mixed materials shall be tested by a qualified geotechnical monitor prior to placement to insure it is suitable for compaction purposes and during placement to insure that it has been compacted in a suitable</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	<p>manner.</p> <p>MMGEO-24 Conventional foundations for structures such as privacy walls or trash enclosures which will not be rigidly connected to the Project buildings may bear in native soils. Continuous footings shall be designed for a bearing capacity of 1,000 pounds per square foot, and shall be a minimum of 12 inches in width, 18 inches in depth below the lowest adjacent grade and 18 inches into the recommended bearing material.</p> <p>MMGEO-25 Since the recommended bearing capacity is a net value, the weight of concrete in the foundations shall be taken as 50 pounds per cubic foot and the weight of the soil backfill may be neglected when determining the downward load on the foundations.</p> <p>MMGEO-26 Resistance to lateral loading may be provided by friction acting at the base of foundations and foundations, and by passive earth pressure. An allowable coefficient of friction of 0.2 shall be used with the dead load forces. Passive earth pressure for the sides of foundations and footings poured against undisturbed or recompacted soil shall be computed as an equivalent fluid having a density of 300 pounds per cubic foot with a maximum earth pressure of 3,000 pounds per square foot. When combining passive and friction for lateral resistance, the passive component shall be reduced by one third. A one-third increase in the passive value shall be used for wind or seismic loads.</p>	

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	<p>MMGEO-27 All foundation excavations shall be observed and inspected by a qualified geotechnical monitor to verify penetration into the recommended bearing materials. The observation shall be performed prior to the placement of reinforcement. Foundations shall be deepened to extend into satisfactory earth materials, if necessary. Foundation excavations shall be cleaned of all loose soils prior to placing steel and concrete. Any required foundation backfill shall be mechanically compacted. Flooding shall not be permitted.</p> <p>MMGEO-28 The mat shall be founded exclusively in native soils found 10 feet below existing site grades. For the at-grade portion of any proposed structure, the mat shall bear in a minimum of newly placed compacted fill, subsequent to the recommended grading. The bottom of the mat foundation shall be a minimum of 18 inches in depth below the lowest adjacent grade at the perimeter of the proposed structure. An allowable bearing pressure of 850 pounds per square foot may be utilized in the design of the proposed mat foundation. The mat foundation shall be designed utilizing a modulus of subgrade reaction of 100 pounds per cubic inch.</p> <p>MMGEO-29 Because the basement of proposed Project structures will be on the order of 20 feet below grade and historic high groundwater levels may be less than 20 feet, the building shall be designed for potential</p>	

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	<p>hydrostatic and buoyancy pressures or a drainage system shall be installed which would operate in the unlikely event that the reported historic high groundwater level is attained again.</p> <p>MMGEO-30 Retaining walls supporting a level backslope shall be designed utilizing a triangular distribution of pressure. Cantilever retaining walls shall be designed for 31.5 pounds per cubic foot for walls retaining up to 6 feet of earth. For this equivalent fluid pressure to be valid, walls which are to be restrained at the top shall be backfilled prior to the upper connection being made. Additional active pressure shall be added for a surcharge condition due to sloping ground, vehicular traffic or adjacent structures.</p> <p>MMGEO-31 Retaining walls shall be provided with a sub-drain covered with a minimum of 12 inches of gravel, and a compacted fill blanket or other seal at the surface. The onsite geologic materials are acceptable for use as retaining wall backfill as long as they are compacted to a minimum of 90 or 95 percent of the maximum density as determined by ASTM D 1557-07 or equivalent.</p> <p>MMGEO-32 The type and brand of sub-drain pipe shall be cleared with the City Engineer. Sub-drainage pipes shall outlet to an acceptable location.</p> <p>MMGEO-33 Restrained retaining walls shall be designed to resist a triangular pressure</p>	

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	<p>distribution of at-rest earth pressure and hydrostatic pressure as indicated in the diagram on page 28 of the Geotechnical and Soils Report (<i>Appendix D</i> of the Draft EIR), or as otherwise approved by the City Engineer. The at-rest soils pressure for design purposes shall be 41 pounds per cubic foot. Additional earth pressure shall be added for a surcharge condition due to sloping ground, vehicular traffic or adjacent structures.</p> <p>MMGEO-34 The upper ten feet of the retaining wall adjacent to streets, driveways, or parking areas shall be designed to resist a uniform lateral pressure of 100 pounds per square foot, acting as a result of an assumed 300 pounds per square foot surcharge behind the walls due to normal street traffic. If the traffic is kept back at least ten feet from the retaining walls, the traffic surcharge shall be neglected.</p> <p>MMGEO-35 Where necessary, the retaining walls shall be designed to accommodate any surcharge pressures that may be imposed by existing buildings on the adjacent property.</p> <p>MMGEO-36 The retaining walls shall be waterproofed. Waterproofing design and inspection of its installation is not the responsibility of the geotechnical engineer. A qualified waterproofing expert shall be consulted in order to recommend a product or method that would provide protection to below grade walls.</p> <p>MMGEO-37 Any required backfill shall be</p>	

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	<p>mechanically compacted in layers not more than 8 inches thick, to at least 90 or 95 percent of the maximum density obtainable by the ASTM Designation D 1557-07 method of compaction. Flooding shall not be permitted. Proper compaction of the backfill shall be necessary to reduce settlement of overlying walks and paving. Some settlement of required backfill shall be anticipated, and any utilities supported therein shall be designed to accept differential settlement, particularly at the points of entry to the structure.</p> <p>MMGEO-38 Excavations on the order of 10 to 25 feet in vertical height shall be required for the subterranean levels of the Project considering the proposed foundation and the recommended recompaction. The excavations are expected to expose fill and dense native soils, which are suitable for vertical excavations up to 5 feet where not surcharged by adjacent traffic or structures. Excavations, which will be surcharged by adjacent traffic or structures shall be shored.</p> <p>MMGEO-39 Where sufficient space is available, temporary unsurcharged embankments shall be cut at a uniform 1:1 slope gradient. A uniform sloped excavation does not have a vertical component. Where sloped embankments are utilized, the tops of the slopes shall be barricaded to prevent vehicles and storage loads near the top of slope within a horizontal distance equal to the depth of the excavation.</p>	

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	<p>MMGEO-40 If temporary construction embankments are to be maintained during the rainy season, berms shall be made along the tops of the slopes to prevent runoff water from entering the excavation and eroding the slope faces. Water shall not be allowed to pond on top of the excavation nor to flow towards it.</p> <p>MMGEO-41 Because the structure will extend to a maximum depth of 20 feet below existing site grades, continuous groundwater could be encountered locally in the deeper portions of the excavation. Temporary dewatering shall be installed as necessary. Temporary dewatering shall consist of gravel-filled drainage trenches leading to a sump area. The collected water shall be pumped to an acceptable disposal area. Where the exposed sub-grade is wet, pumping shall be required.</p> <p>MMGEO-42 It is critical that the soils exposed in the cut slopes shall be observed by a qualified geotechnical monitor during excavation so that modifications of the slopes can be made if variations in the earth material conditions occur. All excavations shall be stabilized within 30 days of initial excavation.</p> <p>MMGEO-43 The City Engineer shall review the final shoring plans and specifications. Consistent with the Preliminary Geotechnical Report, one acceptable method of shoring shall consist of steel soldier piles, placed in drilled holes and backfilled with concrete. The soldier piles</p>	

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	<p>shall be designed as cantilevers or laterally braced utilizing drilled tied-back anchors or raker braces.</p> <p>MMGEO-44 Drilled cast-in-place soldier piles shall be placed no closer than two diameters on center. The minimum diameter of the piles shall be 18 inches. Structural concrete shall be used for the soldier piles below the excavation; lean-mix concrete may be employed above that level. As an alternative, lean mix concrete may be used throughout the pile where the reinforcing consists of a wide flange section. The slurry shall be of sufficient strength to impart the lateral bearing pressure developed by the wide flange section to the earth materials. For design purposes, an allowable passive value for the earth materials below the bottom plane of excavation may be assumed to be 600 pounds per square foot per foot. To develop the full lateral value, provisions shall be implemented to assure firm contact between the soldier piles and the undisturbed earth materials.</p> <p>MMGEO-45 Groundwater was encountered during exploration at a depth of 23 feet below grade. Because proposed piles may be in excess of 23 feet in depth, groundwater may be encountered within that depth. Piles placed below the water level shall require the use of a tremie to place the concrete into the bottom of the hole. A tremie shall consist of a water-tight tube having a diameter of not less than 10 inches with a hopper at the top. The tube</p>	

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	<p>shall be equipped with a device that will close the discharge end and prevent water from entering the tube while it is being charged with concrete. The tremie shall be supported so as to permit free movement of the discharge end over the entire top surface of the work and to permit rapid lowering when necessary to retard or stop the flow of concrete. The discharge end shall be closed at the start of the work to prevent water entering the tube and shall be entirely sealed at all times, except when the concrete is being placed. The tremie tube shall be kept full of concrete. The flow shall be continuous until the work is completed and the resulting concrete seal shall be monolithic and homogeneous. The tip of the tremie tube shall always be kept about five feet below the surface of the concrete and definite steps and safeguards shall be taken to insure that the tip of the tremie tube is never raised above the surface of the concrete.</p> <p>MMGEO-46 A special concrete mix shall be used for concrete to be placed below water. The design shall provide for concrete with strength of 1,000 psi over the initial job specification. An admixture that reduces the problem of segregation of paste/aggregates and dilution of paste shall be included. The slump shall be commensurate to any research report for the admixture, provided that it shall also be the minimum for a reasonable consistency for placing when water is present.</p> <p>MMGEO-47 Casing may be required should caving be</p>	

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	<p>experienced in saturated earth materials. If casing is used, extreme care shall be employed so that the pile is not pulled apart as the casing is withdrawn. At no time shall the distance between the surface of the concrete and the bottom of the casing be less than 5 feet.</p> <p>MMGEO-48 The frictional resistance between the soldier piles and retained earth material may be used to resist the vertical component of the anchor load. The coefficient of friction may be taken as 0.2 based uniform contact between the steel beam and lean-mix concrete and retained earth. The portion of soldier piles below the plane of excavation may also be employed to resist the downward loads. The downward capacity may be determined using a frictional resistance of 400 pounds per square foot. The minimum depth of embedment for shoring piles shall be five feet below the bottom of the footing excavation or seven feet below the bottom of excavated plane whichever is deeper.</p> <p>MMGEO-49 It is possible that lagging between soldier piles could be omitted within more cohesive earth materials where the clear spacing between soldier piles does not exceed four feet. In less cohesive earth materials, such as sands and gravels, lagging shall be necessary. A qualified geotechnical monitor shall observe the exposed earth materials to verify their nature and establish areas where lagging could be omitted, if any. At this time, it is expected that most of the excavation will</p>	

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	<p>require continuous lagging. Soldier piles and anchors shall be designed for the full anticipated pressures. Due to arching in the earth materials, the pressure on the lagging will be less. The lagging shall be designed for the full design pressure but is limited to a maximum of 400 pounds per square foot.</p> <p>MMGEO-50 Cantilevered shoring supporting a level backslope shall be designed utilizing a triangular distribution of pressure as indicated in the table on page 36 of the Geotechnical Report (<i>Appendix D</i> of the Draft EIR). A trapezoidal distribution of lateral earth pressure shall be appropriate where shoring is to be restrained at the top by bracing or tie backs, with the trapezoidal distribution as shown in the diagram in the 'Restrained Retaining Walls' section of the approved Geotechnical Report. Restrained shoring supporting a level backslope shall be designed utilizing a trapezoidal distribution of pressure as indicated in the table on page 37 of the Geotechnical Report.</p> <p>MMGEO-51 Where a combination of sloped embankment and shoring is utilized, the pressure will be greater and must be determined for each combination. Additional active pressure shall be applied where the shoring will be surcharged by adjacent traffic or structures.</p> <p>MMGEO-52 It should be realized that some deflection of a shored embankment will occur and that the estimated deflection could be on the order of one inch at the top of the</p>	

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	<p>shored embankment. If greater deflection occurs during construction, additional bracing shall be necessary to minimize settlement of adjacent buildings and utilities in adjacent street and alleys. If desired to reduce the deflection, a greater active pressure shall be used in the shoring design. Where internal bracing is used, the rakers shall be tightly wedged to minimize deflection. The proper installation of the raker braces and the wedging will be critical to the performance of the shoring.</p> <p>MMGEO-53 Because of the depth of the excavation, there shall be some means of monitoring the performance of the shoring system. The monitoring shall consist of periodic surveying of the lateral and vertical locations of the tops of all soldier piles and the lateral movement along the entire lengths of selected soldier piles. Also, some means of periodically checking the load on selected anchors shall be necessary, where applicable. Some movement of the shored embankments shall be anticipated as a result of the relatively deep excavation. Photographs of the existing buildings on the adjacent properties shall be taken during construction to record any movements for use in the event of a dispute.</p> <p>MMGEO-54 It is critical that the installation of shoring shall be observed by a qualified geotechnical monitor. The observations shall insure that the recommendations of the approved Geotechnical Report are implemented and so that field</p>	

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	<p>modifications of the recommendations can be made if variations in the earth material or groundwater conditions warrant. The observations shall allow for a report to be prepared on the installation of shoring for the use of the local building official, where necessary.</p> <p>MMGEO-55 Concrete floor slabs shall be a minimum of five inches in thickness. Slabs-on-grade shall be cast over undisturbed natural earth materials or properly controlled fill materials. Any earth materials loosened or over-excavated shall be wasted from the site or properly compacted to 90 or 95 percent of the maximum dry density.</p> <p>MMGEO-56 Outdoor concrete flatwork shall be a minimum of four inches in thickness. Outdoor concrete flatwork shall be cast over undisturbed natural earth materials or properly controlled fill materials. Any earth materials loosened or over-excavated shall be wasted from the site or properly compacted to 90 or 95 percent of the maximum dry density.</p> <p>MMGEO-57 A qualified monitor in the field of moisture vapor transmission shall be consulted to evaluate the general and specific moisture vapor transmission paths and any impact on the construction of the proposed Project. The qualified consultant shall provide recommendations for mitigation of potential adverse impacts of moisture vapor transmission on various components of the proposed structure. Where dampness would be objectionable, the floor slabs</p>	

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	<p>shall be waterproofed. A qualified waterproofing expert shall be consulted in order to recommend a product or method which would provide protection for concrete slabs-on-grade.</p> <p>MMGEO-58 All concrete slabs-on-grade shall be supported on vapor retarder. The design of the slab and the installation of the vapor retarder shall comply with ASTM E 1643-98 and ASTM E 1745-97. Where a vapor retarder is used, a low-slump concrete shall be used to minimize possible curling of the slabs. The barrier can be covered with a layer of trimmable, compactable, granular fill, where it is thought to be beneficial.</p> <p>MMGEO-59 The recommendations of the approved Geotechnical Report shall be implemented to reduce the potential for cracking of concrete slabs-on-grade due to settlement. However even where these recommendations have been implemented, foundations, stucco walls, and concrete slabs-on-grade may display some cracking due to minor soil movement and/or concrete shrinkage. The occurrence of concrete cracking shall be reduced and/or controlled by limiting the slump of the concrete used, proper concrete placement and curing, and by placement of crack control joints at reasonable intervals, in particular, where entrant slab corners occur.</p> <p>MMGEO-60 For standard crack control maximum expansion joint spacing of eight feet shall not be exceeded. Lesser spacing would</p>	

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	<p>provide greater crack control. There shall be joints at curves and angle points. The crack control joints shall be installed as soon as practical following concrete placement. Crack control joints shall extend a minimum depth of one-fourth the slab thickness. Construction joints shall be designed by a structural engineer.</p> <p>MMGEO-61 Complete removal of the existing fill soils beneath outdoor flatwork such as walkways or patio areas shall not be required; however, due to the rigid nature of concrete, some cracking, a shorter design life and increased maintenance costs shall be anticipated. In order to provide uniform support beneath the flatwork, a minimum of 12 inches of the exposed subgrade beneath the flatwork shall be scarified and recompact to 90 percent relative compaction.</p> <p>MMGEO-62 Concrete slabs-on-grade shall be reinforced with a minimum of #4 steel bars on 16-inch centers each way. Outdoor flatwork shall be reinforced with a minimum of #3 steel bars on 18-inch centers each way.</p> <p>MMGEO-63 Prior to placing paving, the existing grade shall be scarified to a depth of 12 inches, moistened as required to obtain optimum moisture content, and recompact to 90 percent of the maximum density as determined by ASTM D 1557-02. Removal of all existing fill in the area of new paving is not required; however, pavement constructed in this manner will most likely have a shorter design life and increased</p>	

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	<p style="text-align: center;">maintenance costs.</p> <p>MMGEO-64 Aggregate base shall be compacted to a minimum of 95 percent of the ASTM D 1557-laboratory maximum dry density. Base materials shall conform with Sections 200-2.2 or 200-2.4 of the “Standard Specifications for Public Works Construction”, (Green Book), 1991 Edition.</p> <p>MMGEO-65 The performance of pavement is highly dependent upon providing positive surface drainage away from the edges. Ponding of water on or adjacent to pavement can result in saturation of the sub grade materials and subsequent pavement distress. If planter islands are planned as part of the Project, the perimeter curb shall extend a minimum of 12 inches below the bottom of the aggregate base.</p> <p>MMGEO-66 Engineering of the Project shall not begin until approval of the geotechnical report is obtained in writing from the Department of Building and Safety. Significant changes in the geotechnical recommendations may result during the building department review process. Any additional recommendations identified in the final approved geotechnical report shall be implemented during Project development.</p> <p>MMGEO-67 Geotechnical aspects of the Project shall be reviewed by a qualified geotechnical expert during the design process. This review provides assistance to the design team by providing specific</p>	

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	<p>recommendations for particular cases, as well as review of the proposed construction to evaluate whether the intent of the recommendations presented in the Geotechnical Report are satisfied.</p> <p>MMGEO-68 Geotechnical observations and testing during construction are considered to be a continuation of the geotechnical investigation. It is critical that a qualified geotechnical expert review the geotechnical aspects of the project during the construction process. Compliance with the design concepts, specifications, or recommendations during construction shall require review by a qualified geotechnical monitor during the course of construction.</p> <p>MMGEO-69 If conditions encountered during construction appear to differ substantially from those disclosed in the approved Geotechnical Report, the Developer shall notify the City Engineer and/or qualified geotechnical expert, as appropriate, immediately so the need for modifications may be considered in a timely manner.</p> <p>MMGEO-70 It shall be the responsibility of the developer's contractor to ensure that all excavations and trenches are properly sloped or shored. All temporary excavations shall be cut and maintained in accordance with applicable OSHA rules and regulations.</p> <p>MMGEO-71 Since the exploration performed for in the preliminary Geotechnical Report is limited to the geotechnical excavations described</p>	

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	<p>therein and the direct exploration of the entire site is not feasible, the Project team shall understand that differing excavation and drilling conditions may be encountered based on boulders, gravel, oversize materials, groundwater and many other conditions. Fill materials, especially when they were placed without benefit of modern grading codes, regularly contain materials, which could impede efficient grading and drilling. The appropriateness of all recommended geotechnical mitigation measures shall be evaluated against infield observations encountered during construction, and any and all adjustments coordinated through the City Engineer.</p>	
F. GREENHOUSE GAS EMISSIONS		
<p>The greenhouse gas (GHG) emission impacts due to implementation of the Project are detailed in <i>Section IV.F: Environmental Impact Analysis – Greenhouse Gas Emissions</i> of this Draft EIR and summarized below.</p> <p>Global climate change refers to historical variance in the Earth’s meteorological conditions and has received substantial public attention for many years. Greenhouse gas emission reductions have been addressed through statewide regulations. Some GHGs are emitted naturally (water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O)), while others are exclusively human-made (e.g., gases used for aerosols and emissions from fossil fuel combustion).</p> <p>The transportation sector – largely the cars and trucks that move people and goods – is the largest contributor with 37 percent of the State’s total GHG emissions in</p>	<p>Compliance with all required Compliance Measures would reduce GHG emission impacts to a less-than-significant level, and as such, Mitigation Measures are not required.</p>	<p>Implementation of all required Compliance Measures for the Project would reduce all cumulative greenhouse gas impacts to a less-than-significant level with respect to emissions and consistency with GHG education plans and policies. Voluntary implementation of the Project Design Features (PDFs) spelled out in <i>Section IV.B: Environmental Impact Analysis – Air Quality</i> of this Draft EIR would further reduce GHG impacts. Therefore, no Mitigation Measures are required and GHG impacts would remain less-than-significant.</p>

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<p>2008. On-road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total emissions. On-road emissions grew to a maximum of 171 million metric tons of CO₂e in 2005, plateaued until 2007, and decreased in 2008 to 163 million. The amount of gasoline and diesel fuel consumed by on-road vehicles followed a similar trend.</p> <p>Greenhouse gas emissions from the Project were calculated for mobile sources, natural gas consumption, general electricity consumption, electricity consumption associated with the use and transport of water, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. The proposed Project would result in 1,919 metric tons of CO₂e per year (cumulatively and at Project buildout in 2016). Estimated GHG emissions would be less than the 10,000 metric tons of CO₂e per year quantitative significance threshold under both cumulative existing and future conditions. Therefore, the proposed Project would result in a less-than-significant impact related to GHG emissions.</p>		
G. HYDROLOGY AND WATER QUALITY		
<p>The hydrological and water quality impacts due to implementation of the Project are detailed in <i>Section IV.G: Environmental Impact Analysis – Hydrology and Water Quality</i> of this Draft EIR and summarized below.</p> <p>Hydrology. The Project Site slopes from the northwest corner to the southeast corner at 1.2 percent decrease in elevation. For the proposed Project, Lot 1, consisting of the 9-hole golf course, clubhouse, and golf driving range, would remain intact with minimal changes to accommodate the Project. Lot 2, where the</p>	<p>PDF HYD-1 Stormwater from the roofs shall be reclaimed by conveying runoff through roof downspouts via an underground storm drain pipe network to a pre-treatment system to remove debris and sediment from runoff and then conveyed to an infiltration trench and/or drywell for infiltration purposes. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that would store, evaporate, detain, and/or treat runoff may be used.</p>	<p>As required by City, State, and federal regulations, the Project would incorporate into its design all required Compliance Measures. With implementation of the Compliance Measures, no additional Mitigation Measures would be required. Additionally, due to the proximity of the Project to the Los Angeles River and the adjacent use of the golf course on the Project Site, the Project Applicant has volunteered certain PDFs that would further reduce environmental impacts related to hydrology. Therefore, impacts on hydrology and water quality would be less-than-significant with</p>

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<p>tennis courts and tennis house are currently located, would involve demolition of the tennis courts, tennis house, sidewalks and a portion of the surface parking lot followed by development of the proposed Studio City Senior Living Center Project. Because post-Project conditions for Lot 1 would be essentially unchanged, no net increase in the rate and quantity of stormwater runoff is expected from Lot 1.</p> <p>A net increase from pre-development to post-development conditions on Lot 2 is anticipated. During a 50-year storm event, Lot 2 would result in a net increase of runoff of 9.97 cfs. And a net increase of 9.16 cfs would result during a 25-year storm event. The Project would be required to incorporate design Best Management Practices (BMPs) in compliance with the Standard Urban Stormwater Mitigation Plan (SUSMP). BMPs that would be incorporated, along with compliance with other required Compliance Measures, would minimize any net-increase of water flow expected to occur during a 50 or 25-year storm event. Volunteered PDFs would further reduce the increase in water flow. Additionally, the proposed drainage system of the Project would be designed utilizing sustainable methods consistent with Leadership in Energy and Environmental Design (LEED) criteria and River Improvement Overlay (RIO) compliance. With implementation of the BMPs, Compliance Measures, and the proposed drainage system sustainable PDFs described above, impacts related to hydrology would be less-than-significant.</p> <p>Surface Water Quality. During the construction of the Project, the existing tennis courts, tennis house, paved sidewalks and a portion of the surface parking area on Lot 2 would be demolished and approximately 82,000 cubic yards of grading and soil export would occur. As development occurs, if rainy days are</p>	<p>PDF HYD-2 Various landscape areas shall be developed along the building perimeters. Landscaped areas shall be graded, where possible, to flow directly to an infiltration trench and/or drywell, for infiltration purposes, or intercepted by a series of planter drains, area drains, etc., and conveyed to the selected infiltration system through a subsurface PVC storm drain pipe. An overflow pipe shall be provided to discharge excess stormwater that cannot be infiltrated during a heavy storm event. Overflow from the infiltration trench shall be discharged to the Los Angeles River open channel. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that will store, evaporate, detain, and/or treat runoff may be used.</p> <p>PDF HYD-3 Hardscaped pedestrian walkways shall be graded in coordination with existing topography to sheet flow storm runoff into landscaped areas, where possible, or to various catch basins and curb inlet catch basins with filter inserts to be treated prior to discharging into a bio-retention basin. A series of cleanouts shall be provided for the new subsurface pipe network at appropriate distances and/or bends.</p>	<p>development of the proposed Project.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>encountered, the potential exists for stockpiled soil to be exposed and cause contaminated surface water to enter the stormwater conveyance system that serves the Project Site. Additionally, dust-watering activities during construction could contribute to contaminated surface water entering the stormwater conveyance systems. The Project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Permit, which in turn would require that a Stormwater Pollution Prevention Plan (SWPPP) be developed to address BMPs to minimize water quality impacts during construction activity. Construction activity on the Development Site would also be required to comply with City of Los Angeles grading permit regulations as described in the Los Angeles City Municipal Code. Through permitting and implementation of water quality control measures, contamination or pollution of surface water during construction activities would be reduced and impacts during construction would be less-than-significant.</p> <p>Occupancy and operational activities at the Project would be similar to other surrounding urbanized properties. While it is possible that activity associated with the Studio City Senior Living Center would contribute to polluted surface water entering the stormwater conveyance system, the potential for contaminants entering the water system would be minimized through Compliance Measures, such as BMPs and Low Impact Development (LID) protocol. Furthermore, with implementation of the City-required SUSMP, it is anticipated that the Project would not result in discharges that would create pollution, contamination or nuisance of surface water and therefore, surface water quality impacts during operation of the Project would be less-than-significant.</p>		

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<p>Consistency with Adopted Plans and Policies. Development of the Project would not be inconsistent with plans and policies addressing water quality and hydrology on the Project Site. During the final design/engineering stages of the Project, the Applicant will be required to demonstrate compliance, exemption, or consistency with the Clean Water Act, NPDES, Los Angeles County Municipal Stormwater System, SUSMP, LID, County of Los Angeles Hydrology Manual, Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, RIO District Guidelines, and the Los Angeles Municipal Code, as applicable, in order to obtain a grading or building permit to start construction on the Project. The permitting plan check process and implementation of the Compliance Measures and PDFs will ensure that the Project is consistent with all adopted plans and policies applicable to the Project Site.</p> <p>Cumulative Impacts. Hydrological and water quality impacts are typically discussed on a regional level in urbanized locations. Individual sites are required to abide by regulations and development standards to reduce contribution of hydrological sheetflow and surface water quality concerns in urbanized areas. The <i>Hydrology and Water Quality Civil Narrative</i> (Appendix F of this Draft EIR) was developed by KPFF Consulting Engineers to determine site-specific hydrological and surface water quality characteristics at the Project Site. This report has recommended that the BMPs, PDFs and Compliance Measures be implemented to mitigate against hydrological and surface water quality issues during construction and operation of the Project. It is expected that the Related Projects associated with the Project would each be required to have a hydrology and water quality report completed to determine site-specific hydrological and</p>		

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<p>water quality issues and provide Mitigation Measures and/or BMPs to reduce such issues and impacts. Furthermore, each Related Project in the City would be required to abide by development standards in the Los Angeles Municipal Code, the NPDES, and the Regional Water Quality Control Board (RWQCB) to reduce impacts associated with hydrological and water quality issues. Significant cumulative hydrological and water quality impacts associated with concurrent development of the proposed Project and Related Projects are not anticipated.</p>		
<p>H. LAND USE AND PLANNING</p>		
<p>The land use impacts due to implementation of the Project are detailed in <i>Section IV.H: Environmental Impact Analysis – Land Use and Planning</i> of this Draft EIR and summarized below.</p> <p>Land Use Compatibility. The Project will require a General Plan Amendment to change the Community Plan’s designation of a portion of the Project Site from Open Space to Medium Density Residential and a Zone Change from A1-1XL to R3-1. These entitlement changes are enacting approvals that would allow the land uses to transition from one of primarily open space and recreational uses to medium density residential uses, which would result in a change in how the Project Site interrelates with surrounding land uses.</p> <p>Although the Community Plan Map currently identifies the Project Site as “Open Space”, the Applicant requests a change in land use designation that would designate a portion (4.52 acres) of the 16.1-acre Project Site as “Medium Density Residential”. Because findings can be made to support this change, approval of residential uses on a portion of the Project Site would demonstrate that the proposed Medium</p>	<p>PDF LU-1 The landscaping for the Project shall use water efficient landscaping and native drought tolerant plants.</p> <p>PDF LU-2 The Project shall make use of stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.</p> <p>PDF LU-3 The Project shall install a high efficiency irrigation system and have its design reviewed by the City as part of the required Landscape Plan review.</p> <p>PDF LU-4 The Project shall include display and distribution of transit information for both residents and visitors.</p> <p>PDF LU-5 The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs of the Project.</p> <p>PDF LU-6 The Project design incorporates subterranean parking that shall be located below the buildings and street level.</p>	<p>With implementation of the Compliance Measures, PDFs, and Mitigation Measures, the proposed Project would not result in significant land use compatibility or land use plan consistency impacts on a project-level or cumulative basis; it would not result in significant unavoidable impacts.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Density Residential uses would be compatible with the existing low-density, single-family residential neighborhoods to the northeast, north and west, as well as with the existing medium density developments to the east. The proposed change in land use would be a continuation of the residential land use pattern that is already observed in the area. The reallocation of 4.5 acres of open space would not adversely affect the land balance mix because a substantial area (11.6 acres) of open space would remain and additional opportunities to activate the open space along the Los Angeles River are available.</p> <p>The Project is consistent with the permitted uses of the R3-1 zone, complies with the adopted development standards, is similar in intensity to other R3-1 zoned properties in the immediate area, and would be appropriately conditioned through a Site Plan Review. As such, the proposed Project would have a less-than-significant impact with regard to zoning compliance.</p> <p>The site plan and building design variances requested for the Project can be supported without detriment to the environment. Approval and implementation of the requested variances related to the Project would be less-than-significant.</p> <p>Finally, the Project would be integrated into the community in such a manner that existing single-family neighborhoods are protected and linkages to key community components are maintained. The Project design would be in substantial compliance with the Urban Design Guidelines of the Community Plan, as well as adopted Community Plan policies and the RIO.</p> <p>Consistency with Adopted Plans and Policies. The Project is consistent with the Community Plan, in part</p>	<p>Therefore, the parking shall not be located between the buildings and the street and/or River.</p> <p>PDF LU-7 Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that shall be provided from Valleyheart Drive (which shall lead from Whitsett Avenue).</p> <p>PDF LU-8 The Project minimizes the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.</p> <p>PDF LU-9 The Applicant shall require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.</p> <p>PDF LU-10 The Project shall include a children's playground for public use along its southern edge.</p> <p>PDF LU-11 Pedestrian walkways within the Project shall provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south; the Whitsett Avenue street frontage to the east; and the golf course recreational facilities to north.</p> <p>PDF LU-12 Pedestrian walkways within the Project</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>due to the fact that a substantial area of open space would be retained and because development of the SCSLC would further the housing goals and maintain the residential community character. As a result, the Project will result in a less-than-significant impact to land use consistency, as the Project is consistent with applicable policies and programs of the Community Plan.</p> <p>The Project would meet the minimum point threshold requirements for each of the three RIO categories (i.e., watershed, urban design, and mobility), as well as the overall point threshold minimum of 20 points. Because the Project exceeds the minimum required threshold points, the Project would be deemed to be in compliance with the RIO. Because the Project would be consistent with the RIO, it would also be consistent with the Los Angeles River Revitalization Master Plan (LARRMP) because the Project either directly contributes toward the furtherance of LARRMP policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for the realization of those policies. The Project will result in a less-than-significant impact to land use consistency and compatibility in the Project area due to conflicts with policies and programs of the LARRMP and RIO.</p> <p>The Project is consistent with the Walkability Checklist guidelines, in part due to the fact that it would be conveniently located within an established community with existing pedestrian access to commercial, services, transit, and recreational facilities. In addition, the surrounding community offers a safe and pleasant environment for non-destination recreational walking. Because the Project meets the intention of the Walkability Checklist, it is further demonstrated that the Project is substantially</p>	<p>and the adjacent sidewalks shall be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors and the public, including lighting and wayfinding signage.</p> <p>PDF LU-13 Project landscaping in the vicinity of the parking garage driveway and the public playground along the south edge, and at the golf course/driving range secondary pedestrian access at the northeast corner of Lot 2, shall be designed to assist in the easy identification of and access to these areas.</p> <p>PDF LU-14 Buildings oriented along the Whitsett Avenue frontage shall incorporate common area/community use areas in the ground-floor space so that larger window openings and architectural transparency features shall visually link interior gathering areas with the active streetscape.</p> <p>PDF LU-15 The Project buildings and individual dwelling units shall be designed so that private open spaces (i.e., step-out patios and balconies) are oriented toward the living center perimeter, embracing both the Whitsett Avenue street and L.A. River development frontages.</p> <p>PDF LU-16 The Project shall be designed as several (six) smaller building components, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the L.A. River</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>consistent with the General Plan.</p> <p>Because the Project requests the development of 200 dwelling units, it does not qualify as a regionally significant project, which is defined by a threshold minimum size of 500 dwelling units (per CEQA Guidelines Section 15206). Ultimately, the Project is consistent with the Southern California Association of Government's (SCAG) Regional Comprehensive Plan (RCP) because the Project either directly contributes toward the furtherance of the RCP policies or indirectly supports the RCP policies by not creating obstacles for their realization. The Project will result in a less-than-significant impact to land use consistency, as the Project will not create any conflict with policies and programs of SCAG's regional plans, including the RCP.</p> <p>Cumulative Impacts. The majority of cumulative development (Related Projects) would be consistent with the underlying land use and zoning designations, thus not requiring a General Plan Amendment. As a result, those Related Projects are considered consistent with the General Plan. City review of those projects will require that they demonstrate consistency with the General Plan and relevant Community Plan policies. Since the proposed Project and other developments planned for the area are consistent with the overall existing and planned land use patterns in the area, cumulative impacts in this regard are not expected.</p> <p>The identified Related Projects are not located immediately adjacent to the Project Site such that they could not, in relation to the Project Site, divide an established community. Additionally, land use impacts due to conflict with applicable plans, such as the General Plan, are typically site-specific and will be identified during environmental analysis for each</p>	<p>greenway.</p> <p>PDF LU-17 The Project shall provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information.</p> <p>PDF LU-18 The Project design for the parking structure layout shall allocate 2% of the residential (i.e., excluding the overflow golf) parking spaces for use by a third party shared car (or equivalent) program.</p> <p>PDF LU-19 The Project shall be designed specifically to limit development to the Development Site, including Lot 2 and small southeastern portions of Lot 1, thus avoiding disturbance of any potential historic components on the Project Site.</p> <p>PDF LU-20 The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.</p> <p>MM LU-1 The Project shall obtain the appropriate approvals, including zone change, zone variances, site plan review, and conditional</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>specific Related Project. Cumulative land use impacts are anticipated to be less-than-significant.</p>	<p>use permits, prior to commencing Project development. Attainment of such approvals shall in turn ensure that the Project is in full compliance with local codes, procedures and regulations.</p>	
<p>I. NOISE</p>		
<p>The noise levels associated with the construction and operational phases of the Project, and cumulative future noise levels, are detailed in <i>Section IV.I: Environmental Impact Analysis – Noise</i> of this Draft EIR and summarized below.</p> <p>Construction (Short-Term) Noise. Construction of the Project would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby residents during the approximate 24-month construction schedule. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.</p> <p>Noise levels related to construction activity of the Project would exceed the 5 dBA significance threshold at two of the five nearby sensitive receptors. As such, the Project would result in a net significant unavoidable impact related to construction (short-term) noise at sensitive receptors. Mitigation Measures should be implemented to reduce impacts to the extent possible. However, if impacts are still significant, 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</p>	<p>MM NOI-1 All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.</p> <p>MM NOI-2 Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).</p> <p>MM NOI-3 All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.</p> <p>MM NOI-4 A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of</p>	<p>Even with implementation of Mitigation Measures, construction and drilling noise levels would still exceed the significance threshold at various sensitive receptors. Therefore, general construction noise would result in a significant and unavoidable impact after incorporation of Mitigation Measures. However, this significant and unavoidable impact would be temporary during the construction phase of the Project.</p> <p>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.</p> <p>The Project-related operational noise, as well as construction and operational vibration, would result in a less-than-significant impact without the need for Mitigation Measures.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>benefits of the Project.</p> <p>Operational (Long-Term) Noise. The predominant noise source during operation of the Project is vehicular traffic. The greatest Project-related noise increase from vehicular traffic would be 0.1 dBA L_{eq} along Whitsett Avenue. This would not exceed the most conservative roadway noise threshold of 3-dBA. Therefore, the operation of the Project under the scenario of being developed in existing noise conditions (current year) would result in a less-than-significant impact related to mobile noise levels.</p> <p>Potential stationary noise sources related to the long-term operations of the Project include mechanical equipment and parking areas. Per required Compliance Measures, mechanical equipment (e.g., parking structure air vents and HVAC equipment) would be designed so as to be located within an enclosure or confined to the rooftop of the proposed structure. HVAC equipment typically generates a noise level of approximately 60 dBA L_{eq} at 50 feet. Mechanical equipment would be screened from view as necessary to comply with provisions of the LAMC for onsite stationary sources. Operation of mechanical equipment would not be anticipated to increase ambient noise levels by 5 dBA or more. Therefore, the Project would result in a less-than-significant impact related to stationary equipment noise levels.</p> <p>The proposed Project would include 613 subterranean parking spaces underneath the senior housing community. Subterranean parking would be enclosed on all sides and noise generated by this facility would be inaudible at sensitive receivers. As such, parking structure activity would not be anticipated to incrementally increase ambient noise levels at sensitive receptors by 5 dBA or more. Therefore, the</p>	<p>the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.</p> <p>MM NOI-5 The construction contractor shall utilize caisson drilling instead of pile driving on the Development Site.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Project would result in a less-than-significant impact related to parking noise.</p> <p>Vibration. Heavy-duty equipment activity from construction/demolition on the Development Site would generate vibration. Typical heavy-duty equipment (e.g., a large bulldozer) generates vibration levels of 0.089 inches per second PPV at a distance of 25 feet. The closest sensitive receptor that can be potentially impacted from heavy equipment activity is a multi-family residence along Whitsett Avenue, located approximately 120 feet away from the Development Site. This sensitive receptor could experience a vibration level of 0.008 inches per second PPV. Vibration levels would not exceed the potential building damage threshold of 0.3 inches per second PPV. Therefore, the Project would result in a less-than-significant impact related to general construction vibration.</p> <p>The Project would not include significant stationary sources of vibration, such as heavy equipment operations. Operational vibration in the Project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less-than-significant impact.</p> <p>Cumulative Impacts. The Project would result in significant construction noise impacts on sensitive receptors located in the Project area. Due to the possibility that construction of these identified Related Projects could potentially occur at times that overlap with Project construction. Project related construction noise levels could combine with Related Project construction noise levels to create a cumulatively</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>considerable temporary noise impact upon noise sensitive receptors. As such, cumulative construction noise impacts would be considered significant.</p> <p>With regards to cumulative operational noise impacts, the maximum cumulative roadway noise increase would be 0.6 dBA L_{eq} and would occur along Whitsett Avenue between Moorpark Street and Ventura Boulevard. Cumulative roadway noise levels would not exceed the 3 dBA threshold increment and would not result in a perceptible change in noise level. Therefore, the proposed Project would result in a less-than-significant cumulatively considerable impact related to roadway noise and Project operations.</p> <p>With regards to cumulative construction and operational vibration impacts, the Project would not exceed the potential building damage thresholds for construction and pile driving vibration. Additionally, neither the Project nor any Related Projects would substantially increase heavy-duty vehicle traffic near the Project Site and would not cause a substantial increase in heavy-duty trucks on local roadways. Therefore, the Project would result in less-than-significant cumulatively considerable impacts related to both construction and operational vibration.</p>		
J. POPULATION AND HOUSING		
<p>The population, housing and employment impacts due to implementation of the Project are detailed in <i>Section IV.J: Environmental Impact Analysis – Population, Housing</i> of this Draft EIR and summarized below.</p> <p>Direct Growth. The Project involves a request for a Zone Change on Lot 2 from A1-1XL to R3-1 and a General Plan Amendment from Open Space to Medium Density Residential to accommodate the new</p>	<p>PDF POP-1 The Project shall be age-restricted for seniors aged 55 and older and shall target support for a resident population with an average age of approximately 75 years (upon move-in).</p> <p>PDF POP-2 The Project shall provide for resident ownership of individual dwelling units and an undivided interest in the residential</p>	<p>Impacts related to population and housing would be less-than-significant as a result of development of the Project at the Project Site. There are no existing housing units located on the Project Site that would be demolished for the Project. Due to the need for housing within the City of Los Angeles, the addition of housing units, especially those serving special needs, such as for the elderly, could be considered a beneficial effect of the proposed Project.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>dwelling units. Approximately 340 persons are anticipated at full occupancy of the Project. The population increase of 340 persons is not considered to be substantial relative to the current built-out conditions of the Studio City community and the immediate neighborhood around the Project Site. Based on the 2010 Census population of 29,034 residents within the Studio City area, the increase of 340 residents due to the 200-unit SCSLC would result in a population increase of approximately 1.2 percent within the community.</p> <p>The projected population associated with the Project would be consistent with area-wide housing (and population) forecasts, because it would be consistent with the City General Plan, Community Plan and SCAG RCP/RTP. As a result, development of the proposed Project would not directly induce substantial population growth, and impacts related to population and housing would be less-than-significant.</p> <p>Indirect Growth. The Project would extend roadways and other infrastructure (e.g., water, sewer and energy services) to and within the Project Site as needed to ensure adequate access and support for the Project. However, these services and infrastructure are already in place within the established Studio City community. Further, the Project Site is already connected to the existing infrastructure for the existing golf course and tennis court uses. The extension and minor configuration adjustments necessary for the proposed Project to effectively connect to the available infrastructure within Whitsett Avenue would not induce growth because they would serve only the Project within Lot 2.</p> <p>The access road to serve the Project along Valleyheart Drive would utilize an existing easement for a</p>	<p>common areas. Individual resident-occupant ownership (rather than rental arrangement) shall be arranged through purchase agreements coordinated by the Project Applicant/Manager. Resale of units shall be facilitated and/or monitored through the Project Applicant/Manager to ensure that ownership is reserved for senior residents 55 years and older. For example, when an owner of a dwelling unit passes away or needs to relinquish ownership, the unit shall be transferred back (at market value to the owner or beneficiaries) to the Project Applicant/Manager and resold to another senior resident.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>roadway that was previously planned, but never built. Hence, Project-related roads would not induce growth because they would serve only the Project and would not open up access to new areas not previously contemplated for connection to the City's roadway and circulation system.</p> <p>Existing services and infrastructure are already adequate to serve the projected growth contemplated by the proposed Project. As a result, development of the proposed Project would not indirectly induce substantial population growth and impacts related to population and housing would be less-than-significant.</p> <p>Consistency with Adopted Plans and Policies. The Project would be consistent with applicable housing related goals, objectives, and policies because the Project would preserve existing housing and add new housing types that target diverse populations. Also, the Project would preserve the existing community character through retention of the existing golf course and by incorporating architecture and landscape design features that are sensitive and non-intrusive to the surrounding residential community, thus protecting the longevity of the existing residential neighborhoods. Further, the introduction of 200 new residential units for senior residents would contribute to the diversification of housing opportunities in the Project vicinity as it would target the needs for a select and underserved segment of the population. The Project would result in the establishment of a senior residential community that would fulfill a senior housing void currently present in the community.</p> <p>Additionally, the Project can be characterized as infill development on a large underutilized parcel in the Studio City area, in which development would be located within an established urban area that offers a</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>mix of uses. The Project would be conveniently located near residential neighborhoods, commercial retail and services, recreation facilities and public transit corridors (i.e., Ventura Boulevard), thus allowing for reduced commuting distances and facilitating opportunity for walkability. The Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within Studio City. As such, the proposed Project would implement the City's vision for compact growth within community core areas.</p> <p>Cumulative Impacts. The Related Projects would introduce approximately 1,455 residents into the Community Plan Area, representing a total 1.98 percent increase from the 2010 projection of the City of Los Angeles Framework EIR as a result of the Project and Related Projects. This approximately 1.98 percent increase would not be a substantial enough growth beyond normal population growth to trigger a significant impact and thus would result in a less-than-significant impact on population in the area. Additionally, the population increase would not result in unplanned infrastructure not previously adopted by the Community Plan and would therefore result in a less-than-significant impact to population in the area.</p> <p>The Related Projects would add approximately 831 new multiple-family housing units to the Community Plan Area, representing a total 2.27 percent increase from the 2010 projection of the City of Los Angeles Framework EIR as a result of the Project and Related Projects. This approximately 2.27 percent increase would not be a substantial enough growth beyond normal housing stock growth to trigger a significant impact and thus would result in a less-than-significant</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>impact on housing stock in the area. Additionally, the housing stock increase would not result in unplanned infrastructure not previously adopted by the Community Plan and would therefore result in a less-than-significant impact to housing in the area.</p>		
<p>K.1 PUBLIC SERVICES: FIRE PROTECTION</p>		
<p>The fire service impacts due to implementation of the Project are detailed in <i>Section IV.K.1: Environmental Impact Analysis – Public Services: Fire Protection</i> of this Draft EIR and summarized below.</p> <p>LAFD Response Distances and Site Access. The nearest LAFD fire station that would serve the Project is Fire Station No. 78. Fire Station No. 78 is located directly south of the Project and is bordered on its northern boundary line by proposed Lot 2 of the Project Site. Station No. 78 would be the primary responding unit to any fire or medical emergency occurring on the Project Site. Additionally, if required, fire protection services would also be available by two other LAFD fire stations in the vicinity, including Fire Stations Nos. 86 and 102. No new LAFD fire stations would be required to be developed nor would an existing station need to be expanded to provide adequate fire and emergency medical protection service to the Project. Therefore impacts regarding fire protection service response distances would be less-than-significant.</p> <p>The Project will also incorporate numerous fire lanes and entry points into its design to allow ease of access for firefighting equipment in the event of a fire. With incorporation of these access points and fire lanes in the design of the proposed Project, it is expected that fire department access will be adequately provided onsite. Therefore, impacts would be reduced even further.</p>	<p>MM PSF-1 All buildings developed on Lot 2, including the subterranean parking structure, shall be equipped with automatic sprinkler systems.</p> <p>MM PSF-2 All landscaping associated with the Project shall be of indigenous plants and materials, and shall be "fire-resistant" (as defined by a Certified Landscape Architect or by the Metropolitan Water District of Southern California list of Fire-Resistant California Friendly Plants) to the extent possible.</p> <p>MM PSF-3 The Project shall be designed so that the Los Angeles Fire Department has adequate access to, and sufficient equipment space for, every building in the complex, which shall include providing fire lanes of required width (as determined by the LAFD) along the perimeter of the Project, and providing a central courtyard, which shall dually function as an open space plaza for residents and a path of travel for fire and emergency vehicles to traverse the site and enter and exit the complex.</p>	<p>Implementation of all required Compliance Measures will ensure that adequate fire protection service is provided to the proposed Project. Implementation of the Mitigation Measures, specific to the Project, shall also be required to ensure safety at the Project Site. As such, all potential impacts related to fire safety and fire protection resulting from the Project would be less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Fire Flows. The Project Site is located in an area that currently has adequate existing fire flow pressure to provide adequate fire protection service for the existing uses in the neighborhood. The existing water system at the Project Site has a fire flow capacity of approximately 1,500 gpm with a water pressure of 150 psi for the existing golf course and tennis court uses on the Project Site. The existing water pressure meets the LAFD requirements for the existing uses on Lot 1. The fire flow capacity will need to be increased at the Project Site with development of the SCSLC on Lot 2; however, since the area has adequate existing fire flow pressure in general, this can be accomplished with the inclusion of additional fire hydrants for the Project, as anticipated by the LAFD. Additionally, the Project would comply with all required Compliance Measures that would ensure adequate fire flow for the Project. Finally, Mitigation Measures will be implemented to ensure that adequate fire flow to the proposed Project is provided. With implementation of the Compliance Measures and Mitigation Measures, impacts from the Project would be less-than-significant.</p> <p>CAL-FIRE Very High Fire Hazard Severity Zones. The California Department of Forestry and Fire Protection (CAL-FIRE) has begun a program to map Very High Hazard Severity Zones in Local Responsibility Areas and State Responsibility Areas. These maps show the locations of susceptibility to wildland fires for State controlled land and for local municipalities. The Project Site is located in an area mapped as LRA Unzoned, indicating that the area is urbanized and not susceptible to wildland conflagrations. Because the Project is located within an LRA Unzoned area, according to CAL-FIRE, no wildland fire protection measures would be required with development of the proposed Project. Therefore, impacts would be less-than-significant.</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Consistency with Adopted Plans and Policies. Development of the Project would not be inconsistent with Plans and policies addressing the service requirements of fire protection services.</p> <p>Cumulative Impacts. The Project, in combination with the ten Related Projects, would increase the need for fire protection services from the LAFD. Specifically, there would be a demand to increase staffing ratios, equipment, fire station construction, and fire station expansion to better serve the proposed Project and Related Projects in the future. The demand for such increased service to the LAFD would be met through existing mechanisms such as property taxes and government funding to which the Project and Related Projects would contribute.</p> <p>Similar to the Project, the Related Projects would each be reviewed by the LAFD and would be required to implement design features and Compliance Measures of the Los Angeles Municipal Code to reduce impacts to fire protection services. All Related Projects would be required to be within 1.5 miles of an LAFD fire station and, if not, would be required to develop an automatic sprinkler system to slow down the spread of fire. Additionally, each Related Project would be required to abide by the fire flow requirements as presented in the Los Angeles Municipal Code along with site access requirements. In compliance with all regulations and design features required by the LAFD, the proposed Project and Related Projects would have less-than-significant impacts on LAFD fire services and would not contribute to cumulative impacts.</p>		
K.2 PUBLIC SERVICES: POLICE PROTECTION		
The police service impacts due to implementation of the Project are detailed in <i>Section IV.K.2</i> :	Compliance with all required Compliance Measures would reduce police protection service impacts to a less-	Incorporation of crime prevention features into the Project in consultation with the LAPD during the

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p><i>Environmental Impact Analysis – Public Services: Police Protection</i> of this Draft EIR and summarized below.</p> <p>LAPD Service Ratios and Facilities. The Project will be served by LAPD through its North Hollywood Community Police Station located at 11640 Burbank Boulevard in the community of North Hollywood. This station is currently staffed with 300 sworn officers that serve a population of 220,000 residents. Therefore the North Hollywood Community Police Station has a current officer-to-population ratio of 1 officer per 734 residents. With the development of the Project, the population served by the North Hollywood Community Police Station within its boundary would increase by 340, up to 220,340 residents. With the projected population, the officer-to-population ratio would decline to 1 officer per 735 residents served. This ratio would still be consistent with the service goal of 1 officer per 758 residents as required by the City of Los Angeles. Considering that the proposed Project would not cause a decline in the current officer-to-resident ratio above the City of Los Angeles’ standard of 1 officer per 758 residents, it is expected that the North Hollywood Community Police Station would continue to adequately serve the area of the proposed Project. Therefore, impacts from the development of the Project on police services would be less-than-significant.</p> <p>Project Security and Design Features. The Project Site is located within Reporting District 1581 and Basic Car unit area 15A85 of the North Hollywood Community Police Station’s jurisdiction. In 2010, the North Hollywood Community Police Station reported 6,242 Part I Offences of which includes crimes such as Homicide, Rape, Aggravated Assault, Robbery, Burglary, Larceny and Vehicle Theft. This station</p>	<p>than-significant level, and as such, Mitigation Measures are not required.</p>	<p>final design stages of the building plans would reduce the calls for police protection from the LAPD at the proposed Project Site. The cumulative population increase from the Project and the Related Projects would not significantly impact police coverage or emergency response times. Therefore, impacts would be less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>reported a total of 13 Homicides, 42 Rapes, 314 Aggravated Assaults, 299 Robberies, 946 Burglaries, 3,681 Larceny crimes, and 847 Vehicle Thefts in 2010.</p> <p>As part of the LAPD’s Design Out Crime program, the Project will incorporate specific design features to reduce calls from the LAPD involving crime. The specific design features will be determined in final design of the Project and in consultation with the LAPD. With implementation of the LAPD design features into the Project, it is expected that crime on the Project Site would be reduced. This in turn would reduce the number of calls to the LAPD to provide police protection services to the Project Site. Therefore, impacts would be less-than-significant.</p> <p>Consistency with Adopted Plans and Policies. Development of the Project would not be inconsistent with Plans and policies addressing the service requirements of police services.</p> <p>Cumulative Impacts. The population increase from the proposed Project in combination with the Related Projects would cause the officer-to-population ratio to decline to 1 officer per 740 residents resulting in a cumulative impact to the LAPD. However, this ratio would still be consistent with the service goal of 1 officer per 758 residents as required by the City of Los Angeles. The demand for such increased service from the LAPD would be met through existing mechanisms such as property taxes and government funding that the proposed Project and Related Projects would contribute.</p> <p>Similar to the proposed Project, each Related Project would be reviewed by the LAPD. Project Design Features for each Related Project would be incorporated into their design to help reduce calls for</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>police protection service from the LAPD. Furthermore, upon LAPD review, the department may suggest incorporating crime prevention features and techniques into each related project to further deter property crimes.</p> <p>Implementation of the Project would only incrementally increase the need for police protection services from the LAPD in the North Hollywood Community Police Department's jurisdiction. The proposed Project would have a less-than-significant impact on the LAPD police protection service and would not contribute to cumulative impacts.</p>		
<p>K.3 PUBLIC SERVICES: LIBRARY</p>		
<p>The library service impacts due to implementation of the Project are detailed in <i>Section IV.K.3: Environmental Impact Analysis – Public Services: Library</i> of this Draft EIR and summarized below.</p> <p>Library Services. The nearest library that would serve the residents of the Project is the Studio City Neighborhood Branch Library (Studio City Library). According to standards set forth by the LAPL, the Studio City Library is currently undersized for the amount of residents that it serves within its jurisdictional boundary.</p> <p>Development of the Project would increase the population of the area served by the Studio City Library. The increase in population would demand an increase in services from the branch; however, the increase would be nominal compared to the overall population. Although the Studio City Library is undersized, the LAPL indicates that this library branch adequately serves the population within its jurisdictional boundary. As such, the nominal increase</p>	<p>MM PSL-1 The Project Applicant or developer shall pay a mitigation fee of \$200 per capita based upon the Project population of the development to be used for books, computers, and other library materials. However, if a small library, adequate to serve the needs of the Project population, is provided as part of the Project, the \$200 per capita mitigation fee shall be waived.</p>	<p>The Project is anticipated to have a less-than-significant service impact on the three nearest libraries to the Project Site. However, due to the fact that the nearest library, the Studio City Neighborhood Branch Library, is considered to be undersized for the community, there is the possibility that the Project will have an unexpected impact on this branch due to the increase in population resulting from the Project. However, implementation of the Mitigation Measures will ensure that any unexpected Project impacts are reduced to a less-than-significant level. Therefore, the Project will have a less-than-significant impact on library services.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>in population from the Project would not cause the Studio City Library to be overused. Additionally, two other LAPL branches (the Sherman Oaks Neighborhood Branch Library and the North Hollywood Regional Branch Library) are within three miles of the Project Site and would also be able to serve its residents adequately.</p> <p>Because the three library branches nearest to the Project Site would adequately serve the increase in population due to the Project, the Studio City Senior Living Center is not anticipated to cause a substantial impact on library services or to the LAPL System; therefore, impacts would be less-than-significant.</p> <p>Further, to ensure that any unforeseen impacts are less-than-significant, Mitigation Measures will be implemented, which will further reduce impacts.</p> <p>Consistency with Adopted Plans and Policies. Development of the proposed Project would not be inconsistent with Plans and policies addressing the service requirements and siting of library services.</p> <p>Cumulative Impacts. The Project along with the ten Related Projects (seven of which have residential or school components) would be served by the LAPL system for library services. The library branches in the LAPL system that would serve the Related Projects with residential and school components include: The Studio City Neighborhood Branch Library, the Sherman Oaks Neighborhood Branch Library, and the North Hollywood Regional Branch Library. The Studio City Library would continue to be undersized due to the population increase of the proposed Related Projects; however, the Sherman Oaks Neighborhood Branch Library and North Hollywood Regional Branch Library, which would absorb much of</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>patronage from the Related Projects, would be adequate to handle the new population. Each Related Project would be required to provide Mitigation Measures, if necessary, to reduce any possible significant impacts on library services at the respective LAPL library branches that would provide service.</p> <p>The proposed Project would cause a nominal increase in library service demand from the Studio City Library. As such, the Project would have a less-than-significant impact on the library service and would not contribute to cumulative impacts.</p>		
L. RECREATION AND PARKS		
<p>The impacts to recreational facilities and parks due to implementation of the Project are detailed in <i>Section IV.L: Environmental Impact Analysis – Recreation and Parks</i> of this Draft EIR and summarized below.</p> <p>Impact on Citywide Tennis Facilities. With the closure of several other tennis facilities in the City, the Weddington Golf and Tennis Club has become one of the few remaining privately-owned facilities that are open to the public for play in the City of Los Angeles and within the community of Studio City. Although there are many exclusive private golf and tennis facilities in the City of Los Angeles, there are a limited number of privately-owned facilities that are open to the public.</p> <p>However, seven pay tennis facilities are available for public play within a 10-mile radius of the Studio City community. Demolition of the 16 tennis courts at the Project Site would reduce the inventory of tennis courts within Studio City, the City of Los Angeles, and the County of Los Angeles, but would not significantly impact the tennis court inventory overall.</p>	<p>PDF REC-1 The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing, and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children’s playground.</p> <p>PDF REC-2 The Project shall include approximately 30,000 square feet of indoor common-use activity center area. These areas shall be used for exercise areas, craft rooms, organized social activities and similar recreational uses for the residents and their guests.</p> <p>PDF REC-3 The Project shall include private balconies</p>	<p>With implementation of the Project Design Features and Compliance Measures, the Project impacts to park and recreational facilities would be less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Tennis facilities remain available through public and private facilities, as well as within school facilities. Patrons to local tennis courts may be inconvenienced by longer wait times to play, but the inventory of tennis courts throughout the region is enough to support the shift in use to other facilities. Therefore, impacts would be less-than-significant with regards to removal of the 16 tennis courts and effect on other tennis facilities.</p> <p>Demand on Recreation and Park Facilities. The Project is estimated to have a resident population of 340 residents. The increase in residential population would increase demand for parks and recreational facilities serving the Studio City area.</p> <p>The Project would be located in an area of Studio City that is served by five parks that are within a two-mile radius of the Project Site. According to the City of Los Angeles General Plan, neighborhood and community recreational facilities should be provided at a minimum of 2 acres per 1,000 persons. With an estimated population of 340 residents, under this standard, the Project would create a demand for 0.68 acres of neighborhood parkland or community recreational facilities.</p> <p>When considered on a one-for-one basis, the proposed Project would incorporate the equivalent of 3.19 acres of area within Lot 2 for common recreational uses. This represents almost four times the 0.68-acre demand for parkland calculated for the Project. In addition, and not part of the above calculation, the Project would retain the Weddington Golf Course essentially unchanged on the Project Site, inclusive of the existing 9-hole pitch-and-putt golf course, driving range, and clubhouse. The golf course would offer additional recreational opportunities for the SCSLC,</p>	<p>and small patios in some of the residential units that offer opportunities for private open space and recreation use.</p> <p>PDF REC-4 The Project shall be designed to retain the golf course, driving range, and clubhouse currently on the Project Site, largely unchanged. Minor reconfiguration and modification are permitted. It is anticipated that these facilities shall continue to be privately-owned and made available for use by the public or the adjacent Project residents on a fee basis.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>continuing to serve the public as well as the new Project residents. The Weddington Golf Course would further offset the need for Project residents to use City recreational facilities.</p> <p>Implementation of all required Compliance Measures would reduce impacts to a less-than-significant level, and implementation of volunteered Project Design Features would reduce recreational impacts even further.</p> <p>Consistency with Adopted Plans and Policies. The Project is consistent with the objectives and policies of the Community Plan, which encourage a balance of open space and adequate recreational area to meet resident needs.</p> <p>The Project will be developed within proposed Lot 2 on the Project Site, which would require removal of 16 tennis courts and a tennis house. Within the Studio City Senior Living Center development, 109,176 square feet (approximately 2.5 acres) of outdoor plaza area, which would include a pool, outdoor seating areas, and a children’s playground, would be provided. Although existing active-use recreational facilities (i.e., the tennis courts) would be lost, they would be replaced with both active and passive recreational facilities within the Project that are suitable for the specific resident population and are compatible with the senior residential use. Further, the site layout would include pedestrian access that would allow Project residents to access the Los Angeles River area.</p> <p>Lot 1, including the golf course, clubhouse, and driving range would remain intact. It is anticipated that this facility would continue to be privately owned and made available for public use on a fee basis. The golf course would continue to serve as a prominent</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>recreational facility within the Community Plan Area and would remain as a designated open space amenity for both the community and the Project residents.</p> <p>Cumulative Impacts. With an estimated 340 residents, the Project would generate the need for 0.68 acres of parkland or recreational uses. The Related Projects would increase the population of the area by approximately 1,455 persons and would require an estimated demand for 2.91 acres of park or recreation area. The 0.68 acres of parkland demand for the Project represents 18.9 % (percent) of the total demand identified for the proposed Project and Related Projects, combined. However, because the Project would incorporate Project Design Features that are expected to entirely offset the Project’s recreational needs/demand, the incremental increase to cumulative demand would be negligible. Therefore, the Project would not cumulatively contribute to the need for parkland and recreational facilities. To offset their respective impacts, each Related Project would be required to dedicate the required parkland, develop the recreational facilities, or pay in-lieu fees to satisfy the demand for parks and recreational services. With implementation of such Project Design Features or payment of in-lieu fees, the Related Projects' cumulative impacts to parkland and recreational facilities would be less-than-significant.</p>		
M. TRANSPORTATION AND CIRCULATION		
<p>The transportation and circulation effects associated with the construction and operational phases of the Project, and cumulative future traffic levels, are detailed in <i>Section IV.M: Transportation and Circulation</i> of this Draft EIR and summarized below. A total of five study intersections and two street segments were studied to determine and estimate the</p>	<p>PDF TRF-1 The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or Los Angeles River.</p>	<p>With implementation of Compliance Measures, all Project-specific and cumulative transportation and circulation impacts relating to traffic congestion on roadways and freeways and at intersections, cut-through traffic, Project access, pedestrian access, bicycle access, parking, public transit, and consistency with adopted Plans and policies will be</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>traffic impacts of the Project during the construction and operational phases of the Project.</p> <p>Construction Activity. During the construction phase, traffic would be generated by activities including construction equipment, crew vehicles, haul trucks, and trucks delivering building materials. Hauling of debris would be restricted to a haul route approved by the City of Los Angeles. The City would approve specific haul routes for the transport of materials to and from the Project Site during demolition and construction.</p> <p>It is assumed that heavy construction equipment would be located onsite during grading activities and would not travel to and from the Development Site (the area of the Project Site that will undergo physical disturbance for the Project) on a daily basis. However, truck trips would be generated during the demolition, grading, and export period, so as to remove material (from grading and demolition) from the Development Site. Trucks are expected to carry the export material to a receptor site located within 20 miles of the Project Site.</p> <p>During the construction phase, local traffic may experience a temporary increase as additional construction-related trips (comprising commuting construction personnel and haul trucks) would be added to the area in addition to traffic generated by the existing uses. However, based on the relatively low estimated number of generated construction related trips, traffic impacts due to construction activities are forecast to be less-than-significant at the five study intersections during the weekday A.M. and P.M. peak hours.</p> <p>Regardless, it will be necessary to develop and</p>	<p>PDF TRF-2 Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that will be provided from Valleyheart Drive (which will lead from Whitsett Avenue).</p> <p>PDF TRF-3 The Project shall minimize the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.</p> <p>MM TRF-1 Existing access shall be maintained for the existing site uses and parking facilities.</p> <p>MM TRF-2 Any roadway lane closures shall be limited to off-peak travel periods.</p> <p>MM TRF-3 Receipt of construction materials shall be scheduled to non-peak travel periods, to the extent possible.</p> <p>MM TRF-4 Deliveries shall be coordinated to reduce the potential of trucks waiting to unload for protracted periods of times.</p> <p>MM TRF-5 Parking by construction workers shall be prohibited on adjacent streets and construction workers shall be directed to available parking areas within the Project Site.</p> <p>MM TRF-6 The existing sidewalk along the Whitsett Avenue Project Site frontage shall be improved as portions of the sidewalks are cracked and uneven and in poor conditions for pedestrians. The sidewalks shall be well-lit, even, and wide enough to</p>	<p>less-than-significant and not cumulatively considerable. With implementation of the additional volunteered PDFs and required Mitigation Measures, impacts will be reduced further and any potentially unforeseen impacts will be reduced to a less-than-significant level.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>implement construction management practices for the Project to minimize impacts, including maintaining existing access to the Project Site, limiting roadway lane closures, delivering construction materials during non-peak travel periods, reduction of truck waiting times, and staging for construction worker parking.</p> <p>Long-Term Operation. Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volume expectations to be generated by the Project were based upon rates per number of dwelling units in the housing development, number of tees in the driving range, and number of holes in the golf course. The Project is expected to generate 59 net new vehicle trips (0 inbound trips and 59 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Project is expected to generate 38 net new vehicle trips (37 inbound trips and 1 outbound trips). Over a 24-hour period, the Project is forecast to generate 624 net new daily trip ends during a typical weekday (approximately 312 inbound trips and 312 outbound trips). With traffic generated from ambient growth and Related Projects taken into consideration, the proposed Project is not anticipated to create significant impacts at any of the study intersections.</p> <p>Access. Application of the impact threshold criteria from the City of Los Angeles indicates that none of the five study intersections or two study street segments would be significantly impacted by the forecast Project traffic. As no significant impacts are expected due to development of the proposed Project, it can be reasonably assumed that vehicular access into the SCSLC Project, as well as the driveways and surrounding streets that are utilized for site access will not be significantly impacted by congestion caused by</p>	<p>accommodate seniors in walkers or wheelchairs. The improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.</p> <p>MM TRF-7 Existing traffic signal timing at the Whitsett Avenue/Ventura Boulevard intersection shall be reviewed by the Los Angeles Department of Transportation (LADOT) to ensure that pedestrians, in particular senior walkers, have adequate time to safely cross Whitsett Avenue and Ventura Boulevard during allocated pedestrian walk phases. The costs or fees associated with submittal and review by LADOT shall be paid by the Applicant, Property Owner, Developer, and/or other private party.</p> <p>MM TRF-8 A high visibility crosswalk with appropriate signage shall be installed at the west leg of the Whitsett Avenue/Valleyheart Drive intersection (i.e., across Valleyheart Drive) to provide access to nearby transit stops. The improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.</p> <p>MM TRF-9 A high visibility crosswalk with appropriate signage shall be installed across the west leg of the Whitsett Avenue/Valley Spring Lane intersection (i.e., across Valley Spring Lane) to provide</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>the Project.</p> <p>Pedestrian Environment. Due to the Project's consistency with the principles of walkability, its location in close proximity to commercial services on Ventura Boulevard, and its consistency with the design guidelines in the Community Plan, the Project can be considered a pedestrian-friendly development, and thus will not have any detrimental significant impacts on pedestrian access to the site and pedestrian orientation of the existing surrounding streets.</p> <p>Bicycle Environment. Bicycle access to the Project Site is facilitated by the City of Los Angeles bicycle roadway network. None of the identified bicycle paths/routes are adjacent to the Project Site. As such, neither construction nor operation of the proposed Project will have any significant impact on the three bicycle routes in the Project vicinity. Bicycle access to the existing pathway along the north side of the Los Angeles River, adjacent to the Project Site, can be utilized if the pathway is opened for public use by the City and Los Angeles County Flood Control District. The Project will not hinder nor prevent the river pathway from being used for bicycle access if desired by the City. Additionally, any required long-term and short-term bicycle parking will be provided within the Project.</p> <p>Parking. In accordance with City of Los Angeles Planning Department Deputy Advisory Agency residential parking requirements, a total of 500 parking spaces will be required for the Studio City Senior Living Center. Strictly speaking, approximately nine parking spaces would be required for the golf uses that will remain on the Project Site (using the floor area for the clubhouse). However, parking requirements for the recreational uses will be at the sole discretion of the</p>	<p>access to nearby transit stops. This improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>decision-maker during the Conditional Use Permit process for those uses.</p> <p>As planned, a total of 70 of the 92 existing surface parking spaces on the Project Site will be eliminated to accommodate development of the Project. The Project will retain 22 of the existing surface spaces to continue to be used for the golf course, driving range, and clubhouse. In sum, a total of 635 parking spaces will be provided at the Project Site, including 613 new spaces in the subterranean parking garage and the aforementioned 22 existing spaces in the surface parking lot to be located adjacent to the driving range (the existing spaces may be modified to accommodate the Project). As required, of the 635 parking spaces, a total of 500 spaces will be allocated for residents and guests of the proposed Project and a total of 135 spaces will be allocated for employee parking and parking for patrons of the golf course, driving range, and clubhouse, which is more than currently exist for those uses. Therefore, the parking provided for the Project will be sufficient to satisfy the parking requirements for the Project Site uses.</p> <p>Transit System. It is anticipated that the existing transit service in the Project area will adequately accommodate the increase of Project-generated transit trips. Thus, given the low number of Project-generated transit trips per bus, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the proposed Project.</p> <p>Consistency with Adopted Plans and Policies. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan is the primary guiding document for development in the Project area. The proposed residential Project will be consistent with a number of objectives and policies relating to</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>transportation set forth in the Community Plan and will not impede realization of any goals, objectives, or policies of the Community Plan.</p> <p>Cumulative Impacts. Application of the impact threshold criteria from the City of Los Angeles indicates that none of the five study intersections and two study street segments would be significantly impacted on a cumulative level by the forecast Project traffic and Related Project traffic. Incremental, but not significant cumulative impacts are noted at the study locations evaluated in the analysis.</p>		
<p>N.1 UTILITIES: ENERGY</p>		
<p>The impacts to energy resources due to implementation of the Project are detailed in <i>Section IV.N.1: Environmental Impact Analysis – Utilities: Energy</i> of this Draft EIR and summarized below.</p> <p>Impacts on Energy Resources During Construction. Proposed development for the Project would be limited to the Development Site. During construction of the proposed Project, both mobile and stationary equipment will require energy (electrical) supplies. Construction equipment and onsite facilities will require electrical energy. The amount of energy to be consumed during construction will be limited to the construction period during development. Existing electrical infrastructure of the LADWP currently has enough capacity to provide service during construction of the Project. Furthermore, electrical infrastructure or facilities would not have to be expanded or newly developed to provide service to the Project Site during construction or demolition. Therefore impacts would be less-than-significant during construction of the proposed Project.</p>	<p>PDF UTE-1 The Project shall attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.</p> <p>PDF UTE-2 The senior housing shall be located adjacent to the existing golf course to allow utilization of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.</p> <p>PDF UTE-3 The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.</p> <p>PDF UTE-4 The Project shall use water efficient landscaping and native drought tolerant plants.</p> <p>PDF UTE-5 The Project shall use stormwater</p>	<p>With implementation of all required Compliance Measures, the Project will result in less-than-significant construction and operational impacts related to energy resources. With implementation of the volunteered Project Design Features, any impacts will be further reduced and any potentially unforeseen impacts will be less-than-significant.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Construction activities are not anticipated to utilize natural gas infrastructure or facilities at the Development Site. Therefore, impacts to natural gas resources or infrastructure during construction would be less-than-significant.</p> <p>Operational Impacts on Electrical Resources. The proposed Project’s net increase in electricity demand of almost 4.98 million kWh per year represents less than 0.02 percent of LADWP’s forecast annual net energy load in 2016, and even less in subsequent years after 2017. As such, the Project would be adequately served for its demand on electricity, and no new electrical infrastructure or facilities would need to be developed to accommodate the Project. With implementation of all required energy saving Compliance Measures from the LAMC and the Green Building Code, as well as volunteered PDFs, the Project would have a less-than-significant impact on electrical services.</p> <p>Operational Impacts on Natural Gas Resources. The Project represents a large increase in natural gas demand on the Project Site from current uses; however, this is due to the recreational nature of the existing uses on the Project Site, which have a minimal usage of natural gas in comparison to residential uses in general. The approximately 27,178 cubic feet per day (cf/day) natural gas demand of the Project represents a very minimal percentage of the supply to be provided by SoCalGas in 2016 and beyond. Additionally, the Project’s increase in natural gas demand at the Project Site is not out of line with the general demand for natural gas in the area from the multi-family residential buildings along Whittsett Avenue. Ultimately, the Southern California Gas Company has capacity to adequately serve the proposed Project upon its completion and during its</p>	<p>infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.</p> <p>PDF UTE-6 The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.</p> <p>PDF UTE-7 The Project shall utilize natural light as the primary source of light in all dwelling units. Lighting systems shall be controllable to achieve maximum efficiency.</p> <p>PDF UTE-8 The Project energy performance shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.</p> <p>PDF UTE-9 The Project shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.</p> <p>PDF UTE-10 The Project shall achieve LEED Platinum, Gold, or Silver status.</p>	

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>operation.</p> <p>Furthermore, the Project Site is currently served by an underground 4-inch natural gas line within Whitsett Avenue. This existing infrastructure would be adequate to serve the proposed Project upon its completion and during its operation. Similarly, the existing distribution facilities have capacity to serve the increase in demand of the Project. No new or expanded facilities would have to be developed. Therefore, impacts to natural gas resources would be less-than-significant.</p> <p>Cumulative Impacts. Similar to the proposed Project, each of the ten Related Projects would be required to contact LADWP and SoCalGas to ensure that existing infrastructure and facilities serving each Related Project site would be adequate. LADWP and SoCalGas may suggest new infrastructure development or expansion of existing infrastructure for certain Related Projects as needed. Furthermore, Title 24 of the California Code of Regulations establishes energy conservation standards for new construction. These energy conservation standards would be incorporated into new buildings as part of the building permit process and thus would reduce the amount of electricity and natural gas cumulatively consumed by the proposed Project in combination with the Related Projects by addressing insulation, glazing, lighting, shading, and water and space heating systems.</p> <p>In consideration of the fact that the proposed Project would have a nominal increase in demand of energy resources compared to the Related Projects; the proposed Project would have a less-than-significant contribution to cumulative impacts of energy resources.</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
N.2 UTILITIES: WATER		
<p>The impacts to recreational facilities and parks due to implementation of the Project are detailed in <i>Section IV.N.2: Environmental Impact Analysis – Utilities: Water</i> of this Draft EIR and summarized below.</p> <p>Water Supply. The proposed Project includes replacement of 16 existing tennis courts and related facilities with 200 multiple-family units intended for senior residents. The analysis generally assumes that the Project will be constructed and operated in accordance with all required Compliance Measures, including Title 20 and Title 24 of the California Code of Regulations, which establish various conservation standards, including standards that relate to water conservation and the protection of water resources.</p> <p>A project would have a significant environmental impact if sufficient water supplies were not available to serve the project from existing entitlements and resources, or if new or expanded entitlements were needed. According to the City of Los Angeles Urban Water Management Plan (LA-UWMP), water demand Citywide in 2010 was approximately 555,500 acre-feet per year (AFY). The proposed Citywide demand for 2015 is expected to be approximately 614,800 AFY, and in 2035 to be 710,800 AFY. Project buildout is in 2016, however, it is anticipated that the 2015 figure for Citywide demand will be substantially similar in 2016.</p> <p>Since the projected water supply is based on the growth projections of the City’s General Plan and SCAG, and the Project is consistent with the General Plan and Community Plan designations, the Project will fit within the water demand projections. LADWP has stated that water requirements for any project that</p>	<p>PDF UTW-1 The landscaping for the Project shall use water efficient landscaping and native drought tolerant plants.</p> <p>PDF UTW-2 The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs on proposed Lot 2 of the Project Site.</p>	<p>With implementation of all required Compliance Measures, as well as volunteered Project Design Features, the Project will result in less-than-significant impacts to water supply or water delivery infrastructure. No Mitigation Measures are required since impacts related to water supply and delivery are already less-than-significant as a result of the proposed Project.</p>

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>is consistent with the City’s General Plan have been taken into account as part of the planned cumulative growth used to forecast water demand. As such, sufficient water supplies are available to accommodate the proposed Project. Further, the LADWP has indicated in its LA-UWMP that it will provide an adequate water supply to meet current and future growth through year 2035. Finally, LADWP does not have any known water service problems in the area and the treatment plant has adequate capacity to handle the Project. Therefore, impacts to water supply would be less-than-significant.</p> <p>Cumulative Impacts. With respect to potential cumulative impacts to water provisions, based on the uses identified and not accounting for demolition of existing uses as part of the Related Projects (which would result in water demand reductions), the ten Related Projects could result in an increase in water demand of approximately 193,918 gpd, which, based on a conservative estimate of a seven-day-a-week operation, could result in approximately 217.4 AFY of additional water demand. Since the anticipated Related Projects are already planned for in the City’s General Plan, SCAG’s population projections, and the LA-UWMP, these Related Projects’ additional demand of 217.4 AFY will not be cumulatively considerable, resulting in a less-than-significant impact. Additionally, the SCSLC Project’s addition of 40.35 AFY of water demand to the Project Site represents approximately 18.6% of water demand from the Related Projects, which is not a considerable contribution to the cumulative water demand. Consequently, the proposed Project will result in a less-than-significant cumulative impact to water supply and infrastructure, and as such, no Mitigation Measures are required.</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
GROWTH INDUCING		
<p>Section 15126(d) of the CEQA Guidelines requires that an EIR discuss the growth inducing impact of a 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 California Department of Transportation (“Caltrans”) requires similar analysis for projects located along State highways, including the proposed Project.</p> <p>The proposed Project is not expected to generate growth in the area beyond the intensification of the Project Site. Development of the Project will result in an increase in permanent senior residents on the Project Site and in the area, as well as short-term construction and long-term employment opportunities. The Project consists of 200 additional housing units that will accommodate the non-significant increase in senior residents in the area. Additionally, it is not expected that any significant number of employees will move to the area specifically because of the Project. Further, no additional infrastructure would be constructed that could generate additional population growth in the Project area.</p> <p>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 at the SCSLC. Although the proposed Project would directly provide 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</p>		

ENVIRONMENTAL IMPACT	PROJECT DESIGN FEATURES (PDF) AND MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. Further, in conducting a “First-cut Screening” analysis of the Project, utilizing criteria set forth by Caltrans relating to accessibility, Project type, Project location, growth pressure, and geography, it has been determined that the Project is unlikely to cause direct or indirect growth-related impacts. Therefore, no significant growth inducing impacts are anticipated from the Project.</p>		

0. EXECUTIVE SUMMARY

E. MITIGATION PROGRAM

A Mitigation Monitoring and Reporting Program (“MMRP”) will be prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” A Final MMP will be adopted at the conclusion of the EIR process and will reflect the final set of required mitigation measures to address Project impacts.

I. INTRODUCTION

A. ENVIRONMENTAL REVIEW PROCESS

1. OVERVIEW OF THE CEQA PROCESS

The California Environmental Quality Act (CEQA) (Public Resources Code (PRC), Sections 21000-21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report (EIR) must be prepared. The "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative (in association with other related projects) environmental impacts that could result from the implementation of the proposed project.

Pursuant to CEQA Guidelines Section 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and, consider a number of reasonable alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is the City of Los Angeles Department of City Planning (Department of City Planning). The Department of City Planning is the public agency which has the primary responsibility for approving or carrying out the proposed Project. Further, Responsible Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the Department of City Planning.

An EIR is prepared in two key stages. First, a Draft EIR (DEIR) is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR (FEIR). Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the term EIR or Draft EIR may be used interchangeable since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided specifically in that volume. Similarly, reference to the Final EIR may be in

reference to that separate volume or that stage of the EIR process and its collective documents. Technical Appendices may accompany either stage of the EIR, usually in a separate volume, and may be referenced as an independent volume or collectively as part of the either the Draft EIR or the Final EIR.

The Final EIR is used by the recommending bodies (i.e., Hearing Officer and City Planning Commission) and the final decision-makers (City Council) to weigh the environmental impacts against a proposed project in order to make an informed decision.

2. PROJECT EIR PROCESS

This EIR has been prepared at the direction of and under the supervision of the Los Angeles Department of City Planning in accordance with CEQA and the Los Angeles CEQA Thresholds Guide (2006).

As discussed in *Section II: Project Description*, the proposed Project involves the subdivision of property presently occupied by the Weddington Golf & Tennis Club to create two separate lots. Lot 1 would allow for the continued operation of the 9-hole pitch-and-putt golf course and accompanying driving range and clubhouse. Lot 2 would be converted from tennis court uses to medium-density residential buildings for senior housing.

Based on the preliminary review and EIR scoping process (see *Section I.A.4: Introduction – Environmental Review Process – Preliminary Review and Notice of Preparation*, below), the Lead Agency determined that an EIR should be prepared because the implementation of the proposed Project may, either by itself and/or in conjunction with past, present and reasonably foreseeable future development in the Project vicinity, have significant environmental effects on some environmental issues.

For each significant impact identified in the EIR, the City must make findings and, if appropriate, prepare a statement of overriding considerations if the mitigation presented does not reduce impacts to a less-than-significant level. Other Responsible Agencies, discussed in the following section, may also use this EIR in their discretionary approval of permits during the implementation process.

3. PROJECT APPROVAL AND INTENDED USES OF THIS EIR

In accordance with CEQA and its implementing guidelines, the purpose of this EIR is to identify all potentially significant effects of the proposed Project on the physical environment, to determine the extent to which those effects can be reduced or avoided and to identify and evaluate feasible alternatives to the proposed Project. The City of Los Angeles will use this information when considering action on the proposed Project. The EIR itself is not a decision document and does not determine whether a project will be approved. Rather, the EIR is an informational and disclosure document to be taken under consideration during the decision-making process.

The City of Los Angeles, including its individual departments, and any Responsible Agencies providing approvals or permits, will use the information contained in this EIR while determining whether to grant permits and approvals as described in the preceding section. This EIR considers the physical construction effects due to demolition, grading and construction at the Project Site, as well as the operational change in land use associated with the proposed Project. The proposed Project may require approvals and permits as provided in *Table I-1: Required Approvals and Permits*.

TABLE I-1
REQUIRED APPROVALS AND PERMITS

DISCRETIONARY APPROVAL OR PERMIT	PROJECT COMPONENT	AGENCY	AGENCY AUTHORITY
General Plan Amendment (“GPA”) to change the land use designation from Open Space to Medium Density Residential and remove the “Privately Owned Golf Course” symbol to permit medium-density senior housing land uses.	New Lot 2	City of Los Angeles	Lead Agency
Zone Change (“ZC”) to change zone from A1-1XL to R3-1, including height approval to permit the senior housing use at the R3 density and allow buildings up to 45 feet in height.	New Lot 2	City of Los Angeles	Lead Agency
Zone Variance (“ZV”) to permit a fence up to 100 feet in height for the driving range.	New Lot 1	City of Los Angeles	Lead Agency
Zone Variance (“ZV”) to allow the provision of 113 parking spaces for the adjoining golf course/driving range and the placement of a self-service retail hut (for range ball sales and vending machines) in the R3 zone.	New Lot 2	City of Los Angeles	Lead Agency
Conditional Use Permit (“CUP”) to allow the reconfigured pitch-and-putt golf course and driving range in the A1 zone and permit an over-in-height fence enclosure for the driving range within the required yard setbacks, as well as allow a temporary reduction in off-street parking during construction.	New Lot 1	City of Los Angeles	Lead Agency
Conditional Use Permit for Alcoholic Beverages (“CUB”) to permit the sale and dispensing of beer and wine in cafeterias/cafes within the common areas to residents and/or their guests for on-site consumption within the senior community.	New Lot 2	City of Los Angeles	Lead Agency
Tentative Tract Map (“TTM”) to subdivide the property and create two new lots (Lot 1 for the existing golf course and driving range uses and Lot 2 for 200 senior condominium units).	Project Site	City of Los Angeles	Lead Agency

TABLE I-1 (CONTINUED)
REQUIRED APPROVALS AND PERMITS

DISCRETIONARY APPROVAL OR PERMIT	PROJECT COMPONENT	AGENCY	AGENCY AUTHORITY
Building Line Removal incident to the subdivision to remove the existing 18-foot building line along Whitsett Avenue.	Project Site	City of Los Angeles	Lead Agency
Revocable Permit to allow encroachment of existing non-structural golf course components (i.e., greens and fairways) into a City right-of-way along Valleyheart Drive and County right-of-way along the Los Angeles River.	New Lot 1	City of Los Angeles County of Los Angeles	Lead Agency and Responsible Agency
Site Plan Review for the senior housing project.	New Lot 2	City of Los Angeles	Lead Agency
Haul Route Permit to export approximately 82,000 cubic yards of earth from the site related to grading for the subterranean parking and demolition of sixteen tennis courts.	New Lot 2	City of Los Angeles	Lead Agency
Other incidental permits as required for construction and implementation of the project, including grading permits, demolition permits, building permits, B-Permits, etc.	New Lot 1 New Lot 2	City Los Angeles	Lead Agency

4. PRELIMINARY REVIEW AND NOTICE OF PREPARATION

In compliance with the CEQA Guidelines, the Department of City Planning completed a preliminary review of the proposed Project and determined that an EIR would be required. Because the Department of City Planning, as Lead Agency, determined that preparation of an EIR was evident, and pursuant to CEQA Guidelines Section 15063, an Initial Study was not required. In the absence of an Initial Study, scoping of the EIR was established through agency input and the public scoping process, which included circulation of the Notice of Preparation (NOP) and conductance of Scoping meetings.

The proposed Project was initially proposed in 2001, at which time the Department of City Planning determined that an EIR would be required. Subsequent to the initial proposal, the Project was postponed and reconfigured to address various environmental and community concerns, and to accommodate implementation and construction of the City of Los Angeles Fire Station No. 78 at the southeast corner of the property. A more detailed discussion of the Project background is provided in *Section II.C: Project Description – Background* of this Draft EIR. Under previous, but similar Project designs, NOPs and Notices of Scoping Meeting were issued on February 22, 2002, May 8, 2003, January 4, 2007, and March 6, 2007 to solicit public comments on potential environmental issues for the Project. The public scoping meetings for the Project were held on March 6, 2002, January 18, 2007 and March 20, 2007. To accommodate additional public concerns, the proposed Project was revised again and the NOP was issued on

April 17, 2008 and recirculated to reflect the new project description, which is essentially equivalent to the current proposed Project described in this EIR.

The NOP for the proposed Project was distributed to responsible and interested agencies/persons on April 17, 2008 for a 30-day review period (ending May 19, 2008) as required by CEQA, to solicit comments on the proposed scope of the EIR. Written comments were received on the NOP and have been reviewed and incorporated or discussed in this Draft EIR. Several comments were received after the due date of the NOP, but these comments have still been accepted and incorporated for discussion in this Draft EIR. It should be noted that the City of Los Angeles determined that there was no need to re-issue or recirculate a new NOP for the current Project as it is substantially similar to the project described in the 2008 NOP. A copy of the 2008 NOP is included in *Appendix A: A-1: Notice of Preparation (NOP)* of this Draft EIR. Responses to the 2008 NOP were received from the following and are included in *Appendix A: A-2: NOP Written Comment Letters*:

Federal and State Agencies

- California Department of Fish and Game (CDFG)
- California Department of Transportation (Caltrans)
- California Legislature Assembly, Office of Mike Feuer
- California Legislature Assembly, Office of Lloyd E. Levine
- California Native American Heritage Commission (NAHC)
- California Office of Planning and Research (OPR), State Clearinghouse and Planning Unit
- California State Senate, Office of Shiela James Kuehl
- Santa Monica Mountains Conservancy (SMMC)
- United States House of Representatives, Office of Representative Howard L. Berman

Regional, County, and Local Agencies

- City of Los Angeles, Bureau of Sanitation
- City of Los Angeles, City Council District No. 2, Office of Wendy Greuel
- City of Los Angeles, Department of Water and Power (DWP)
- City of Los Angeles, Fire Department (LAFD)
- County of Los Angeles, Department of Public Works (DPW), Land Development Division
- Los Angeles County Metropolitan Transportation Authority (Metro)
- South Coast Air Quality Management District (SCAQMD)
- Southern California Association of Governments (SCAG)

Organizations, Special Interest Groups and Interested Individuals

- Friends of the Los Angeles River
- Los Angeles Audubon Society
- Los Angeles County Bicycle Coalition
- Los Angeles Tennis Association (LATA)

- Southern California Tennis Association (SCTA)
- Studio City Residents Association (SCRA)
- Approximately 240 individuals

A number of written public comments were received in 2002 and 2003 (included in *Appendix A: A-2: NOP Written Comment Letters*) and were also considered in this Draft EIR. Based on the scoping process, current conditions and public input, this Draft EIR is focused on the following topical issue sections:

Aesthetics	Section IV.A
Air Quality	Section IV.B
Biological Resources	Section IV.C
Cultural Resources	Section IV.D
Geology, Soils, and Seismicity	Section IV.E
Greenhouse Gas Emissions	Section IV.F
Hydrology and Water Quality	Section IV.G
Land Use and Planning	Section IV.H
Noise	Section IV.I
Population and Housing	Section IV.J
Public Services: Fire Protection	Section IV.K.1
Public Services: Police Protection	Section IV.K.2
Public Services: Library	Section IV.K.3
Recreation and Parks	Section IV.L
Transportation and Circulation	Section IV.M
Utilities: Energy	Section IV.N.1
Utilities: Water	Section IV.N.2

This EIR includes analysis of the above environmental issues, identifies potential physical impacts and recommends mitigation measures to reduce potentially significant adverse impacts. In accordance with CEQA Guidelines Section 15128, other possible effects of the Project, which were determined to be not significant through the preliminary review and NOP scoping process, are not discussed in detail in this EIR. Those possible effects that did not warrant detailed analyses are identified in *Section VI: Other Environmental Considerations* of this Draft EIR.

5. REVIEW OF THE DRAFT EIR

This Draft EIR is being distributed to responsible and other affected agencies, surrounding jurisdictions, interested parties, and others who requested a copy of the document in accordance with PRC Section 21092. The Notice of Completion (“NOC”) of this Draft EIR is also being distributed as required by CEQA. The Draft EIR will be available for public review for not less than 45 days, pursuant to Section 15105 of the State CEQA Guidelines. During this public review period, the Draft EIR including its technical appendices is available for review at the following locations:

Los Angeles Department of City Planning Major Projects Valley Section 6262 Van Nuys Boulevard, Suite 351 Van Nuys, CA 91401	Los Angeles Department of City Planning Major Projects Section City Hall, 200 N. Spring Street, Room 750 Los Angeles, CA 90012
North Hollywood Regional Library 5211 Tujunga Avenue North Hollywood, CA 91601	Central Library 630 W. 5 th Street Los Angeles, CA 90071
Studio City Branch Library 12511 Moorpark Street Studio City, CA 91604	

Written comments on the Draft EIR should be addressed to Adam Villani at the Environmental Analysis Section of the Department of City Planning (Lead Agency) at the following address:

Attention: Adam Villani
Los Angeles Department of City Planning
Major Projects Section
City Hall, 200 N. Spring Street, Room 750
Los Angeles, CA 90012

Upon completion of the 45-day public review period and conclusion of public hearings on the Project, written responses will be prepared and incorporated into the Final EIR to address comments received on the Draft EIR and will be made available for review at least ten days prior to when certification of the EIR is considered by the City of Los Angeles Planning Commission and ultimately the City Council. These environmental comments and their responses will be included as part of the environmental record for consideration by the decision-makers for the Project and will constitute the Final EIR.

I. INTRODUCTION

B. ORGANIZATION OF THIS EIR

This Draft EIR conforms to the content requirements stated in Sections 15120 through 15130 of the State CEQA Guidelines. A list of the overall document sections and a brief description of their content is provided here to assist the reader in locating information.

Section 0: Executive Summary: Located at the front of this document, the Executive Summary provides a brief description of the Project, including an overview of the impact analysis, recommended mitigation measures, and net residual impact. Summary information of alternatives and key conclusions are also provided.

Section I: Introduction: The Introduction provides a general orientation to the purpose of CEQA and this Draft EIR, including the scoping of this Draft EIR, availability of documents, and review process.

Section II: Project Description: Section II presents a statement of the Project objectives, a detailed description of the proposed Project's physical development characteristics, and related information on phasing and implementation.

Section III: General Overview and Environmental Setting: This section discusses the location and general characteristics of the Project Site within a regional-setting context. It also provides an overview of the site-specific environmental setting and characteristics of the immediate surrounding area.

Section IV: Environmental Impact Analysis: This section analyzes the potential impacts from implementation of the Project, including actions anticipated from the demolition, construction, operational, and maintenance phases of the Project. The impact discussion is organized by topical environmental issues as outlined by Appendix G of the State CEQA Guidelines. Relevant background information has been summarized and a Project-specific level of analysis is provided to address implementation of the Project. Mitigation Measures are recommended as necessary.

Section V: Alternatives: The Alternatives section includes a discussion and analysis of potential and feasible alternatives to the Project pursuant to Section 15126.6 of the CEQA Guidelines. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project, but may avoid or lessen any of the significant effects of the Project. The comparative merits of each alternative are evaluated.

Section VI: Other Environmental Considerations: Section VI evaluates the contextual impacts related to growth-inducing effects and cumulative growth. Impacts found not to be significant, unavoidable adverse impacts, and irreversible impacts are also summarized in this section.

Section VII: Persons and Organizations Consulted: Section VII lists persons that directly contributed to the preparation of this Draft EIR.

Section VIII: References: This section includes a listing of source information referenced for the analyses contained within this Draft EIR.

II. PROJECT DESCRIPTION

A. PROJECT APPLICANT

The Applicant for the proposed Studio City Senior Living Center (“SCSLC” and/or the “Project”) and related development components is Weddington Golf and Tennis, LLC (“Weddington Golf” and/or the “Applicant”). The Project Site for the proposed Project is currently owned by Weddington Investment Properties, LLC. As described in greater detail below (see *Section II.E: Project Description - Requested Actions and Entitlements*), the proposed Project involves a subdivision of an existing 16.1-acre lot into two parcels (i.e., Lots 1 and 2). The existing pitch-and-putt golf course and driving range on Lot 1 would continue to be owned and operated by Weddington Investment Properties, LLC. Lot 2 would be developed and operated as a 200-unit senior living community.

II. PROJECT DESCRIPTION

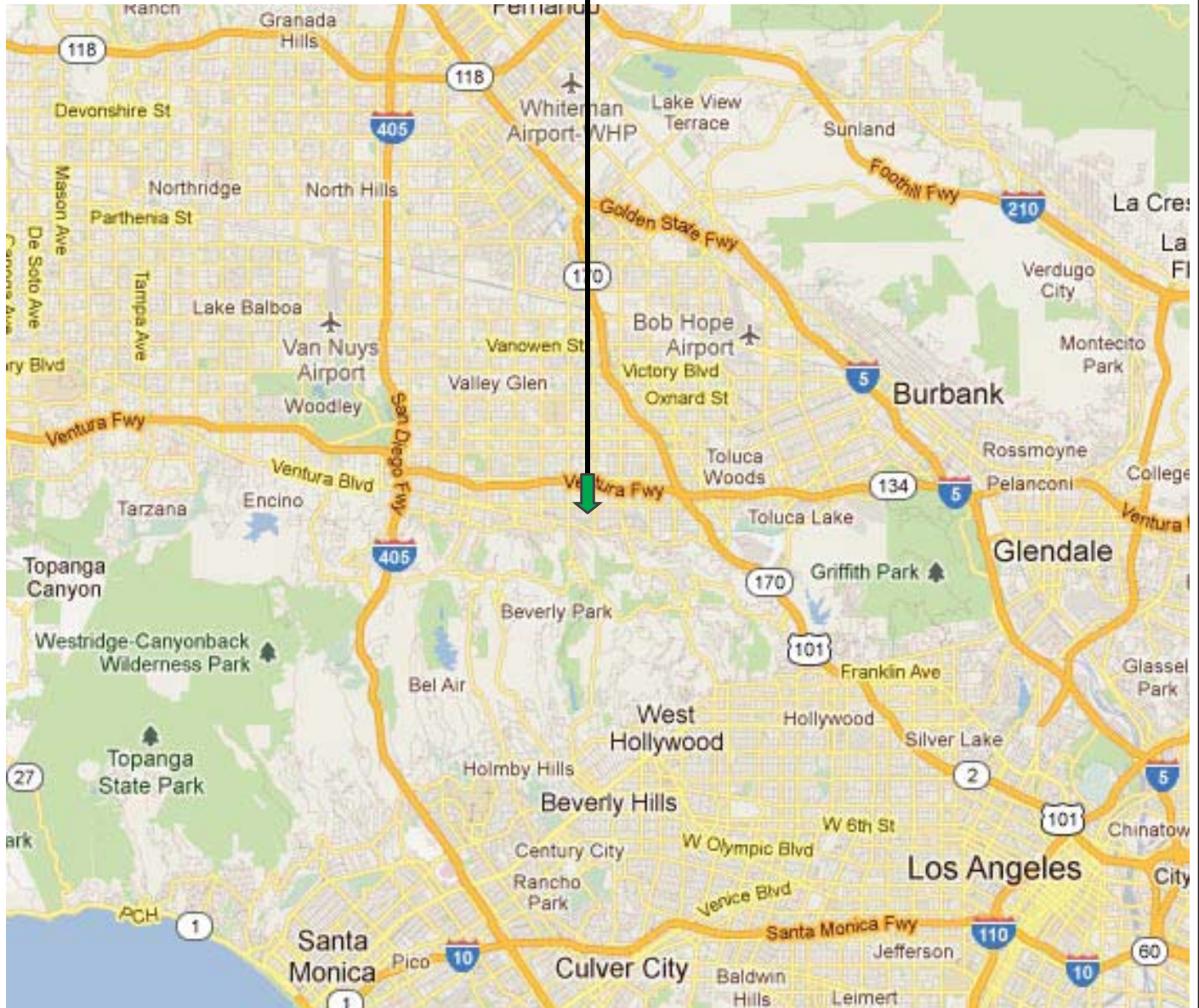
B. PROJECT LOCATION

The proposed Project is located within a 16.1-acre Project Site occupied by the Weddington Golf & Tennis Club, a private recreation facility consisting of an existing nine-hole, par-3, pitch-and-putt golf course¹ and sixteen tennis courts. The irregularly shaped Project Site is located generally northwest of the intersection of Whitsett Avenue and Ventura Boulevard in the Studio City area of Los Angeles, California (see *Figure II-1: Regional Location*). The Project Site falls within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. The Project Site is bounded by Valley Spring Lane to the north, Bellaire Avenue to the west, the approximately 150-foot-wide Los Angeles River right-of-way to the south, and Whitsett Avenue to the east (see *Figure II-2: Local Vicinity*). Directly south of the Project Site is a 40- to 50-foot wide right-of-way for Valleyheart Drive, most of which has remained unimproved and unpaved, except for an approximately 200-foot-long section off of Whitsett Avenue to serve Fire Station No. 78. The station occupies a 1.1-acre parcel located at the northwest corner of Valley Heart Drive and Whitsett Avenue, and adjoins the Project Site to the south. This parcel is not a part of the Project Site or the Project. An aerial overview of the Project Site and its surrounding development is provided in *Figure II-3: Aerial Overview and Surrounding Uses*.

The Project involves three components on the Project Site: 1) Division of the property into two lots, one for the continuation of the nine-hole golf course on the northern and westerly portion of the Property (Lot 1) and the other for a new senior housing development at 4141 Whitsett Avenue (Lot 2) on approximately 4.5 acres within the southeast portion of the Property (see *Figure II-4: Project Site and Development Site Location Key*); 2) Minor modifications to the golf course and driving range to accommodate the lot split, and 3) Demolition and removal of sixteen existing tennis courts and construction of the new senior housing development, known as the Studio City Senior Living Center. Collectively, all of Lot 2 and that portion of Lot 1 (i.e., primarily the southeastern portions adjacent to Lot 2) that will undergo any physical change (i.e., demolition, construction, modification, or reconstruction) for the Project are referred herein as

¹ Golf courses are described in terms related to their size or length (such as the number of holes), difficulty, or style. A full-length course typically comprises 18 holes, which when laid out contiguously end-to-end would total approximately three miles in length. A typical standard 18-hole golf course requires between 100-120 acres of land area. A “short” course is typically defined as only nine holes, or the “front” or “back” half of a full 18-hole course. The term “par” is used to describe the ideal number of strokes required to play a hole by an average “scratch” golfer. Par can also indicate the level of difficulty as well as the length of time needed to play the course. An easy par course may also be called a “short” course. Other terms are used to describe the style of the course, such as a PGA (Professional Golf Association) course, which is designed to certain professional golf standards. Pitch-and-putt is a term technically used to describe a style of golf popular throughout Europe where the players are limited to the use of only three golf clubs (two irons and one putter). With a pitch-and-putt golf course, the length of the fairways (i.e., distance from the tee-off area to the hole) is shorter than those on a standard golf course, thereby requiring less overall land area to accommodate them. According to the Los Angeles Municipal Code (LAMC), Section 12.05.A.5, a pitch-and-putt golf course is defined as having an average fairway length per hole of less than 125 yards. The Weddington Golf Course is a nine-hole facility of par-3 difficulty, and is a pitch-and-putt style design because the average fairway length per hole is approximately 108 yards. The terms “pitch-and-putt golf course” and “golf course” may be used interchangeably throughout this EIR, unless specifically differentiated otherwise, in reference to the golf course component of the Weddington Golf & Tennis facility.

PROJECT SITE



**FIGURE II-1
REGIONAL LOCATION**

SOURCE: MAPS.GOOGLE.COM



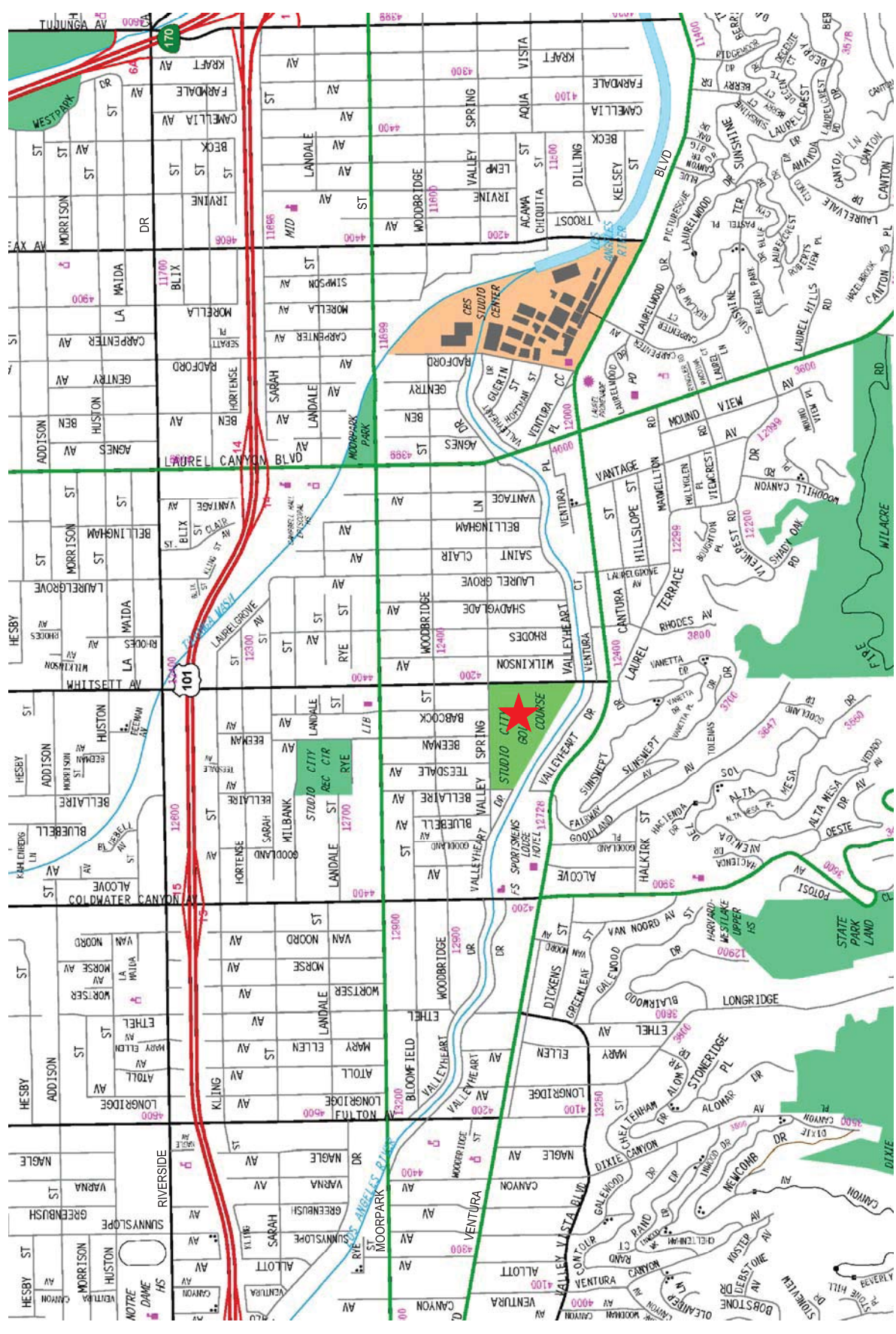


FIGURE II-2
LOCAL VICINITY

★ PROJECT SITE

SOURCE: RAND MCNALLY & COMPANY



FIGURE II-3
AERIAL OVERVIEW AND SURROUNDING USES

SOURCE: MAPS.GOOGLE.COM



- PROJECT SITE
- DEVELOPMENT SITE (AREA OF PHYSICAL DISTURBANCE)
- PROPOSED SUBDIVISION (CREATION OF LOT 1 AND LOT 2)
- ❶ PROPOSED LOT 1
- ❷ PROPOSED LOT 2
- ❸ CITY OF LOS ANGELES FIRE STATION -NOT A PART

FIGURE II-4
PROJECT SITE AND DEVELOPMENT SITE LOCATION KEY

SOURCE: MAPS.GOOGLE.COM



the “Development Site”. The Development Site is the area of the Project Site in which physical alteration will occur that may potentially have environmental impacts. As such, the Development Site, within the context of the Project Site, is the primary focus of the environmental analysis for the construction phase of the Project in this Draft EIR. All other portions of the Project Site will not be changed or physically altered and are not anticipated to result in environmental impacts as a result of the Project.

A more detailed discussion of the local vicinity, including on-site and surrounding land uses, is provided in *Section III: General Overview and Environmental Setting*, *Section IV.A: Environmental Impact Analysis - Aesthetics* and *Section IV.H: Environmental Impact Analysis - Land Use and Planning* of this Draft EIR.

II. PROJECT DESCRIPTION

C. BACKGROUND

The Project Site is located within the Studio City area of Los Angeles. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, which serves as a guide for development and land uses in the area, designates the land use for the Project Site as Open Space and identifies the Project Site as a private golf course (see *Figure II-5: Community Plan Designation*). The Project Site is currently zoned A1-1XL, which indicates agricultural zoning (A1) within an Extra Limited Height District (1-XL) that restricts all buildings and structures to two stories or 30 feet in height.

In 2005, the 1.1-acre “non a part” parcel, located adjacent to the southeast corner of the Project Site and currently developed with Fire Station No. 78 was separated from the 16.1-acre Project Site and acquired by the City of Los Angeles for public-facility uses. Prior to the separation of the 1.1-acre parcel to accommodate the fire station, the site had comprised approximately 17.2 acres. Historic accounts of the Project Site prior to 2005, as provided in the following paragraphs, include reference to the 1.1-acre parcel coincident with the Project Site.

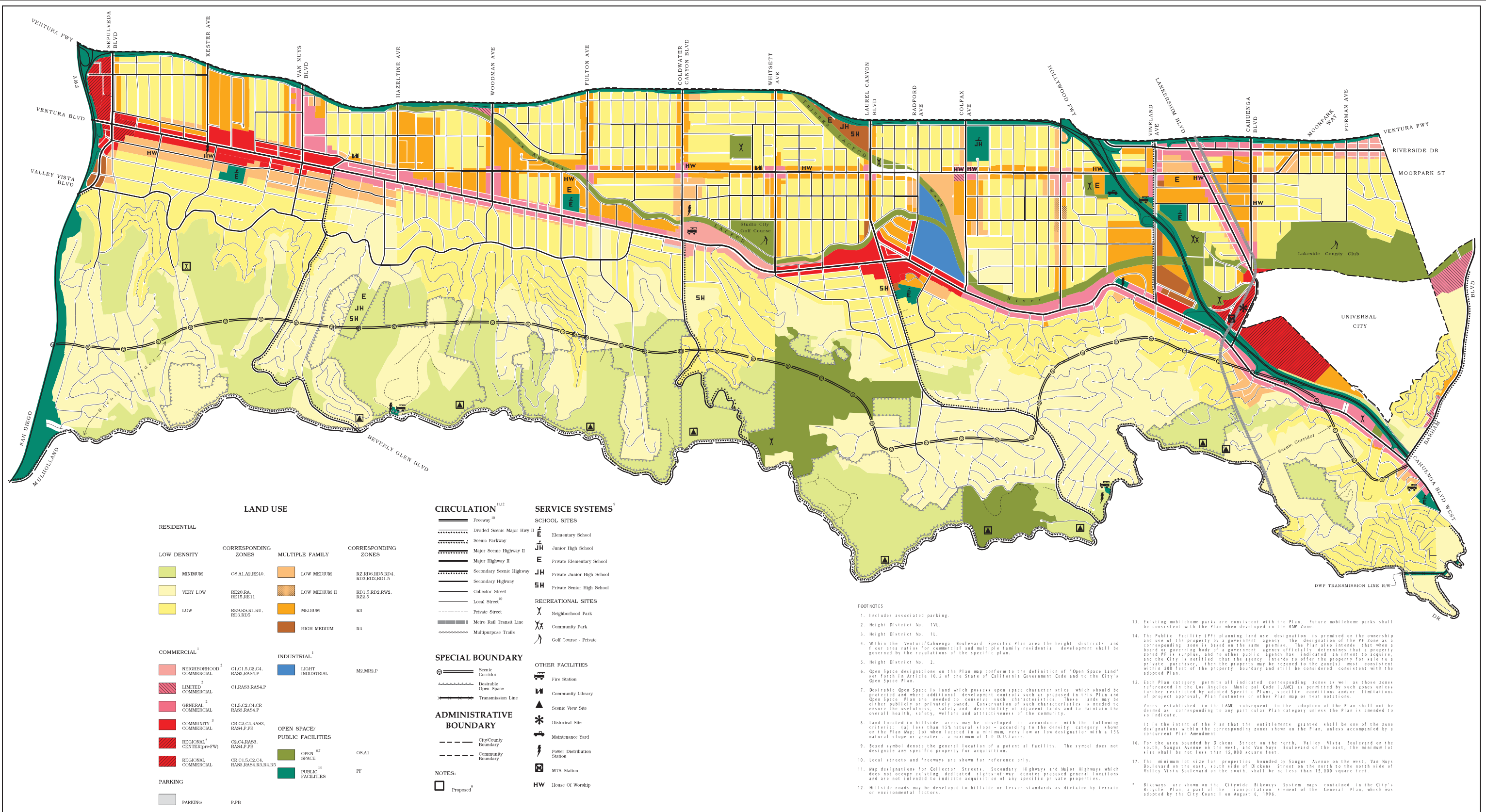
The Weddington Golf & Tennis Club was historically called the Studio City Golf and Tennis Club. The Project Site has been owned continuously by the Weddington family and Weddington Investment Company for over a century. The existing nine-hole, pitch-and-putt golf course was originally constructed and opened for public use in 1955. The tennis courts and ancillary facilities were approved and constructed throughout the following years. Buildings that support the operation of the existing golf course and tennis courts include a clubhouse, cashier hut, and maintenance facilities. Parking for the facilities is located along the property frontage on Whitsett Avenue.

Prior to 1971, the Project Site was zoned R3-1 (Medium Density Residential) along its Whitsett Avenue frontage and R1-1 (Low Density Residential) over the remainder of the site. The zoning pattern was established in 1946. On October 22, 1970, the City Planning Commission recommended that the Project Site be designated “Privately Owned Open Space” with a symbol of “golf-course private” on the Project Site in acknowledgement of the established uses.

The City Council, on May 14, 1971, adopted a motion to initiate zone change proceedings to consider a change of zone from R1-1 and R3-1 to A1-1XL (Agricultural) on the Project Site. The City Planning Commission on August 19, 1971, recommended that the zone change be approved. The City Council on October 13, 1971, adopted Ordinance No. 142,584 changing the zone over the entire Project Site to A1-1XL (Agricultural). Ordinance No. 142,584 became effective on November 26, 1971.

A change in use, including the introduction of residential uses, at the Project Site has been contemplated since 2000. The earliest iterations of the Project contemplated various development designs, which included possible removal of the golf course, removal of the tennis courts, and development of single-family homes. An alternate version of the proposed Project and the introduction of senior housing units to the City of Los Angeles Planning Department was

initially proposed in 2001, including development of 240 senior housing units and removal and replacement of the tennis courts on- and off-site. Subsequent to this initial proposal, the Project was postponed and reconfigured to address various environmental and community concerns, and to accommodate implementation of the City of Los Angeles Fire Station No. 78 through removal of four existing tennis courts. In 2007, the Project was revised with the City as a three-lot subdivision with a proposal to eliminate the golf course, reconfigure the driving range, on-site relocation of the tennis courts, and an increase in units for a total of 272 senior housing units. However, in response to community input from the public scoping process, the Project underwent additional design modifications and now reflects a proposal with the City to preserve the existing golf course and related facilities while removing all 16 existing tennis courts to accommodate 200 new senior housing units and related facilities.



LAND USE		CIRCULATION ^{11,12}		SERVICE SYSTEMS ⁸	
RESIDENTIAL		SPECIAL BOUNDARY		OTHER FACILITIES	
LOW DENSITY		Scenic Corridor		Fire Station	
MINIMUM	OS.A1A2.RE40.	Distractable Open Space		Community Library	
VERY LOW	RE20.RA, RE15,RE11	Transmission Line		Scenic View Site	
LOW	RE3.RS,R1,RU, RE9,RD5			Historical Site	
MULTIPLE FAMILY		ADMINISTRATIVE BOUNDARY		Maintenance Yard	
LOW MEDIUM	RZ,RD6,RD5,RD4, RD3,RD2,RD1.5	City/County Boundary		Power Distribution Station	
LOW MEDIUM II	RD1.5,RD2,RW2, RZ2.5	Community Boundary		MTA Station	
MEDIUM	R3			House Of Worship	
HIGH MEDIUM	R4				
COMMERCIAL		NOTES:			
NEIGHBORHOOD COMMERCIAL ²		Proposed			
C1,C1.5,C2,C4, RAS3,RAS4,P					
LIMITED COMMERCIAL ²					
C1,RAS3,RAS4,P					
GENERAL COMMERCIAL ²					
C1.5,C2,C4,CR, RAS3,RAS4,P					
COMMUNITY COMMERCIAL ³					
CR,C2,C4,RAS3, RAS4,P,FB					
REGIONAL CENTER(pre-FW) ⁵					
C2,C4,RAS3, RAS4,P,FB					
REGIONAL COMMERCIAL ⁵					
CR,C1.5,C2,C4, RAS3,RAS4,R3,R4,R5					
PARKING					
PARKING	P,PB				
INDUSTRIAL					
LIGHT INDUSTRIAL					
M2,M2,P					
OPEN SPACE/ PUBLIC FACILITIES					
OPEN SPACE ^{6,7}	OS.A1				
PUBLIC FACILITIES ¹⁴	PF				

- FOOTNOTES**
- Includes associated parking.
 - Height District No. 1VL.
 - Height District No. 1L.
 - Within the Ventura/Cahuenga Boulevard Specific Plan area the height districts and floor area ratios for commercial and multiple family residential development shall be governed by the regulations of the specific plan.
 - Height District No. 2.
 - Open Space designations on the Plan map conform to the definition of "Open Space Land" set forth in Article 10.3 of the State of California Government Code and to the City's Open Space Plan.
 - Desirable Open Space is land which possesses open space characteristics which should be protected and where additional development controls such as proposed in this Plan and Open Space Plan are needed to conserve such characteristics. These lands may be either publicly or privately owned. Conservation of such characteristics is needed to ensure the usefulness, safety and desirability of adjacent lands and to maintain the overall health, safety, welfare and attractiveness of the community.
 - Land located in hillside areas may be developed in accordance with the following criteria: (a) less than 15% natural slope, according to the density category shown on the Plan Map; (b) when located in a minimum, very low or low designation with a 15% natural slope or greater - a maximum of 1.6 D.U./acre.
 - Boxed symbol denote the general location of a potential facility. The symbol does not designate any specific property for acquisition.
 - Local streets and freeways are shown for reference only.
 - Map designations for Collector Streets, Secondary Highways and Major Highways which does not occupy existing dedicated rights-of-way denotes proposed general locations and are not intended to indicate acquisition of any specific private properties.
 - Hillside roads may be developed to hillside or lever standards as dictated by terrain or environmental factors.
 - Existing mobilehome parks are consistent with the Plan. Future mobilehome parks shall be consistent with the Plan when developed in the RMP Zone.
 - The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zoning most consistent within 300 feet of the property boundary and still be considered consistent with the adopted Plan.
 - Each Plan category permits all indicated corresponding zones as well as those zones referenced in the Los Angeles Municipal Code (LAMC) as permitted by such zones unless further restricted by adopted Specific Plans, specific conditions and/or limitations of project approval, Plan footnotes or other Plan map or text notations. Zones established in the LAMC subsequent to the adoption of the Plan shall not be deemed as corresponding to any particular Plan category unless the Plan is amended to so indicate. It is the intent of the Plan that the entitlements granted shall be one of the zone designations within the corresponding zones shown on the Plan, unless accompanied by a concurrent Plan Amendment.
 - For the area bounded by Dickens Street on the north, Valley Vista Boulevard on the south, Sugas Avenue on the west, and Van Nuys Boulevard on the east, the minimum lot size shall be not less than 15,000 square feet.
 - The minimum lot size for properties bounded by Sugas Avenue on the west, Van Nuys Boulevard on the east, south side of Dickens Street on the north to the north side of Valley Vista Boulevard on the south, shall be no less than 15,000 square feet.
 - Bikeways are shown on the Citywide Bikeways System Maps contained in the City's Bicycle Plan, a part of the Transportation Element of the General Plan, which was adopted by the City Council on August 6, 1996.

FIGURE II-5
COMMUNITY PLAN DESIGNATION

II. PROJECT DESCRIPTION

D. STATEMENT OF PROJECT OBJECTIVES

In accordance with Section 15124(b) of the State CEQA Guidelines, an EIR shall include “a statement of objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further clarifies that “the statement of objectives should include the underlying purpose 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 a residential community oriented toward senior independent housing² 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 Applicant’s Project has the following objectives:

- 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;

² LAMC Section 12.03 defines “senior independent housing” as residential housing that consists of dwelling units for persons 62 years of age and older and which may include common dining areas or other community rooms. Because the proposed Project targets seniors defined as age 55 years of age or older, the Project does not meet the City’s criteria for senior housing and is thus categorized as multi-family residential development.

- 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.

II. PROJECT DESCRIPTION

E. REQUESTED ACTIONS AND ENTITLEMENTS

The Applicant requests approval of a Tentative Tract Map to subdivide the Project Site in order to create two functional parcels (Lots 1 and 2) for future development and management, and for residential condominiums on Lot 2. Further, the Applicant seeks a Building Line Removal incident to the subdivision, to remove an obsolete 18-foot building line along Whitsett Avenue.

On Lot 1, the Applicant seeks to obtain a Conditional Use Permit (CUP), a Revocable (encroachment) Permit, and a Zone Variance, if needed, to implement physical improvements and maintain an existing pitch-and-putt golf course and driving range. The maintenance and minor reconfiguration of the existing driving range and golf course will require a Conditional Use Permit to allow the driving range and golf course in the existing A (Agricultural) Zone, as well as a Revocable Permit to retain existing encroachments in the City's and County's rights-of-way along Valleyheart Drive and the Los Angeles River, respectively. The driving range and golf course will remain largely unaltered, but would undergo minor modifications to accommodate the lot split. A Zone Variance may be required to permit the existing over-in-height driving range fence with minor reconfiguration, if the fence cannot be entitled by the Conditional Use Permit.

On Lot 2, the Applicant seeks approval of a General Plan Amendment, Zone Change, Site Plan Review, Zone Variance, Tentative Tract Map, and Haul Route to develop a 200-unit senior housing project. The senior housing project will require a General Plan Amendment to change the Plan's designation of Lot 2 from Open Space to Medium Density Residential, a Zone Change from A1-1XL to R3-1, a Site Plan Review, a Zone Variance for golf course/driving range parking and the dispensing of golf balls for the driving range in the proposed R3 zone, a Tentative Tract Map for 200 residential condominiums, approval of a Haul Route to export approximately 82,000 cubic yards of earth for subterranean parking and demolition debris from removal of sixteen tennis courts, and other general permits related to construction and implementation. A Conditional Use permit for alcohol (CUB) is requested for the sale and/or dispensing of alcohol to residents and/or their guests within common area facilities for on-site consumption.

The requested actions and entitlements, as summarized here, are discussed in greater detail in *Section IV.H: Environmental Impact Analysis - Land Use and Planning* of this Draft EIR.

This Draft EIR may be used by various governmental decision-makers for the following discretionary permits and actions that are necessary or may be requested in connection with the Project, as well as any other discretionary permits and actions that may be identified during the environmental review and entitlement process:

- Project Site
 - Tentative Tract Map to create two separate parcels (Lot 1 for the existing golf course uses and Lot 2 for 200 senior condominium units);

- Building Line Removal incident to Subdivision to eliminate the existing 18-foot Building Line along Whitsett Avenue;
 - Lot 1
 - Conditional Use Permit to allow the reconfigured driving range and pitch-and-putt golf course within the A1 zone, including over-in-height driving range fence, determination of appropriate yards, and temporary reduction in off-street parking during construction;
 - Zone Variance, if necessary, to permit a fence up to 100 feet in height for the driving range;
 - Revocable Permit to allow encroachment of existing, non-structural golf course components (i.e. greens and fairways) into a City right-of-way along Valleyheart Drive and County right-of-way along the Los Angeles River;
 - Lot 2
 - General Plan Amendment to change the designation of Lot 2 from Open Space to Medium Density Residential and remove the Privately Owned Golf Course symbol, to permit medium-density senior housing land uses;
 - Zone Change from A1-1XL to R3-1 to permit the senior housing use at the R3 density and allow buildings up to 45 feet in height;
 - Zone Variance for self-service retail (golf balls) and parking for adjoining golf course and driving range;
 - Site Plan Review for the senior housing project;
 - Conditional Use Permit for the sale and dispensing of alcoholic beverages from cafeterias/cafés within the common area to residents and/or their guests for onsite consumption;
 - Haul Route Permit to export approximately 82,000 cubic yards of earth from site preparation related to grading for the subterranean parking and demolition of sixteen tennis courts; and
 - Other (as required for Lot 1 and/or 2)
 - B-Permit or other necessary permits from the Department of Public Works for necessary street, sewer, storm drain, and lighting improvements, as well as tree removals;
 - Grading Permits from the Department of Building and Safety;
 - Demolition Permits from the Department of Building and Safety;
 - Building Permits from the Department of Building and Safety;
 - Permits pursuant to Section 404 of the Clean Water Act;
 - Any other necessary discretionary or ministerial permits and approvals from the City and County of Los Angeles required for the construction or operation of the proposed Project.
-

General Plan Amendment

The Applicant is requesting a General Plan Amendment to change the designation of a portion of the Project Site, within the area proposed as Lot 2, from Open Space to Medium Density Residential and remove the Privately Owned Golf Course symbol, to permit medium-density senior housing land uses. The land use designation for the remainder of the Project Site (Lot 1) would remain unchanged as Open Space. The Open Space designation corresponds to the A1 (Agricultural) and OS (Open Space) zones. The Medium Density Residential designation corresponds to the R3 zone.

Zone Change

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

Conditional Use Permit (for Use)

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

Conditional Use Permit (for Alcohol)

The Applicant is requesting a Conditional Use Permit for alcohol (CUB) for Lot 2 to permit on-site cafeterias/cafés within the common area of the senior living center to sell/dispense alcohol (including wine and beer) to residents and/or their guests.

Zone Variance(s)

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

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

Site Plan Review

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

Revocable/Encroachment Permit(s)

The Applicant is requesting a Revocable or Encroachment Permit to retain existing non-structural golf course encroachments in the City and County rights-of-way. At the southern edge of the Project Site, the City of Los Angeles maintains an unimproved, 40- to 50-foot right-of-way for Valleyheart Drive, adjacent to the Los Angeles River. Similarly, the Los Angeles County Flood Control District maintains a variable approximately 150-foot right-of-way for the Los Angeles River. Currently, several southern portions of the existing golf course encroach into Valleyheart Drive and the Los Angeles River right-of-way. These encroachments have existed for the life of the golf course. As part of the Project, the southern portion of the golf course, within Lot 1, will remain unchanged and unaltered. As a result, the Applicant is requesting to retain existing rights within these rights-of-way through a Revocable Permit or Encroachment permit, as necessary, from the City and County of Los Angeles.

Building Line Removal

The Applicant is requesting removal of a building line on the Project Site along Whitsett Avenue, incident to the requested subdivision. Prior to adoption of the current Transportation Element of the General Plan, the City of Los Angeles had intended that Whitsett Avenue, a Secondary Highway, be widened to a width that exceeded the standard for Secondary³ designation. In order to reserve the appropriate right-of-way in anticipation of the future street widening, a “building line”⁴ was recorded against properties abutting Whitsett Avenue. For the Project Site, the building line extends 18 feet into the buildable area of the Project Site. As the

³ The current standard for a Secondary Highway consists of a 90-foot right-of-way. The current right-of-way for Whitsett Avenue along the Property frontage varies from 80 to 82 feet.

⁴ A “building line” establishes an alternate setback distance for which no structures may be located.

building line is now obsolete, and it is highly unlikely that Whitsett Avenue will be widened to the building line, the Applicant is requesting removal of the building line on the Project Site. Further, as constructed, Fire Station No. 78 at the northwest corner of Whitsett Avenue and Valleyheart Drive encroaches within the area of the 18-foot building line (currently a 15-foot building line due to a three-foot dedication that was completed during development of the fire station).

Subdivision

The Applicant is requesting approval to subdivide the Project Site into two lots, Lots 1 and 2. Lot 1 will be approximately 504,764 square feet (11.6 acres) and will retain, with minor alterations to accommodate the lot split, the existing nine-hole pitch-and-putt golf course, clubhouse, driving range, and 22 surface parking spaces. Lot 2 will be approximately 196,946 square feet (4.5 acres) for condominium purposes for 200 senior residential condominiums with common areas.

Construction Related Permits

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

II. PROJECT DESCRIPTION

F. PROJECT CHARACTERISTICS

Overview

The Applicant proposes to subdivide the Project Site into two parcels, Lots 1 and 2. Lot 1 will be approximately 504,764 square feet (11.6 acres) and will retain, with minor alterations to accommodate the lot split, the existing nine-hole golf course, clubhouse, driving range, and 22 surface parking spaces. Lot 2 will be approximately 196,946 square feet (4.5 acres) and will be developed with an approximately 336,000 square-foot, 200-unit senior residential condominium campus. An approximate 1.1 acre site, located at the northwesterly corner of Whitsett Avenue and Valleyheart Drive and developed with a fire station, is not a part of the subject Project. The Development Site, the area to be physically disturbed on the Project Site, consists of the 4.5-acre Lot 2 and small portions of Lot 1, which are directly adjacent to Lot 2.

The senior housing, known as the Studio City Senior Living Center, will consist of six, 45-foot-high, 4-story buildings. The ground floor of four buildings will provide common areas for senior activities. The six buildings will house a total of 200 senior condominium units and 40,000 square feet of common area. Of the 200 units, 136 will be two-bedroom units and 64 will be one-bedroom units. The total building area is expected to be approximately 336,000 square feet. The senior residential housing will be age-restricted for seniors aged 55 and older.

The six buildings will be designed as a unified senior community campus. The height, massing, and setbacks of the structures will be consistent with the existing multi-family dwelling units along the easterly side of Whitsett Avenue. The open areas surrounding the buildings will be landscaped with plants, gardens, and hardscape features to integrate the development with the surrounding community. A public children's playground for guests will also be located within the open area surrounding the buildings.

A total of 613 subterranean parking spaces will be provided underneath the senior housing community on Lot 2 of the Project Site. The 613 parking spaces will exceed the 500 parking spaces required by the LAMC for the senior housing condominiums by 113 spaces. Access to the subterranean parking area will be provided from Valleyheart Drive off of Whitsett Avenue (beyond the southerly boundary of the Los Angeles fire station site). The development and construction of the senior housing condominium units will require a Zone Change from A1-1XL to R3-1, General Plan Amendment from Open Space to Medium Density Residential, Site Plan Review, Subdivision into 200 condominium and common property lots, and a Haul Route Permit to export approximately 82,000 cubic yards of earth for subterranean parking and removal of demolition debris. A Zone Variance will also be required for a retail hut associated with the golf course at the northeast corner of Lot 2.

Lot 1 of the Project Site will consist of the remaining approximately 11.6 acres on the north and west portions of the site, which are currently occupied by the 9-hole pitch-and-putt golf course, driving range, and clubhouse facility. Modifications to the existing facilities (the driving range and the golf course portions adjacent to Lot 2) are necessary to accommodate the lot split and

Project development. Approximately 22 of the surface parking spaces within the existing parking lot along Whittsett Avenue will be retained to service the golf course, driving range, and clubhouse. The remainder of the existing parking lot (70 parking spaces) will be removed to accommodate the senior housing development. In addition, the golf course will have a shared parking arrangement to use the excess 113 parking spaces within the subterranean parking structure associated with the senior housing development on Lot 2, which will require a Zone Variance for golf course parking in the proposed R3 zone. The total 135 subterranean and surface parking spaces designated and used for the golf course, driving range, and clubhouse will exceed the current 92 surface parking spaces that serve the existing Weddington Golf & Tennis facility. The minor reconfiguration of the golf course and driving range will require a Conditional Use Permit to allow these uses in the A (Agricultural) Zone. A Zone Variance may also be required for over-in-height fencing and yard setback encroachments, and Revocable Permits may be required to retain the golf course in existing City and County rights-of-way.

Additional actions may include permits from the Department of Building and Safety for grading and building; permits from the Department of Public Works for street, sewer, and drainage issues; and other discretionary and ministerial approvals necessary to obtain building permits and complete construction.

In summary, the Project consists of the following elements:

- Subdivision of Project Site into Lot 1 (approx. 11.6 acres) and Lot 2 (approx. 4.5 acres);
- Retention of the existing golf course and related facilities, inclusive of minor configuration modifications;
- Demolition of the sixteen tennis courts;
- Construction of a senior living center, inclusive of 200 residential condominium units and common areas, and 613 subterranean parking spaces.

Proposed Land Uses

The Project involves two separate uses: the continuation of recreational uses on Lot 1 and the establishment of new multi-family residential uses on Lot 2.

Lot 1 of the Project Site will continue the operation of the existing Weddington Golf Course, a 9-hole, 3-par pitch-and-putt facility, and the associated driving range. The existing clubhouse and associated facilities would also continue to operate at their current locations. The golf course will remain largely unchanged from the existing configuration. However, certain changes will be implemented on the southeastern portions of the golf course to accommodate the subdivision and senior housing development. The green/hole for hole number five will be moved approximately 25 feet to the northwest, and the tee for hole number six will be moved approximately 90 feet to the west, thus shortening the length of the holes by the respective amounts. The driving range consists of a 100-foot-high driving range screening fence, ground level tees and necessary lighting for nighttime play. The driving range will also remain largely unaltered, however, to

accommodate the subdivision, the southern screening fence will be moved approximately 21 feet to the north, which will eliminate three of the 24 existing driving range tees.

Sixteen existing tennis courts on proposed Lot 2 would be removed and replaced with up to 200 multi-family residential condominium units (reserved for seniors) and ancillary community activity services and facilities. In addition, a tot-lot style playground would be provided for both public use as well as use by the Project residents' guests. A small building at the northeast corner of the Lot 2 would also serve as a self-service retail hut for the driving range on Lot 1.

With respect to the development of the 200 senior independent living condominium units, the proposed senior retirement community will be age-restricted for seniors aged 55 and older; however, the Applicant anticipates the average age of residents upon move-in will be approximately 75 years of age. Interior common areas will be provided on the entire ground floor of two buildings and on approximately one-third of the ground floor of two other buildings, providing approximately 40,000 square feet of communal living area. The buildings will surround, and be separated by, a combination of approximately 109,176 square feet of landscape and hardscape. The Studio City Senior Living Center will accommodate both residential and common resident-serving uses, as shown in *Table II-2: Summary of Uses and Square Footages in Project*.

TABLE II-1
SUMMARY OF USES AND SQUARE FOOTAGES IN PROJECT

Lot No.	Lot Area (SF)	Proposed Use(s)	Total Floor Area (LAMC)
1	504,764	Golf course, driving range, clubhouse, and putting green (all existing)	4,342 sf (for existing clubhouse facility)
2	196,946	200-unit senior living campus including six buildings, playground, landscape, and hardscape	336,000 sf (for senior housing and common areas)

Site Plan Layout, Circulation and Access

Figure II-6: Proposed Site Plan, shows proposed Lot 2 relative to proposed Lot 1 on the Project Site. Generally, the senior housing development will be situated on the southeastern portion of the Project Site, on an area currently occupied by sixteen tennis courts and related appurtenances. The remainder of the Project Site will be occupied by the existing golf course, driving range, and clubhouse facility, which will continue operation. An approximately 22-space surface parking lot will be retained on Lot 1 along Whitsett Avenue and an approximately 613-space subterranean parking garage will be developed under the senior housing development on Lot 2.

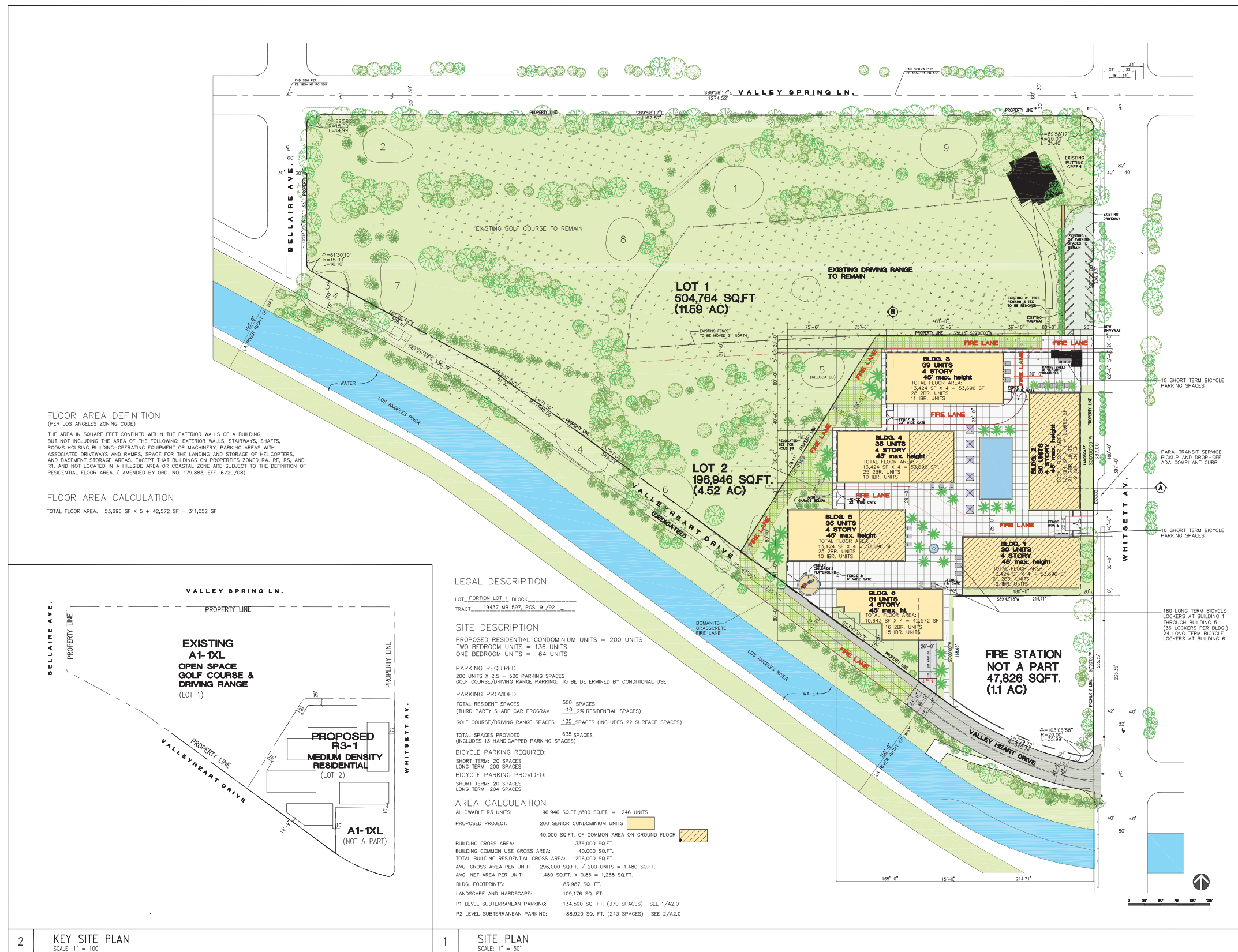


FIGURE II-6
PROPOSED SITE PLAN

Access and circulation for the Project are shown on *Figure II-7: Site Access and Circulation*. Primary automobile access to the SCSLC will be provided via the westerly extension of Valleyheart Drive, which will be improved and extended as part of the proposed Project. An inbound/outbound driveway for access to the subterranean parking garage will be provided off the extension of Valleyheart Drive. Secondary automobile access will be provided along Whitsett Avenue through two driveways (one inbound and one outbound) for access to the 22-space surface parking lot intended for golf course, driving range, and clubhouse patrons. A description of the proposed Project Site access and circulation scheme is provided in the following paragraphs.

- *Valleyheart Drive*

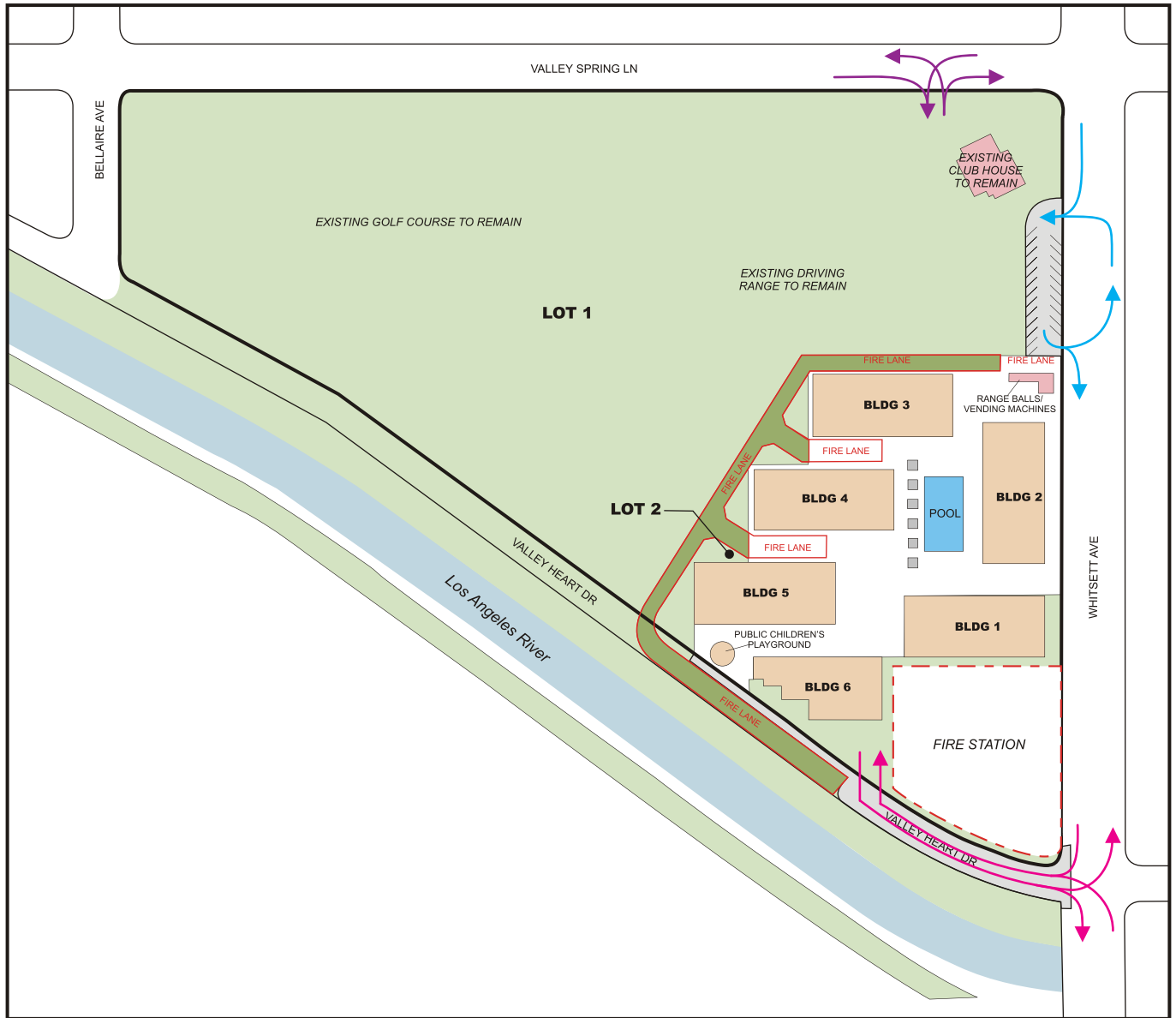
Access to the proposed Project will be provided from the Valleyheart Drive roadway extension, which currently extends westerly from Whitsett Avenue adjacent to the Los Angeles fire station site and the southerly property frontage. The roadway will be further extended and improved to City of Los Angeles roadway design standards, as necessary to provide access to the Project. It is anticipated that public access on Valleyheart Drive will terminate at the Project entrance/exit driveway; however, a fire lane for emergency/LAFD access will also be provided, extending from the terminus of Valleyheart Drive at the Project driveway to the western property line of Lot 2. Further details on emergency access to the Project are provided in *Section IV.K.1: Environmental Impact Analysis – Public Services: Fire Protection* of this Draft EIR. The Valleyheart Drive extension currently accommodates full access (i.e., left-turn and right-turn ingress and egress turning movements) onto and from Whitsett Avenue and will continue to do so after development of the Project.

- *Project Access No.1: Subterranean Parking Driveway*

This Project driveway will be located on the north side of Valleyheart Drive, along the southerly property frontage, at the southeast corner of the Project Site. The proposed Project driveway will be located approximately 260 feet west of Whitsett Avenue. This driveway will accommodate right-turn ingress and left-turn egress turning movements into and out of the Project onto/from Valleyheart Drive. This driveway will provide access for senior housing residents/guests and golf course/driving range/clubhouse patrons to an internal ramp, which extends to the subterranean parking garage situated beneath the senior housing buildings. The planned Project driveway will be constructed to City of Los Angeles design standards.

- *Project Access No. 2: Whitsett Avenue Inbound/Outbound Driveways*

Additional Project driveways will be provided via inbound and outbound driveways along the west side of Whitsett Avenue, south of Valley Spring Lane. These driveways will provide access to and from the planned 22-space surface parking lot for use by golf course, driving range, and clubhouse patrons. The Whitsett Avenue inbound driveway currently exists and is situated immediately south of Valley Spring Lane. The inbound driveway will remain in its current location and will be reconstructed, as necessary, to satisfy City of Los Angeles design standards.



- ◀▶ SCSLC INBOUND/OUTBOUND DRIVEWAY
- ◀▶ GOLF COURSE / DRIVING RANGE / CLUBHOUSE DRIVEWAY
- ◀▶ LOADING DRIVEWAY

FIGURE II-7
SITE ACCESS AND CIRCULATION

SOURCE: PLANNING ASSOCIATES, INC.



The Whitsett Avenue outbound driveway will be situated approximately midway along the Project's Whitsett Avenue property frontage. The outbound driveway will be constructed to City of Los Angeles design standards.

Building Elevations, Floor Plans, and Architectural Treatment

Figure II-6: Proposed Site Plan, Figure II-8: Elevations and Sections, Figure II-9: Buildings 1 Through 5 Typical Floor Plan, and Figure II-10: Building 6 Typical Floor Plan, show the general configuration for the six proposed buildings that comprise the senior living center campus on Lot 2. All buildings will be four stories tall and up to 45 feet in height. Two buildings will contain 30 dwelling units, two buildings will contain 35 dwelling units, one building will contain 31 units, and one building will contain 39 units for a total of 200 units. All buildings will contain both two-bedroom and one-bedroom condominium units. Two buildings will have direct frontage on Whitsett Avenue and will be directly visible from the street, with other buildings visible in the back. The two buildings fronting on Whitsett Avenue will contain common activity space on the entire ground level of the buildings. Common activity space will also partially occupy the ground floors of two additional buildings. The entrances into all the buildings will face the interior courtyard of the development, which will be fenced and gated.

In compliance with the provisions for the proposed R3-1 zoning on Lot 2, no building or structure on the Project Site will exceed 45 feet in height above grade as defined by LAMC Section 12.21.1. The architectural style and treatment will be consistent throughout all the buildings. Primarily, the facades will be treated with a combination of cultured stone, cement plaster, and glass as shown in *Figure II-8: Elevations and Sections*. Clay tile roofing, painted shutters for windows, wrought iron balusters for balconies, and residential light fixtures are also proposed as part of the façade treatments.

The Project will be designed in accordance with the LAMC with regards to graffiti removal and deterrence. Specifically, in all buildings, the first nine feet, measured from grade, of exterior walls and doors must be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. The only exception to this requirement is if a building owner files a "Covenant and Agreement Regarding Maintenance of Building (Graffiti Removal)" with the Los Angeles Department of Building and Safety, agreeing to remove the graffiti within seven days of the graffiti being applied or within 72 hours of being notified by the Department of Building and Safety to remove the graffiti. If the building owner fails to abide by the Covenant and Agreement, the Covenant and Agreement may be terminated by the Department of Building and Safety and the above requirements would apply to the building owner.

Parking

The Project will provide a total of 635 parking spaces, including 613 spaces in the subterranean parking garage associated with Lot 2 and 22 spaces in the surface parking lot to be located adjacent to the driving range and associated with Lot 1. The subterranean parking for the Project is shown on *Figure II-11: Proposed Parking Plan*. Of the 613 subterranean parking spaces, a



**FIGURE II-8
 ELEVATIONS AND SECTIONS**



FIGURE II-9
BUILDINGS 1 THROUGH 5 TYPICAL FLOOR PLAN



FIGURE II-10
BUILDING 6 TYPICAL FLOOR PLAN

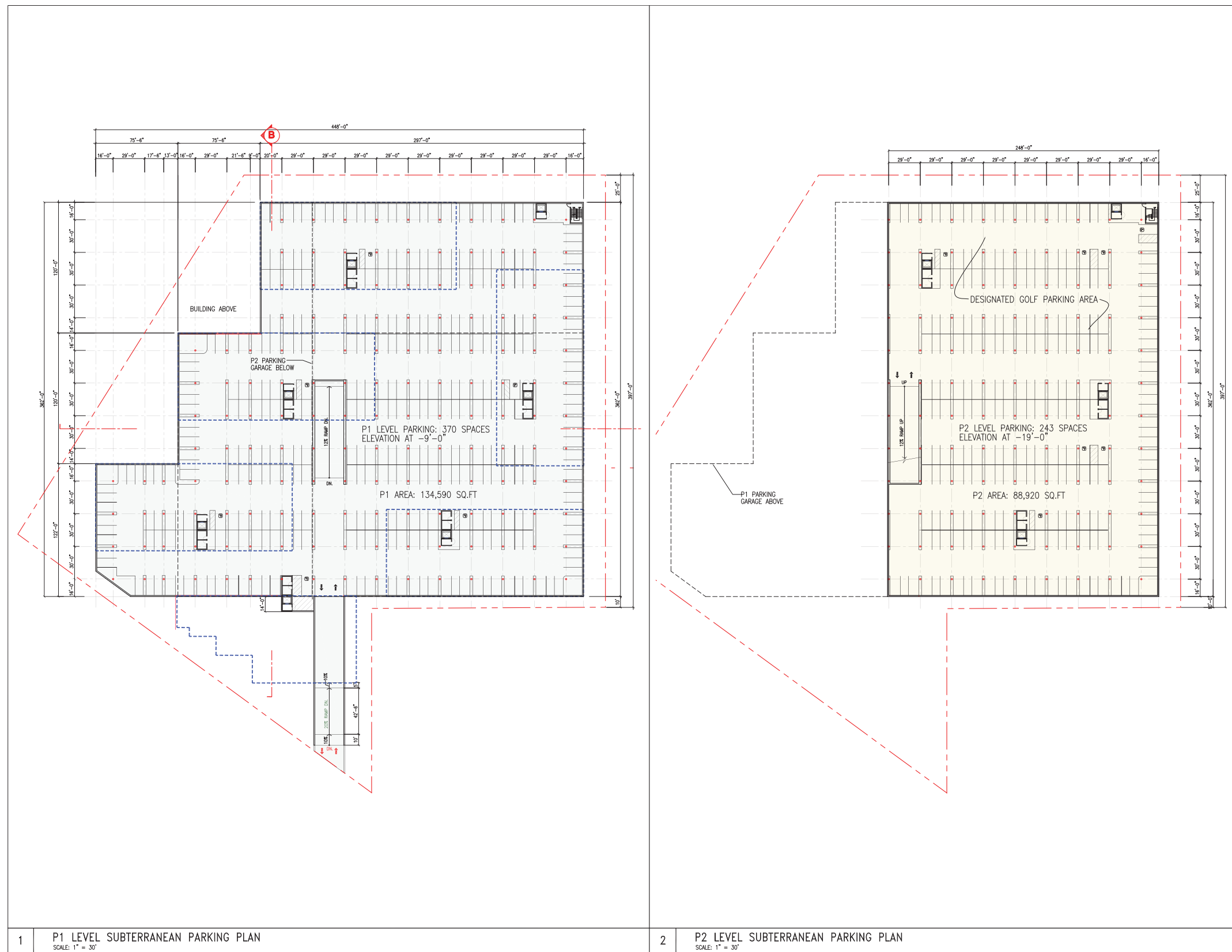


FIGURE II-11
PROPOSED PARKING PLAN

total of 500 spaces (provided at a ratio of 2.5 spaces per dwelling unit) will be allocated for residents and guests of the senior residential development and a total of 113 spaces will be allocated for employee parking and parking for patrons of the golf course, driving range, and clubhouse. These 113 spaces, in combination with the existing 22 surface parking spaces on Lot 1 will provide a total of 135 spaces to be designated and reserved for the golf course, driving range, and clubhouse patrons and employees.

The 613 subterranean parking spaces will be provided entirely within two levels of a new subterranean parking garage in Lot 2. Parking level P1 will contain 370 spaces for the exclusive use by senior residents and their guests. Residents and their guests will also have access to 130 of the 243 spaces on the lower parking level P2. The remaining 113 spaces on parking level P2 (plus the existing 22 surface parking spaces) would be designated for the golf course/driving range/clubhouse uses located on the adjacent Lot 1, as previously noted.

As part of the parking supply, the Project will provide a minimum of 13 handicap-accessible spaces in order comply with the American with Disabilities Act (ADA).⁵

Pedestrian Environment and Transit

The proposed Project has been designed to encourage pedestrian activity and walkability.⁶ As shown in *Figure II-6: Proposed Site Plan*, pedestrian walkways are planned throughout Lot 2 to facilitate connectivity to the local recreational facilities and public sidewalks, in a manner intended to promote walkability.⁷ Specific characteristics defining walkability for the proposed Project are discussed in *Section IV.M: Environmental Impact Analysis - Transportation and Circulation* of this Draft EIR. The Project Site is adjacent to and accessible from nearby commercial uses (e.g., retail, restaurant, etc.) and other amenities along the Ventura Boulevard corridor, as well as adjacent to public bus transit stops. Pedestrian walkways within Lot 2, as well as the adjacent sidewalks, will be appropriately landscaped and hardscaped to provide a “friendly” walking environment, including lighting and wayfinding signage.

Transit access is readily available through the Metropolitan Transit Authority (the “Metro”) bus service stops along adjacent roadways. *Figure II-12: Existing Transit Routes* shows the existing transit stops that serve the Project area, which will continue to serve the area and the Project.

⁵ The American with Disabilities Act (ADA) requires a minimum of two percent (2.0%) of the on-site parking supply as handicap spaces for parking facilities with 501 to 1,000 spaces, with one in every eight handicap spaces also being van accessible.

⁶ Walkability is a term to describe the extent to which walking is readily available as a safe, connected, accessible and pleasant mode of transport. For example, refer to <http://www.walkscore.com/>, which identifies desirable walkability characteristics. Walk Score calculates the walkability of an address by locating nearby stores, restaurants, schools, parks, etc. and rating the ease to which one can lead a “car-lite” lifestyle for accessing these important community needs.

⁷ Chapter 4 of the *Pedestrian Network Planning and Facilities Design Guide*, Government of New Zealand, from the www.ltsa.govt.nz website.

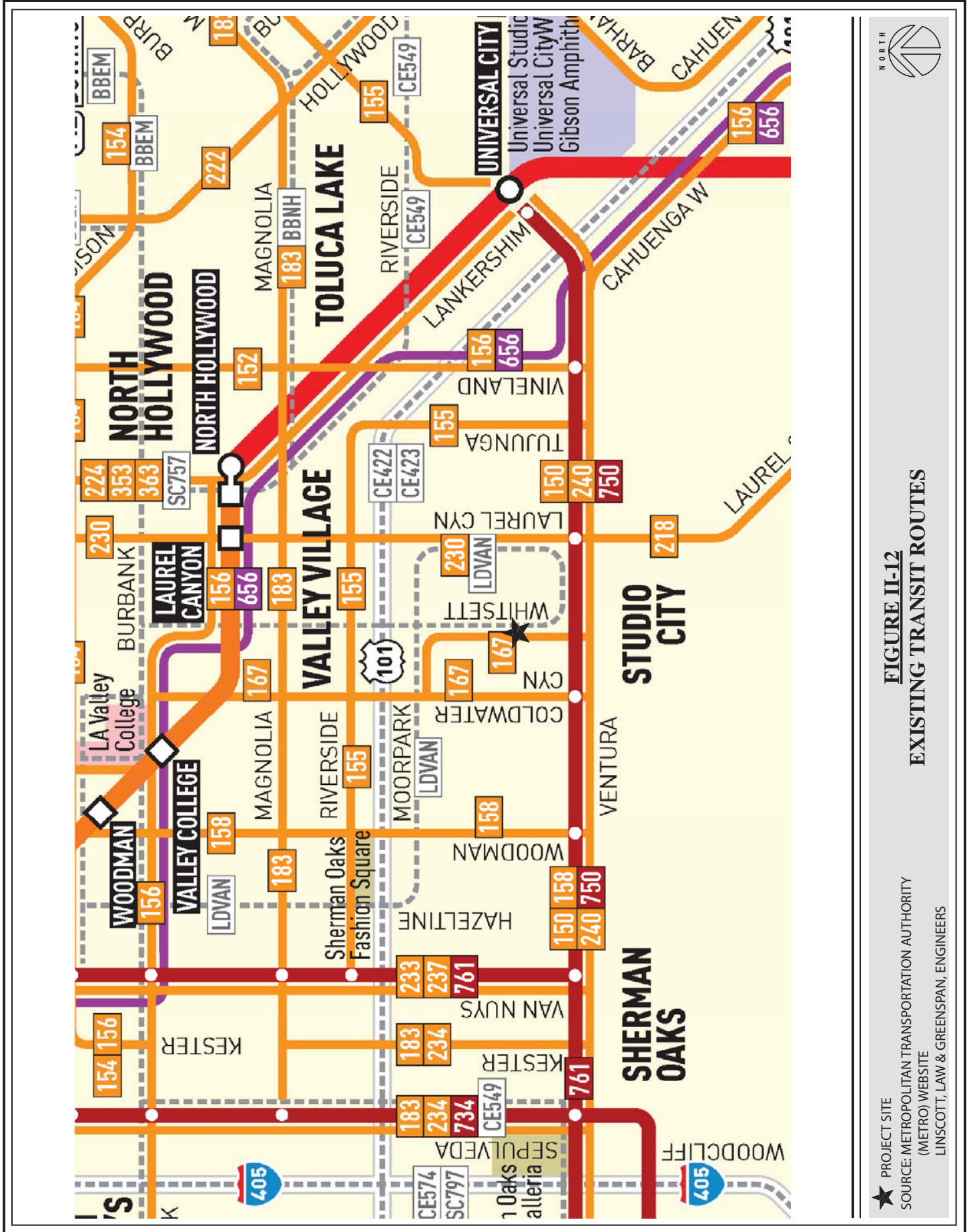


FIGURE II-12
EXISTING TRANSIT ROUTES

★ PROJECT SITE
 SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY
 (METRO) WEBSITE
 LINSBOTT, LAW & GREENSPAN, ENGINEERS

Project Landscaping/Lighting/Signage

The proposed landscaping is generally illustrated in *Figure II-6: Proposed Site Plan*. Landscaping and lighting on Lot 1 will remain essentially unchanged. However, minor changes to Lot 1 will require landscaping modifications, including the replacement of turf and green to accommodate the movement of the southern driving range fence, relocation of golf hole number five, and relocation of the tee for golf hole number six; possible removal (and subsequent replacement or recycling) of trees bordering Lot 2 to accommodate grading and excavation for the subterranean parking garage; and the removal and relocation of four of the potentially historic “golf ball” light standards, which are currently situated in the existing surface parking lot along Whitsett Avenue, to accommodate development of the senior housing development.

Landscaping, lighting and signage associated with Lot 2 will be designed to address the public interface around Lot 2 perimeter and to address the internal space for the SCSLC residents. Perimeter landscaping for Lot 2 adjacent to Whitsett Avenue (the eastern edge) will reinforce the pedestrian interface along the public right-of-way by creating a pleasant street experience and by buffering the sidewalk from the adjacent street and buildings. Landscaping along the north and west Lot 2 perimeter will act as dual function to visually screen off the SCSLC development from the golf course on Lot 1 and to provide privacy by buffering the residents from the golf course. Landscaping in the vicinity of the parking garage driveway and the playground along the south edge, and at the golf course/driving range pedestrian access at the northeast corner of Lot 2, will be designed to assist in the easy identification of and access to these areas.

Landscaping within the interior of Lot 2 is designed to reinforce the campus-style setting of the SCSLC. It establishes an outdoor plaza-style area that serves to extend the community activity areas from indoors to outdoors. Outdoor Project amenities, such as the lap pool, children’s playground, seating areas, fountains, and sculptures would be located throughout the large plaza area, interconnecting the five SCSLC buildings. Accent landscaping laced throughout the plaza would include landscape trees and shrubs to serve as focal points and planters.

All signs for the Project would be of an identifying or directional nature only and shall be arranged and located so as not to be a distraction to vehicular traffic. It is intended that signage be designed to facilitate walkability and pedestrian access. Animated or flashing signs are not proposed. The sign program will be submitted separately to the City for review and approval.

Project Utilities and Service Access

The Project Site is currently served by City of Los Angeles infrastructure, including sanitary sewer, water, and roadways. No unplanned expansion of infrastructure in the community is proposed.

Operational Characteristics

The golf course, driving range, and clubhouse will operate essentially unchanged from existing operations. The senior community development would operate in a manner in which residents would own their dwelling unit and an undivided interest in the residential common areas. A

homeowners' association would be established with a limited administrative function related to the residential common areas. The Applicant will retain ownership and operate the community areas and outdoor facilities. The community areas will include a large dining room and multipurpose room for guest speakers and community events, an arts and crafts room, library, computer room, exercise room, mail room, and administrative offices. The campus will function as a "senior living center", providing a services program in which residents are obligated by contract to participate by paying an applicable monthly fee. Services will include:

- Maintenance of the entire campus, excluding individually owned units
- Weekly housekeeping of individual units
- 24- hour security
- Concierge services
- Dining room with sit-down service
- Arts and crafts
- Exercise facilities
- Onsite programs and outings
- Planned community events
- Neighborhood van service
- Wellness clinic

In order to retain a residential population of senior residents 55 years and older, the owner of the senior living center will operate as owner of the dwelling units in the case of death or resale. Should an owner of a dwelling unit pass away, the dwelling unit is transferred back to the owner of the development and resold to another senior resident. If a profit is made on the resale, the beneficiary or beneficiaries of the former owner of the dwelling unit will have right to a portion of the profit (to be agreed upon by the owner of the development). If an owner of a dwelling unit wishes to sell the unit, it must be resold back to the owner of the development for resale at fair market price. Similarly, the former owner of the dwelling unit will be entitled to a portion of the profit made from resale (to be agreed upon by the owner of the development).

The Project design and operational characteristics incorporate Project Design Features ("PDFs")⁸ that minimize or avoid adverse impacts. Because PDFs are already incorporated into the Project, they do not constitute mitigation measures, but nonetheless are credited toward reducing potential impacts. The Project incorporates many "sustainable" or "green" strategies that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. Project sustainable strategies include the following:

- Site location of the proposed senior housing adjacent to the existing golf course will allow use of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and potentially lower air-conditioning and energy usage.

⁸ Project Design Features (PDFs) are specific design and/or operational characteristics proposed by the Project Applicant that are incorporated into the Project to avoid or reduce its potential environmental effects. The role of PDFs in the analysis for this EIR is discussed in *Section IV: Environmental Impact Analysis* of this Draft EIR.

- The Project will attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.
- The Project will use water-efficient landscaping and native drought-tolerant plants.
- The Project will use stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.
- The Project will contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.
- The Project will use natural light as the primary source of light in all dwelling units. Lighting systems will be controllable to achieve maximum efficiency.
- The proposed Project would include exterior lighting that would minimize nighttime illumination.
- The Project energy performance will be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.
- The Project will be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.
- The Project design will incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.
- The Project intends to achieve at least LEED (Leadership in Energy and Environmental Design) Platinum, Gold, or Silver status.

Grading, Construction and Phasing

Although an exact construction schedule is not known at this time, demolition, grading, and construction for the SCSLC Project on the Development Site of the Project Site is anticipated to take approximately 24 months.

Three primary construction phases are anticipated: 1) demolition of existing development (i.e., tennis courts) on the Development Site; 2) excavation, grading, and preparation of the Development Site; and 3) construction of the SCSLC and parking structure on proposed Lot 2. The minor construction activity anticipated on the Development Site within the southeastern portions of proposed Lot 1 related to adjustments to the driving range and golf course greenways/fairways configuration will most likely occur concurrent to the site preparation stage on Lot 2.

Demolition, grading, and construction activities are anticipated to begin in year 2014 and occupancy of the SCSLC Project is planned during year 2016. It is anticipated that the golf course, driving range, and clubhouse would continue to operate without significant disruption throughout the construction on the Development Site

Demolition of the tennis courts will generate construction waste (primarily concrete, asphalt, green waste, and fencing). During construction activities, per compliance with the City of Los Angeles Construction and Demolition (C&D) Waste Recycling Ordinance, the Applicant will recycle non-hazardous demolition and/or construction debris, therefore reducing waste materials being transported to landfills serving the Project area. In order to minimize construction waste taken to landfills, the Applicant will require primary construction contractors to provide separate receptacles for materials that can be recycled such as wood scraps, metal scraps, and cardboard. Individual contractors will be required to emphasize diversion planning to ensure that the maximum amount of recyclable materials are separated and placed in the appropriate bins. Some of these materials may be temporarily stockpiled at the Project Site until they are either incorporated into the new construction and/or removed for off-site recycling.

Grading of the Development Site is expected to entail minor cuts and fills from the existing grades to establish the building pads and to provide surface drainage for the site. However, major excavation will be required to establish the two levels of subterranean parking on Lot 2. Soils are not anticipated to be imported to the Development Site; however, an estimated 82,000 cubic yards of earth materials excavated from Lot 2 is anticipated to be exported.

Construction activities generating noise are limited to the hours between 7 A.M. and 9 P.M. from Monday through Friday and between 8 A.M. and 6 P.M. on Saturday. The City of Los Angeles Noise Control Ordinance (No. 144,331), which applies to construction activities being undertaken within 500 feet of a residential zone (such as the Project Site), prohibits noise that is "loud, unnecessary, and unusual, and substantially exceeds the noise customarily and necessarily attendant to the reasonable and efficient performance of work." Construction activities will be scheduled in compliance with City regulations.

Project Assumptions

The Project Description, and hence the analysis in this EIR, assumes that, unless otherwise stated, the Project will be designed, constructed, and operated following all applicable laws, regulations, ordinances, and formally adopted City standards (e.g., *Los Angeles Municipal Code* and Bureau of Engineering *Standard Plans*), as well as all applicable statewide regulations. Also, this analysis assumes that construction will follow the uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., *Standard Specifications for Public Works Construction* and the *Work Area Traffic Control Handbook*) as specifically adapted by the City of Los Angeles (e.g., The City of Los Angeles Department of Public Works *Additions and Amendments to the Standard Specifications For Public Works Construction* (AKA "The Brown Book," formerly Standard Plan S-610)).

Other Project assumptions related to the analysis "baseline" and other Related (cumulative) Projects are discussed in *Section III: General Overview and Environmental Setting* of this Draft

EIR, and Project “net” and “credit” assumptions are discussed in *Section IV: Environmental Impact Analysis*.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

Furthermore, as the proposed Project consists of the development of a senior living center with 200 independent dwelling units, the proposed senior retirement community will be age-restricted for seniors aged 55 and older. However, it should be noted that the Applicant anticipates the average age of residents upon move-in will be approximately 75 years of age.

II. PROJECT DESCRIPTION

G. PROPOSED PROJECT DESIGN FEATURES AND COMPLIANCE MEASURES ASSUMED IN IMPACT ASSESSMENT

CEQA Guidelines, Section 15126.4(A), “The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed...which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.” This EIR clarifies these “other measures” into Project Design Features (PDFs) and Compliance Measures and has used this information to support reasonable assumptions about the proposed Project. PDFs and Compliance Measures, as used herein, are defined more specifically as follows:

Project Design Features - PDFs are specific design and/or operational characteristics incorporated into the Project that would avoid or reduce its potential environmental effects. The impact analyses in this Draft EIR include the PDFs because they are proposed by the Applicant as integral to the Project. They do not constitute Mitigation Measures because they are not applied in addition to the Project as proposed to reduce significant impacts determined in the EIR. They are delineated in the EIR, however, for the EIR to be as informative as possible and so that they will appear in the checklist of the Mitigation Monitoring and Reporting Program.

Compliance Measures - Compliance Measures are existing requirements and reasonably anticipated standard conditions that are based on local, State, or federal regulations or laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts. Typical standard conditions and requirements include compliance with the provisions of the Uniform Building Code, South Coast Air Quality Management District Rules, local agency fees, etc. The City may impose additional conditions during the approval or building permit processes, as appropriate. Because Compliance Measures are neither Project specific nor a result of development of the Project Site, they are not considered to be either PDFs or Mitigation Measures. Since these regulations are required by law and shall be conditioned through the entitlement approval or building permit processes, they are incorporated into the impact analyses as “built-in” measures credited to the Project to reduce impacts. As such, the Compliance Measures are described in this Draft EIR to help establish the baseline impacts resulting from the Project, but are not part of the Mitigation Program.

Applicable PDFs and Compliance Measures that were considered in the analysis of potential environmental impacts are discussed in each issue section of this DEIR. However, a complete compilation of the PDFs and Compliance Measures is also provided below.

1. PROJECT DESIGN FEATURES (PDFs)

The analysis includes the following Project Design Features are implemented as integral features of the Project. It should be noted that several PDFs are repeated in various environmental categories, as they apply to each respective environmental category.

Aesthetics PDFs

- The Project shall include an exterior lighting design that will minimize nighttime illumination.

Air Quality PDFs

- Project shall be located so that the proposed senior housing is adjacent to the existing golf course to allow use of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.
- The landscaping for the SCSLC shall use water efficient landscaping and native drought tolerant plants.
- The Project shall attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.
- The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.
- The Project shall use natural light as the primary source of light in dwelling units. Lighting systems will be controllable to achieve a maximum efficiency.
- The Project shall use exterior lighting that would minimize nighttime illumination.
- The SCSLC energy performance goal shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.
- The SCSLC shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.
- The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.
- The Project shall achieve LEED Platinum, Gold, or Silver status.

Cultural Resources PDFs

- In order to physically distinguish and differentiate between the two proposed parcels, appropriate landscaping, such as the placement of trees or shrubs at the parcel boundary to act as a natural screen between the two properties, shall be used to create a buffer between Lot 1 and Lot 2.

Hydrology and Water Quality PDFs

- Stormwater from the roofs shall be reclaimed by conveying runoff through roof downspouts via an underground storm drain pipe network to a pre-treatment system to remove debris and sediment from runoff and then conveyed to an infiltration trench and/or drywell for infiltration purposes. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that would store, evaporate, detain, and/or treat runoff may be used.
- Various landscape areas shall be developed along the building perimeters. Landscaped areas shall be graded, where possible, to flow directly to an infiltration trench and/or drywell, for infiltration purposes, or intercepted by a series of planter drains, area drains, etc., and conveyed to the selected infiltration system through a subsurface PVC storm drain pipe. An overflow pipe shall be provided to discharge excess stormwater that cannot be infiltrated during a heavy storm event. Overflow from the infiltration trench shall be discharged to the Los Angeles River open channel. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that will store, evaporate, detain, and/or treat runoff may be used.
- Hardscaped pedestrian walkways shall be graded in coordination with existing topography to sheet flow storm runoff into landscaped areas, where possible, or to various catch basins and curb inlet catch basins with filter inserts to be treated prior to discharging into a bio-retention basin. A series of cleanouts shall be provided for the new subsurface pipe network at appropriate distances and/or bends.

Land Use and Planning PDFs

- The landscaping for the SCSLC shall use water efficient landscaping and native drought tolerant plants.
- The Project shall make use of stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.
- The Project shall install a high efficiency irrigation system and have its design reviewed by the City as part of the required Landscape Plan review.
- The Project shall include display and distribution of transit information for both residents and visitors.

- The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs of the Project.
- The Project design incorporates subterranean parking that shall be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or River.
- Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that shall be provided from Valleyheart Drive (which shall lead from Whitsett Avenue).
- The Project minimizes the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.\
- The Applicant shall require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.
- The Project shall include a children’s playground for public use along its southern edge.
- Pedestrian walkways within the Project shall provide linkages from the SCSLC residential and community building to key areas on three sides of the development, including linkages to: the LA River greenway toward the south; the Whitsett Avenue street frontage to the east; and the golf course recreational facilities to north.
- Pedestrian walkways within the Project and the adjacent sidewalks shall be appropriately landscaped and adorned to provide a “friendly” walking environment for residents, visitors and the public, including lighting and wayfinding signage.
- Project landscaping in the vicinity of the parking garage driveway and the public playground along the south edge, and at the golf course/driving range secondary pedestrian access at the northeast corner of Lot 2, shall be designed to assist in the easy identification of and access to these areas.
- Buildings oriented along the Whitsett Avenue frontage shall incorporate common area/community use areas in the ground-floor space so that larger window openings and architectural transparency features shall visually link interior gathering areas with the active streetscape.
- The Project buildings and individual dwelling units shall be designed so that private open spaces (i.e., step-out patios and balconies) are oriented toward the living center perimeter, embracing both the Whitsett Avenue street and L.A. River development frontages.

- The Project shall be designed as several (six) smaller building components, thus providing view corridors through the Project such that intermittent views of Weddington Golf Course (an urban landmark) are maintained from both Whitsett Avenue and the L.A. River greenway.
- The Project shall provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information.
- The Project design for the parking structure layout shall allocate 2% of the residential (i.e., excluding the overflow golf) parking spaces for use by a third party shared car (or equivalent) program.
- The Project shall be designed specifically to limit development to the Development Site, including Lot 2 and small southeastern portions of Lot 1, thus avoiding disturbance of any potential historic components on the Project Site.
- The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.

Population and Housing PDFs

- The Project shall be age-restricted for seniors aged 55 and older and shall target support for a resident population with an average age of approximately 75 years (upon move-in).
- The Project shall provide for resident ownership of individual dwelling units and an undivided interest in the residential common areas. Individual resident-occupant ownership (rather than rental arrangement) shall be arranged through purchase agreements coordinated by the Project Applicant/Manager. Resale of units shall be facilitated and/or monitored through the Project Applicant/Manager to ensure that ownership is reserved for senior residents 55 years and older. For example, when an owner of a dwelling unit passes away or needs to relinquish ownership, the unit shall be transferred back (at market value to the owner or beneficiaries) to the Project Applicant/Manager and resold to another senior resident.

Recreation and Parks PDFs

- The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing, and coordinated events. The common area plaza connecting the six senior living center buildings shall function

predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.

- The Project shall include approximately 30,000 square feet of indoor common-use activity center area. These areas shall be used for exercise areas, craft rooms, organized social activities and similar recreational uses for the residents and their guests.
- The Project shall include private balconies and small patios in some of the residential units that offer opportunities for private open space and recreation use.
- The Project shall be designed to retain the golf course, driving range and clubhouse currently on the Project Site, essentially unchanged. It is anticipated that these facilities shall continue to be privately-owned and made available for use by the public or the adjacent Project residents on a fee basis.

Transportation and Circulation PDFs

- The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or Los Angeles River.
- Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that will be provided from Valleyheart Drive (which will lead from Whitsett Avenue).
- The Project shall minimize the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.

Utilities – Energy PDFs

- The Project shall attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.
- The senior housing shall be located adjacent to the existing golf course to allow utilization of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.
- The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.
- The Project shall use water efficient landscaping and native drought tolerant plants.
- The Project shall use stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.

- The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.
- The Project shall utilize natural light as the primary source of light in all dwelling units. Lighting systems shall be controllable to achieve maximum efficiency.
- The Project energy performance shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.
- The Project shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.
- The Project shall achieve the equivalent of LEED Platinum, Gold, or Silver status.

Utilities – Water PDFs

- The landscaping for the Project shall use water efficient landscaping and native drought tolerant plants.
- The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs on proposed Lot 2 of the Project Site.

2. COMPLIANCE MEASURES

The analysis assumes that the Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following measures. It should be noted that several Compliance Measures are repeated in various environmental categories, as they apply to each respective environmental category.

Aesthetics Compliance Measures

- As required by LAMC Section 12.40, the site shall be required to prepare a Landscape Plan, which shall address replacement of removed trees.
- The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Section 91.6306.
- The residential component of the Project shall be subject to the City of Los Angeles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits light source intensity and reflective glare.

- Exterior lighting shall be directed onsite to minimize nighttime lighting illumination and light spillover onto neighboring properties.

Air Quality Compliance Measures

- The Project shall comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.
- The Project shall comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the District. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.
- During construction and demolition activities, non-hazardous construction and demolition debris shall be recycled and/or salvaged per the City's Construction and Demolition (C&D) Waste Recycling Ordinance.

Biological Resources Compliance Measures

- Any work on non-removed (e.g., saved) trees shall be in accordance with the City of Los Angeles' preservation tree policies.
- The Project landscape plan should include provision for 15-gallon, 24" box or 36" box specimen trees, to replace any "of size" trees removed. Such replacement should be on a 1:1 ratio basis.
- The City of Los Angeles Tree Protection Guidelines and landscape requirements shall require that new landscaping, including trees, be integrated into the new construction area, and shall require at a minimum a 1:1 replacement for any tree removed. The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review shall ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.

Cultural Resources Compliance Measures

- Standard conditions imposed by the City of Los Angeles require that a qualified archeological monitor will be present during construction to observe for potential

archaeological resources and take appropriate measures to evaluate and process any archeological resources encountered during construction.

Geology, Soils and Seismicity Compliance Measures

- Design and construction of the Project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.
- All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork Specifications in an approved Geotechnical Report.

Greenhouse Gas Emissions Compliance Measures

- The Project shall comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Construction & Demolition (C&D) Waste Recycling Ordinance.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Green Building Code.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Bicycle Parking Ordinance.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Landscape Ordinance and associated Irrigation Guidelines.

Hydrology and Water Quality Compliance Measures

- The Project Applicant shall be required to implement a SUSMP, which shall outline the stormwater treatment measures or post-construction Best Management Practices (BMPs) required to control pollutants associated with storm events up to the 3/4-inch precipitation level.
- The Project shall comply with the Low Impact Development (LID) Standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, including, but not limited to, high-flow biotreatment devices, vegetated swales, filter strips, bioretention facilities, planter boxes, bioinfiltration facilities, and dry wells.

- The Project's stormwater management features shall focus on meeting or exceeding the goals of the General Construction Permit, as well as SUSMP and LID.
- Since Lot 2 accounts for approximately 4.52 acres, the Project shall implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall be designed to address the following objectives:
 - All pollutants and their sources, including sources of sediment associated with construction, construction site erosion and all other activities associated with construction activity shall be controlled;
 - Where not otherwise required to be under a Regional Water Quality Control Board (RWQCB) permit, all non-stormwater discharges shall be identified and either eliminated, controlled, or treated;
 - BMPs are effective and shall be used in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity to the Best Available Technology/Best Control Technology (BAT/BCT) standard;
 - Calculations and design details as well as BMP controls for the site run-off shall be complete and correct;
 - Stabilization BMPs installed to reduce or eliminate pollutants after construction shall be completed;
 - Shall identify post-construction BMPs, which are those measures to be installed during construction that are intended to reduce or eliminate pollutants after construction is completed (post-construction BMPs are required for all sites by Section XIII.B); and
 - Shall identify and provide methods to implement BMP inspection, visual monitoring, Rain Event Action Plans (REAPs) and Construction Site Monitoring Program (CSMP) requirements to comply with the General Permit.
- In order to implement a SWPPP, the sediment and receiving water risk factors shall be calculated to determine the overall combined risk level for this Project.
- Since the Project is adjacent to the Los Angeles River, the combined risk level for this Project can be hypothesized to be a minimum of Risk Level 2; it may also be determined to be a Risk Level 3 based on final calculations of the sediment risk factor. As such, the following Risk Level 2 or 3 requirements shall be met:
 - Compliance with narrative effluent standards;

- Good site management “housekeeping”;
 - BMP implementation to control all non-stormwater discharges during construction;
 - Erosion control BMP implementation;
 - Sediment control BMP implementation;
 - Effectively manage all run-on, runoff within the site and all runoff that discharges off the site;
 - Ensure all inspection, maintenance, repair and sampling activities are performed or supervised by a Qualified SWPPP Practitioner (QSP) certified and trained by the California Stormwater Quality Association;
 - Ensure the Qualified SWPPP Practitioner develops a Rain Event Action Plan (REAP) forty-eight (48) hours prior to any likely precipitation event;
 - Develop and implement a Construction Site Monitoring Program (CSMP);
 - Collect water quality samples or runoff that is discharged offsite;
 - Prepare and electronically submit an Annual Report no later than September 1st of each year for the duration of construction.
- Construction BMPs shall be designed and maintained as part of the implementation of the SWPPP in compliance with the General Construction Permit. Implementation of the SWPPP shall begin when construction commences, before any site clearing and grubbing or demolition activity. During construction, the SWPPP shall be referred to regularly and amended as changes occur throughout the construction process. The Notice of Intent (NOI), Amendments to the SWPPP, Annual Reports, Rain Event Action Plans (REAPs), and Non-Compliance Reporting shall be posted to the State’s SMARTS website in compliance with the requirements of the General Construction Permit. All of the following BMPs shall be included as part of the Project to manage construction stormwater run-off:
 - **Erosion Control BMPs** protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMP shall be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels.
 - **Sediment Control BMPs** are treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMP shall be based on keeping sediments on site and controlling the site boundaries.
-

- **Wind Erosion Control BMPs** consists of applying water to prevent or minimize dust nuisance.
- **Tracking Control BMPs** consists of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. All sites shall have a stabilized construction entrance to prevent off-site tracking of sediment and debris.
- **Non-Stormwater Management BMPs** are also referred to as “good housekeeping practices,” which involve keeping a clean, orderly construction site.
- **Waste Management and Materials Pollution Control BMPs** consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.
- The proper disposal, storage or use of hazardous materials such as cleaners, agents, solvents, or other construction or operations related activities shall occur in accordance with regulatory requirements. Any non-stormwater discharge shall be controlled and properly disposed of through either approved connections to the sanitary sewer system or transported to an approved processing facility to prevent the contamination of the Project Site’s soils or groundwater. In addition, loading docks and storage areas shall be designed to provide spill containment and prevent contaminants from reaching the groundwater.
- The following BMPs shall be included as part of the SUSMP for the Project to manage post-construction stormwater run-off:
 - Promote evapotranspiration and infiltration by increasing the overall footprint of landscaped areas and promoting the use of native and/or drought tolerant plants.
 - Provide storm drain system stenciling and signage to discourage illegal dumping.
 - Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system.
 - Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing.
 - Design post-construction structural or treatment control BMPs to either treat or infiltrate stormwater runoff. Stormwater treatment facilities and systems shall be designed to meet the requirements of the SUSMP manual.

- Volumetric Treatment Control BMPs shall be designed to capture the volume of runoff from a 0.75-inch storm event, prior to discharging to the public storm drain system.
- Flow based Treatment Control BMPs shall be designed to the same standards as the volume-based control BMPs. The flow of runoff produced from the storm event shall be equal to or at least 0.2 inches per hour.
- Treatment devices shall be sized and designed to meet the above requirements outlined in the SUSMP manual.
- The Project shall be designed to comply with all local and State regulations regarding the control of pollutants of concern that may affect the quality of groundwater underlying the Development Site. Compliance with both the Construction General Construction Permit and Los Angeles County SUSMP shall require the implementation of both construction related and post-construction Best Management Practices (BMPs) for the safe handling and disposal of contaminants and pollutants of concern.

Land Use and Planning Compliance Measures

- The City of Los Angeles Tree Protection Guidelines and landscape requirements shall require that new landscaping, including trees, be integrated into the new construction area, and shall require at a minimum a 1:1 replacement for any tree removed. The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review shall ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.
- The Project Applicant shall be required to implement a SUSMP, which shall outline the stormwater treatment measures or post-construction Best Management Practices (BMPs) required to control pollutants associated with storm events up to the 3/4-inch precipitation level.
- The Project shall comply with the Low Impact Development (LID) Standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater.
- The Project's stormwater management features shall focus on meeting or exceeding the goals of the General Permit, as well as, SUSMP and LID.
- In compliance with the SUSMP for the management of post-construction stormwater runoff, the Project shall promote evapotranspiration and infiltration by increasing the overall footprint of landscaped areas.
- In compliance with the SUSMP for the management of post-construction stormwater runoff, the Project shall design post-construction structural or treatment control BMPs to

either treat or infiltrate stormwater runoff. Stormwater treatment facilities and systems shall be designed to meet the requirements of the SUSMP manual.

- The Project design shall integrate trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street. Trash/recycling bin storage areas shall be incorporated within the subterranean parking area with bins being ported to Valleyheart Drive for pick-up. Any trash enclosure area not entirely screened within the parking structure shall be screened from view by the general public through architecturally treated enclosures and/or landscaping.
- The Project design shall screen from public view all exterior rooftop and ground-level mechanical equipment, including HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes. Rooftop equipment shall be located within rooftop wells and screened by the perimeter mansard roof treatment. Ground level equipment shall be screened with architectural enclosures and/or landscaping as appropriate. Building mounted equipment (such as antennas) shall be incorporated into the architectural treatment of the building façade to blend and reduce visibility from the street, river greenway, and golf course views.
- The Project shall provide lighting throughout the site that shall distribute light evenly across the property and shall be positioned to prevent harsh glares on public rights-of-way or adjacent properties.
- The Project shall provide long-term and short-term bicycle parking in accordance with the Bicycle Parking Ordinance (Ordinance No. 182,386).
- Exterior lighting shall be directed onsite to minimize nighttime illumination and light spillover onto neighboring properties.
- The three primary pedestrian accesses to the development shall be established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the Project to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure shall be served by with multiple elevator corridors offering direct access to each residential building above.
- New trees integrated into the Project shall be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. Hence, it is required that the Project tree program incorporate recommendations of the Cal-IPC (California Invasive Plant Council- www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.

Noise Compliance Measures

- The Project shall comply with the City's Noise Ordinance (Ord. No. 156,363) to ensure that construction activities are conducted in accordance with the Los Angeles Municipal Code (LAMC).
- In compliance with the LAMC, construction activity shall be limited to between 7:00 A.M. and 9:00 P.M. on weekdays and 8:00 A.M. and 6:00 P.M. on Saturdays. Construction activity shall be prohibited on Sundays and federal holidays.

Public Services – Fire Compliance Measures

- The Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as established as an element of the City of Los Angeles General Plan.
 - Adequate access to the site for fire protection service vehicles and personnel shall be provided. A diagram of the site shall be sent to the Fire Department for their review, and their recommendations and requirements shall be incorporated into the final design.
 - If any portion of the first story exterior walls of any building structure is more than 150 feet from the edge of the roadway of an approved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane.
 - When required access is provided by an improved street, fire lane or combination of both which results in a dead-end in excess of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished.
 - Fire lanes shall be designated and maintained as follows:
 - Fire lanes shall have a minimum clear roadway width of 20 feet when no parking is allowed on either side.
 - Those portions of a fire lane which must accommodate the operation of Fire Department aerial ladder apparatus shall have a minimum clear roadway width of 28 feet when no parking is allowed on either side.
 - Those portions of a fire lane 30 feet on either side of a private fire hydrant shall have a minimum clear roadway width of 28 feet. No parking shall be permitted within those portions of the roadway which are within 30 feet of and on the same side of the roadway as a private fire hydrant.
 - Where parking is allowed on only one side of a required fire lane, parking shall be on the same side of the roadway as the hydrants.
-

- Where parallel parking is allowed on either side of a fire lane, the roadway width shall be increased eight feet for each parking lane.
- Where access requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- Fire lanes shall be paved to the City Engineer's standards for public alleys.
- Any person owning or having control of any facility, structure, group of structures or premises, shall maintain all fire lanes in an unobstructed manner.
- Fire lanes shall be posted with signs not less than 17 inches by 22 inches in size, with lettering not less than one inch in height, stating "*NO PARKING — DESIGNATED FIRE LANE. VIOLATORS WILL BE CITED VEHICLE CODE SECTION 22500.1. VEHICLES PARKED IN VIOLATION WILL BE TOWED AWAY AT OWNER'S EXPENSE.*" Signs shall also contain a telephone number of the Los Angeles Police Department which may be called by the person owning the vehicle to find out where it has been towed. Signs shall be in plain view at all entrances to required fire lanes and the spacing of signs shall be as required by the Chief. The bottom of such signs shall be six feet above the adjacent ground surface.
- The owner of the property shall be responsible for the installation of approved fire lane signs on private roadways.
- All fire hydrants shall have 2 1/2" x 4" outlets or 4" x 4" outlets and conform to the minimum standards of the American Water Works Association for wet barrel hydrants. A minimum of one fire hydrant is to be provided at each intersection. "Built-up" type single 2-1/2" outlet hydrants (6" pipe surmounted by an angle valve) shall be used in areas having a static water pressure of 210 P.S.I. or more.
- Where a response distance is greater than 1.5 miles, all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Chief.
- When access to or within a structure or premises is unduly difficult because of secured openings or where immediate access is necessary for lifesaving or fire fighting purposes, the Chief has the authority to order the owner or person having control of the structure or premises to install an access box in an approved location accessible to the Fire Department. The access box shall be of a type approved by the Chief and shall contain all keys, access cards, buttons, switches, locks, and actuators determined by the Chief to be necessary for access.

Public Services – Police Compliance Measures

- As part of the LAPD “Design Out Crime” program and the techniques employed by the Crime Prevention Through Environmental Design Guidelines, the Project Applicant shall consult with the LAPD Crime Prevention Unit on any suggested crime prevention features appropriate to the design of the Project, and shall incorporate such measures to the extent feasible and practical.

Recreation and Parks Compliance Measures

- In accordance with LAMC Section 17.12, the Applicant shall implement one of the following: 1) dedicate parkland to meet the requirements of the City of Los Angeles General Plan and Los Angeles Municipal Code; 2) pay in-lieu fees for any land dedication requirement shortfall; or, 3) provide on-site improvements equivalent in value to the in-lieu fees for recreation and parks facility credit.

Transportation and Circulation Compliance Measures

- In accordance with Los Angeles Municipal Code Section 91.70067, hauling of construction materials shall be restricted to a haul route or haul route memo approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction.
- A parking and driveway plan shall be prepared for approved by the appropriate District Office of the Bureau of Engineering, the Department of Transportation, and/or the Department of City Planning.
- Access for the handicapped shall be located in accordance with the requirements of the Handicapped Access Division of the Department of Building and Safety.
- In compliance with future RIO District requirements, the Project design for the parking structure layout shall allocate 2% of the residential (i.e., excluding the overall golf) parking spaces for use by a third party shared car (or equivalent) program.

Utilities – Energy Compliance Measures

- The Project shall comply with the applicable provisions of the City of Los Angeles Green Building Code, including, but not limited to:
 - Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of 0.90 or higher;
 - Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher;

- Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5;
- Installed tank type water heaters shall have an Energy Factor (EF) higher than 0.60;
- Installed tankless water heaters shall have an Energy Factor (EF) higher than 0.80;
- Contractors shall perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow;
- Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaries); and,
- Installed swimming pool circulation pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

Utilities – Water Compliance Measures

- The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review will ensure that the Project conforms to the City’s policies and guidelines for compatible plantscape and hardscape materials, including those related to non-invasive and LA River compatible species as required under the RIO.
- The Project shall comply with all Water Closet, Urinal, and Showerhead Regulations in the LAMC.
- The Project shall comply with Title 20 (Public Utilities and Energy) and Title 24 (Building Standards Code) of the California Code of Regulations.

II. PROJECT DESCRIPTION

H. INTENDED USES OF THIS EIR

This Draft EIR will be used by the City during its determination to grant permits and approvals as described in the preceding section. This Draft EIR may also be used by Responsible Agencies during their determination to grant any necessary permits.

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

A. OVERVIEW OF THE ENVIRONMENTAL SETTING

1. GEOGRAPHIC SETTING AND ACCESS

The Project Site is located in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”) Area within the Studio City portion of the City of Los Angeles (the “City”), generally in the southeastern portion of the San Fernando Valley. The Project Site is approximately 11 miles northwest of downtown Los Angeles and 11 miles northeast of the Pacific Ocean at Pacific Palisades (see *Figure II-1: Regional Location*, provided in *Section II: Project Description*).

The Project area is served by the Ventura Freeway (US-101), located approximately 0.8 miles to the north of the Project Site. Regional access to the Project Site is provided by several major roadways including Whitsett Avenue (along the eastern Project Site boundary), Moorpark Street (0.3 miles to the north), Coldwater Canyon Avenue (0.4 miles to the west), and Ventura Boulevard (0.2 miles to the south).

The roughly triangularly shaped Project Site is located generally northwest of the intersection of Whitsett Avenue and Ventura Boulevard and is bounded by Valley Spring Lane to the north, Bellaire Avenue to the west, an approximately 150-foot wide right-of-way of the Los Angeles River to the south, and Whitsett Avenue to the east (see *Figure II-2: Local Vicinity* provided in *Section II: Project Description*). It should be noted that the approximately 1.1-acre parcel adjacent to the southeast corner of the Project Site and currently occupied with a City of Los Angeles fire station, is no longer part of the Project Site and is not a part of the current Project. A 40- to 50-foot wide right-of-way for Valleyheart Drive exists directly to the south of the Property, adjacent and parallel to the L.A. River right-of-way.

The Project Site is located on a relatively flat parcel that slopes (downgrade) gently to the southeast and is at an elevation of approximately 640 feet above sea level.

2. EXISTING DEVELOPMENT AND SURROUNDING LAND USES

The Studio City area is recognized for its collection of production and post-production businesses serving the movie and television entertainment industry. Properties located along Ventura Boulevard are developed with a mix of pedestrian-oriented retail storefronts and office structures. A portion of the Los Angeles River runs through Studio City.

The Project Site vicinity would be described as urban and developed, characterized by single- and multi-family housing, commercial uses, parking lots, and a well-established street system. Properties adjacent to the Project Site include single-family residential dwellings along Valley Spring Lane and Bellaire Avenue to the north and west, respectively; multi-family residential dwellings along Whitsett Avenue to the east; and the Los Angeles River and commercial uses along Ventura Boulevard to the south (see *Figure II-3: Aerial Overview and Surrounding Uses*, provided in *Section II: Project Description*).

A 1.1-acre parcel of land adjacent to the southeast corner of the Project Site is occupied by Los Angeles Fire Station No. 78 and also zoned A1-1XL. This parcel was split from the Project Site and acquired by the City of Los Angeles in 2005 and is neither under the ownership of the Applicant nor a part of the proposed Project. Besides the fire station and the L.A. River, properties surrounding the Project Site are within the R3-1 or R1-1 Zones and are characterized by level topography and improved streets. The L.A. River right-of-way is currently designated as Public Open Space (OS). The commercial properties just south of the L.A. River on Ventura Boulevard are zoned Limited Commercial (C1.5).

The existing triangular Project Site totals approximately 16.1 acres and is currently occupied by a pitch-and-putt golf course, driving range, clubhouse, and tennis court facilities. The existing Weddington Golf Course occupies roughly 10.2 acres on the northerly portion of the Project Site. The pitch-and-putt golf course is a nine-hole, par-three course located primarily along Valley Spring Lane and Bellaire Avenue. The golf course also includes a clubhouse with a snack bar-type restaurant, and a driving range. The driving range is located in the central area of the Project Site and includes 24 tee stations. The tennis courts occupy roughly 5.9 acres on the southerly portion of the Project Site. A total of 16 tennis courts are currently provided along with related facilities including a small tennis house for equipment and other tennis related services. It should be noted that the existing tennis courts and related facilities would be removed to accommodate the proposed Project.

The primary parking for the existing uses on the Project Site is located along Whitsett Avenue, stretching between the driving range and tennis courts. Access to the surface parking lot is provided via two driveways along the Whitsett Avenue property frontage. A small service driveway is also provided on Valley Spring Lane, immediately west of Whitsett Avenue.

3. PHYSICAL SITE CHARACTERISTICS

The Property is a triangular-shaped lot with an area of approximately 16.1 acres. The Property is zoned A1-1XL (Agricultural) with an Open Space land use designation, and is currently improved with a privately operated 9-hole pitch-and-putt golf course, driving range, clubhouse, tennis courts, and associated parking, collectively known as Weddington Golf and Tennis.

The Project area, being fully urbanized, is fully serviced for all public utilities and public services. Electricity and water at the Project Site are currently provided by the City of Los Angeles, Department of Water and Power (the "LADWP"). Natural gas at the Project Site is currently provided by the Southern California Gas Company (the "Gas Company"). The Project Site is located within the Hyperion Water Treatment Plant (the "HWTP") Service Area.

A comprehensive discussion of the specific setting for each physical environmental issue area is provided in the impact analysis chapters of this Draft EIR.

4. LAND USE AND PLANNING CONTEXT

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area (update adopted May 13, 1998) within the City of Los Angeles. The intent of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan is to guide development and land use in the Community Plan Area in order to create a healthful and pleasant environment.¹ The Community Plan Area is bounded by the communities of North Hollywood and Van Nuys-North Sherman Oaks to the north; Hollywood, Universal City, and portions of the City of Burbank to the east, Encino-Tarzana to the west and Beverly Crest-Bel Air to the south. The area comprises five community subareas: Cahuenga Pass, Campo de Cahuenga Transit Station, Studio City, Sherman Oaks, and Toluca Lake.

The Project Site is within the Studio City subarea. According to the Community Plan:

“Studio City with its collection of production and post production businesses contains the majority of industrially zoned properties found within the plan area, is generally bounded by Lankershim on the east and Fulton on the west. With its expansion to the northerly 11.5 acre portion of their site approved under ZA Case No. 94-0292 (CUZ), CBS Studio Center, a major employer in the area, is the tenant of the largest industrial site. Properties located along Ventura Boulevard are developed with a mix of pedestrian oriented storefronts and office structures. Laurel Canyon Boulevard serves as the focal point of Studio City with its intense commercial development at the respective four corners. A portion of the L.A. River runs through Studio City. In keeping with the vision stated by residents during citywide workshops, and community plan update focus group meetings, the west side of Laurel Canyon, north of Ventura Boulevard could be developed with a Village concept accented toward the river.”

The need to provide affordable senior housing within the Community Plan Area is identified as a key issue in the Plan. Further, the Community Plan identifies the Project Site as a “major development opportunity site, as follows (emphasis added):

“Several areas have been identified as major opportunity sites: Properties located along the south side of the Los Angeles River between Coldwater Canyon and Laurel Canyon; Transit Station site along Lankershim Boulevard, north of Ventura boulevard, adjacent to Universal City; *the Studio City Golf Course*; and, CBS Studios. Additionally, the properties located on the westerly side of Sepulveda Boulevard (including the Sherman Oaks Galleria) from the 101 Freeway to Valley Vista Boulevard. The designation has been applied to areas which will potentially generate significant community wide impacts.”

The Community Plan designates Valley Spring Lane and Bellaire Avenue as local streets and Whitsett Avenue as a secondary roadway.

¹ Los Angeles, City of. 1998 (as updated). *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*. 5 September 2008 <<http://cityplanning.lacity.org/complan/pdf/shrcptxt.pdf>>.

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

B. RELATED PROJECTS

Section 15130 of the CEQA Guidelines, requires that EIRs analyze cumulative impacts of a project. The analysis of cumulative impacts need not be as in-depth as what is provided relative to the proposed Project, but rather is to “be guided by the standards of practicality and reasonableness.” CEQA Guidelines Section 15355 further defines cumulative impacts as “two or more individual projects, which when considered together, are considerable or which compound or increase the environmental impacts.”

Cumulative impacts are anticipated impacts of the Project along with foreseeable growth. The forecast of future conditions is clarified in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines provide that foreseeable growth may be based on either of the following:

- (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or
- (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

The analysis of cumulative impacts may be based on an analysis of the geographical area that is relevant to a particular environmental issue. Hence, the cumulative study area may vary slightly depending on the issue under analysis. For example, a cumulative assessment of visual impacts will generally focus on the more immediate surrounding area, while traffic impacts may consider a broader range of roadways that may be used by the Project.

For purposes of the Project, a list of potential Related Projects, which are generally representative of foreseeable growth was developed in coordination with the Los Angeles Department of Transportation (“LADOT”) and the Planning Department. The Related Projects research was based on information on file as of December 2011 at the City of Los Angeles Departments of Planning and Transportation. The location of the Related Projects is shown in *Figure III-1: Location of Related Projects*. The list of Related Projects in the Project area is presented in *Table III-1: List of Related Projects*. The list of Related Projects was submitted to LADOT for review and approval as part of the Traffic Impact Study on February 9, 2012.

The Related Projects listed are considered, to the extent that they are appropriate and relevant in the context of incremental impacts of the Project, in the cumulative impact analysis of each environmental issue evaluated in this Draft EIR.

TABLE III-1
LIST OF RELATED PROJECTS¹

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME/NUMBER ADDRESS/LOCATION	LAND USE	SIZE ²	STATUS
LA1	VEN-2010-020	12548 Ventura Boulevard	Apartment Retail Existing Retail Other	62 DU 10,747 GLSF (3,000) GLSF 1,925 GSF	Proposed
LA2	VEN-2008-080	Credit Union 4061 Laurel Canyon Boulevard	Walk-In Bank	1,467 GSF	Proposed
LA3	SFV-2004-294	Campbell Hall School 4533 Laurel Canyon Boulevard	Private School (K-12) Existing Senior Housing Existing Apartment	400 Students (54) DU (22) DU	Under Construction
LA4	SFV-2006-130	Sherman Village 12629 Riverside Drive	Condominium TV program production	270 DU	Approved
LA5	VEN-2004-008	11617 Ventura Boulevard	Apartment Existing Office Coffee House Existing Retail Existing Car Service Existing Restaurant	391 DU (7,793) GSF 1,000 GSF (5,598) GSF (4,065) GSF (4,000) GSF	Inactive
LA6	SFV-2006-044	Merdinian Evangelical School 13330 Riverside Drive	Private High School	383 Students	Approved
LA7	SFV-2011-025	11422 Moorpark Street	Restaurant	124 Seats	Proposed
LA8	VEN-2006-018	11331 Ventura Boulevard	Condominium Office	62 DU (21,694) GSF	Proposed
LA9	SFV-2007-032	Aqua Vista Condos 11163 Aqua Vista Street	Condominium	122 DU	Under Construction
LA10	VEN-2009-014	Ralph's Supermarket 14049 Ventura Boulevard	Supermarket Expansion	27,389 GSF	Approved

¹ Source: City of Los Angeles Department of Transportation Related Project List, excepted as noted below. Trip generation for the Related Projects are based on "ITE 'Trip Generation', 8th Edition, 2008.

² A number in parenthesis (i.e., "(3,000) GLSF" or "(54) DU") indicates removal of that use from the Related Project site.

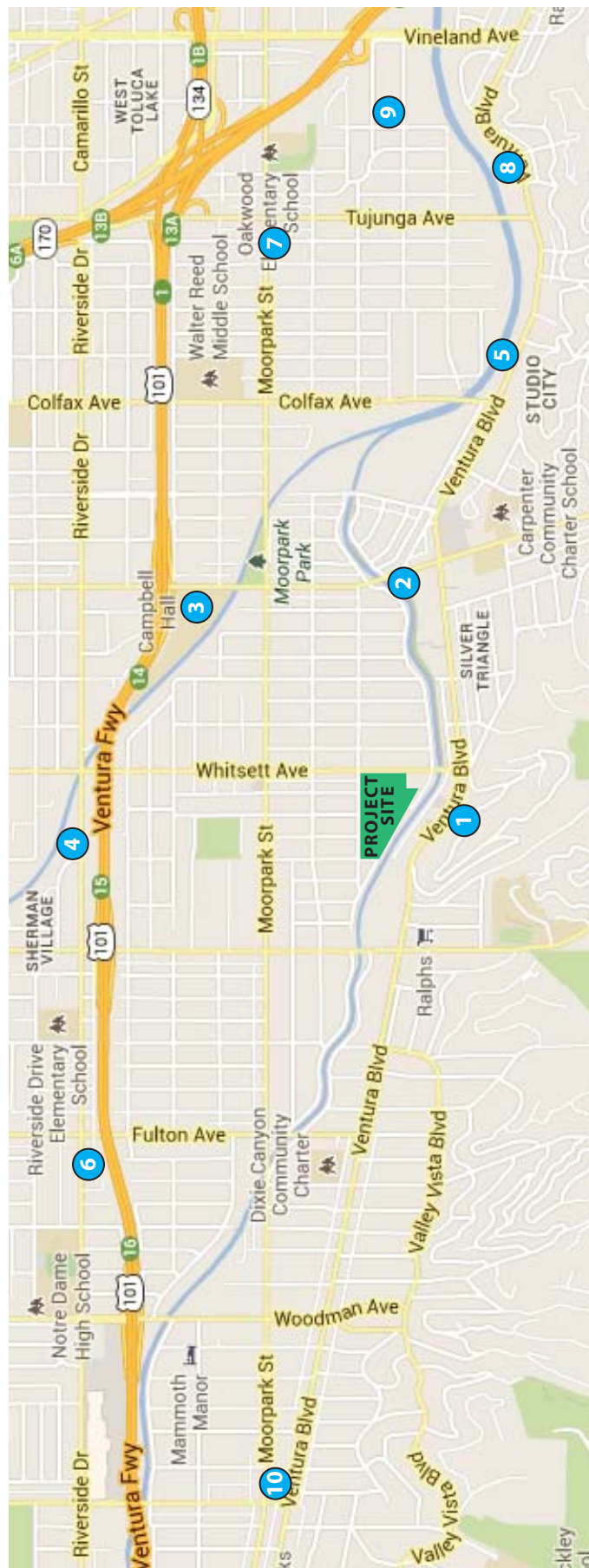


FIGURE III-1
LOCATION OF RELATED PROJECTS

SOURCE: MAPS.GOOGLE.COM

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

C. PROJECT BASELINE

“Baseline” refers to the environmental setting conditions that establish the background against which a project is compared. The CEQA Guidelines Section 15125 establishes that a project’s environmental baseline is typically established by the physical conditions that exist within the project area at the time the Lead Agency issues the NOP (i.e., at the beginning of the environmental review). However, the Lead Agency has some discretion in defining the baseline when supported by substantial evidence of the administrative record. For example, the Lead Agency may recognize a “credit” for conditions that may already exist but would be replaced by a project, or for conditions that may not actually exist (at the time of the project’s environmental review) but have been previously approved, and in theory, could be undertaken without further discretionary permits.

The Project’s baseline is established as a combination of the current existing physical conditions near the period of March 2008 (as updated through 2013) and projected future conditions for build-out year 2016. For this EIR analysis, the baseline is adjusted accordingly to account for the removal of sixteen (16) tennis courts to be replaced by senior housing, and thus allowing for an acceptable background “credit” for the Project and/or establishing the “net” incremental effect of the Project is discussed in *Section IV: Environmental Impact Analysis* of this Draft EIR.

IV. ENVIRONMENTAL IMPACT ANALYSIS

1. EIR IMPACT METHODOLOGY

Consistent with CEQA, the analyses in this Draft EIR consider the physical environmental effects related to the demolition of 16 tennis courts and related facilities, and the development of six new senior housing buildings supporting 200 senior dwelling units, shared common areas, and 613 parking spaces within a subterranean structure.

2. ANALYSIS SECTION FORMAT

Each topical analysis section is organized and defined as provided below.

Introduction - provides a brief explanation of the “scope” of the analysis section and identifies key references used for the section analysis.

Environmental Conditions – provides an overview of the existing conditions and defines the baseline (see *Section III.C: General Overview and Environmental Setting – Project Baseline* of this Draft EIR) relevant to the scope of the particular environmental topic. The Environmental Conditions section is subdivided into two sections:

Physical Setting – provides a description of the applicable physical conditions at the Project Site and surrounding area, and may include information related to the existing land uses, structures and operational characteristics of those existing developments.

Regulatory and Policy Setting – provides information about policies, procedures, regulations and requirements that were in place at the time the NOP was published and/or adopted through July 2013, and would be applicable to the proposed Project.

Environmental Impacts – provides the analysis and an assessment of the cumulative impacts. The Environmental Impacts section has four subsections:

Methodology – summarizes the methods, procedures and techniques used to estimate Project impacts.

Thresholds of Significance – identifies and explains the thresholds of significance and any additional criteria used to determine the significance of the Project’s impacts.

Project Impacts – discusses the potential impacts of the Project.

Cumulative Impacts – discusses the extent to which the Project may create cumulative impacts.

Compliance Measures, PDFs, and Mitigation Program – where it is determined that the Project would generate potentially significant impacts, Mitigation Measures are recommended that would reduce the level of those potential impacts. This section includes a combination of

Compliance Measures, Project Design Features (“PDFs”), and additional Mitigation Measures, as necessary, to address the incremental “net” impact of the Project.

PDFs and Compliance Measures – CEQA Guidelines, Section 15126.4(A), states “The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.” This EIR distinguishes between Project Design Features (“PDFs”), which are features incorporated into the design of the Project to minimize or avoid adverse impacts, and Compliance Measures, which are imposed by the City or by regulatory agencies. PDFs and Compliance Measures, as used herein, are defined more specifically as follows:

Project Design Features

PDFs are specific design and/or operational characteristics incorporated into the Project that would avoid or reduce its potential environmental effects. The impact analyses in this Draft EIR include the PDFs because they are proposed by the Applicant as integral to the Project. They do not constitute Mitigation Measures because they are not applied in addition to the Project as proposed to reduce significant impacts determined in the EIR. They are delineated in the EIR, however, for the EIR to be as informative as possible and so that they will appear in the checklist of the Mitigation Monitoring and Reporting Program.

Compliance Measures

Compliance Measures are existing requirements and reasonably anticipated standard conditions that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts. Typical standard conditions and requirements include compliance with the provisions of the Uniform Building Code, South Coast Air Quality Management District Rules, local agency fees, etc. The City may impose additional conditions during the approval or building permit processes, as appropriate. Because Compliance Measures are neither Project specific nor a result of development of the Project Site, they are not considered to be either PDFs or Mitigation Measures. Since these regulations are required by law and shall be conditioned through the entitlement approval or building permit processes, they are incorporated into the impact analyses as “built-in” measures credited to the Project to reduce impacts. As such, the Compliance Measures are described in this Draft EIR to help establish the baseline impacts resulting from the Project, but are not part of the Mitigation Program.

Project Mitigation Measures – Mitigation Measures are recommended when the Project would result in a significant environmental impact with or without implementation of the PDFs and applicable Compliance Measures.

Level of Significance After Mitigation – provides a summary of the significance conclusions regarding the Project’s impacts after implementation of all Mitigation Measures.

3. REFERENCES AND RESOURCES

The background information and analyses to support this Draft EIR are based on current site-specific technical reports, field observations, and available public documents. Information used also includes collaboration with resource agencies and an assessment of various regional policy documents. Key relevant EIR-level technical studies are included as Technical Appendices to this EIR. Other more general or published documents may be obtained through the authoring agency.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. AESTHETICS

1. INTRODUCTION

Aesthetics, views, nighttime illumination, and daytime glare are related elements in the visual environment. *Aesthetics* generally refers to the identification of visual resources, the quality and character of what can be seen, and the overall visual perception of the environment. *View* refers to the visual access to important focal points or panoramic views from an area. *Nighttime illumination* addresses the extent to which a use's nighttime lighting (either interior or exterior) is visible from the surrounding area. *Glare* refers to the effect from reflective surfaces or lighting that may result in a safety or nuisance concern to drivers or surrounding uses.¹

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Visual Character

The Project Site is located within the Studio City/North Hollywood neighborhood of the San Fernando Valley. The visual character of the Project Site is that of a recreational center with ample greenery, trees, and landscaping. The visual character of the surrounding area is that of a fully developed multi-family and single-family residential neighborhood, also developed with a mix of local and chain commercial stores, restaurants, and services along major thoroughfares such as Ventura Boulevard, Laurel Canyon Boulevard, and Coldwater Canyon Avenue. The Los Angeles River also bisects the community and runs approximately parallel to Ventura Boulevard.

The existing Project Site is currently developed with a 9-hole pitch-and-putt golf course, a 24-tee driving range enclosed by a varying approximately 40- to 70-foot mesh fence, a surface parking lot containing a row of eight approximately 20-foot-high light standards in the shape of a golf ball resting on a tee, tennis courts enclosed by approximately 12-foot-high fences as well as a small tennis house, a one-story golf course clubhouse, and a maintenance yard. *Figure IV.A-1: Photo Key for Views of Project Site* shows the general direction and location in which the following photographs were taken, thus providing an idea of the visual character of the Project Site. *Figure IV.A-2: Views of Project Site - South Whitsett Avenue Location*, *Figure IV.A-3: Views of Project Site -North Whitsett Avenue Location*, *Figure IV.A-4: Views of Project Site - Corner of Whitsett Avenue and Valley Spring Lane*, *Figure IV.A-5: Views of Project Site - Surface Parking Lot*, *Figure IV.A-6: Views of Project Site -Corner of Valley Spring Lane and Babcock Avenue*, *Figure IV.A-7: Views of Project Site -Corner of Valley Spring Lane and Beeman Avenue*, *Figure IV.A-8: Views of Project Site -Corner of Valley Spring Lane and Teesdale Avenue*, *Figure IV.A-9: Views of Project Site -Corner of Valley Spring Lane and Bellaire Avenue*, *Figure IV.A-10: Views of Project Site -Northwesterly Valleyheart Drive Across Los Angeles River*, *Figure IV.A-11: Views of Project Site -Southeasterly Valleyheart Drive Across Los Angeles River*, *Figure IV.A-12: Views of Project Site - Southeasterly Valleyheart*

¹ City of Los Angeles, *L.A. CEQA Thresholds Guide* (Los Angeles: City of Los Angeles, 2006).

Drive Across Los Angeles River -Through Foliage demonstrate views which typify the Project Site as viewed from surrounding streets.

The major streets in the Project vicinity include Whitsett Avenue, Ventura Boulevard, Moorpark Street, Coldwater Canyon Avenue, and Laurel Canyon Avenue. Development along Whitsett Avenue, Moorpark Street, Coldwater Canyon Avenue, and Laurel Canyon Avenue consists of low- to mid-rise (one to four stories) multi-family residential buildings, interspersed with one- and two-story single family dwellings, as well as local-serving corner commercial uses at most of the major street intersections, and larger, more intense commercial uses near intersections with Ventura Boulevard. The smaller neighborhood streets that lie between these major streets, such as Valley Spring Lane, Valleyheart Drive, Woodbridge Street, and Bellaire Avenue, as well as the foothills of the Hollywood Hills to the south of Ventura Boulevard are characterized primarily by one- and two-story single family dwellings. Ventura Boulevard is the primary commercial destination in the community, consisting of local and regional serving commercial uses, including big-box retail and national chain restaurants and services. Most of the commercial development along Ventura Boulevard is made up of low-rise buildings (one- to two-stories) with associated parking lots and garages. Most of the major commercial uses in the neighborhood lie south of the Los Angeles River.

Notable structures and developments in the area include the Sportsmen's Lodge Event Center (one story) and Hotel (five stories) along Ventura Boulevard, south of the Los Angeles River and to the west of the Project Site; the approximately 8.5-acre Studio City Recreation Center (a.k.a. Beeman Park) to the north of the Project Site approximately 1/3 of a mile, consisting of a one-story auditorium, baseball diamonds, basketball and tennis courts, picnic tables, and a children's play area; the four-story Hallmark Channel building, situated on an inclined foothill to the south of the Project Site at the southeast corner of the intersection of Ventura Boulevard and Fairway Avenue; a four-story office building complex directly across the Los Angeles River to the southwest of the Project Site, on the north side of Ventura Boulevard; the one-story City of Los Angeles Fire Station No. 78, adjacent to the Project Site on the northwest corner of Whitsett Avenue and Valleyheart Drive; and the one-story Thirty-Sixth Church of Christ, Scientist on the northeast corner of Whitsett Avenue and Valleyheart Drive.

Figure IV.A-13: Photo Key for Views of Neighborhood Character shows the general direction and location in which the following photographs were taken, thus providing an idea of the visual character of the immediately surrounding neighborhood. *Figure IV.A-14: Views of Neighborhood Character -South Whitsett Avenue Location*, *Figure IV.A-15: Views of Neighborhood Character -North Whitsett Avenue Location*, *Figure IV.A-16: Views of Neighborhood Character -Corner of Whitsett Avenue and Valley Spring Lane*, *Figure IV.A-17: Views of Neighborhood Character -Corner of Valley Spring Lane and Babcock Avenue*, *Figure IV.A-18: Views of Neighborhood Character -Corner of Valley Spring Lane and Beeman Avenue*, *Figure IV.A-19: Views of Neighborhood Character -Corner of Valley Spring Lane and Teesdale Avenue*, *Figure IV.A-20: Views of Neighborhood Character -Corner of Valley Spring Lane and Bellaire Avenue*, *Figure IV.A-21: Views of Neighborhood Character -Adjacent Fire Station*, and *Figure IV.A-22: Views of Neighborhood Character -Corner of Whitsett Avenue and Valleyheart Drive - Los Angeles River* demonstrate views which typify the immediately surrounding neighborhood character.



FIGURE IV.A-1
PHOTO KEY FOR VIEWS OF PROJECT SITE





PHOTO #1

FIGURE IV.A-2
VIEWS OF PROJECT SITE -SOUTH WHITSETT AVENUE LOCATION



PHOTO #2

FIGURE IV.A-3
VIEWS OF PROJECT SITE -NORTH WHITSETT AVENUE LOCATION



PHOTO #3

FIGURE IV.A-4
VIEWS OF PROJECT SITE -CORNER OF WHITSETT AVENUE AND VALLEY SPRING LANE



PHOTO #4

FIGURE IV.A-5
VIEWS OF PROJECT SITE -SURFACE PARKING LOT



PHOTO #5

FIGURE IV.A-6
VIEWS OF PROJECT SITE -CORNER OF VALLEY SPRING LANE AND BABCOCK AVENUE

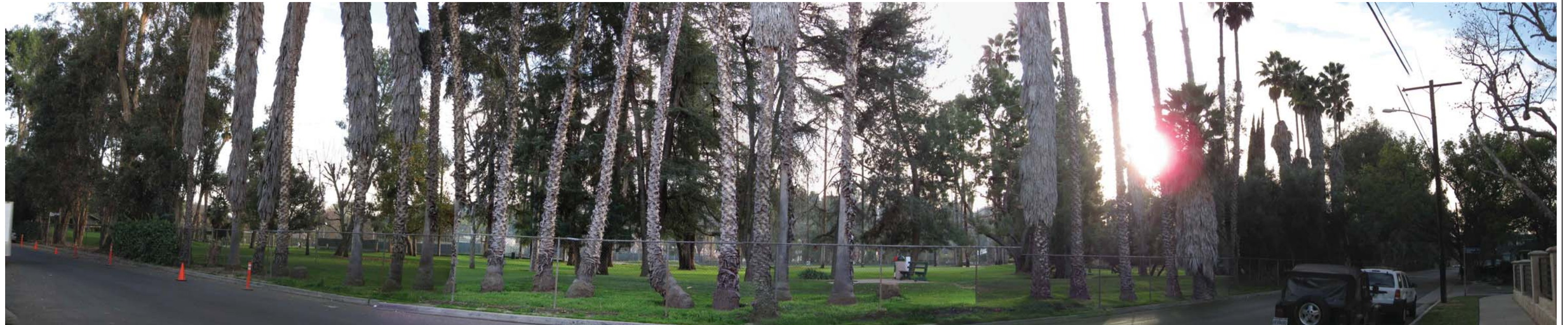


PHOTO #6

FIGURE IV.A-7
VIEWS OF PROJECT SITE -CORNER OF VALLEY SPRING LANE AND BEEMAN AVENUE



PHOTO #7

FIGURE IV.A-8
VIEWS OF PROJECT SITE -CORNER OF VALLEY SPRING LANE AND TEESDALE AVENUE



PHOTO #8

FIGURE IV.A-9
VIEWS OF PROJECT SITE -CORNER OF VALLEY SPRING LANE AND BELLAIRE AVENUE



PHOTO #9

FIGURE IV.A-10
VIEWS OF PROJECT SITE -NORTHWEST VALLEYHEART DRIVE LOCATION ACROSS LOS ANGELES RIVER

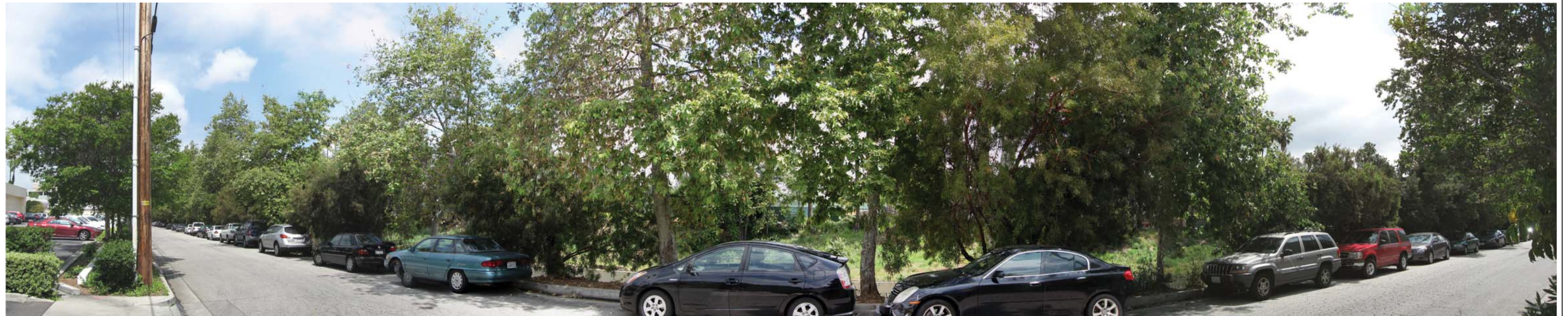


PHOTO #10

FIGURE IV.A-11
VIEWS OF PROJECT SITE -SOUTHEAST VALLEYHEART DRIVE LOCATION ACROSS LOS ANGELES RIVER



PHOTO #11

FIGURE IV.A-12
VIEWS OF PROJECT SITE -SOUTHEAST VALLEYHEART DRIVE LOCATION ACROSS LOS ANGELES RIVER - THROUGH FOLIAGE



FIGURE IV.A-13
PHOTO KEY FOR VIEWS OF NEIGHBORHOOD CHARACTER





PHOTO #12

FIGURE IV.A-14
VIEWS OF NEIGHBORHOOD CHARACTER -SOUTH WHITSETT AVENUE LOCATION



PHOTO #13

FIGURE IV.A-15
VIEWS OF NEIGHBORHOOD CHARACTER -NORTH WHITSETT AVENUE LOCATION



PHOTO #14

FIGURE IV.A-16
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF WHITSETT AVENUE AND VALLEY SPRING LANE



PHOTO #15

FIGURE IV.A-17
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF VALLEY SPRING LANE AND BABCOCK AVENUE



PHOTO #16

FIGURE IV.A-18
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF VALLEY SPRING LANE AND BEEMAN AVENUE



PHOTO #17

FIGURE IV.A-19
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF VALLEY SPRING LANE AND TEESDALE AVENUE



PHOTO #18

FIGURE IV.A-20
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF VALLEY SPRING LANE AND BELLAIRE AVENUE



PHOTO #19

FIGURE IV.A-21
VIEWS OF NEIGHBORHOOD CHARACTER -ADJACENT FIRE STATION



PHOTO #20

FIGURE IV.A-22
VIEWS OF NEIGHBORHOOD CHARACTER -CORNER OF WHITSETT AVENUE AND VALLEYHEART DRIVE - LOS ANGELES RIVER

(2) *Existing Viewsheds*

According to the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the Project Site is not located within an important scenic viewshed, such as the Mulholland Scenic Parkway Specific Plan. Due to the flat local topography, portions of the Santa Monica Mountain Range, known as the Hollywood Hills, are visible from the Project Site and surrounding uses. In all directions, except to the south, the long-range visual horizon is primarily obstructed (and dominated) by existing man-made low- and mid-rise buildings and features, including the driving range fence and golf ball light standards on the Project Site, as well as various tall trees in the foreground. Views to the south include limited intermittent long-range views of portions of the Hollywood Hills, with foreground views dominated by existing urban development and tall foliage. Portions of the Los Angeles River are also visible to the south, although heavily obstructed by foliage and greenery.

The primary public views of the Project Site are generally from Whitsett Avenue or Valleyheart Drive. Several of the existing tennis courts (enclosed by fences) on the Project Site are visible from Whitsett Avenue, but are partially obstructed by tall trees. The remaining tennis courts, the greens and fairways of the golf course, and the driving range are not visible from Whitsett Avenue due to fencing and foliage or shrubbery. The taller elements on the Project Site, including the driving range fence, the golf ball light standards in the surface parking lot, several tall trees, as well as the clubhouse structure and putting green along Whitsett Avenue, are clearly visible in the foreground and background from Whitsett Avenue. Some of the tennis court fences are also visible from Valleyheart Drive, but the majority of the Project Site is blocked from view by the existing City of Los Angeles fire station at the corner of Whitsett Avenue and Valleyheart Drive. From Valley Spring Lane and Bellaire Avenue, portions of the golf course greens and fairways are visible through fencing and trees; however, these northern and western portions of the Project Site are not part of the Development Site that will be modified or physically disturbed for the Project. The Project Site may also be visible from vantage points from the Hollywood Hills and taller structures along Ventura Boulevard, although, if so, the views would be partially obstructed by tall trees and foliage on the Project Site and along the Los Angeles River.

(3) *Night Lighting*

The Weddington Golf and Tennis Project Site is bordered by residential uses to the east, north, and west, with the Los Angeles River and commercial uses along Ventura Boulevard to the south. Commercial development and traffic along Ventura Boulevard provide the greatest sources of local illumination. The major sources of nighttime illumination in the immediate Project vicinity are the big-box retail stores (e.g., Bed Bath and Beyond, Staples, Aaron Brothers, etc.) immediately south of the Project Site and Los Angeles River, which generate lighting from surface parking lots, exterior building lighting, and vehicle headlights. Other, smaller commercial uses along Ventura Boulevard, as well as Los Angeles Fire Station No. 78 at the corner of Whitsett Avenue and Valleyheart Drive, are also sources of nighttime illumination and vehicle headlights. The nearest multi-family residences to the Project Site are located across the street on Whitsett Avenue. The nearest single-family residences to the Project Site are located across the street on Valley Spring Lane and Bellaire Avenue.

The Project Site itself also generates nighttime illumination. Current sources of illumination on the Weddington Golf and Tennis Project Site include lighting for the driving range, surface parking lot, and tennis courts, as well as exterior lighting for the clubhouse structure. The sources of illumination from the Project Site are directed on-site, but are visible to surrounding uses—specifically the taller lighting elements such as the 1000-watt stadium style golf ball light standards, which provide light for the driving range, as well as tennis court lighting. Nighttime traffic entering and exiting the Weddington Golf and Tennis Project Site does not significantly contribute to the existing illumination of the area due to the reduced usage of the facilities at night and the existence of a block wall/shrub wall around the perimeter of the parking lot along Whitsett Avenue.

(4) Daytime Glare

Glare may be caused directly by intense illumination or indirectly from the reflection of light off building surfaces. The presence of glare is frequently a subjective issue; however, when glare is excessive, it can cause discomfort, reduction of visibility, and even momentary loss of vision. A common source of adverse glare includes buildings with exterior facades that incorporate highly reflective glass or mirror-like surface materials, which can reflect light when the sun is at a low angle. To a minor extent, evening glare can also be a factor due to vehicle headlights reflecting off reflective surfaces at street level.

The existing structures (i.e., golf clubhouse and small tennis house) on the Project Site have brick and painted wood facades with batten siding, wood shingle roofs, and aluminum-framed glass windows and doors. The driving range contains a wood shelter and high fencing consisting of mesh netting and wooden posts. The tennis courts are enclosed by chain link fencing with non-reflective wind screens. The golf ball light standards are comprised of white and green painted metal. Due to the composition of building materials throughout the Project Site and the low height of the building structures that contain reflective surfaces (i.e., glass windows), the Project is not currently a source of significant glare.

b. Regulatory and Policy Setting

(1) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass

Often spoken of as the South Valley area of the San Fernando Valley, the majority of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”) Area consists of gently sloping plains abutting the northern portions of the Hollywood Hills and located about 11 miles northwesterly of downtown Los Angeles. The Community Plan Area has a pattern of low- to medium-density residential uses, including within portions of the Hollywood Hills, interspersed with a mix of low- and high-intensity commercial uses, especially along Ventura Boulevard, as well as production and post-production uses on industrially zoned properties, such as the CBS Studio Center.

The Community Plan does not identify any significant visual and/or scenic resources within or immediately adjacent to the Project Site. Most significant visual and/or scenic resources in the Community Plan Area are considered in the Mulholland Scenic Parkway Specific Plan Area.

However, the Community Plan does provide generalized urban design policies and standards to ensure that projects, public spaces, and rights-of-way incorporate specific elements of good design. The Community Plan acknowledges that a community's environment can be enhanced by individual projects through promotion of architectural design that enhances quality of life, living conditions, and neighborhood pride of the residents, as well as improvements to the streetscape in commercial corridors, public spaces, and rights-of-way to create continuity and encourage pedestrian and economic activity.

Generally, the Community Plan sets forth planning goals and objectives to maintain the community's visual character by:²

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.
- Improving the function, design, and economic vitality of the commercial corridors.
- Preserving and enhancing the positive characteristics of existing uses, which provide the foundation for community identity, such as scale, height, bulk, setback, and appearance.
- Planning the remaining commercial and industrial development opportunity sites for needed job producing uses that improve the economic and physical condition of the Community Plan Area.

More specifically, the Community Plan includes the following objectives and policies addressing visual character in residential areas:³

Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods.

Policy 1-3.1: Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.

Policy 1-3.2: Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.

Policy 1-3.3: Preserve existing views in hillside areas.

The Community Plan also includes Urban Design guidelines that address individual land uses as well as the overall community design. The design policies establish a minimum level of design

² City of Los Angeles, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan* (Los Angeles: City of Los Angeles, 1998), Chapter II, p. II-2 and II-3.

³ City of Los Angeles, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan* (Los Angeles: City of Los Angeles, 1998), Chapter III, p. III-4.

required in private projects and recommendations for public space improvements. Urban design policies applicable to the Project Site include:⁴

Site Planning. Projects shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents by:

- Providing a pedestrian entrance at the front of each project.
- Requiring useable open space for outdoor activities, especially for children.

Building Design. The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety and monotonous repetition. The following policies are suggested to address building design:⁵

- Require the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building facades.
- Utilize complementary building facades.
- Incorporate varying designs to provide definitions of each floor.
- Integrate building fixtures, awnings, security gates, etc. into the design of the building.
- Screen all rooftop equipment and building appurtenances from adjacent properties.
- Require decorative, masonry walls to enclose trash.

Parking Structures. Parking structures should be integrated with the design of buildings they serve through the following:⁶

- Design parking structure exteriors to match the style, materials, texture, and color of the main building(s).
- Utilize decorative walls and landscaping to buffer adjacent residential uses from parking structures.

Community Design and Landscaping. In addition to the establishment of Design Standards for individual projects, improvements to the streetscape and landscaping of public spaces, roadway medians, and other rights-of-way create an attractive and orderly public realm and contribute to the overall urban aesthetic of a community. It is the intent of these guidelines to improve the environment, both aesthetically and physically, as opportunities in the Sherman Oaks-Studio

⁴ City of Los Angeles, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan* (Los Angeles: City of Los Angeles, 1998), Chapter V, p. V-3 and V-4.

⁵ City of Los Angeles, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-4.

⁶ *Ibid.*

City-Toluca Lake-Cahuenga Pass Community Plan Area occur which involve public improvements or other public and/or private projects that affect public spaces and right-of-ways. The design guidelines in the Community Plan seek to establish standards for a comprehensive streetscape and landscape improvement program for street trees, street lighting, sidewalk/crosswalk paving, street furniture, public signage, and public plazas. The area of the Project Site is not included in the design guidelines as one of the four corridors and/or districts of specific interest for establishment of streetscape and landscape standards.

(2) *Los Angeles Municipal Code (“LAMC”)*

According to LAMC Section 12.21.1, the Project Site is within Extra Limited Height District 1-XL, which permits structures up to two stories and 30 feet in height (to the highest point of the roof). The residential properties surrounding the Project Site, north of the Los Angeles River, are zoned Height District No. 1 with building height limits ranging between 28 and 45 feet. The commercial properties along Ventura Boulevard, south of the Project Site and the Los Angeles River, are zoned Very Limited Height District 1-VL with a building height limit of three stories and 45 feet.

As it pertains to this analysis, additional LAMC requirements regulate such aspects of development as the design of parking facilities and site plan design. Requirements regulating land use controls (that may, in turn, influence the visual character at the Project Site) will be considered as part of the entitlement approval process for the Project.

LAMC Section 91.6306 addresses graffiti removal and deterrence. Specifically, in all buildings, the first nine feet, measured from grade, of exterior walls and doors must be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. The only exception to this requirement is if a building owner files a “Covenant and Agreement Regarding Maintenance of Building (Graffiti Removal)” with the Los Angeles Department of Building and Safety, agreeing to remove the graffiti within seven days of the graffiti being applied or within 72 hours of being notified by the Department of Building and Safety to remove the graffiti. If the building owner fails to abide by the Covenant and Agreement, the Covenant and Agreement may be terminated by the Department of Building and Safety and the above requirements would apply to the building owner.

The Project is also subject to LAMC Section 93.0117, which limits the effect on neighboring residential properties of the light intensity and direct glare from the materials and exterior light sources used in the design. Lighting systems for parking areas for the Project would be subject to LAMC Section 12.21 A.5(k).

(3) *Los Angeles River Improvement Overlay District (“RIO”)*

The City of Los Angeles is currently undergoing an approval process to codify and establish a Supplemental Use District known as the Los Angeles River Improvement Overlay (RIO) District for properties located within a specific boundary area of the city—generally those within approximately 2,500 feet of the Los Angeles River, which includes the Project Site. The purpose

of the RIO District is to assure that development within river-adjacent areas is in accordance with design policies adopted in the City's General Plan Framework while also contributing to the overall environmental and ecological health of the City's watersheds and the L.A. River. If approved by the City, the RIO District would implement development regulations and design guidelines that may affect the design and aesthetics of the Project. If approved, the RIO District requirements on landscaping, screening, exterior lighting, river access and views, and building orientation would be implemented and enforced in the Project design as part of the entitlement approval process.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis considers the overall visual effect anticipated at the Project Site with the development of the SCSLC on the Development Site, including 200 senior living dwelling units within six, four-story buildings, minor reconfiguration of the existing driving range and golf course uses, and demolition of 16 existing tennis courts.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant impact on aesthetics if it would cause any of the following conditions to occur:⁷

- a) Have a substantial adverse effect on a scenic vista;
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- c) Substantially degrade the existing visual character or quality of the site and its surroundings; or
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide,² the determination of significance shall be made on a case-by-case basis, considering the following:

- a) The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;
- b) The amount of natural open space to be graded or developed;

⁷ California Resources Agency, reproduced by AEP, *2011 California Environmental Quality Act (CEQA) Statute and Guidelines*, http://www.califaep.org/index.php?option=com_content&view=article&id=111&Itemid=198 (Jan 2012).

- c) The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- d) The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- e) The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;
- f) The degree to which the project would contribute to the area's aesthetic value;
- g) Applicable guidelines and regulations;
- h) The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- i) Whether the project affects views from a designated scenic highway, corridor, or parkway;
- j) The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- k) The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.
- l) The change in ambient illumination levels as a result of project sources; and
- m) The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

c. Project Impacts

(1) Visual Character/Aesthetics

The proposed Project includes the construction of the 200-unit Studio City Senior Living Center consisting of six four-story buildings on proposed Lot 2 of the Project Site, with associated landscaping, hardscaping, common areas, and amenities. Construction of the senior residential complex and any physical disturbance of the Project Site will be contained within the Development Site on the southeast corner of the Project Site, which is comprised of proposed Lot 2 and small portions of Lot 1 that are adjacent to Lot 2. The physical alterations on Lot 1, which are required to accommodate the Project, will include movement of the existing southern driving range fence approximately 21 feet to the north of its current location, thus eliminating three of the 24 existing tee stands, as well as movement of the existing green/hole for golf hole number five approximately 25 feet to the northwest and the tee for golf hole number six

approximately 90 feet to the west, thus shortening the fairways for the two holes by the respective distances.

Implementation of the Project would result in the replacement of 16 existing tennis courts and associated fencing, nighttime lighting, and a small tennis house on the Project Site. As detailed in *Section IV.D: Environmental Impact Analysis – Cultural Resources* of this Draft EIR, although the golf course, driving range, golf clubhouse, and golf ball light standards on the Project Site are considered eligible as historic resources on the California Register, the tennis courts and appurtenances to be removed for the Project are not considered historical resources. The tennis courts, which are all enclosed by approximately 12-foot-high windscreen fencing, as well as the lighting and tennis house, are not noted or valued for their visual character or aesthetic contribution to the Project Site. As such, demolition of the tennis courts, including the fencing, nighttime lighting, and small tennis house would not substantially alter the valued visual character or image of the immediate area.

The golf course and the driving range, which are the existing elements to be slightly modified (in specific locations) as part of the Project, are considered eligible for listing as historic resources in the California Register, and thus, may be considered a valuable visual element to maintain the visual character of the Project Site. As such, extensive modification or complete removal of these uses may constitute a significant change and impact to the visual character of the Project Site and immediate area. However, as proposed, the minor modifications to the southeastern portion of the golf course turf and the southern portion of the driving range fence will not substantially alter the visual character of the Project Site nor the general image of the immediate area. The areas to be modified will continue to be used as turf for golf course purposes and fencing for the driving range. The fairways for golf hole numbers five and six will be shortened; however, the fairways, greens, and tees will be recreated to appear similar to those that currently exist. No stands of trees are anticipated to be affected by the reconfiguration of the two golf hole fairways. The overall visual character and aesthetic of the golf course as a green open space with an abundance of aged trees, used for a nine-hole pitch-and-putt golf course, will remain intact.

The movement of the southern fence of the existing driving range is not anticipated to alter the appearance, alignment, or direction of the fence—only the location. Although the driving range modification will eliminate three existing southern tee stands, these changes are not anticipated to alter the overall visual character of the driving range or the Project Site, due to the retention of all existing visual elements on the driving range, including the 230-yard fairway, the varying approximately 40- to 70-foot screen fence, 21 tee stands, and the wooden shed-style canopy that shelters the northern half of the tee stands. As a result, the impact on visual character of eliminating and/or modifying existing structures and elements on the Project Site would be less-than-significant.

The six four-story buildings proposed for the Project would be similar in size and mass to several existing multi-family residential buildings across the street from the Project Site along Whitsett Avenue. The design of the new buildings would incorporate many of the architectural elements that are present in the surrounding multi-family residential buildings, as well as in the community in general, such as the use of cultured stone, clay tile roofing, pitched roofs, earth tone colors, and wrought iron. *Figure II-8: Elevations and Sections, Figure II-9: Buildings 1*

Through 5 Typical Floor Plan, and Figure II-10: Building 6 Typical Floor Plan (in Section II: Project Description) show the proposed general configuration and appearance of the SCSLC buildings. Each building will be a maximum of four stories tall and up to (and not exceeding) 45 feet in height. The entrances into all the buildings will face the interior courtyard of the development, which will be fenced and gated. The proposed subterranean parking structure for the complex will not be visible at or above grade.

The architectural style and treatment will be consistent throughout all the buildings in the complex. Primarily, the building façades will be treated with a combination of cultured stone, cement plaster, and glass as shown in *Figure II-8: Elevations and Sections*. Also, the Project will be designed in accordance with LAMC Section 91.6306, addressing graffiti removal and deterrence. Specifically, in all buildings, the first nine feet, measured from grade, of exterior walls and doors must be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel, or a renewable coating of an approved, anti-graffiti material or a combination of both. The only exception to this requirement is if a building owner files a “Covenant and Agreement Regarding Maintenance of Building (Graffiti Removal)” with the Los Angeles Department of Building and Safety, agreeing to remove the graffiti within seven days of the graffiti being applied or within 72 hours of being notified by the Department of Building and Safety to remove the graffiti. If the building owner fails to abide by the Covenant and Agreement, the Covenant and Agreement may be terminated by the Department of Building and Safety and the above requirements would apply to the building owner.

The new SCSLC buildings will be buffered from the existing golf course and driving range uses by greenery, hedging, fencing, and existing stands of tall trees on the Project Site. Access will be provided to the 22-space golf course and driving range parking lot from the senior housing complex to provide visual and physical connectivity, and to unify the golf course uses on Lot 1 with the residential uses on Lot 2. Landscaping will be provided and trees will be planted throughout the senior residential complex that is consistent with landscaping and trees on the golf course and throughout the adjacent neighborhood. As a result, with the appropriate Project Design Features and Mitigation Measures to ensure visual consistency of landscaping, trees, and building materials with the existing golf course on the Project Site and the surrounding residential community, the impact on visual character of constructing new uses and structures on the Project Site would be less-than-significant.

During construction activities for the Project, the visual character of the Project Site will reflect short-term changes, as some of the construction activities will be visible from adjacent land uses. As all of the demolition and construction will be located within the Development Site on the southeastern portion of the Project Site, all of the noticeable construction activity will be along Whitsett Avenue. As such, construction security fencing, noise barriers, and staging areas may be visible from Whitsett Avenue during the short-term construction phase. These construction elements will not be visible or will be highly obstructed in view from Valley Spring Lane and Bellaire Avenue, due to the buffer from the Development Site provided by the golf course and the tall trees lining the northern and western perimeter of the Project Site.

During construction, equipment and materials would be stored on the Project Site, and temporary facilities (such as construction trailers, staging sites, and portable toilets) would be stored onsite and could potentially cause aesthetic blight to those in direct view of the materials, equipment, and facilities. However, this potential aesthetic blight would be screened by temporary construction fencing. As required by Mitigation Measure MM AES-2, because of the potentially ongoing golf course and driving range operations, efforts will be made by the developers to continue to present an attractive community presence throughout the duration of the construction activities. Further, as required by Mitigation Measure MM AES-3, to enhance safety concerns, construction areas will be clearly partitioned and visually segregated from public areas.

Although construction-related structures and activities would create a notable change to the visual character of the Project Site along part of Whitsett Avenue, these changes would extend only for the duration of the construction activities (approximately 24 months). Following the completion of construction, Lot 1 of the Project Site, containing the golf course, driving range, and golf clubhouse, would resume the visual character that currently exists, while Lot 2 will maintain a visual character, aesthetics, and architecture that are consistent with the surrounding multi-family residential uses.

Finally, as part of the Project, it will be necessary to remove a number of existing trees for grading, construction, and development of the senior living center. Removal of large stands of trees or trees with unique appearances may affect the overall visual character of the Project Site. As detailed in *Section IV.C: Environmental Impact Analysis – Biological Resources* of this Draft EIR, approximately nine trees are anticipated for removal on the Development Site. The trees are all non-protected species, and include “of-size⁸” Aleppo pines, Montebello ash, Mexican fan palms, Queensland umbrella tree, Benjamin fig, and an orange tree.

Two of the trees, a Mexican fan palm and an orange tree, to be removed within the interior portion of the Development Site, adjacent to the tennis courts, are singular ornamental trees that are isolated from the heavier stands of trees throughout the golf course and along the Los Angeles River right-of-way. These two trees are not unique in appearance, and are not visible from any surrounding street. Removal of these trees would not affect the tree canopy or visual character of the Project Site with regards to foliage cover.

The seven remaining trees anticipated for removal consist of singular ornamental trees and one small grouping, situated closer to Whitsett Avenue, within the existing surface parking lot and adjacent to the existing tennis courts. These seven trees are more visible from Whitsett Avenue, but they do not contribute significantly to the visual character or foliage canopy of the Project Site. The trees are generally isolated from the larger stands of trees throughout the golf course, along the Los Angeles River, and along Valley Spring Lane. The trees to be removed also do not appear especially unique in appearance. No trees in the public right-of-way are planned for removal, and as such, the appearance of the tree line along the Project Site frontage will not be significantly altered. All trees to be removed near Whitsett Avenue are set back from the Project Site frontage and removals will not impact the visual continuity of the tree line, hedging, or golf

⁸ “Of-size” trees refer to ornamental trees that measure at least 8 inches or more in cumulative trunk diameter(s) at 4.5 feet above existing grade. (Source: Horticultural Tree Report, *Appendix J* of this Draft EIR)

ball light standards along the frontage. As a result, the impacts on visual character of removing existing trees on the Project Site would be less-than-significant. Further details about tree removal impacts and mitigations are discussed in *Section IV.C: Environmental Impact Analysis – Biological Resources* of this EIR.

(2) *Viewsheds*

Implementation of the Project would increase visibility of development at the Project Site. The majority of the 16 existing tennis courts to be removed for the Project are interior and not visible from surrounding streets; however, the 12-foot-high screening fences for certain tennis courts with frontage on Whitsett Avenue and adjacent to the Los Angeles fire station, are visible along Whitsett Avenue and at the terminus of Valleyheart Drive. The nighttime lampposts for the tennis courts are also visible, as they extend above the 12-foot windscreen fencing. Much of the fencing for the tennis courts along Whitsett Avenue is set back from the street due to an existing surface parking lot fronting on Whitsett Avenue, while other parts of the fencing are relatively obscured from view by foliage and trees. There are very limited views of the tennis courts and the 12-foot-high fencing from Valleyheart Drive due to view obstruction by the Los Angeles fire station, the maintenance facilities for the golf course, and heavy tree cover. A small, one-story tennis house is also visible from Whitsett Avenue. The tennis courts, including fencing and tennis house, would be replaced with six four-story buildings with associated landscaping and hardscaping as part of the SCSLC development. The buildings would be taller than all existing development on the Project Site, with the exception of the driving range fence and many tall trees within the golf course, but of similar height and massing to the surrounding residential buildings along Whitsett Avenue.

The footprint of the senior housing complex would be similar to the existing footprint of the 16 tennis courts with the intention to preserve the location and configuration of the golf course and driving range to the extent possible. The Project will increase the general height and massing of the Project Site by converting part of the existing footprint from 16 tennis courts with approximately 12-foot-high fencing into six residential condominium buildings that extend 45 feet high.

With respect to views of the existing golf course, driving range, and golf clubhouse from surrounding streets, even with an increase in building height and massing on the southeast portion of the Project Site, views would not be affected by Project development. Currently, the greens and tees for the golf course and driving range are not visible from Whitsett Avenue due to fencing and hedging obstructions. As such, the Project development would not create any additional view obstructions of those uses. However, the taller elements, such as the driving range fence and the golf ball light standards are visible from Whitsett Avenue. Views of these elements would be largely unaffected by the Project buildings. It is possible, however, from certain viewpoints along Whitsett Avenue, that views of the approximately 40- to 70-foot driving range fence in the background may be partially obscured by the 45-foot-high senior housing buildings in the foreground. Additionally, although five of the eight existing golf ball light standards may be removed from their current locations to accommodate the Project and relocated to undetermined locations on the Project Site, in accordance with required Mitigation Measure MM AES-4, these light standards will be situated so that they remain on the Project Site and are

visible to the public, whether they continue to light the adjacent driving range or not. It is likely that the removed golf ball light standards will be relocated to the portion of the surface parking lot that will remain on the project site after project development; however, the relocations have yet to be finally determined.

Currently obstructed views of the golf course, driving range, and golf clubhouse from Valley Spring Lane would be unaffected by development of the Project. Limited views of the golf course from Bellaire Avenue would also be unaffected by the Project. No public views are currently available from the south of the Project Site within the Los Angeles River right-of-way, as public access to this area is currently restricted.

Further south, only views of the golf course greens and driving range fence are available from Valleyheart Drive (the segment south of the Los Angeles River), and are highly obstructed by trees and foliage. The Project would not affect current visibility of the golf course greens from Valleyheart Drive, but may further obstruct visibility of the driving range fence. However, due to the approximately 40- to 70-foot height of the fencing, it may still be visible above the 45-foot height of the Project buildings. Further to the south, views of only the golf course and driving range fence are available from Ventura Boulevard, and these views are largely obstructed by existing commercial development, the Los Angeles fire station, and tall trees that line the Los Angeles River. As such, the Project height and massing will have a negligible impact on views from Ventura Boulevard.

Views of the golf course, driving range, and golf clubhouse, may be available from higher viewpoints in the Hollywood Hills. An increase in height and massing on the existing tennis court footprint may obstruct additional minor portions of the driving range or golf course greens adjacent to proposed Lot 2, but the effects would be negligible. As a result, the impact on views of the existing golf course, driving range, and golf clubhouse caused by increasing height and massing on the Project Site would be less-than-significant.

With respect to overall viewsheds in the immediate area, according to the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the Project Site is not located within any important scenic viewshed, including the Mulholland Scenic Parkway Specific Plan. From Whitsett Avenue, short- and mid-range viewsheds toward the Project Site would be dominated by the Project buildings on the southern half of the street frontage, some of which will be obscured by existing trees along Whitsett Avenue. Long-range views of tall trees on the golf course and of the Hollywood Hills from Whitsett Avenue may be obscured by the new Project buildings. The long-range viewsheds from Whitsett Avenue are already obscured by tall trees and the Los Angeles fire station in the foreground, but the Project may further obscure views of the Hollywood Hills and the taller trees visible on the golf course in the distance. However, these features are not considered scenic resources, do not constitute scenic vistas, and are already obstructed by features in the foreground along Whitsett Avenue.

From Valley Spring Lane, short-range viewsheds consist primarily of golf course greens, fencing, and heavy foliage along the northern perimeter of the golf course. Mid-range viewsheds are heavily obscured by foreground foliage and fencing, and include golf course greens, portions of the driving range, and limited views of the tennis court fencing in the distance. Long-range

views included very limited viewsheds of the Hollywood Hills in the background from specific viewpoints along Valley Spring Lane. Due to the highly obstructed short-, mid-, and long-range views, the proposed Project buildings will have a negligible impact on viewsheds from Valley Spring Lane. Similarly, the Project will not be visible from Bellaire Avenue, which currently has short-, mid-, and long-range views of only the golf course greens, heavily obstructed by foreground foliage and fencing. Additionally, no public viewsheds are currently available from the south of the Project Site within the Los Angeles River right-of-way, as public access to this area is currently restricted.

Further south, along Valleyheart Drive (the segment south of the Los Angeles River), short-range viewsheds towards the Project Site include a heavy cover of street trees and the Los Angeles River. Mid- and long-range viewsheds include limited views of the golf course greens and driving range fence, as well as tall trees and foliage throughout the Project Site. The Project buildings would not affect the short-range viewsheds of the Los Angeles River and may obscure mid- and long-range viewsheds of the driving range fence and tall trees on the Project Site. However, these features are not scenic resources, do not constitute scenic vistas, and are already obstructed by street trees in the foreground along Valleyheart Drive.

Further to the south, along Ventura Boulevard, short- and mid-range viewsheds towards the Project Site include big-box commercial development, surface parking lots, and street trees along Ventura Boulevard and Valleyheart Drive (segment south of the Los Angeles River). Long-range viewsheds include the tall trees on the Project Site and very limited views of the existing tennis court screening and the driving range fence. These visible features are not scenic resources and do not constitute a scenic vista. Further, as views of the Project Site are already heavily obscured by foreground commercial development, trees, and foliage, the development of the Project would have a negligible impact on viewsheds towards the Property along Ventura Boulevard.

Figure IV.A-23: Conceptual View of Project – Whitsett Avenue, Figure IV.A-24: Conceptual View of Project – Whitsett Avenue Near Valleyheart Drive South Roadway, Figure IV.A-25: Conceptual View of Project – Valleyheart Drive South Roadway Near Whitsett Avenue, Figure IV.A-26: Conceptual View of Project – Valleyheart Drive South of Los Angeles River – Through Foliage, Figure IV.A-27: Conceptual View of Project – Valley Spring Lane, and Figure IV.A-28: Conceptual View of Project – Elevated View From Hollywood Hills South of Ventura Boulevard, show viewsheds toward the Project Site and demonstrate the context of the urban development in the Project area. The Project would be most visible and prominent in the foreground along Whitsett Avenue as shown in *Figure IV.A-23*. With the exception of the driving range fencing/netting, the golf course and driving range are currently obstructed from view along Whitsett Avenue by existing tennis court fencing and parking lot hedging. The Project structures would continue to obstruct views of the golf course and driving range along Whitsett Avenue. The driving range fence would likely also continue to be visible above the height of the Project structures. The Project is also anticipated to be visible in the background from elevated viewpoints in the Hollywood Hills as shown in *Figure IV.A-28*, with possible foreground obstructions from foliage and structures not accounted for in the rendering. The large, big-box commercial uses and surface parking lots along Ventura Boulevard would continue to be a prominent mid-ground sight from the Hollywood Hills.

The Project may be partially visible in the distance from Valleyheart Drive south of the Los Angeles River as depicted in *Figure IV.A-26*. However, as shown earlier in *Figure IV.A-10: Views of Project Site -Northwest Valleyheart Drive Location Across Los Angeles River* and *Figure IV.A-11: Views of Project Site -Southeast Valleyheart Drive Location Across Los Angeles River*, there is a heavy stand of trees and foliage along Valleyheart Drive south of the Los Angeles River, which will obstruct many views of the Project. The Project may also be partially visible in the distance from certain residences along Valley Spring Lane that are nearer to the intersections with Babcock Avenue and Beeman Avenue, as depicted in *Figure IV.A-27*. However, as shown earlier in *Figure IV.A-6: Views of Project Site – Corner of Valley Spring Lane and Babcock Avenue*, *Figure IV.A-7: Views of Project Site – Corner of Valley Spring Lane and Beeman Avenue*, *Figure IV.A-8: Views of Project Site – Corner of Valley Spring Lane and Teesdale Avenue*, there are stands of trees, heavy foliage, hedging, fencing, the driving range, and the golf course clubhouse, which would largely obstruct views of the Project structures from these residences. The senior housing complex would not be visible from residences or viewpoints along the western Project Site boundaries including Bellaire Avenue and parts of Valley Spring Lane.

From viewpoints to the south of the Project Site (i.e. along Valleyheart Drive and Ventura Boulevard), as depicted in *Figure IV.A-24* and *Figure IV.A-25*, foreground and background views are dominated by existing development. With development of the Project, either the upper stories of the new Project buildings would be visible behind the existing, adjacent fire station or the Project would be completely obstructed by the existing development.

The height and massing of the Project would be consistent with the surrounding multi-family residential buildings, specifically along Whitsett Avenue. As the Project would incorporate many of the architectural elements that are present in surrounding multi-family residential buildings, the Project would appear as a continuation of existing background features. Overall views from surrounding areas would not be significantly impacted due to the existing development and landscaping surrounding the Project Site, which already obscure and limit views to and from the Project Site. Furthermore, the Project Site and surrounding area are not considered scenic resources and do not constitute scenic vistas according to the Community Plan. Although the immediate views of the Project Site would be of the intensified development, the senior housing complex would be visually consistent with the surrounding residential structures. Therefore, less-than-significant impacts to existing viewsheds are expected.

(3) *Nighttime Illumination*

The Project would provide additional sources of nighttime illumination with security lighting, landscape lighting, exterior building and courtyard lighting, and interior building lighting. The Project would eliminate existing lighting used for the 16 tennis courts that will be removed, and would retain existing driving range and parking lot lighting, including the eight golf ball light standards along Whitsett Avenue.



FIGURE IV.A-23
CONCEPTUAL VIEW OF PROJECT -WHITSETT AVENUE



FIGURE IV.A-24
CONCEPTUAL VIEW OF PROJECT - WHITSETT AVENUE NEAR VALLEYHEART DRIVE SOUTH ROADWAY



FIGURE IV.A-25
CONCEPTUAL VIEW OF PROJECT -VALLEYHEART DRIVE SOUTH ROADWAY NEAR WHITSETT AVENUE



FIGURE IV.A-26
CONCEPTUAL VIEW OF PROJECT -VALLEYHEART DRIVE SOUTH OF LOS ANGELES RIVER -THROUGH FOLIAGE



FIGURE IV.A-27
CONCEPTUAL VIEW OF PROJECT - VALLEY SPRING LANE



FIGURE IV.A-28
CONCEPTUAL VIEW OF PROJECT -ELEVATED VIEW FROM HOLLYWOOD HILLS SOUTH OF VENTURA BOULEVARD

Project lighting for the senior residential buildings would be similar to that of the existing multi-family residential buildings along Whitsett Avenue and would be designed to minimize any adverse impacts. The SCSLC will incorporate interior lighting systems that utilize occupancy sensors that will shut off unnecessary/unused lights, which would reduce the amount of lighting visible to the surrounding area. All new exterior lighting would be directed downward for illumination onsite, would be “dark-sky compliant”, and/or would be shielded with visors/louvers to minimize light spillover for areas offsite.

Night lighting from the SCSLC may be visible from multi-family residential developments along Whitsett Avenue across from the development, the Christian Science Church on the northeast corner of Whitsett Avenue and Valleyheart Drive, and from the Los Angeles fire station adjacent to the Project Site. Lighting from the Project would not significantly impact the surrounding uses and would not significantly increase the intensity of existing nighttime illumination on the Project Site. Currently, each of the 16 tennis courts at the Project Site contains eight lamps for nighttime play that extend above the screen fencing for the courts. As such, lights from a total of 128 lamps, directed onsite, are currently visible from the surrounding uses. Additionally, the Project Site is brightly lit by eight approximately 20-foot golf ball light standards, directed onsite toward the driving range, and retrofitted with 1000-watt stadium style lights, which are currently visible from the surrounding uses. The tennis courts and associated nighttime lighting will be replaced by the Project, which will contain lighting directed onsite or shielded, which is typical of multi-family residential dwellings. The intensity of the Project lighting will not be greater than the intensity of the tennis court lighting that currently exists (and to be removed). Much of the Project’s exterior lighting will be used for the interior courtyard of the complex, which will largely be shielded from view on surrounding properties by the Project buildings and stands of landscape trees. The lighting for the Project will not appear more intense than the similarly lighted multi-family residential buildings, the Los Angeles fire station, nor the Christian Science Church on Whitsett Avenue. As such, the Project would not significantly impact the nighttime illumination levels for the immediately adjacent or surrounding properties.

At 45 feet in height, the senior housing buildings will not be significantly taller than the surrounding buildings along Whitsett Avenue, and thus the nighttime lighting will not be visible to properties outside of the immediate surrounding area. Views of the Project’s nighttime lighting from the single- and multi-family residential dwellings on both Valley Spring Lane and Bellaire Avenue would largely be unnoticeable or unseen due to the distance of these properties from the senior housing complex, as well as the intervening tree foliage and stadium-style lighting that currently emanates from the approximately 20-foot-high golf ball light standards for the existing driving range. Similarly, the Project would not have significant impacts on the already brightly lit Ventura Boulevard due to the intervening effects of tree foliage along the Los Angeles River, as well as nighttime lighting from existing commercial development, big-box retail, and associated parking lots along the corridor. Finally, the Project would not significantly impact residences in the Hollywood Hills and other outlying areas due to the distance of these areas from the SCSLC and the cumulative illumination effect from the intervening commercial development on Ventura Boulevard (i.e., the incremental effect of additional lighting due to the Project would be negligible at these distances). Therefore, no significant adverse illumination impacts are expected to occur.

(4) *Daytime Glare*

The SCSLC building façades will be treated with a combination of stone, cement plaster, and glass for windows and doors. The glass surfaces are not continuous along the façades of the buildings and would be broken up by the cement plaster walls, cultured stone base, balusters, balconies, landscaping, and other architectural detailing, thereby minimizing the potential for glare at ground-level and from early morning or late afternoon sun on the upper levels. Compliance with LAMC Section 93.0117 (reflective materials design standards), which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact for building material glare. Implementation of the Project would not produce glare that would create a visual nuisance and, therefore, would not result in a significant impact.

(5) *Consistency with Adopted Plans and Policies*

The Community Plan identifies the Project Site as an Open Space land use with a private golf course designation. The Project is consistent with the Community Plan, in part due to the fact that the Project preserves the pitch-and-putt golf course, driving range, and golf clubhouse, which have long been recognized by the community as an established use in this area. Further, the Project is consistent because it furthers the Urban Design policies and guidelines identified above (i.e., as through physical site improvements) and indirectly supports those policies by not creating obstacles for their realization. The Project implements many of the site planning, building height, pedestrian-orientation, lighting and landscaping guidelines identified in the Urban Design section of the Community Plan for multi-family residential uses. Pedestrian-orientation is also addressed in detail in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* of this Draft EIR. The Project would result in a less-than-significant impact to aesthetic-related and urban design consistency and compatibility issues in the project area as demonstrated by the Project's consistency with applicable policies and programs of the Community Plan. A more detailed and complete analysis of the Project's consistency with the Community Plan can be found in *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this Draft EIR.

It should be noted that the City of Los Angeles is currently undergoing an approval process to codify and establish a Supplemental Use District known as the Los Angeles River Improvement Overlay District (RIO) for properties located approximately 2,500 feet from the Los Angeles River, which includes the Project Site. The RIO District has not been adopted as a plan or policy. In initial examination of the draft proposed ordinance for the RIO District, it appears that the Project design would be compliant with the development regulations and design guidelines of the plan. Full adoption of the RIO District would require the Project to be evaluated for compliance in design and relation to the Los Angeles River, as enforced by the City.

d. Cumulative Impacts

Development of the Related Projects would incrementally increase the intensity and urbanization of the Project area. As required by the City of Los Angeles, the Project design must be reviewed by the Los Angeles City Department of Planning for consistency with applicable Los Angeles codes and regulations prior to final plan approval.

(1) *Visual Character*

Impacts to aesthetics are generally site specific and localized. As discussed above, the Project is anticipated to result in a less-than-significant aesthetic impact to the visual character along all Project Site frontages. The Project is located within a neighborhood dominated by single- and multi-family residential dwellings and with commercial development primarily along Ventura Boulevard, all consisting of low- and mid-rise structures. None of the Related Projects are located within the immediate Project area or immediately surrounding streets. The nearest Related Project includes a proposal for a mixed-use residential/retail project (Related Project LA1 at 12548 Ventura Boulevard) directly to the south of the Project Site, on the south side of Ventura and buffered from the Project Site by the big-box retail along the Los Angeles River. In examination of the proposal, the Related Project would be constructed consistent with the Community Plan standards and the proposed use would be consistent with the surrounding area and character of Ventura Boulevard. Development of the proposed Project in conjunction with the Related Projects would result in redevelopment or infilling of residential and commercial land uses throughout the community. As a result, the Project would not contribute to a potential cumulative impact to visual character in the Project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to visual character. Therefore, cumulative visual character impacts of Related Projects are considered to be less-than-significant.

(2) *Alteration of Views*

Although aesthetic impacts are generally site specific to the local setting, impacts that may affect panoramic viewsheds or recognized visual resources can have an effect on a broader area. As discussed above, the Project is anticipated to result in a less-than-significant impact to views from surrounding development. All the Related Projects would not be at a scale or height to impact views. The inactive status 391-unit apartment and coffee house development at 11617 Ventura Boulevard (Related Project LA5) and the approved status 270-unit condominium Sherman Village project at 12629 Riverside Drive (Related Project LA4) appear to be the largest in scale of the Related Projects. However, these Related Projects are not of such great height and mass that would affect or significantly alter views in their immediately surrounding areas. Further, as depicted in *Figure III-1: Location of Related Projects* in *Section III: General Overview and Environmental Setting*, most of the Related Projects are spaced a sizeable distance from each other and are not closely concentrated in a single area. Therefore, these projects are not anticipated to have a significant cumulative impact to views within the Project area. The Project would not contribute to a potential cumulative impact to views or viewsheds in the Project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to aesthetics. Therefore, cumulative impacts related to viewsheds affected by Related Projects are considered to be less-than-significant.

(3) *Lighting and Glare*

Build-out of Related Projects in the Project area will contribute to the overall levels of nighttime illumination and glare in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. Nighttime illumination would cumulatively increase with these developments; however, the Related Projects are located along and spread throughout Ventura Boulevard, a highly commercialized corridor with a high degree of existing nighttime illumination. The additional glow from these projects is considered negligible and not cumulatively considerable, based on comparison to the existing conditions for the densely commercial corridor. Glare and direct lighting are site-specific concerns that would be addressed through the separate, site-specific environmental analysis prepared for each Related Project and, if necessary, mitigated appropriately. Further, the Project and the Related Projects are subject to the LAMC Section 93.0117 reflective materials design standards, which limit reflective surface areas and materials that could contribute to glare. Thus, potential glare created from these Related Projects is not cumulatively considerable. Such mitigation would contribute to the reduction of nighttime illumination as well. Because the Project would not contribute significantly toward increased nighttime lighting levels in the immediate area, its cumulative contribution to lighting is considered to be less-than-significant.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific aesthetic impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- As required by LAMC Section 12.40, the site shall be required to prepare a Landscape Plan, which shall address replacement of removed trees.
- The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Section 91.6306.
- The residential component of the Project shall be subject to the City of Los Angeles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits light source intensity and reflective glare.
- Exterior lighting shall be directed onsite to minimize nighttime lighting illumination and light spillover onto neighboring properties.

b. Project Design Features (PDFs)

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

PDF AES-1: The Project shall include an exterior lighting design that will minimize nighttime illumination.

c. Mitigation Measures

The Project will result in less-than-significant operational aesthetic impacts. To ensure that the aesthetic impacts are less-than-significant during the construction phase of the Project, the following Mitigation Measures shall be implemented:

MM AES-1: During the construction/demolition phase of the Project, equipment, materials, and temporary facilities (such as construction trailers, staging sites, and portable toilets) shall be stored on the Project Site and screened by temporary construction fencing.

MM AES-2: Due to potentially ongoing golf course and driving range operations during the construction/demolition phase of the Project, efforts shall be made by the developer to continue to present an attractive community presence through construction screening (i.e., fencing) that is sufficient enough to screen the construction site from view along Whitsett Avenue and from the golf course/driving range, and through responsible cleanup of dirt, debris, and materials around and outside the construction site screening.

MM AES-3: To enhance safety, construction areas shall be clearly partitioned and visually segregated from public areas.

MM AES-4: Any existing golf ball light standards removed from their current locations shall be retained and relocated so that they remain on the property and continue to be visible to the public, whether they are utilized for lighting purposes or not.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts during operations, with regard to visual character, views, illumination, and glare, are less-than-significant. During the construction and demolition phase of the Project, aesthetic impacts would be temporary and applicable only to uses immediately surrounding the Project Site and with direct view to the Development Site; however, with implementation of the above Mitigation Measures, any potential, short-term aesthetic impacts related to construction and demolition would be reduced to a less-than-significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS

B. AIR QUALITY

1. INTRODUCTION

The following analysis of air quality impacts is based primarily upon the *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates and dated June 27, 2013, and which is incorporated herein. The air quality report, including the applicable calculation sheets, are provided in *Appendix B: Air Quality and Noise Assessments* of this Draft EIR.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) *Air Quality Terms and Characteristics*

This section examines the degree to which the proposed Project may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities on the Development Site (area of physical disturbance within the Project Site), such as site grading and haul truck trips, and long-term effects related to the ongoing operation of the Project are discussed in this section. This analysis focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the quantity of pollutant released into the air, measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($\text{PM}_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

Carbon Monoxide. CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spacial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and

February.¹ The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Ozone. O₃ is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), which includes volatile organic compounds (VOC) and nitrogen oxides (NO_x), react in the presence of ultraviolet sunlight. O₃ is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x, the components of O₃, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The primary source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide. NO₂, like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase of bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 ppm.

Sulfur Dioxide. SO₂ is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{2.5} and PM₁₀ represent fractions of particulate matter. Fine particulate matter, or PM_{2.5}, is roughly 1/28 the diameter of a human hair. PM_{2.5} results from fuel combustion (e.g., motor vehicles, power generation and industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as SO₂, NO_x and VOC. Inhalable particulate matter, or PM₁₀, is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction,

¹ Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead. Pb in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Toxic Air Contaminants. Toxic air contaminants (TACs) are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Other factors, such as the amount of the chemical, its toxicity, and how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility, and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust and may exist as PM₁₀ and PM_{2.5} or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.

The emission of toxic substances into the air can be damaging to human health and to the environment. Human exposure to these pollutants at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental,

and respiratory problems. Pollutants deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act (AB 2588, 1987) is a State law requiring facilities to report emissions of TACs to air districts. The program is designated to quantify the amounts of potentially hazardous air pollutants released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks.

The State Air Toxics Program (established through AB 2588) identified over 200 TACs, including the 188 TACs identified in the federal Clean Air Act. The United States Environmental Protection Agency (USEPA) has assessed this expansive list of toxics and identified 21 TACs as Mobile Source Air Toxics (MSATs). MSATs are compounds emitted from highway vehicles and nonroad equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the six priority MSATs: benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1,3-butadiene. While these six MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules.

To date, the most comprehensive study on air toxics in the South Coast Air Basin (Basin) is the Multiple Air Toxics Exposure Study (MATES-III), conducted by the South Coast Air Quality Management District (SCAQMD), a local agency created to coordinate air quality planning efforts throughout Southern California (the description of the agency to be elaborated upon later). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-III found that the average cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million.

Diesel Particulate Matter. According to the 2006 California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines (diesel PM). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances.

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or

composition. Fine and ultra fine diesel particulates are of the greatest health concern, and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on road diesel engines of trucks, buses, and cars and the off road diesel engines that include locomotives, marine vessels, and heavy duty equipment. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to diesel PM is breathing the air that contains diesel PM. The fine and ultra-fine particles are respirable (similar to $PM_{2.5}$), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lungs. Exposure to diesel PM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from both short-term or acute exposures, and long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on exposure to just diesel PM but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes acute and chronic health effects.

Acute exposure to diesel exhaust may cause irritation to the eyes, nose, throat, and lungs, some neurological effects such as lightheadedness. Acute exposure may also elicit a cough or nausea as well as exacerbate asthma. Chronic exposure to diesel PM in experimental animal inhalation studies has shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that diesel exhaust is a likely carcinogen. Human epidemiological studies demonstrate an association between diesel exhaust exposure and increased lung cancer rates in occupational settings.

Unlike other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, California Air Resources Board (CARB) has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM.

Diesel PM poses the greatest health risk among these ten TACs mentioned. Based on receptor modeling techniques, SCAQMD estimated that diesel PM accounts for 84 percent of the total risk in the South Coast Air Basin.

(2) *Regional Air Quality and Climatology*

The Project Site is located within the Los Angeles County portion of the South Coast Air Basin (Basin), which will be described later. Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the Basin.

The Basin is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. This Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature and winds throughout the region.

The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO₂ react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO₂ emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 P.M.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. NO₂ levels are also generally higher during fall and winter days.

(3) *Local Climate*

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Within the Project Site and its vicinity, the average wind speed, as recorded at the Burbank Wind Monitoring Station, is approximately four miles per hour, with calm winds occurring approximately ten percent of the time. Wind in the vicinity of the Project Site predominately blows from the southwest.²

The annual average temperature in the Project area is 64.1 degrees Fahrenheit (°F). The Project area experiences an average winter temperature of approximately 55.2°F and an average summer temperature of approximately 73.1°F. Total precipitation in the Project area averages approximately 16.5 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately ten inches during the

² SCAQMD, Meteorological Data, available at <http://www.aqmd.gov/smog/metdata/MeteorologicalData.html>, accessed November 30, 2011.

winter, approximately four inches during the spring, approximately two inches during the fall, and less than one inch during the summer.³

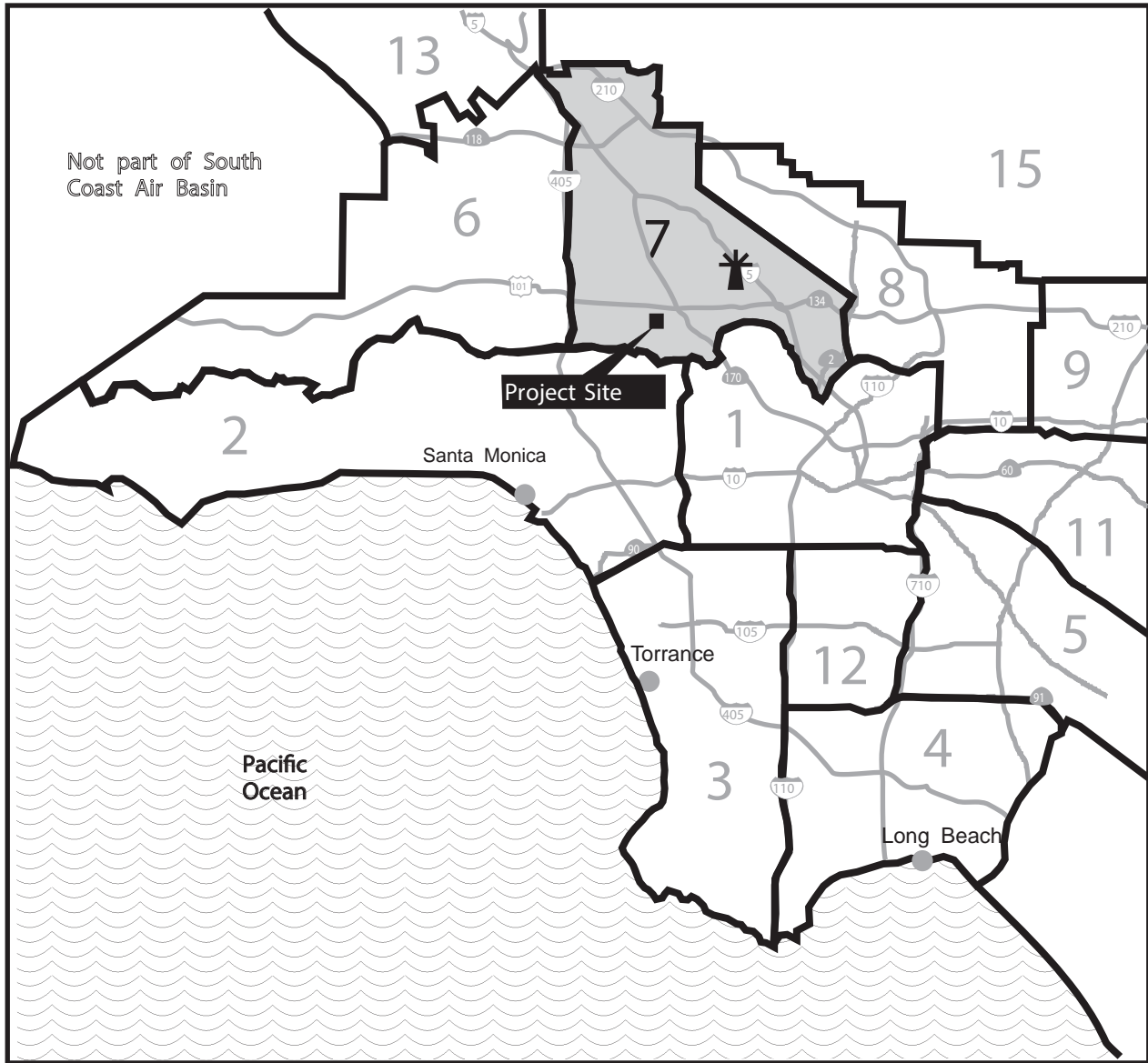
(4) *Air Monitoring Data*

The SCAQMD monitors air quality conditions at 38 locations throughout the Basin. The Project Site is located in SCAQMD's East San Fernando Valley Air Monitoring Subregion, which is served by the Burbank – West Palm Avenue Monitoring Station. The Burbank – West Palm Avenue Monitoring Station is located approximately 5.5 miles northeast of the Project Site near the intersection of Victory Boulevard and Olive Avenue. Historical data from the Burbank Monitoring Station were used to characterize existing conditions in the vicinity of the Project area. Criteria pollutants monitored at the Burbank Monitoring Station include O₃, CO, NO₂, PM₁₀, PM_{2.5}, and SO₂. The locations of the relevant air monitoring stations, including the Burbank Monitoring Station, in relation to the Project Site, are shown in *Figure IV.B-1: Air Monitoring Areas*.

Table IV.B-1: 2008-2010 Ambient Air Quality Data shows pollutant levels, the State standards, and the number of exceedances recorded at the Burbank Monitoring Station from 2008 to 2010.⁴ As *Table IV.B-1* indicates, criteria pollutants CO, NO₂, and SO₂ did not exceed the State standards from 2008 to 2010. However, the one-hour State standard for O₃ was exceeded 3 to 20 times during this period while the one-hour federal standard for O₃ was exceeded zero to one time during this period. The eight-hour State standard for O₃ was exceeded 9 to 34 times while the federal standard for O₃ was exceeded four to 17 times during this period. The 24-hour State standard for PM₁₀ was exceeded 5 to 10 times during this period and the annual State standard for PM_{2.5} was also exceeded each year from 2008 to 2010.

³ Western Regional Climate Center, Historical Climate Information, available at [http:// www.wrcc.dri.edu](http://www.wrcc.dri.edu), accessed November 30, 2011.

⁴ Monitored data for 2011 was not available when this analysis was completed.



LEGEND: Burbank Monitoring Station

Air Monitoring Areas in Los Angeles County:

- | | |
|---------------------------------|--------------------------------------|
| 1. Central Los Angeles | 9. East San Gabriel Valley |
| 2. Northwest Coastal | 10. Pomona/Walnut Valley (not shown) |
| 3. Southwest Coastal | 11. South San Gabriel Valley |
| 4. South Coastal | 12. South Central Los Angeles |
| 5. Southeast Los Angeles County | 13. Santa Clarita Valley |
| 6. West San Fernando Valley | 15. San Gabriel Mountains |
| 7. East San Fernando Valley | |
| 8. West San Gabriel Valley | |

SOURCE: South Coast Air Quality Management District Air Monitoring Areas Map, 1999

APPROX.
SCALE



FIGURE IV.B-1
AIR MONITORING AREAS

SOURCE: TERRYA.HAYES ASSOCIATES INC.



TABLE IV.B-1
2008-2010 AMBIENT AIR QUALITY DATA ¹

POLLUTANT	POLLUTANT CONCENTRATION AND STANDARDS	BURBANK-WEST PALM AVE MONITORING STATION		
		NUMBER OF DAYS ABOVE STATE STANDARD		
		2008	2009	2010
Ozone (O ₃)	Maximum 1-hr Concentration (ppm) Days > 0.09 ppm (State 1-hr standard)	0.133 20	0.145 16	0.111 3
	Maximum 8-hr Concentration (ppm) Days > 0.07 ppm (State 8-hr standard)	0.110 34	0.097 28	0.084 9
Carbon Monoxide (CO)	Maximum 1-hr concentration (ppm) Days > 20 ppm (State 1-hr standard)	3 0	3 0	--- ---
	Maximum 8-hr concentration (ppm) Days > 9.0 ppm (State 8-hr standard)	2.48 0	2.89 0	2.35 0
Nitrogen Dioxide (NO ₂)	Maximum 1-hr Concentration (ppm) Days > 0.18 ppm (State 1-hr standard)	0.105 0	0.088 0	0.082 0
Respirable Particulate Matter (PM ₁₀)	Maximum 24-hr concentration (µg/m ³) Estimated Days > 50 µg/m ³ (State 24-hr standard)	61.0 5	76.0 10	--- ---
Fine Particulate Matter (PM _{2.5})	Maximum 24-hr concentration (µg/m ³) Exceed State Standard (12 µg/m ³)	68.9 Yes	67.5 Yes	43.7 Yes
Sulfur Dioxide (SO ₂)	Maximum 24-hr Concentration (ppm) Days > 0.04 ppm (State 24-hr standard)	0.003 0	0.003 0	0.004 0
' --- ' = There was insufficient (or no) data available to determine the value. ¹ Source : CARB, Air Quality Data Statistics, <i>Top 4 Summary</i> , http://www.arb.ca.gov/adam/topfour/topfour1.php , accessed November 30, 2011. CO pollutant concentration was obtained from SCAQMD, Historical Data by Year, available at http://www.aqmd.gov/smog/historicaldata.htm , accessed November 30, 2011.				

(5) Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

As shown in *Figure IV.B-2: Sensitive Receptor Locations*, sensitive receptors were determined within one-quarter mile (1,320 feet) of the Development Site because this is the only area of the Project Site that will be physically disturbed and may potentially have impacts on surrounding sensitive receptors. The remainder of the Project Site (the north and west portions) will remain intact and will not have impacts on sensitive receptors. The sensitive receptors include the following:



LEGEND:

Project Site Development Site # Sensitive Receptors

- 1. Single- and Multi-Family Residences
- 2. Christian Science Church
- 3. Single- and Multi-Family Residences
- 4. Single-Family Residences
- 5. Single-Family Residences

SOURCE: ESRI and TAHA, 2012

APPROX.
SCALE



FIGURE IV.B-2
SENSITIVE RECEPTOR LOCATIONS

SOURCE: TERRYA.HAYES ASSOCIATES INC.



- Single- and multi-family residences located 120 feet to the east
- Christian Science Church located 180 feet to the southeast
- Single- and multi- family residences located 415 feet to the north
- Single-family residences located 595 feet to the south
- Single-family residences located 995 feet to the northwest

The above sensitive receptors represent the nearest residential land uses with the potential to be impacted by the proposed Project. Additional sensitive receptors are located further from the Development Site in the surrounding community and would be less impacted by air emissions than the above sensitive receptors.

b. Regulatory and Policy Setting

(1) Federal

United States Environmental Protection Agency (USEPA). The Federal Clean Air Act (CAA) governs air quality in the United States. The USEPA is responsible for enforcing the CAA. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in States other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in *Table IV.B-2: State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin*. The USEPA has classified the Basin as attainment for SO₂, maintenance for CO and nonattainment for O₃, PM_{2.5}, PM₁₀, and Pb.

(2) State

California Air Resources Board. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, the CCAA is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels. The CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the State requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB regulates mobile air pollution

sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in *Table IV.B-2: State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin*.

TABLE IV.B-2
STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS AND
ATTAINMENT STATUS FOR THE SOUTH COAST AIR BASIN ¹

POLLUTANT	AVERAGING PERIOD	CALIFORNIA		FEDERAL	
		STANDARDS	ATTAINMENT STATUS	STANDARDS	ATTAINMENT STATUS
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	N/A	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Nonattainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	15 µg/m ³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 µg/m ³)	Maintenance	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 µg/m ³)	Maintenance	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Nonattainment	0.053 ppm (100 µg/m ³)	Attainment
	1-hour	0.18 ppm (338 µg/m ³)	Nonattainment	100 ppb (188 µg/m ³)	N/A
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	--	--	0.030 ppm (80 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	0.14 ppm (365 µg/m ³)	Attainment
	3-hour	--	--	--	--
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m ³	Nonttainment	--	--
	Calendar Quarter	--	--	1.5 µg/m ³	Nonattainment

N/A = Not available

¹ Source: CARB, *Ambient Air Quality Standards*, June 7, 2012; CARB State Standard Area Designations, <http://www.arb.ca.gov/degis/statedesig.htm>; USEPA, The Green Book Nonattainment Areas for Criteria Pollutants, <http://www.epa.gov/air/oaqps/greenbk/index.html>

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM_{2.5}, PM₁₀, NO₂, and Pb⁵.

Toxic Air Contaminants (TACs). CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)]. The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds.

California has established a two-step process of risk identification and risk management to address the potential health effects from air toxic substances and protect the public health of Californians. During the first step (identification), CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified as a TAC in California. During this process, CARB and the OEHHA staff draft a report that serves as the basis for this determination. CARB staff assesses the potential for human exposure to a substance and the OEHHA staff evaluates the health effects. After CARB and the OEHHA staff hold several comment periods and workshops, the report is then submitted to an independent, nine-member Scientific Review Panel (SRP), who reviews the report for its scientific accuracy. If the SRP approves the report, they develop specific scientific findings which are officially submitted to CARB. CARB staff then prepares a hearing notice and draft regulation to formally identify the substance as a TAC. Based on the input from the public and the information gathered from the report, the CARB Board decides whether to identify a substance as a TAC. In 1993, the California Legislature amended the Toxic Air Contaminant Identification and Control Act by requiring CARB to identify 189 federal hazardous air pollutants as State TACs.

In the second step (risk management), CARB reviews the emission sources of an identified TAC to determine if any regulatory action is necessary to reduce the risk. The analysis includes a review of controls already in place, the available technologies and associated costs for reducing emissions, and the associated risk.

The Air Toxics "Hot Spots" Information and Assessment Act (Health and Safety Code Section 44360) supplements the Toxic Air Contaminant Identification and Control Act by requiring a

⁵ CARB, Area Designation Maps, available at <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed August 28, 2011.

statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. The "Hot Spots" Act also requires facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

California's Diesel Risk Reduction Program. The CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, the ARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program.

For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase.

During the control measure phase, specific statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions.

(3) *Local*

South Coast Air Quality Management District. The 1977 Lewis Air Quality Management Act created the SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, the SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality within the Project area. The SCAQMD has jurisdiction over an area of 10,743 square miles, consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin is a subregion of the SCAQMD and covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east; and the San Diego County line to the south as shown on *Figure IV.B-3: South Coast Air Basin*.

Air Quality Management Plan. All areas designated as nonattainment under the CCAA are required to prepare plans showing how the area would meet the State air quality standards by its attainment dates. The Air Quality Management Plan (AQMP) is the SCAQMD plan for improving regional air quality. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must demonstrate that daily construction and operational emissions thresholds, as established by the SCAQMD, would not be exceeded. The environmental review must also demonstrate that individual projects would not increase the number or severity of existing air quality violations.

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007. The 2007 AQMP proposes attainment demonstration of the federal PM_{2.5} standards through a more focused control of SO_x, directly-emitted PM_{2.5}, and NO_x supplemented with VOC by 2015. The eight-hour ozone control strategy builds upon the PM_{2.5} strategy, augmented with additional NO_x and VOC reductions to meet the standard by 2024. The 2007 AQMP also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2007 AQMP is consistent with and builds upon the approaches taken in the 2003 AQMP. However, the 2007 AQMP highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the time frames allowed under the CAA.

Toxic Air Contaminants. The SCAQMD has a long and successful history of reducing air toxics and criteria emissions in the South Coast Air Basin (Basin). SCAQMD has an extensive control program, including traditional and innovative rules and policies. These policies can be viewed in the SCAQMD's *Air Toxics Control Plan for the Next Ten Years* (March 2000). To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study (MATES-III), conducted by the SCAQMD. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million.

An addendum to the plan was completed in March 2004 that included a status update on the implementation of the various mobile and stationary source strategies. Revised projections were based on accomplishments thus far and a new inventory was included to reflect the updated 2003 Air Quality Management Plan.

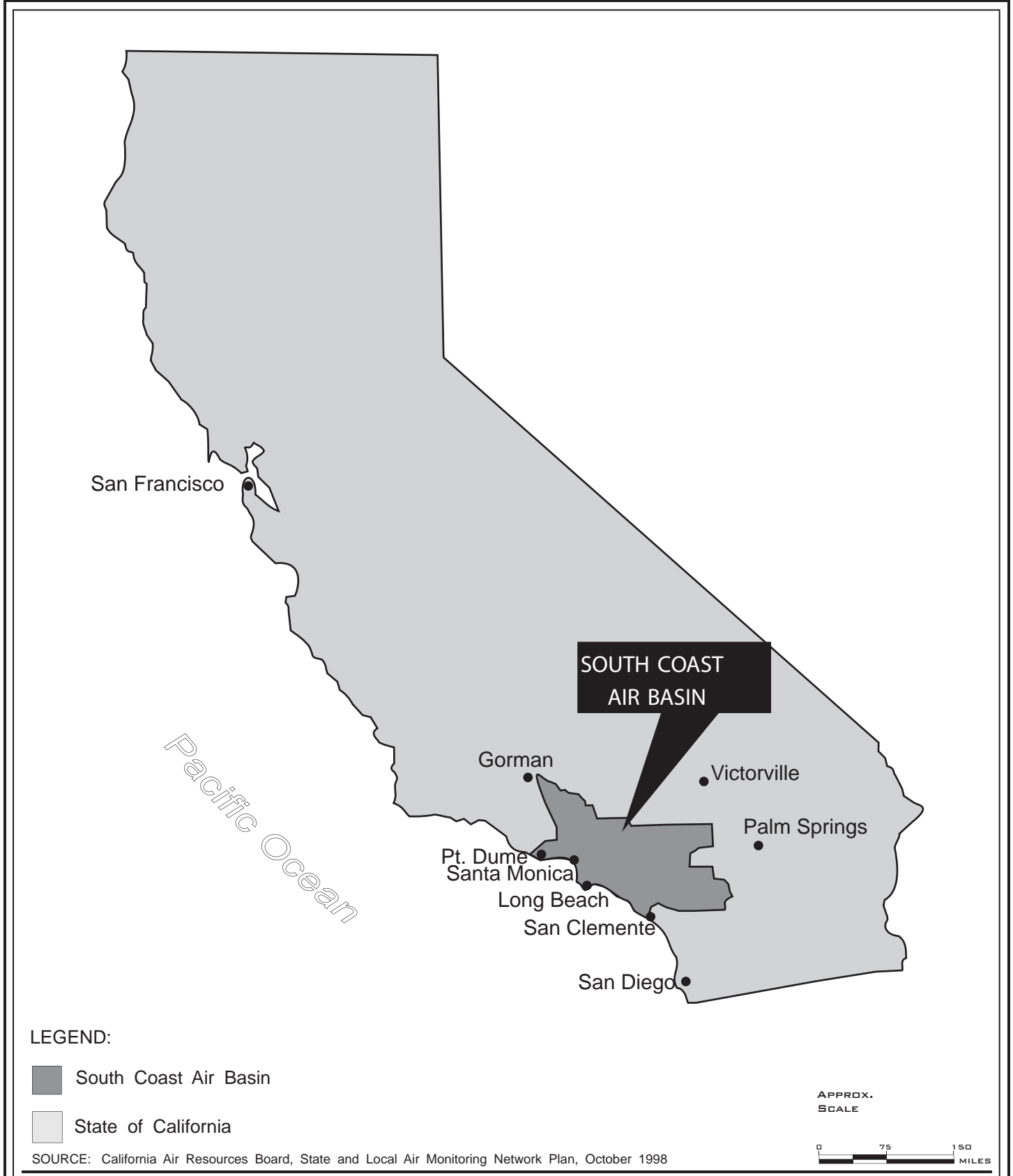


FIGURE IV.B-3
SOUTH COAST AIR BASIN



SOURCE: TERRYA.HAYES ASSOCIATES INC.

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) *Construction Phase Analysis*

This air quality analysis is consistent with the methods described in the SCAQMD *CEQA Air Quality Handbook* (1993 edition), as well as the updates to the *CEQA Air Quality Handbook*, as provided on the SCAQMD website.

Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operation from a variety of land use projects. The model quantifies direct emissions from construction and operation (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Construction assumptions used in the CalEEMod analysis include:

Phase 1: Demolition

- Duration: 6 weeks
- Demolition Amount: 508 tons of debris
- Total Number of Truck Trips Haul: 32 haul trucks

Phase 2: Grading

- Duration: 25 weeks
- Full-time Operating Equipment: 5
- Total Number of Truck Trips Haul: 7,688 haul trucks
- Amount of Materials Exported: 82,000 cubic yards of earth
-

Phase 3: Construction

- Duration: 39 weeks
- Full-time Operating Equipment: 8
- Total Operating Equipment: 4

Phase 4: Architectural Coating

- Duration: 2 weeks
- Total Operating Equipment: 1

Phase 5: Asphalt Paving

- Duration: 1.5 weeks
- Full-time Operating Equipment: 1

Localized emissions, or onsite, emissions were also estimated using CalEEMod. Based on site specifics, the analysis utilized a 25-meter receptor distance and a five-acre Development Site. Emissions were compared to the SCAQMD Lookup Tables to assess the level of significance.

(2) Operations Analysis

CalEEMod was used to calculate operational mobile and area source emissions. CalEEMod uses EMFAC2007 emissions rates to calculate vehicle emissions. EMFAC2007 is the latest emission inventory model for motor vehicles operating on roads in California. This model reflects the CARB's current understanding of how vehicles travel and how much they pollute. The EMFAC2007 model can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.

Localized CO emissions were calculated utilizing the USEPA's CAL3QHC dispersion model and the CARB's EMFAC 2007 model. CAL3QHC is a model developed by the USEPA to predict CO and other pollutant concentrations from motor vehicle emissions at roadway intersections. The model uses a traffic algorithm for estimating vehicular queue lengths at signalized intersections.

b. Thresholds of Significance

The following are the significance criteria that SCAQMD has established to determine Project construction and operational impacts.

(1) Construction Phase Significance Criteria

The proposed Project would have a significant impact if:

- Daily localized or regional, construction emissions were to exceed SCAQMD thresholds for VOC, NO_x, CO, SO_x, PM_{2.5} or PM₁₀, as presented in *Table IV.B-3: SCAQMD Daily Construction Emissions Thresholds*;
- The proposed Project would generate significant emissions of TACs; and/or
- The proposed Project would create an odor nuisance.

TABLE IV.B-3
SCAQMD DAILY CONSTRUCTION EMISSIONS THRESHOLDS¹

CRITERIA POLLUTANT	REGIONAL EMISSIONS (POUNDS PER DAY)	LOCALIZED EMISSIONS (POUNDS PER DAY) ²
Volatile Organic Compounds (VOC)	75	--
Nitrogen Oxides (NO _x)	100	221
Carbon Monoxide (CO)	550	1,158
Sulfur Oxides (SO _x)	150	--
Fine Particulates (PM _{2.5})	55	6
Particulates (PM ₁₀)	150	11

¹ Source: SCAQMD, 2011.
² Localized thresholds based on 25-meter receptor distance and a five-acre Development Site.

(2) Operations Significance Criteria

The proposed Project would have a significant impact if:

- Daily operational emissions were to exceed SCAQMD operational emissions thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀, as presented in *Table IV.B-4: SCAQMD Daily Operational Emissions Thresholds*;
- Project-related traffic causes CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively;
- The proposed Project would generate significant emissions of TACs;
- The proposed Project would create an odor nuisance; and/or
- The proposed Project would not be consistent with the AQMP.

TABLE IV.B-4
SCAQMD DAILY OPERATIONAL EMISSIONS THRESHOLDS¹

CRITERIA POLLUTANT	POUNDS PER DAY
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO _x)	55
Carbon Monoxide (CO)	550
Sulfur Oxides (SO _x)	150
Fine Particulates (PM _{2.5})	55
Particulates (PM ₁₀)	150

¹ Source: SCAQMD, 2007

c. Project Impacts

(1) Construction Phase Activity (Short-Term)

(a) Regional Impacts

Construction of the proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Development Site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. NO_x emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, using a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Development Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.

CalEEMod was used to calculate the daily construction emissions. *Table IV.B-5: Estimated Daily Construction Emissions* shows the estimated daily emissions associated with each construction phase. Daily construction emissions for VOC, NO_x, CO, SO_x, PM_{2.5} and PM₁₀ would not exceed the SCAQMD regional thresholds. Therefore, the proposed Project would result in a less-than-significant impact related to regional construction emissions. It should be noted that although the Project will result in less-than-significant regional construction emission impacts, as a Project Design Feature incorporated as PDF AQ-3 herein, the Project will also use as many regional construction materials as possible to reduce any unforeseen environmental impacts associated with the transportation of construction materials.

(b) Localized Impacts

Emissions for the localized construction air quality analysis of PM_{2.5}, PM₁₀, CO, and NO₂ were compiled using LST methodology promulgated by the SCAQMD.⁶ Localized on-site emissions were calculated using similar methodology to the regional emission calculations.

⁶ The concentrations of SO₂ are not estimated because construction activities would generate a small amount of SO_x emissions. No State standard exists for VOC. As such, concentrations for VOC were not estimated.

TABLE IV.B-5
ESTIMATED DAILY CONSTRUCTION EMISSIONS¹

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO _x	CO	SO _x	PM _{2.5} ²	PM ₁₀ ²
DEMOLITION						
On-Site Emissions	7	53	30	< 1	2	3
Off-Site Emissions	< 1	< 1	1	< 1	< 1	1
<i>Total Emissions</i>	7	53	31	< 1	2	4
SITE PREPARATION						
On-Site Emissions	8	61	37	< 1	10	15
Off-Site Emissions	2	23	14	< 1	1	1
<i>Total Emissions</i>	10	84	51	< 1	11	16
BUILDING						
On-Site Emissions	4	30	21	< 1	2	2
Off-Site Emissions	3	14	28	< 1	1	7
<i>Total Emissions</i>	7	44	49	< 1	3	9
ARCHITECTURAL COATING						
On-Site Emissions	37	3	2	0	< 1	< 1
Off-Site Emissions	< 1	< 1	4	< 1	1	< 1
<i>Total Emissions</i>	37	3	6	< 1	1	< 1
PAVING						
On-Site Emissions	1	5	3	0	< 1	< 1
Off-Site Emissions	1	1	1	0	0	0
<i>Total Emissions</i>	2	6	4	0	< 1	< 1
Maximum Regional Total	37	84	51	< 1	11	16
REGIONAL SIG. THRESHOLD	75	100	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
Maximum On-Site Total	37	61	37	---	10	15
LOCALIZED SIG. THRESHOLD [3]	---	221	1,158	---	6	11
Exceed Threshold?	---	No	No	---	Yes	Yes

¹ Source: Terry A Hayes Associates, 2013.

² CalEEMod emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.

³ Assumed a 5-acre Development Site and a 25-meter (82-foot) receptor distance.

LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. As shown in *Table IV.B-5: Estimated Daily Construction Emissions*, estimated daily localized emissions associated with each construction phase. Daily construction emissions would not exceed the SCAQMD localized thresholds for NO₂, CO, and SO_x (no State standards exist for VOC), and these localized construction emissions would result in a less-than-significant impact. Daily construction emissions of PM_{2.5} and PM₁₀ would exceed the SCAQMD localized thresholds. Therefore, without mitigation, the proposed Project would result in a significant impact related to localized construction emissions.

(c) *Toxic Air Contaminant (“TAC”) Impacts*

The greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. The majority of heavy-duty construction equipment activity would take place over a six-month period during demolition and site preparation activity. These short-term emissions would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after construction. Therefore, the proposed Project would result in a less-than-significant impact related to construction TAC emissions.

(d) *Odor Impacts*

Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Development Site. The proposed Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, the proposed Project would result in a less-than-significant impact related to construction odors.

(2) *Operations Activity (Long-Term)*

The Project will implement a variety of design and operational features, known as Project Design Features (“PDFs”) to achieve energy efficiency, which in turn serve to directly and proactively reduce air pollutant emissions. Implementation of the “sustainable strategies” described in *Section II.F: Project Description – Project Characteristics* of this Draft EIR would directly reduce Project-related energy use and address indoor air quality conditions. For the air quality analysis, these PDFs are assumed to be incorporated into the Project and the effective reduction credit accounted for in the project-level impact assessment. The Applicant has incorporated the measures into the design of the Project to achieve enhanced energy efficiency (and thereby reduce air quality impacts) and further reduce any potentially unforeseen impacts from the Project. The measures include, but are not limited to, the following or their equivalent:

- Site location of the proposed senior housing adjacent to the existing golf course to allow use of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.
- The landscaping for the SCSLC will use water efficient landscaping and native drought tolerant plants.
- The Project will contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.
- The Project will use natural light as the primary source of light in dwelling units. Lighting systems will be controllable to achieve a maximum efficiency.
- The Project will use exterior lighting that would minimize nighttime illumination.
- The SCSLC energy performance goal will be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.
- The SCSLC will be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.
- The Project design will incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.
- The Project intends to achieve at least the equivalent of LEED (Leadership in Energy and Environmental Design) Platinum, Gold, or Silver status.

(a) *Regional Impacts*

Motor vehicles that access the Project Site would be the predominate source of long-term Project emissions. Operational emissions are expected to be emitted primarily from vehicles accessing the Project Site for the on-site residences. Traffic impacts and analyses are described in detail in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*. The analysis of the Project traffic impacts indicate that the proposed Project would generate 624 net daily vehicle trips.⁷ The data from the traffic analysis are used in *Table IV.B-6: Estimated Daily Operational Emissions*, which compares Project and cumulative emissions under Existing Conditions to Existing With Project Conditions and emissions under Future Cumulative Pre-Project Conditions to Future Cumulative With Project Conditions (see *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* for descriptions of these terms). Regional operational emissions for both scenarios would not exceed SCAQMD significance thresholds. Therefore, the

⁷ Linscott, Law & Greenspan, Engineers, Studio City Senior Living Center Project Traffic Impact Study, February 2, 2012.

proposed Project would result in a less-than-significant impact related to regional operational emissions.

(b) *Localized Impacts*

CO concentrations in the future are expected to be lower than existing conditions due to stringent State and federal mandates for lowering vehicle emissions. Although traffic volumes would be higher in the future both without and with the implementation of the proposed Project, CO emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems, as well as from normal turnover in the vehicle fleet. Accordingly, increases in traffic volumes are expected to be offset by increases in cleaner-running cars as a percentage of the entire vehicle fleet on the road.⁸

The State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. An exceedance of the State CO standards at an intersection is referred to as a CO hotspot. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by two percent at intersections with a LOS of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from C to D.

Based on the traffic study, the only intersection that requires a localized CO analysis is Whitsett Avenue/Riverside Drive (AM Peak Hour) under Existing With Project Conditions. The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations. One- and eight-hour CO concentrations would be approximately 3 and 2.4 ppm, respectively, at worst-case sidewalk receptors. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the study intersection. Therefore, the proposed Project would result in a less-than-significant impact related to operational localized impacts.

TABLE IV.B-6
ESTIMATED DAILY OPERATIONAL EMISSIONS¹

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
EXISTING CONDITIONS						
Area Source	0	0	0	0	0	0
Mobile Source	7	16	62	< 1	1	10
<i>Total</i>	<i>7</i>	<i>16</i>	<i>62</i>	<i>< 1</i>	<i>1</i>	<i>10</i>

⁸ Consistent with CARB's vehicle emissions inventory.

TABLE IV.B-6 (CONTINUED)
ESTIMATED DAILY OPERATIONAL EMISSIONS¹

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
EXISTING WITH PROJECT CONDITIONS						
Area Source	17	< 1	17	0	< 1	< 1
Mobile Source	13	34	122	< 1	2	21
<i>Total</i>	30	34	139	< 1	2	21
Net Emissions	23	18	77	< 1	1	11
REGIONAL SIG. THRESHOLD	55	55	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
FUTURE CUMULATIVE PRE-PROJECT CONDITIONS (2016)						
Area Source	0	0	0	0	0	0
Mobile Source	5	12	46	< 1	1	10
<i>Total</i>	6	2	17	< 1	1	4
FUTURE CUMULATIVE WITH PROJECT CONDITIONS (2016)						
Area Source	17	< 1	17	0	< 1	< 1
Mobile Source	10	25	90	< 1	2	21
<i>Total</i>	27	25	107	< 1	2	21
Net Emissions	21	23	90	< 1	1	17
REGIONAL SIG. THRESHOLD	55	55	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No

¹ Source: Terry A Hayes Associates, 2013.

(c) Toxic Air Contaminant (“TAC”) Impacts

The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁹ The proposed Project is not anticipated to generate a substantial number of daily truck trips. Based on the limited activity of TAC sources, the proposed Project would not warrant the need for a health risk assessment associated with onsite activities, and potential TAC impacts are expected to be less-than-significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products

⁹ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

(e.g., aerosol sprays). It was expected that the proposed Project would not release substantial amounts of TACs, and no significant impact on human health would occur.

The CARB has published guidance for locating new sensitive receptors (e.g., residences) out of harm's way with respect to nearby sources of air pollution.¹⁰ Relevant recommendations include avoiding locating new sensitive land uses within 500 feet of a freeway (defined as an urban road with 100,000 vehicles per day) or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). The Project Site is located approximately 4,000 feet from US-101 and approximately 755 feet from the nearest gas station (Arco at 12500 Ventura Boulevard). Additional guidelines in the handbook include avoiding locating new sensitive receptors near rail yards, ports, refineries, distribution centers, and dry cleaners. The proposed Project would not be located near these air polluting sources. The location of the proposed Project would be consistent with the CARB recommendations for locating new sensitive receptors. Therefore, the proposed Project would have a less-than-significant impact related to TACs.

(d) *Odor Impacts*

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Development Site would be developed with residences and not land uses that are typically associated with odor complaints. Onsite trash receptacles would have the potential to create adverse odors. However, trash receptacles would be located and maintained in a manner that promotes odor control and no adverse odor impacts are anticipated from these types of land uses. Therefore, the proposed Project would result in a less-than-significant impact related to operational odors.

(e) *Consistency with the Air Quality Management Plan (AQMP)*

The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. The regional and localized emissions analysis demonstrated that the proposed Project would not generate significant emissions according to the SCAQMD. Therefore, the proposed Project would result in a less-than-significant impact related to the AQMP.

In addition, the AQMP includes short-term control measures for stationary and mobile sources developed by the SCAQMD. As shown in *Table IV.B-7: Project Consistency with the Air Quality Management Plan*, the proposed Project would not interfere with implementation of any of these control measures, thus resulting in a less-than-significant impact related to the AQMP.

As the Applicant is including certain Project Design Features proposed for the Project, *Table IV.B-7* also shows how several of these PDFs would be consistent with several of the control measures, thus further reducing the already less-than-significant impacts related to the AQMP.

¹⁰ CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

**TABLE IV.B-7
 PROJECT CONSISTENCY WITH THE AIR QUALITY MANAGEMENT PLAN¹**

CONTROL MEASURE	PROJECT CONSISTENCY
FACILITY MODERNIZATION	
Facility Modernization (NO _x , VOC, and PM _{2.5})	Not Applicable: The proposed Project would be a new development and would not include modernization. In addition, all new stationary sources would comply with SCAQMD rules and regulations to control emissions.
ENERGY EFFICIENCY/CONSERVATION	
Urban Heat Island (All Pollutants)	Consistent: The proposed Project is adjacent to the existing golf course, which will allow utilization of the existing greenery as a heat absorption source. Therefore, the proposed Project will result in reduced air-conditioning and energy usage than if the Project were not located next to the existing golf course or other substantial greenery.
Energy Efficiency and Conservation (All Pollutants)	Consistent: The proposed Project has been designed to have an energy performance goal of 20 percent more effective than required by California Title 24 Energy Design Standards, 2010 Edition. The proposed lighting system will be controllable for maximum efficiency (e.g., installation of occupancy sensors that will shut-off unnecessary/unused lights).
GOOD MANAGEMENT PRACTICES	
Improved Leak Detection and Repair (VOC)	Not Applicable: The proposed Project would not include oil and gas production facilities, petroleum and chemical products processing, storage and transfer facilities, marine terminals, or other sources contributing to fugitive VOC emissions from piping components.
Emission Reductions from Gasoline Transfer and Dispensing Facilities (VOC)	Not Applicable: The proposed Project would not include gasoline transfer and dispensing facilities.
Further Emission Reductions from Pipeline and Storage Tank Degassing (VOC)	Not Applicable: The proposed Project would not include gasoline sources of pipeline and storage tank degassing.
PM Control Devices (Baghouses, Wet Scrubbers, Electrostatic Precipitators, and Other Devices) (PM)	Consistent: All stationary sources would comply with SCAQMD rules and regulations to control emissions.
Emissions Reductions from Green Waste Composting (VOC and PM)	Consistent: The proposed Project would include recycling areas dedicated to the collection and storage of non-hazardous materials for recycling, including paper, corrugated cardboard, glass, plastics, metals and landscaping debris.
Improved Start-Up, Shut-down & Turnaround Procedures (All Pollutants)	Not Applicable: The proposed Project would not include major stationary sources with start-up and shut-down procedures.
MARKET INCENTIVES/COMPLIANCE FLEXIBILITY	
Clean Coatings Certification Program (VOC)	Not Applicable: The proposed Project would not include stationary sources of VOC emissions.
Further SO _x Reduction for RECLAIM (SO _x)	Not Applicable: The proposed Project would not include stationary sources of SO _x emissions.
Clean Air Act Emission Fees for Major Stationary Sources (VOC and NO _x)	Not Applicable: The proposed Project would not include major stationary sources (e.g., power plants).
Economic Incentive Programs (All Pollutants)	Not Applicable: The proposed Project would not include major sources of mobile (e.g., warehouse distribution facilities) or stationary emissions (e.g., power plants).
Petroleum Refinery Pilot Program (VOC and PM _{2.5})	Not Applicable: The proposed Project would not include a petroleum refinery.

TABLE IV.B-7 (CONTINUED)
PROJECT CONSISTENCY WITH THE AIR QUALITY MANAGEMENT PLAN¹

CONTROL MEASURE	PROJECT CONSISTENCY
EMISSION GROWTH MANAGEMENT	
Emission Reduction from New or Redevelopment Projects (NOx, VOC, and PM _{2.5})	Consistent: All stationary sources would comply with SCAQMD rules and regulations to control emissions. The proposed Project has been designed to be 20 percent more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing air pollutant emissions and greenhouse gas emissions.
Electricity Consumption Emissions	Not Applicable: The proposed Project does not require a federal conformity analysis.
Electricity Consumption Emissions	Not Applicable: The proposed Project does not require federal permits.
¹ Source: Terry A. Hayes and Associates, 2013.	

d. Cumulative Impacts

A significant impact would occur if the proposed Project resulted in a cumulative net increase in any criteria pollutant above threshold standards. The SCAQMD’s approach for assessing cumulative air quality impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. The SCQAMD has set forth significance thresholds designed to assist in the attainment of ambient air quality standards. The proposed Project would not result in a significant regional impact during construction or operation. However, the proposed Project would result in significant localized PM_{2.5} and PM₁₀ impacts during construction activities. As the proposed Project results in localized significant impacts during construction relative to particulate matter, it is anticipated that Related Project development would also result in significant localized impacts. While Mitigation Measures would reduce air quality impacts, cumulative construction emissions of PM_{2.5} and PM₁₀ would exceed SCAQMD localized significance thresholds. Therefore, the proposed Project would result in a cumulatively considerable impact related to construction air quality.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific air quality impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- The Project shall comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

- The Project shall comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the District. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.
- During construction and demolition activities, non-hazardous construction and demolition debris shall be recycled and/or salvaged per the City's Construction and Demolition (C&D) Waste Recycling Ordinance.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential air quality impacts.

- PDF AQ-1: Project shall be located so that the proposed senior housing is adjacent to the existing golf course to allow use of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.
- PDF AQ-2: The landscaping for the SCSLC shall use water efficient landscaping and native drought tolerant plants.
- PDF AQ-3: The Project shall attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.
- PDF AQ-4: The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.
- PDF AQ-5: The Project shall use natural light as the primary source of light in dwelling units. Lighting systems will be controllable to achieve a maximum efficiency.
- PDF AQ-6: The Project shall use exterior lighting that would minimize nighttime illumination.
- PDF AQ-7: The SCSLC energy performance goal shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

PDF AQ-8: The SCSLC shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.

PDF AQ-9: The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.

PDF AQ-10: The Project shall achieve LEED Platinum, Gold, or Silver status.

c. Mitigation Measures

The Project will result in less-than-significant operational air quality impacts and less-than-significant construction air quality impacts, except for localized impacts from PM_{2.5} and PM₁₀ emissions. The Project shall implement the following Mitigation Measures to reduce air quality impacts further and to the extent possible to ensure that impacts remain at less-than-significant levels:

(1) Construction Phase Activity (Short-Term)

MM AQ-1: Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.

MM AQ-2: The construction contractor shall use at least one or more of the following measures at each vehicle egress from the Project Site to a paved public road, in order to effectively reduce the migration of dust and dirt offsite:

- Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
- Pave the surface extending at least 100 feet and at least 20 feet wide;
- Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
- Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.

MM AQ-3: All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

MM AQ-4: Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts).

MM AQ-5: Ground cover in disturbed areas shall be replaced as quickly as possible.

(2) *Operations Activity (Long-Term)*

MM AQ-6: The Project shall include heating, ventilation, and air conditioning (HVAC) systems equipped with air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13. Filtration shall be applied to process both return and outside air that is to be delivered as supply air.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the Mitigation Measures would reduce all project air quality impacts, except for construction-phase localized impacts, to less-than-significant levels.

Implementation of the Mitigation Measures related to construction would ensure that fugitive dust emissions would be reduced by approximately 61 percent. However, PM_{2.5} and PM₁₀ emissions would continue to exceed the localized significance. Therefore, the Project would result in a significant and unavoidable impact related to localized construction emissions.

Implementation of the Mitigation Measure related to operation would ensure that interior air supply is filtered at an acceptable level and will ensure that the air quality impacts during the operational phase of the Project remain at less-than-significant levels.

Pursuant to CEQA Guidelines Sections 15092 and 15093, in the event that 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 any benefits of the Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS

C. BIOLOGICAL RESOURCES

1. INTRODUCTION

Aquatic Consulting Services, Inc. conducted field surveys at the Project Site in 2007 and 2008. The purpose of these surveys was to identify biological resources at the site, including a survey of squirrels and birds found at the Project Site, and determine the potential for significant impacts to biological resources. The findings of those surveys is provided in "*Results of Biological Surveys Performed on the Studio City Golf Course Property, City of Los Angeles, Los Angeles County, California*," dated December 23, 2008, and provided in *Appendix C: Biological Resources Report* of this Draft EIR. Due to the fully developed and urban environment surrounding the Project Site, it is reasonable to conclude that the biological conditions have not changed in any substantial way since 2008 and that the findings of the survey continue to accurately reflect biological conditions at the Project Site

TREES, Etc. also conducted a field survey of trees located on the Project Site in 2001 and 2002, and updated the survey for the Project Site in 2011. The resultant tree report, "*Horticultural Tree Report, Valleyheart Senior Community Housing*," dated December 6, 2011 and provided in *Appendix J: Tree Report* of this Draft EIR, was prepared in accordance with Ordinance No. 177,404, effective April 23, 2006 (Subdivision 12, Section 5, R.4a.) of the City of Los Angeles Municipal Code relating to the "*Tree Preservation Guidelines*."

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) *Existing Biological Character*

The approximately 16.1-acre Weddington Golf & Tennis Club Project Site is located west of Whitsett Avenue and north of the Los Angeles River. The Project Site is developed with a 9-hole pitch-and-putt golf course, driving range, clubhouse, putting green, 16 tennis courts, small tennis house, small maintenance buildings, maintenance yard, and surface parking lot. City of Los Angeles Fire Station No. 78, located adjacent to the southeast corner of the Project Site, is not part of the Project.

The golf course portion of the Project Site is vegetated by turf grass and ornamental trees and shrubs. Although dominated by exotics, the vegetation onsite does provide suitable nesting and foraging habitat for native bird species. Similarly, the presence of vegetative cover and lack of paved surfaces within the golf course provides suitable habitat for squirrels.

The tennis court portion of the Project Site is primarily paved with walkways and tennis court facilities. Vegetation is limited to shrubs along the perimeter of the court areas. Due to the lack of vegetation on the tennis court portion of the Project Site, as well as the high intensity of

human activity in this area, the potential for animal species in this area is considered low. As such, the tennis court area was not part of the official biological survey.

Two common squirrel species and a variety of bird species, including exotic parakeets, were observed onsite. *Table IV.C-1: Vertebrate Species Identified on the Weddington Golf Course*, is a composite list of animal species encountered during the 2007 and 2008 survey series performed on the golf course portion of the Project Site.

TABLE IV.C-1
VERTEBRATE SPECIES IDENTIFIED ON THE WEDDINGTON GOLF COURSE¹

COMMON NAME	SCIENTIFIC NAME
REPTILIA²	
Iguanid Lizards	Iguanidae
Western fence lizard	<i>Sceloporus occidentalis</i>
MAMMALIA³	
Squirrels	Scillridae
California ground squirrel	<i>Spermophilus beecheyi</i>
Fox Squirrel	<i>Sciurus niger</i>
AVES⁴	
Hawks	Accipitridae
Hawk, Cooper's	<i>Accipiter cooperii</i>
Hawk, Red-shouldered	<i>Buteo lineatus</i>
Hawk, Red-tailed	<i>Buteo jamaicensis</i>
Pigeons and Doves	Columbidae
Dove, Mourning	<i>Zenaida macroura</i>
Parrots and allies	Psittacidae
Red-masked parakeet	<i>Aratinga erythrogenys</i>
Swifts	Apodidae
White throated swift	<i>Aeronautes saxatalis</i>
Hummingbirds	Trochilidae
Hummingbird, Allen's	<i>Salasphorus sasin</i>
Hummingbird, Anna's	<i>Calypte anna</i>
Hummingbird, black-chinned	<i>Archilochus alexandri</i>
Hummingbird, Rufous	<i>Selasphorus sasin</i>
Woodpeckers	Picidae
Nuttal's woodpecker	<i>Picoides nuttallii</i>
Tyrant Flycatchers	Tyrannidae
Phoebe, black	<i>Sayornis nigricans</i>
Swallows	Hirundinidae
Swallow, barn	<i>Hirundo rustica</i>
Swallow, cliff	<i>Hirundo pyrrhonota</i>
Bushtits	Aegithalidae
Bushtit	<i>Psaltriparus minimus</i>
Wrens	Troglodytidae
Wren, Bewick's	<i>Thryomanes bewickii</i>
Kinglets, Gnatcatchers, Thrushes and Babblers	Muscicapidae
Ruby-crowned kinglet	<i>Regulus calendula</i>
Starlings and Mynas	Sturnidae
European starling	<i>Sturnus vulgaris</i>

TABLE IV.C-1 (CONTINUED)
VERTEBRATE SPECIES IDENTIFIED ON THE WEDDINGTON GOLF COURSE¹

COMMON NAME	SCIENTIFIC NAME
AVES⁴ (CONTINUED)	
Warblers	Parulidae
Black and white warbler	<i>Mniotilta varia</i>
Hermit warbler	<i>Dendroica occidentalis</i>
Townend's warbler	<i>Dendroica townsendi</i>
Yellow-rumped warbler	<i>Dendroica coronata</i>
Emberizids	Emberizidae
White-crowned sparrow	<i>Zonotrichia leucophrys</i>
Blackbirds	Icteridae
Bullock's oriole	<i>Icterus bullockii</i>
Hooded oriole	<i>Icterus cucullatus</i>
Finches	Fringillidae
Finch, House	<i>Carpodacus mexicanus</i>
Lesser goldfinch	<i>Carduelis psaltria</i>
Old World Sparrows	Passeridae
Sparrow, House	<i>Passer domesticus</i>
¹ Source: Aquatic Consulting Services, Inc., <i>Results of Biological Surveys Performed on the Studio City Golf Course Property, City of Los Angeles, Los Angeles County, California</i> , December 2008. ² Nomenclature from: Western Reptiles and Amphibians, Stebbins 1985. ³ Nomenclature from: The Audubon Society Field Guide to North American Mammals, Whitaker Jr. 1980. ⁴ Nomenclature from: Sibley Guide to Birds (2003), National Audubon Society.	

Twenty-two (22) bird species were observed at the Project Site, including possible nesting activity for two observed species (bushtit, *Psaltriparlls minimlls*; and house finch, *Carpodaclls mexicanlls*).

Of the species listed in *Table IV.C-1*, five (Allen's hummingbird, rufous hummingbird, Cooper's hawk, Nuttal's woodpecker, and hermit warbler) are listed on the California Department of Fish and Game's California Natural Diversity Database (CNDDDB) Special Animals List (California Department of Fish and Game, February 2008). "Special Animals" is a broad term used to refer to all fauna the CNDDDB is interested in tracking, regardless of their legal or protection status. These species generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the State and/or Federal Endangered Species Acts;
- State or federal candidate for possible listing;
- Species which meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the California Environmental Quality Act (CEQA) Guidelines;
- Species considered by the California Department of Fish and Game to be a Species of Special Concern;
- Species that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical, vulnerable stage in their life cycle that warrants monitoring;
- Population(s) in California that may be peripheral of a species' range, but are threatened with extirpation in California;

- Species closely associated with a habitat that is declining in California at an alarming rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands, vernal pools, etc.); or
- Species designated as a special-status, sensitive, or declining species by other State or federal agencies, or non-governmental organization.

Table IV.C-2: *Special-Status Animals Occurring on the Weddington Golf Course* lists the current regulatory status of animal species that occur onsite.

TABLE IV.C-2
SPECIAL-STATUS ANIMALS OCCURRING ON THE WEDDINGTON GOLF COURSE¹

COMMON NAME	SCIENTIFIC NAME	STATUS ²	COMMENTS
BIRDS			
Allen's hummingbird	<i>Salasphorus sasin</i>	AUDUBON-WL, IUCN-LC, USBC-WL	Of interest only when nesting
Cooper's hawk	<i>Accipiter cooperii</i>	DFG – WL, IUCN-LC	Of interest only when nesting
Hermit warbler	<i>Dendroica occidentalis</i>	ABC – GL, AUDUBON-WL, IUCN-LC	Of interest only when nesting
Nuttall's woodpecker	<i>Picoides nuttallii</i>	ABC – GL, AUDUBON-WL, IUCN-LC, USBC-WL	Of interest only when nesting
Rufous hummingbird	<i>Selasphorus rufous</i>	ABC – GL, AUDUBON-WL, IUCN-LC, USBC-WL	Of interest only when nesting
¹ Source: Aquatic Consultants, Inc. 2008. ² Status Key: ABC-GL = American Bird Conservancy Green List AUDUBON-WL = Audubon Watch List DFG-WL = California Department of Fish and Game - Watch List IUCN-LC = International Union for Conservation of Nature (IUCN) - Least Concern USBC-WL = United States Bird Conservation Watch List			

(2) *Special-Status Species*

The following provides specific life history information for the special-status species observed on the Project Site.

Allen's hummingbird (*Salasphorus sasin*). Allen's hummingbird is a common summer resident (January to July) and migrant along most of the California coast. Breeders are most common in coastal scrub, valley foothill hardwood, and valley foothill riparian habitats, but also are common in closed-cone pine-cypress, urban, and redwood habitats. Sprinklers, birdbaths, and other human water sources are used for bathing and possibly drinking, but water is also obtained from nectar and dew. Breeding occurs in sparse and open woodlands, coastal redwoods, and sparse to dense scrub habitats from mid-February to early August with peak activity in April. The Special Animals List indicates that monitoring organizations are only interested in tracking

nesting locations. Nesting was not confirmed on the Project Site; however, this species has the potential to be a resident on or near the Project Site due to the presence of large, mature trees within the golf course and within the surrounding offsite residential neighborhoods that could provide suitable nesting habitat.

Cooper's hawk (*Accipiter cooperi*). Cooper's hawk is frequently found in patchy woodlands, with dense stands of live oak, riparian deciduous or other forest habitats occurring near water. Cooper's hawk is a breeding resident throughout most of the wooded portion of the state, with nesting occurring in dense stands containing moderate crown-depth. Small birds, especially young birds during nesting season, and small mammals, are the primary prey; however, reptiles and amphibians are also taken. Hunting occurs in broken woodland and habitat edges; prey is caught in the air, on the ground, and in vegetation. Vegetative cover is required to hide, attack, and approach prey. This common winter migrant and occasional summer resident in Southern California breeds in oak woodland habitats and southern cottonwood-willow riparian woodland. The Watch List designation for this species refers to actively nesting individuals only. Nesting was not confirmed on the Project Site; however, this species has the potential to be a resident on or near the Project Site due to the presence of large, mature trees within the golf course and within the surrounding offsite residential neighborhoods that could provide suitable nesting habitat.

Hermit warbler (*Dendroica occidentalis*). Hermit warbler is a fairly common to common summer visitor and migrant throughout California. Spring migration occurs through April and May; fall migration occurs through August and early September. They are common spring and fall migrants in the mountains, and also occur in valley foothill hardwood habitat and in stands of planted pines during migration and in winter. Breeding occurs in mature ponderosa pine, montane hardwood-conifer, mixed conifer, Douglas fir, redwood, red fir, and Jeffery pine habitats within major mountain ranges from San Gabriel and San Bernardino Mountains northward, excluding coastal ranges south of Santa Cruz County. The Special Animals List indicates that monitoring organizations are only interested in tracking nesting locations. The observations of this species on the Project Site were limited to two survey days in April of 2007. Because the observations occurred during the spring migration period, and were limited to two survey days, hermit warbler is not expected to breed at the golf course, or be a resident onsite.

Nuttall's woodpecker (*Picoides nuttallii*). Nuttall's woodpecker occurs in the Central Valley, Transverse and Peninsular Ranges, Coast Ranges north to Sonoma County and rarely to Humboldt County, lower portions of the Cascade and Sierra Nevada Ranges, and as a vagrant in the Owens Valley. Nuttall's woodpecker is a common, permanent resident of low-elevation riparian deciduous and oak habitats, and forages mostly within oak and riparian habitats; insects are gleaned from foliage, and sap is acquired by pecking, probing, or drilling into trunks and branches. Nuttall's woodpecker was observed onsite during the 2007 and 2008 surveys. The Special Animals List indicates that monitoring organizations are only interested in tracking nesting locations. Nesting was not confirmed on the Project Site; however, this species has the potential to be a resident on or near the Project Site due to the presence of large, mature trees within the golf course and within the surrounding offsite residential neighborhoods that could provide suitable nesting habitat in spite of the lack of preferred native riparian and oak habitats.

Rufous hummingbird (*Selasphorus rufous*). Rufous hummingbird is a common migrant and uncommon summer resident of California in general, and a rare, but likely regular winter resident in Southern California. Rufous hummingbird is found in a wide variety of habitats that provide nectar-producing flowers. Trees and shrubs in many habitats provide cover. The Special Animals List indicates that monitoring organizations are only interested in tracking nesting locations. Nesting was not confirmed on the Project Site; however, suitable habitat is present, and both male and female Rufous hummingbirds were observed together during the 2007 surveys, indicating the potential for nesting to occur onsite.

(3) *Exotic Parakeets*

Bird surveys conducted in 2008 identified red-masked parakeet (*Aratinga erythrogenys*) at the Project Site. The parakeet is not a special-status species; however, members of the community expressed concern for these species during the public scoping period. As such, a discussion of this species is included.

The parakeets occurring on the Project Site have been identified as the red-masked parakeet; however, per conversations with Kimball Garrett of the Natural History Museum of Los Angeles County,¹ both the red-masked and mitred parakeets (*Aratinga mitrata*) (which may form mixed flocks with red-masked parakeets), also occur in the vicinity of the Project Site. Both the red-masked parakeet and the mitred parakeet are native to South America; however, escaped individuals previously kept as pets have become naturalized in residential, urban, and suburban areas primarily within coastal Southern California. Scattered observations and smaller naturalized populations occur elsewhere in California, including the San Francisco Bay Area. In their native range, red-masked parakeet occurs in a range of habitats including humid forests, deciduous forest, dry Acacia scrub, open sparsely vegetated desert, and intensely farmed areas and towns. Mitred parakeet is found primarily in small forest patches, arid mountain slopes and valleys, steep hills and rock faces, and legume-dominated cloud forest. In North America, the nesting season for both species generally extends between spring and summer. Nesting typically occurs within cavities; older trees are preferred, but non-traditional cavities (drain pipes, abandoned cavity nests used by other species, etc.) are also used. Based on Forshaw (2006), the female has one clutch per year. Eggs incubate for 23 days, and the young typically fledge within 50 days. Food items vary from nectar to seeds and berries.

Although not included in the Special Animals List, and not afforded regulatory protection in California or the United States due to their presence as an introduced exotic species, both red-masked parakeet and mitred parakeet have been evaluated for population status by the International Union for Conservation of Nature (IUCN) within their natural range. The red-masked parakeet has been assigned a status of Near Threatened (IUCN-NT), indicating that this species nearly qualifies for listing as threatened within its range. Mitred parakeet has been assigned a status of Least Concern (IUCN-LC), indicating that it does not approach the threshold for the population decline criterion used by the IUCN (i.e., declining more than 30% in ten years or three generations).

¹ Personal communication with Mr. Kimball Garrett (Collections Manager, Natural History Museum of Los Angeles County) on October 6, 2008 discussing wild parakeet populations located within the Studio City area.

(4) *Squirrels*

The squirrel is not a special-status species; however, members of the community expressed concern for these species during the public scoping period. As such, a discussion of this species is included.

California ground squirrel (*Spermophilus beecheyi*). California ground squirrels are found within open areas, including rocky outcrops, fields, pastures, and sparsely wooded hillsides from southern central Washington, western Oregon, most of California, and west central Nevada. California ground squirrels form loose colonies of multiple individuals that occupy a single burrow that is accessed individually through used and maintained entrances. California ground squirrels may climb into brush or trees to bask, but otherwise remain on the ground. Plant materials are the primary food source, but insects and small vertebrates may be eaten. Hibernation occurs from November through February; however, first-year individuals may remain above ground. California ground squirrels are residents within the Project Site.

Fox Squirrel (*Sciurus niger*). Fox squirrel, the largest of the North American tree squirrels, is native to the eastern United States, and inhabits woods, mixed forests, cypress and mangrove swamps, and areas containing pine trees. The fox squirrels present on the Project Site are not native to California, but likely represent a small population that has become established and locally naturalized within the Project Site and the portions of the surrounding neighborhoods that contain suitable tree cover. Fox squirrels are active all year, and feed on nuts, seeds, berries, some fungi, and corn in areas of agricultural production. Summer nests are located in tree branches and formed of leaves; winter nests may be in a tree cavity and occupied with several other squirrels. These squirrels are somewhat larger than the Eastern gray squirrel (*Sciurus carolinensis*). Their coat is more colorful and has a brownish tinge to the tail and rusty-gray under parts with a rusty-yellow or orange belly.

(5) *Trees*

A full tree survey was conducted for the Project Site in 2001 and 2002, and updated for the Project Site in 2011. It should be noted that the 2011 update only re-surveyed the Development Site (which includes the tennis court complex, as well as all adjacent areas to the Development Site that may undergo physical change for the Project), where the Studio City Senior Living Center is proposed to be located. As the remainder of the Project Site (including the golf course and driving range areas that are not adjacent to the Development Site), will not be altered or touched by the Project development, the 2011 updated tree survey did not include these areas. The tree surveys identified over 400 “landscape” trees on the Project Site overall. The 2011 survey identified eight species of trees at the Development Site; however, none of the trees were found to be indigenous trees, native to California, including oaks, walnuts, sycamores, or laurel trees. The 2011 survey of the Development Site found 47 trees that met the criteria “of size”² as defined by the City of Los Angeles. Trees identified on the Development Site are summarized in *Table IV.C-3: Trees Located on the Development Site*.

² “Of-size” trees are ornamental trees that measure at least 8 inches or more in cumulative diameter(s) at 40 inches above existing grade. (City of Los Angeles “*Tree Preservation Guidelines*”)

TABLE IV.C-3
TREES LOCATED ON THE DEVELOPMENT SITE¹

QUANTITY	TAG/MAP NUMBER ²	COMMON NAME	BOTANICAL NAME
1	441	Orange	<i>Citrus species</i>
14	11, 12, 23-33, 131	Blue Gum	<i>Eucalyptus globulus</i>
1	440	Benjamin Fig	<i>Ficus benjamina</i>
1	41	Montebello Ash	<i>Fraxinus velutina coriacea</i>
3	36, 38, 442	American Sweet Gum	<i>Liquidambar styraciflua</i>
2	39,40	Aleppo Pine	<i>Pinus halepensis</i>
1	439	Queensland Umbrella Tree	<i>Schefflera adinophylla</i>
24	7, 9, 10, 42-60, 106, 437	Mexican Fan Palm	<i>Washingtonia robusta</i>

¹ Source: TREES, etc., *Horticultural Tree Report Studio City Senior Living Center*, December 2011.

² Tag/Map Numbers are keyed to the Tree Map, enclosed as part of the Tree Report in *Appendix J: Tree Report* of this Draft EIR.

b. Regulatory and Policy Setting

(1) Special-Status Species

The U.S. Fish and Wildlife Service (USFW) and the California Department of Fish and Game (CDFG) are the regulatory agencies charged with oversight of plant and animal resources and implementation of regulations protecting such resources. Guidelines and lists published by each agency establish the required protocol for surveys, including the identification of species that may be listed as “special-status” (i.e., rare, threatened or endangered). When special-status species are encountered or anticipated to be affected by a proposed project, then these agencies may become a Responsible Agency with permitting review authority. Because no special-status species were observed on the Project Site, coordination with USFW or CDFG is not required.

(2) Trees

Los Angeles Tree Preservation Guidelines. Ordinance 177,404, effective April 23, 2006 (Subdivision 12, Section 5, R.4a.) of the City of Los Angeles' Municipal Code, establishes "Tree Preservation Guidelines." It is the policy of the City of Los Angeles to require the preservation of indigenous, native to California, trees, which measure 4 inches or more in cumulative diameter at 40 inches above natural grade. Indigenous trees to be preserved include oak (*Quercus* species), except for scrub oak (*Quercus dumosa*), Southern California black walnut (*Juglans californica*), Western sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*), unless compelling reasons justify the removal of such trees. The above noted trees shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree-planting program.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Biological surveys were performed on the Weddington Golf & Tennis Club Project Site by Aquatic Consulting Services, Inc. (ACS) to evaluate the potential affect to squirrels and exotic parakeets known to occur in the vicinity of the Project Site. Field reconnaissance was initially completed in 2007 with additional field surveys completed on June 25, July 1, 9, 16, 25, 31, and August 8, 2008.

Survey efforts for both the 2007 and 2008 surveys focused within the golf course of the Project Site due to the lack of suitable habitat for squirrels and nesting birds within the Development Site (i.e., tennis courts). The surveys provided baseline biological information regarding the animal species residing in and around the Project Site. Both the 2007 and 2008 survey series were performed between 7:00 A.M. and 10:30 A.M. in weather conditions that were conducive to bird and mammal surveying. Survey areas were walked and visually surveyed. Squirrels were identified by direct observation, and birds were identified by direct observation and/or call.

In accordance with Ordinance 177.404, effective April 23, 2006 (Subdivision 12, Section 5, R.4a.) of the City of Los Angeles Municipal Code relating to the "Tree Preservation Guidelines," the tree survey considered the presence of indigenous, native to California, trees measuring 4 inches or more in cumulative diameter at 40 inches above natural grade, as well as "of-sized" ornamental trees that measure at least 8 inches or more in cumulative diameter at 40 inches above natural grade. The tree report documented the condition, attributes, and health of each surveyed tree. The tree survey field sheets are provided in *Appendix J: Tree Report* of this Draft EIR.

The trees were inventoried as to their species, health, and aesthetic consideration, and reviewed in accordance with presently accepted industry procedures, which are of macro-visual observations only. No extensive microbiological, soil-root excavations, upper crown examination, nor internal tree investigations were conducted.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant biological impact if it would cause any of the following conditions to occur:³

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

³ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (March 2012).

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service;
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Furthermore, as set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis. A project would normally have a significant impact on biological resources if it would result in:

- 1) The loss of individuals, or the reduction of existing habitat, of a State or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- 2) The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- 3) Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species;
- 4) The alteration of an existing wetland habitat; or
- 5) Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

c. Project Impacts

(1) Animal Species

Based on biological surveys conducted in 2007 and 2008, the Project Site, and the golf course in particular, contains a variety of wildlife (reptiles, birds, and mammals) and suitable mature trees, brush, and vegetable cover used by existing wildlife species that have adapted to normal golf

course operations. However, the Development Site, which primarily contains the existing tennis court facilities, has no specific habitat area that would be impacted by the proposed senior housing development. The proposed Project will not remove any stands of large mature trees, brush, or vegetable cover that would contain potential bird nesting habitat, squirrel nesting areas, or other wildlife species areas, and as such, these habitats will remain intact, resulting in a less-than-significant impact. However, since the development footprint would be removing certain trees on the Project Site, resident bird species, especially, may need to be protected during construction through the below Mitigation Measure in the following section.

(2) *Exotic Parakeets*

The exotic parakeets observed on the Project Site are not protected by State or federal regulations, but are of interest to the general public in the area. As most of the proposed construction is planned to occur within the existing footprint of the tennis court complex and immediately adjacent area (comprising the Development Site), which generally lacks suitable nesting and foraging habitat for the bird species observed onsite, it is likely that proposed construction activities within the Development Site will have negligible impacts to birds generally occurring within the golf course.

Although the analysis in this EIR is not required to address any impacts to the species, in acknowledgement of the public interest in the parakeets, the Applicant shall apply the avoidance/protection measures to the exotic parakeets that are typically extended only to native bird species. This includes biological monitoring of Project construction activities so that the construction activities are performed during the regular nesting season or conducted outside the nesting season. The Mitigation Measures presented below will ensure that impacts to the birds during the construction phase of the Project remain at less-than-significant levels.

(3) *Squirrels*

Neither fox squirrels nor the California ground squirrels occurring onsite are Special-Status Species, and are not provided any special State or federal regulatory protection. As most of the proposed construction is planned to occur within the Development Site, which generally lacks suitable burrowing, nesting, and foraging habitat for the squirrel species observed on the Project Site, it is anticipated that the proposed construction and operations will have negligible impacts to squirrels occurring on the Project Site. In addition, it should be noted that fox squirrels are exotic to California (native to the eastern portion of the United States), and the ground squirrel population occurring on the Project Site is presently managed by golf course landscape and maintenance personnel in order to minimize damage caused by these burrowing mammals to the golf course fairway and green areas. Since most of the large mature stands of trees exist on the golf course, which will be left intact—not the Development Site—any fox squirrel nests will be left intact during construction. Therefore, impacts are less-than-significant and no specific recommendations for protecting these animals are required.

(4) *Trees*

It is the intention of the proposed Project to preserve the majority of the trees on the Project Site. However, some trees on the Development Site, which include those trees around the perimeter of the tennis court complex will be removed when the tennis courts are demolished and surrounding area cleared to accommodate construction of the proposed SCSLC.

Of the total 47 trees surveyed within the Development Site, 38 trees will be retained and nine trees removed for the Project. *Table IV.C-4: Tree Disposition Due to the Project*, summarizes the status of trees to remain and to be removed due to the proposed Project.

TABLE IV.C-4
TREE DISPOSITION DUE TO THE PROJECT¹

TREE NO(S). ²	PROPOSED DISPOSITION	REQUESTED ENCROACHMENT
7, 9-12, 23-26	Save	This portion of the site has been acquired by the City of Los Angeles for a Fire Station, which has been completed. These trees are not affected by the Project (3 [#7, #9, #10] Mexican Fan Palms & 6 [#11, #12, #23 to #26] Blue Gums).
27-33	Save	It is the Project's intention to save these 7 Blue Gums.
36 & 38	Save	It is the Project's intention to save these 2 "off-property" American Sweet Gums.
39-43	Remove	These 5 trees (2 [#39, #40] Aleppo Pines, 1 [#41] Montebello Ash & 2 [#42, #43] Mexican Fan Palms) will require removal for the Project's proposed construction.
44-60	Save	It is the Project's intention to save these 17 Mexican Fan Palms.
106	Remove	This Mexican Fan Palm will require removal for the Project's construction.
131	Save	This portion of the site has been acquired by the City of Los Angeles for a Fire Station, which has been completed. This Blue Gum is no longer affected by the Project.
437	Save	It is the Project's intention to save this Mexican Fan Palm.
439-441	Remove	These 3 trees (1 [#439] Queensland Umbrella Tree, 1 [#440] Benjamin Fig & 1 [#441] Orange) will require removal for this Project's proposed construction.
442	Save	It is the Project's intention to save this American Gum.

¹ Source: TREES, etc., *Horticultural Tree Report Studio City Senior Living Center*, December 2011.
² Trees are identified by "tree number" on the Tree Location Map, included in the Tree Report, provided in *Appendix J: Tree Report* of this Draft EIR.

Due to the fact that the Development Site and Project Site do not support any indigenous, native to California (California native bay, oak, sycamore, and/or walnut), trees, there are no anticipated impacts to native trees. However, the nine trees to be removed to accommodate the Project (as indicated in *Table IV.C-4*) meet the definition of "of size" trees per the City's Tree Protection Guidelines. The preservation of healthy, mature trees is an objective for the City and the Applicant should make all attempts to recycle and replant any trees that remain healthy after removal, although this is not always possible. However, the removal of the nine trees compared to an overall total (approximately) 430 trees on the Project Site, represents a potential loss of approximately 2 percent of the total trees onsite. Further, this represents about 19 percent removal of the total "of size" trees at the Development Site. These percentages do not represent a significant amount of tree removals from the Project Site, resulting in a less-than-significant impact due to the Project.

Additionally, the City of Los Angeles Tree Protection Guidelines and landscape requirements will require that new landscaping, including trees, be integrated into the new construction area,

and would require at a minimum a 1:1 replacement for any tree removed. The Compliance Measures for the Project are listed below and are consistent with the objectives of the tree guidelines.

d. Cumulative Impacts

A significant impact to biological resources is typically based on consideration of the Project's impact on known sensitive species and/or the loss of valued habitat. Due to the fact that the proposed Project would not affect any rare, threatened, or endangered species, nor result in the removal of any special or native habitats or trees, or any significant amount of existing trees, the resultant cumulative impact is also considered-less than-significant.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific biological impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- Any work on non-removed (e.g., saved) trees shall be in accordance with the City of Los Angeles' preservation tree policies.
- The Project landscape plan shall include provision for 15-gallon, 24" box, or 36" box specimen trees, to replace any "of size" trees removed. Such replacement shall be on a 1:1 ratio basis.
- The City of Los Angeles Tree Protection Guidelines and landscape requirements require that new landscaping, including trees, be integrated into the new construction area, and shall require at a minimum a 1:1 replacement for any tree removed. The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review shall ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.

b. Project Design Features (PDFs)

There are no PDFs included with respect to biological resources.

c. Mitigation Measures

The Project will result in less-than-significant operational biological impacts. To ensure that the biological impacts are less-than-significant during the construction phase of the Project and that non-invasive new trees are planted in the landscaped areas of the Project, the following Mitigation Measures shall be implemented:

- MM BIO-1: Biological monitoring of all construction activities shall be performed during the regular nesting season (February 1 through September 1). If birds begin to nest during construction, these nest areas shall be marked and a 50-foot buffer/avoidance zone shall be established to protect nesting/fledgling birds. Any nesting birds within this zone shall be avoided until such time that all young have fledged and the nest is no longer active, or until the nest is observed to have been abandoned for a sufficient period of time to preclude egg viability. Heavy equipment (dozer, backhoe, trucks, excavator, and pile driver) used for Project construction shall avoid working within this 50-foot buffer area. Alternatively, excavation, grading, fill, pile driving or any other construction activity requiring the use of heavy equipment shall be conducted outside the typical nesting season.
- MM BIO-2: If additional trees, beyond those proposed in the EIR, are removed as a necessity for grading and construction operations, especially those trees which form a part of a large, established stand or canopy, or trees which appear visually unique, then the Project Applicant or developer shall preserve the trees, if healthy, for re-planting elsewhere onsite, to the extent possible.
- MM BIO-3: New trees integrated into the Project should be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. As such, the proposed Project tree program shall incorporate the following:
- As recommended by Cal-IPC (California Invasive Plant Council-www.caHpc.org), the following trees should be avoided: Tree-of-Heaven (*Ailanthus altissima*), Single Seed Hawthorn (*Crataegus monogyna*), Russian Olive (*Elaeagnus angustifolia*), Blue Gum (*Eucalyptus globulus*), Myoporum (*Myoporum laetum*), Black Locust (*Robinia pseudoacacia*), Chinese Tallow Tree (*Sapium sebiferum*), Brazilian Pepper Tree (*Schinus terebinthifolius*), Scarlet Wisteria (*Sesbania punicea*) & Sa It Cedar (*Tamarix* sp.).
 - As recommended by Cal-IPC, the following trees are discouraged to be planted in California: Acacia (*Acacia dealbata*, *A. decurrens*, & *A. melanoxylon*), Edible Fig (*Ficus carica*), Mayten (*Maytenus boaria*), Olive (*Olea europaea*), Canary Island Date Palm (*Phoenix canariensis*), California Pepper Tree (*Schinus californica*) & Mexican Fan Palm (*Washington robusta*).
 - As recommended by Cal-IPC, the following trees are encouraged: Strawberry Tree (*Arbutus* sp.), Eastern Redbud (*Cercis canadensis*), Chinese Fringe Tree (*Chionanthus retusus*), Japanese Blueberry Tree (*Elaeocarpus decipiens*), Bronze Loquat (*Eriobotrya deflexa*), Nichol's Willow-Leafed Peppermint (*Eucalyptus nicholii*), Crape Myrtle (*Lagerstroemia* sp.), Tulip Tree (*Liriodendron tulipifera*), Dawn Redwood

(Metasequoia glyptostroboides), Sweet Michelia (*Michelia doltsopa*), Tupelo (*Nyssa sylvatica*), Burr Oak (*Quercus macrocarpa*), Southern live Oak (*Quercus virginiana*), Japanese Snowdrop Tree (*Styraxjaponicus*), Bald Cypress (*Taxodium distichum*) & Water Gum (*Tristania laurina*).

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts during operations, with regard to the biological life on the Project Site, are less-than-significant, primarily because the Development Site is largely void of suitable habitat for wildlife species. Further, with implementation of the Compliance Measures as required and the Mitigation Measures identified above, all potential and short-term construction impacts related to biological resources would be reduced to less-than-significant levels.

IV. ENVIRONMENTAL IMPACT ANALYSIS

D. CULTURAL RESOURCES

1. INTRODUCTION

Architectural Resources Group (ARG) completed a historic resource assessment of the Weddington Golf and Tennis Club located at 4141 Whitsett Avenue in Studio City, California. This section summarizes information and conclusions of the report, which is included in its entirety as *Appendix E: Historical Resources Report* of this Draft EIR.

The Weddington Golf and Tennis Club was historically called the Studio City Golf and Tennis Club. For the purposes of this analysis, it is referred to by its current name, except when appropriate for historical context.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The Project Site is located within the boundaries of Studio City, which is a part of the City of Los Angeles located in the San Fernando Valley. Residential neighborhoods occupy most of the surrounding land to the north, east and west. The Los Angeles River channel and Ventura Boulevard, a major commercial thoroughfare, are directly south of the Project Site.

More specifically, the Weddington Golf and Tennis Club is located at 4141 Whitsett Avenue, at the southwest corner of Whitsett Avenue and Valley Spring Lane. The triangular site is approximately 16.1 acres with the Los Angeles River forming the diagonal southwestern boundary, Valley Spring Lane the northern boundary, and Whitsett Avenue the eastern boundary. A short length of Bellaire Avenue forms the western boundary. The southernmost section of the Project Site extends into the public right-of-way for Valleyheart Drive and the Los Angeles River. The Project Site's public entrance is oriented to the east along Whitsett Avenue. An asphalt drive with flanking parking spaces serves as entrance and exit. A putting green and clubhouse at the Project Site's northeastern corner are the most visible elements along Whitsett Avenue and mark the gateway to the Project Site. The majority of the Project Site maintains a park-like setting as a result of the landscaping and mature trees. The southeastern corner of the Project Site is dedicated for tennis uses. Previously, a portion of the southeastern corner of the Project Site was given to the City of Los Angeles for use as a fire station. This portion is no longer included as part of the Project Site and is currently the site of City of Los Angeles Fire Station No. 78.

(1) *Site History*

The Project Site formed part of the vast territory in the San Fernando Valley that Pio Pico, the last Mexican governor of *Alta California*, sold to Isaac Lankershim, a farmer who had migrated to California from Pennsylvania, in 1869. Because of the timing of the parcel's purchase by the Weddingtons in 1890, it may have been a portion of the lands subdivided by James Lankershim,

the son of Isaac Lankershim. Wilson Weddington operated a sheep farm on the Project Site, but then switched to wheat and later, casaba melons. The Toluca post office operated out of the Weddington home until it moved to the family's general store in 1894. In 1927, the river portion of the parcel was dedicated to the Municipal Improvement District #61 for the development of a flood control system. The river was lined with concrete during the late 1940s.

In the 1950's, the Weddingtons agreed to enter into a 50-year lease agreement with Joe Kirkwood, Jr. to develop the Project Site as a golf course. Kirkwood, famous for his role as the boxer Joe Palooka in eleven films and a television series, was also a professional on the PGA tour, along with his father, Joe Kirkwood, Sr., a famous trick-shot golfer.¹ Kirkwood modeled the course on par-3 holes from famous golf courses, including the seventh hole from Pebble Beach, the 15th hole from Cypress Point, and three holes from Augusta.² At the 9-hole course, Kirkwood also built a golf shop and clubhouse with a snack bar. Though the course would have appealed to golf history buffs, it proved too challenging for most average players, who also knew little about the history of the game. Because Kirkwood's Golf Center was essentially a neighborhood course, the difficulty of play limited its draw, and it went bankrupt.³

In 1957, Kirkwood, Jr. sold an option to the course to George McCallister, Sr., a golfer and investor in sporting goods and real estate, and his partner and fellow Wilshire Country Club member, Art Andersen, founder of Western Freight and an industrial real estate investor. Along with his groundskeeper Zeke Avila, McCallister Sr. redesigned the course to make play easier—filling in the water and sand traps, and rebuilding the greens—ensuring that the course would be more accessible to players from the neighborhood. McCallister Sr. also provided a forum for people to learn the game, offering individual golf lessons, as well as group swing classes where an instructor demonstrated from a stage. Golf lessons were promoted in local newspapers, and McCallister Sr. was influential in lobbying the Los Angeles city schools to incorporate his form of golf instruction into physical education programs. The Studio City Golf Course, as it was then called, was frequented by film studio workers who lived in the area. While most private clubs were prohibitively expensive for the middle-class, the Studio City course, though private, was open to the public at a reasonable price, and so was positioned to take advantage of the growing popularity of golf in the 1960s following the televising of the PGA Tour and the stardom of Arnold Palmer.⁴

In 1966, McCallister Sr. replaced the maintenance building with a larger structure, and built an enclosure at the driving range, creating 10 sheltered tees. Construction on the tennis courts began in 1974 spurred on by McCallister's partner Art Andersen's interest in tennis. Andersen and McCallister Sr. shortened and slightly repositioned the fifth and sixth golf tees to accommodate the construction of five tennis courts. Later, the width of the driving range was reduced to make room for an additional fifteen courts. Four tennis courts were more recently dismantled to accommodate the new City of Los Angeles fire station (No. 78 adjacent to the southeast corner of the Project Site).⁵

¹ George McCallister, Jr., personal communication, 29 May 2007.

² Charles Curtis, "Golfagraphs: Littler Defends Montebello Title", *Los Angeles Times*, 11 December 1955, B12.

³ George McCallister, Jr., personal communication, 29 May 2007.

⁴ *Ibid.*

⁵ *Ibid.*

Until June of 2007, the Weddington Golf Course had been operated by the McCallister family since 1958, initially by George McCallister Sr., and later by his sons John and then George Jr. when McCallister Sr. passed away in 1990. Having managed another family course in Pomona, and developed a remodeling business, George McCallister, Jr. was brought on by his brother John to refurbish the golf course. McCallister Jr. became manager in 1993, and his brother John left to become a golf course designer. Groundskeeping was also passed to a new generation: Zeke Avila Jr. is the chief groundskeeper for the course.⁶

Most of the trees on the Project Site were planted during or following the development of the golf course, but a row of Eucalyptus trees along Valley Spring Lane predates the course. In the 1960s, the McCallisters entered the tree nursery business, planting small palm trees in pots with an eye towards future revenue streams. Eventually, rather than being sold, the palm trees were planted on the grounds of the course. Including the palm trees, there are reportedly over 400 trees of at least 30 years of age at the Project Site.⁷

(2) *Site Development Chronology*

A summary of the site development activities throughout the modern history of the Project Site is provided below in *Table IV.D-1: Site Development Chronology*.

TABLE IV.D-1
SITE DEVELOPMENT CHRONOLOGY¹

DATE	SITE DEVELOPMENT MILESTONE OR ACTIVITY
April 1955	Zone Variance filed by Joe Kirkwood, Jr. to permit use of property “as a privately operated recreations center consisting of a golf driving range and a nine-hole pitch-and-putt golf course. (LA Times April 4, 1955, 36.)
January 1956	Driving range opened
May 1956	Joe Kirkwood, Jr. Golf Center officially opened with a celebrity gala hosted by Maurie Luxford.
November 1957	George McCallister assumes operations and management of Studio City Golf Course (LA Times 11/16/1957; A4)
May 1973	Studio City Golf Course, Inc. signs lease with County of Los Angeles for use of 2.5 acres of flood control land just north of the Los Angeles River between Whitsett & Bellaire Avenues. (LA Times, May 20, 1973, SF_B4)
1974	Original four tennis courts constructed
2007	Los Angeles County Fire Station begins construction at southeast corner of site
2008	Name changed to Weddington Golf and Tennis Club

⁶ *Ibid.*

⁷ George McCallister, Jr., personal communication, 29 May 2007.

(3) *Weddington Golf and Tennis Club Components*

Cultural Landscape Elements - According to the current property manager, virtually all design elements of the Project Site were explicitly outlined in a Conditional Use Permit.⁸ The recreational Project Site is composed of multiple contributing elements. Golf-related resources on the Project Site include: a one-story clubhouse; a 24-stand, 230-yard driving range; a 9-hole, par-3 pitch-and-putt golf course; and a putting green. Tennis-related resources on the Project Site include: a small tennis house and 16 concrete courts located in staggered rows at the southeast portion of the Project Site, adjacent to the existing fire station. Other elements on the Project Site include: a maintenance structure east of the tennis courts at the southern property line.

Golf Clubhouse - The Weddington Golf and Tennis Club features a one-story clubhouse building near the southwest corner of Whitsett Avenue and Valley Spring Lane, on the northwest corner of the Project Site. The building sits at an angle facing the street corner. Its front lawn is a putting green, with a low, non-original brick wall with weeping mortar, that borders the street and which replaced an earlier split rail fence. A walkway parallel to the front of the building approaches the entrance from the parking lot to the south.

The clubhouse is of wood frame construction on a concrete slab-on-grade foundation. It has a wood shingle-clad, side-gabled roof with deep eaves along the front and rear of the building to create generous overhangs. The front overhang is sheltered by square wood posts. The exterior cladding of the building is painted board and batten siding. The north side contains utility uses, with a shed-roofed garage (its roof parallel to the main gable) and a small shed (its roof perpendicular to the main gable, attached to the wall) and an exterior vestibule at the back of the pro shop enclosed with chain link fencing.

The recessed entrance is sheltered beneath the overhang, with the entrance and the glass wall of the front of the building recessed from the eave line. Large, low planters to the north and south of the entrance hold shrubs and small trees that pass upwards through rectangular cut-outs in the front slope of the roof. The entrance is on grade, with aluminum-frame glass doors and full-height plate glass windows to either side. It is not clear whether these expanses of glass are original or alterations. Inside the entrance, the main interior space is a reception room. The tile and carpet floor of the clubhouse is not original, nor is the wallpaper above the paneling or large mirror on the south wall, but most other features of the interior have changed very little, leaving the clubhouse with high interior integrity. Knotty pine paneling covers the walls up to a datum line set by the east (entrance) and west (rear) walls. The major feature of the reception room is a slab fireplace wall extending from floor to ceiling and clad in variegated brick. The rectangular cutout of the fireplace box is surrounded by two wrought iron six-arm light fixtures that carry shaded hurricane lanterns. A matching four-arm fixture hangs near the pro shop desk. The reception space is flanked by offices to the north, and restrooms to the south. The rear entrance

⁸ Refer to *Appendix M: Historical Planning Cases for the Project Site* of this Draft EIR for a compilation of all Conditional Use approvals and extensions issued by the City of Los Angeles to maintain operation of the golf course and appurtenances. It should be noted that the Conditional Use approval appears to have expired. As part of the entitlements requested in connection with this Draft EIR, the applicant is requesting issuance or renewal of a Conditional Use approval to continue operation of the golf course facilities on the project site.

to the greens is on axis with the front door, with an enclosed coffee shop to the south and a pro shop to the north.

The coffee shop is enclosed with wood-framed glass panels on the north side and at the entrance, directly north of the fireplace. The space has an open painted wood beamed ceiling with diagonal tongue and groove boards. The open kitchen on the south wall has a large copper hood, and an L-shaped laminate counter with built-in stools provides seating. Windows along the west wall look out to the rear of the building, including a window for walk-up service.

The pro shop area, adjacent to the rear entrance, is marked by a high, L-shaped counter with wood paneling on the front similar to that seen in the rest of the interior. A small decorative corbelled shelf lines the opening. The rear patio of the clubhouse is partly shaded by the deep overhang of the roof. Extending from the south end of the rear patio of the clubhouse is a long open structure that serves as a shelter for golfers using the driving range. This structure has a shed roof that slopes upwards toward the west (i.e., toward the driving range). Its roof has a slight fan shape, with the beams converging toward the concave front of the structure. Each column bay has three berths for golfers using the driving range, separated with ground-mounted metal mesh dividers.

The golf clubhouse was designed by architect William M. Bray, AIA. Bray practiced architecture in Southern California for over sixty years, with an office located in Encino. Aspects of Bray's residential designs were periodically featured in the home décor columns in the Los Angeles Times throughout the 1950s and 1960s. Bray was responsible for two of the residential designs for the Aladowney Homes subdivision in Downey (1951) and Brighton Hills in Montebello (1961), where he employed the popular Ranch style. He also designed a retirement community in Palm Desert, called "Palm City."⁹ In 1994, Bray was awarded a lifetime achievement award from the San Fernando Valley chapter of the American Institute of Architects. His son and business partner, Roger W. Bray, AIA, continues the practice today as William M. Bray, AIA, Architect & Associates (WMBA).

The clubhouse is patterned in scale, style and type of materials on the residences in the surrounding suburban settings. The L-shaped lunch counter and the knotty pine interior of the pro shop are typical of the profile of other mid-1950s community golf centers. Aside from the course itself, the pro shop and the coffee shop or grill were important elements of a golf facility from this period. The Weddington Golf Course represents the essential characteristics of this property type from the period. It has high associative value and very effectively communicates the character and feeling of a local community golf course of the post-war era.

Golf Course - The Weddington Golf Course is characteristic of the small courses that became popular nationwide in the 1950s. The Weddington Golf Course has always been a private facility but it is popular for its public accessibility and community orientation. The combination of greenery, open spaces, social outlets, and community recreation provided by golf courses were valued in the 1950s and were considered a valuable use of land that still allowed for the open spaces that were rapidly disappearing as urban and suburban landscapes developed.

⁹ (Los Angeles Times, 7/29/1951; 7/21/1961)

The 9-hole, par-3, pitch-and-putt golf course is laid out within the Project Site along the property lines that abut Valley Spring Lane on the north, Bellaire Avenue on the west, and the river channel on the south. The course loops around the Project Site, partially encircling the driving range, and winds its way back to the clubhouse. Concrete pads mark tees on each of the holes.

Upon exiting the clubhouse's eastern door, the first tee of the golf course is located a few yards due west of the clubhouse exit, immediately adjacent (north) of the driving range fence. The fairway extends roughly 105 yards west of the concrete tee. Mature trees line both sides of the fairway, visually separating the first hole from the driving range to the south and the ninth hole to the north.

The second hole runs along the northern property line with the tee located on a northeasterly diagonal from the first green. The second fairway extends 130 yards to the second green, which is located on a small rise close to the northwestern corner of the property. A row of mature eucalyptus trees buffers the second fairway from the property line to the north.

With a tee located at the northwest corner of the Project Site, the third hole runs parallel to the western property line. The short, 75-yard fairway drops gently down to the green at the southwestern corner of the Project Site, which is partially surrounded by a low decorative split rail fence. A row of mature Canary Island and Aleppo pine trees, with a few interspersed olive trees, lines the western edge of the third fairway, along Bellaire Avenue.

The fourth hole tees off just east of the third green and runs parallel to the Los Angeles River channel's path, roughly 105 yards. The fourth green is located at the approximate midpoint of the Project Site's southern boundary along the edge of the river channel.

The fifth and sixth holes have been reconfigured from their original 1958 design. Originally, the fifth hole followed a dog-leg pattern with the tee located adjacent to a wider driving range. The fairway opened to a wide triangle, its base lined with mature eucalyptus trees that still stand and currently separate the Project Site from Whittsett Avenue. Originally, the oval-shaped fifth green was located at the southeastern corner of the Project Site. Following the addition of tennis courts and the division of the driving range in the 1970s, the fifth hole now runs along the south fence of the driving range for approximately 115 yards. The sixth hole, originally positioned parallel to the river wash, now runs parallel to the fifth hole but in the opposite direction, with its green located at the edge of the Property along the river. The sixth fairway measures 105 yards.

From the sixth green, a player reaches the seventh tee by walking a short northwesterly diagonal between the fourth green and the fifth tee. A tall row of mature Mexican fan palm trees separates the seventh fairway from the fourth immediately to the south. The seventh green sits atop a short hill, directly east of the third green near the Project Site's southwest corner. The fairway extends 115 yards to the green, located on a short rise above and immediately east of the third green.

From the course's eastern end, the eighth and ninth holes direct the player back to the clubhouse and the Project Site's northeastern corner. The eighth tee is adjacent to the third fairway, between the seventh and second greens. The fairway extends 135 yards, lined on both sides by a

row of mature palms, culminating at the kidney-shaped green immediately adjacent to the driving range's northwestern corner.

The ninth tee is reached by traveling a short northeasterly diagonal between the second tee and the first green. The ninth tee has been moved slightly east from its original location (which is still visible), foreshortening the ninth fairway to just 90 yards. A row of mature eucalyptus trees and Mexican fan palms line the northern property line along the ninth fairway. The green is located atop a slight rise. The length of the hole parallels the Project Site's northern property line, returning the player to the clubhouse entrance.

Driving Range - A 24-stand driving range is located between the clubhouse and the tennis area. A wood, shed-style canopy shelters the northern half of the stands. Temporary awnings provide shelter to the stands on the south end. Extending 230 yards, the driving range is located directly south of the golf clubhouse and is enclosed by a high fence.

Light Standards - When the driving range was reduced in size to accommodate new tennis courts, the lights at the southern end of the row were retained within the expanded parking lot adjacent to the tennis courts. Eight original light standards, designed in the form of a golf ball set atop a tee, line the fence along the Whitsett Avenue parking lot and provide light to the driving range. The parking lot has not changed from the original configuration and so, presumably, the light standards are in their original locations. According to the current property manager, one of the historic standards has been removed. These standards have been retrofitted with new 1000-watt stadium style lights that replaced 750-watt incandescent lights that are no longer manufactured.

Tennis House - The small tennis office was constructed in 1974, when tennis courts were added to the facility. The style of the building was patterned after that of the main clubhouse. It has a front-gabled roof clad in wood shingles facing west toward the tennis courts. A separate flat canopy of open beams for a shade structure is attached to the front façade and supported on metal posts. The exterior siding is board and batten, and the fenestration, concentrated at the west end, consists of large, square aluminum sliding windows. The front door and a side door on the north side have large single lights over an inset panels with a cross-timber details. The tennis house and the adjoining courts were constructed outside of the period of significance for the site, and so are not considered historic features of the site.

Tennis Courts - Sixteen concrete tennis courts are situated, in a staggered pattern, at the southeastern corner of the Project Site. Four courts of the original twenty were demolished in 2006 to accommodate construction of Fire Station No. 78.

Maintenance Structure - A temporary maintenance building has been constructed at the southern end of the Project Site, south and west (behind) of the tennis courts. A previous maintenance structure, constructed in 1966, was demolished when the adjacent fire station was constructed. The current maintenance structure is essentially a fenced yard with a roof; chain link fence with a windscreen form the structure's "walls." This structure does not contribute to the significance of the Project Site as a historic resource.

Maintenance Green - A small maintenance green, used to grow and harvest patch sod, is located at the southeastern corner of the tennis area and behind the fire station.

b. Regulatory and Policy Setting

(1) National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's master inventory of known historic resources. The National Register is administered by the National Park Service (NPS) and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, State or local level. The National Register criteria and associated definitions are outlined in *National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation*. The following is a summary of *Bulletin 15*:

Resources (structures, sites, buildings, districts, and objects) over 50 years of age can be listed on the National Register. However, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included on the National Register. The following list of definitions is relevant to any discussion of the National Register:

- A **structure** is a work made up of interdependent and interrelated parts in a definite pattern of organization. Generally constructed by humans, it is often an engineering object large in scale.
- A **site** is defined as the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself maintains historical or archaeological value regardless of the value of any existing structure.
- A **building** is defined as a structure created to shelter human activity.
- A **district** is a geographically definable area—urban or rural, small or large—possessing a significant concentration, linkage, or continuity of sites, buildings, structures, and/or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.
- An **object** is a material thing of functional, aesthetic, cultural, historical, or scientific value that may be, by nature or design, moveable yet related to a specific setting or environment such as a historic vessel.

There are four criteria under which a structure, site, building, district, or object can be considered significant for listing on the National Register. These include resources that are one or more of the following:

- *Criterion A:* associated with events that have made a significant contribution to the broad patterns of history (such as a Civil War battlefield or a Naval Ship building Center);
- *Criterion B:* associated with the lives of persons significant in our past (such as Thomas Jefferson's Monticello or the Susan B. Anthony birthplace);
- *Criterion C:* embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (such as Frank Lloyd Wright's Taliesin or the Midwestern Native American Indian Mounds) or;
- *Criterion D:* have yielded or may likely yield information important in prehistory or history (such as prehistoric ruins in Arizona or the archaeological sites of the first European settlements in St. Augustine, Florida or at the Presidio of San Francisco).

A resource can be considered significant in American history, architecture, archaeology, engineering, and culture. When nominating a resource to the National Register, one must evaluate and clearly state the significance of that resource. A resource can be individually eligible for listing on the National Register for any of the above four reasons. A resource can also be listed as contributing to a group of resources that are listed on the National Register (i.e., the resource is part of a historic district).

Districts are comprised of resources that are identified as contributing and non-contributing. Some resources within the boundaries of the district may not meet the criteria for contributing to the historic character of the district even though the resource is located within the district boundaries. Contributing resources add to the historic association, historic architectural qualities, or archaeological values for which the district is significant because the resource was present during the period of significance, relates to the documented significant contexts, and possesses integrity. Non-contributing resources do not add to the historic associations, historic architectural qualities, or archaeological values for which the district is significant because the resource was not present during the period of significance, does not relate to the documented significant contexts, or does not possess integrity.

Resources that meet the above criteria and have been determined eligible for the National Register are subject to Section 106 of the National Historic Preservation Act when a federal undertaking is involved. Section 106 of the National Historic Preservation Act does not generally apply to resources where private funding is used to alter or change those resources.

(2) California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a listing of State of California resources that are significant within the context of California's history. The California Register criteria are modeled after National Register criteria. However, the California Register focuses more closely on resources that have contributed to the development of California.

All resources listed in or formally determined eligible for the National Register are eligible for the California Register. In addition, properties designated under municipal or county ordinances are also eligible for listing in the California Register. The primary difference between the National Register and the California Register is that the latter allows a lower level of integrity. The property must be significant at the local, State, or national level under one or more of the following criteria:

- *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 2:* it is associated with the lives of persons important to the nation or to California's past.
- *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.
- *Criterion 4:* it has yielded, or has the potential to yield, information important to the prehistory or history of the State or the nation.

The California Register criteria are linked to the California Environmental Quality Act (CEQA). Under CEQA, resources are considered historically significant "if the resource meets the criteria for listing on the California Register" [Title 14 California Code of Regulations 15064.5 (3)].

Pursuant to CEQA Guidelines Section 15064.5, a historical resource is presumed significant if it is listed on the CRHR or has been determined to be eligible for listing by the State Historical Resources Commission (SHRC). An historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the CRHR. CEQA also contains the following additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed in the National Register of Historic Places (NRHP) (Section 5024.1.d.1);
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the *Public Resources Code*, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the *Public Resources Code*;
- Those resources that a lead agency determines to be historically significant (generally, if it meets criteria for listing on the CRHR), provided the determination is supported by substantial evidence; or
- Those resources a local agency believes are historical for more broadly defined reasons than identified in the preceding criteria.

(3) *Eligibility Factors and Resource Integrity*

To be eligible for either the National or California Registers, a resource must not only be historically or architecturally significant, it must also retain integrity or the ability to convey its significance. Integrity is grounded in an understanding of a property's physical features and how they relate to its significance within one or more contexts. Integrity involves seven aspects: location, design, setting, materials, workmanship, feeling, and association. These aspects closely relate to the resource's significance. For example, if the property is significant for architecture, the setting and association may not be as important as workmanship and materials. Integrity, particularly in the aspects important to the area of significance, must be primarily intact for National or California Register eligibility. Resources that have lost a great deal of their integrity are generally not eligible for the National Register. However, the California Register regulations have specific language regarding integrity, which note the following:

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register [California Code of Regulations Title 15, 11.5 (c)].

Integrity - The National Register Bulletin series provides guidance in regard to eligibility, integrity, period of significance and resource type. Essentially, for a property to qualify as an historic resource, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past (National Park Service, National Register Bulletin 15, 2002).

Bulletin 15 notes that an historic property derives its importance from its association with an important historic context and its retention of historic integrity of those features necessary to convey its significance. Insensitive modifications to an historic property can have a negative impact on that building's integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and their relation to its significance.

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity. The steps in assessing integrity are:

- Define the essential [or character-defining] physical features that must be present for a property to represent its significance;
- Determine whether the essential physical features are visible enough to convey their significance;
- Determine whether the property needs to be compared with similar properties; and

- Determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.

Within the concept of integrity, the National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity, a property must always possess several, and usually most, of the aspects: location, design, setting, materials, workmanship, feeling, and association. Ultimately, a property either does or does not have integrity.

Character-Defining Features - All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics; however, the property must retain the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance.)

(4) *Secretary of the Interior's Standard for Rehabilitation*

The purpose of the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (The Standards) is to promote responsible preservation practices that help to protect irreplaceable cultural resources. The Standards are meant to provide philosophical consistency in the preservation component of a development project and to guide essential decisions about the treatments to these properties. The preamble to the Standards states that they "are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility."

There are four overriding treatments discussed in The Standards: preservation, rehabilitation, restoration, and reconstruction. For the proposed Project, the rehabilitation standards are particularly relevant for guidance. The *Rehabilitation Standards* are a set of 10 guidelines intended to guide the rehabilitation process of an historical resource. Rehabilitation is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." The 10 Rehabilitation Standards are listed and discussed below under the impact analysis.

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

In the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) Area, preservation of historic and cultural resources are encouraged through the following goals, objectives, and policies:

Goal 16: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.

Objective 16-1: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.

Policy 16-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing historically significant buildings and the restoration of original facades.

Objective 16-2: To encourage private owners of historic properties/resources to conserve the integrity of such resources.

Policy 16-2.1: Assist private owners of existing and future historic resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Evaluation and understanding of the proposed Project by ARG was based on documents, including a project description and site plan prepared by the architect, Franco & Associates, Inc. and dated January 23, 2008 (updated December 23, 2011). On May 29, 2007, ARG representatives visited the Property to document existing conditions. Research was conducted at the Los Angeles Public Library and at the Los Angeles Department of Building and Safety. In addition, an informal interview was conducted with George McCallister, Jr. on May 29, 2007 to gather oral history.

ARG initially evaluated the significance of the property in 2007 in order to provide and identify potential areas of historic concern. Earlier versions of the proposed development plans have since been modified to avoid demolition of key historic components and address community concerns.

b. Thresholds of Significance

The CEQA Guidelines (Section 15064.5) define substantial adverse change in the significance of a resource as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource is materially impaired. Under CEQA, the significance of an historical resource is considered to be materially impaired when a project demolishes or materially alters in an adverse manner those characteristics that convey its historical significance and account for its inclusion on an historical resource list.

CEQA Guidelines Section 15065 mandates a finding of significance if a project would eliminate important examples of major periods of California history or prehistory. In addition, pursuant to Section 15064.5, a project could have a significant effect on the environment if it “may cause a substantial adverse change in the significance of an historical resource.” A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is impaired.” Material impairment means altering “in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.”

Impacts to historical resources not determined to be significant according to any of the significance criteria are not considered significant for the purposes of CEQA. Generally, under CEQA (CEQA Guidelines Section 15064.5), a project that follows *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or *The Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures* is considered to have mitigated impacts to an historical resource to a less-than-significant level.

Under CEQA Guidelines Section 15064.5(b)(3), conformity with the Standards in a development project is considered to mitigate impacts to historical resources to a less-than-significant level. Although compliance with the Standards is presumed to constitute a less-than-significant impact on historical resources, compliance with the Standards is not the sole criteria for determining whether a project would cause a substantial adverse change in the significance of an historic resource, and a failure to comply with the Standards may or may not constitute a significant impact or substantial adverse change under CEQA Guidelines.

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on historic and cultural resources if it would cause any of the following conditions to occur:¹⁰

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

Furthermore, as set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

Paleontological Resources

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

Archaeological Resources

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;

¹⁰ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100-years-old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Historical Resources

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

c. Project Impacts

(1) Evaluation of Eligibility

For CEQA purposes, a historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources or a qualified local register. The Weddington Golf and Tennis Club has not been previously listed on or determined eligible for the CRHR (California Register of Historical Resources) or the NRHP (National Register of Historical Resources), nor has it been designated as a City of Los Angeles Historic-Cultural Monument. The Property was not evaluated for National Register or Los Angeles Historic-Cultural Monument eligibility; however, the evaluation of significance under the California Register establishes a reasonable benchmark for national and local eligibility.

Significance Under the California Register

The Weddington Golf and Tennis Club appears to be eligible for the CRHR under criteria 1 and 3, as discussed below:

Criterion 1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

The Weddington Golf & Tennis Club appears to be locally significant in the area of recreation and entertainment as a community recreation center. Specifically, the 9-hole golf course and driving range were constructed in the mid-1950s and developed over the next ten years to provide the growing Studio City community with a publicly-accessible facility where children and adults alike could learn and practice the sport. The clubhouse, course, and driving range were a community draw, particularly for many patrons at all levels of the entertainment industry.

The course and driving range reflects the broad popularity of golf in the 1950s and 1960s, and how such recreational facilities were valuable amenities to serve the rapidly growing suburban population base in the San Fernando Valley during its most significant period of community development.

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.

The Weddington Golf Course represents the essential characteristics of a local, community golf course in the mid-1950s. It has high associative value and it effectively communicates the features of such a facility. Its setting has high integrity, as do the component elements including the low-slung, ranch style clubhouse (and its compatible, adjoining driving range shelter) that echo the preferred residential forms of the San Fernando Valley in that era, the golf course with its fairways lined in palm, eucalyptus, and pine trees, and associated features such as the golf ball-shaped light standards and putting green.

Character-Defining Features

The character-defining features of the Weddington Golf and Tennis Club include:

- 9-hole golf course, composed of fairways, greens, and tees (fifth & sixth holes altered).
- Park-like setting on the Project Site created by extensive trees and open space.
- Clubhouse: including board-and-batten siding, shake roof with rectangular cut-outs at planters, brick fireplace and chimney, knotty-pine interior paneling, and lunch counter.
- Driving range (altered) with shed-roof canopy with shake roof.
- Putting green in front of clubhouse.
- Golf ball light standards.

Integrity

To retain historic integrity, a property must always possess several, and usually most, of these aspects: location, design, setting, materials, workmanship, feeling, and association. Ultimately, a property either does or does not have integrity. The following is an analysis of each of the seven aspects of integrity in relation to the Property.

Location: The place where the historic property was constructed or the place where the historic event occurred.

The historic property remains in its original location. The proposed Project would retain the location aspect of integrity, thus resulting in a less-than-significant impact.

Design: The combination of elements that create the form, plan, space, structure, and style of a property.

The Weddington Golf Course has been partially altered in terms of design. The northern portion retains its 1958 design in terms of golf course layout, location, and design of the putting green and clubhouse. Alterations completed in 1974 to accommodate tennis courts required the realignment of two holes (five and six) and the reduction in size (by nearly half) of the driving range. However, the alterations reflect the evolution of the property as a community recreation center. These alterations have the potential of becoming significant and, therefore, do not substantially subtract from the Project Site's integrity of design.

A 1966 maintenance building was demolished, but it was located in a part of the Project Site that was removed from the clubhouse, as well as the starting and ending points of the course, and did not contribute to the historic design.

The more recent construction of the fire station to the southeast of and adjacent to the Project Site is not associated with the Project Site's historic significance as a community recreation center. However, its siting at the southeast corner of the Project Site minimizes the impact of the proposed Project on the Project Site's integrity of design as the golf course layout would remain unaffected, thus resulting in a less-than-significant impact.

Setting: The physical environment of a historic property.

Unlike location, setting refers to the character of the place in which the property played a historic role. It involves how, not just where, the property is situated, and its relationship to surrounding features and open space. Examples of features that create setting are: topographic features, vegetation, simple manmade features, and relationships between buildings and other features or open spaces.

The Weddington Golf and Tennis Club largely retains its integrity of setting. Setting is a particularly important aspect of integrity for the Project Site, and refers both to the Project Site's surroundings and the setting created within the Project Site by the arrangement and integrity of its component parts, combining buildings, outdoor spaces and hardscape, and landscaped areas, all with a particular purpose that contributes to the recognition of the property type and the associated use. The clubhouse is the nexus of all of the golf-related uses on the Project Site, including the putting green, the starting and ending points of the golf course, and the driving range. The setting of the Project Site is defined not just by the functional interrelationships of elements, but also by the sense of open space created by the design and location of the golf course. The site is buffered from Ventura Boulevard by its location along the Los Angeles River channel, and along each of the boundaries (as well as within the site), mature trees act as windbreaks, visual buffers, and markers of open space within the neighborhood and on the Project Site.

The southeast corner of the original Project Site boundary was acquired by the City and developed with Fire Station No. 78; however, the station is oriented

away from the historic focus of the Project Site. Furthermore, the fire station removed maintenance structures that were secondary to the significance of the Project Site and partially removed the tennis elements of the Project Site. (The tennis courts are not considered contributing features.) Therefore, the overall impact of the new construction for the Studio City Senior Living Center on proposed Lot 2 on the historic setting has been limited, thus resulting in a less-than-significant impact.

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

The site retains its integrity of materials. This aspect of integrity refers mainly to building materials and to whether the original materials from the period of significance continue to compose the significant structures, objects, and hardscape of the grounds. The substantially unaltered clubhouse retains the characteristic materials of the interior and exterior, such as the board-and-batten siding, shingled roof, and knotty pine paneling. The concrete patios that lie between the driving range, clubhouse, and first and last golf holes also contribute to the setting and design of the Project Site. The driving range shelter is also unaltered and composed of its original materials. As the Project will not completely remove these structures and original materials, a less-than-significant impact would result.

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

Workmanship is not a significant aspect of integrity for the Project Site. Most of the building materials of the structures were mass-produced and do not reflect either traditional building crafts or significant new materials or methods. Workmanship for the Project Site is best exhibited in the superior maintenance of the fairways and greens. In this respect, the skilled craft of golf course maintenance reflects the Project Site's workmanship and the Weddington Golf and Tennis Club retains its integrity of workmanship. Since the Project does not remove the golf course, a less-than-significant impact would result.

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

As a result of the Project retaining all material aspects of integrity, in whole or in part, the Weddington Golf and Tennis Club retains its integrity of feeling, thus resulting in a less-than-significant impact.

Association: The direct link between an important historic event or person and a historic property.

As a result of the Project retaining all material aspects of integrity, in whole or in part, the Weddington Golf and Tennis Club retains its integrity of association, thus resulting in a less-than-significant impact.

(2) Compliance with the Secretary of the Interior's Standard for Rehabilitation

The compatibility of the new design as a whole has been reviewed with respect to the Standards. Each of the Standards is listed below, followed by discussion of any potential for impacts in italicized text. Under CEQA Guidelines Section 15064.5(b)(3), conformity with the Standards in a development project is considered to mitigate impacts to historical resources to a less-than-significant level.

Standard #1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

The proposed Project meets Standard #1. The majority of the Project Site will be used as it was historically, which is a driving range and golf course (Lot 1). The portion of the Project Site that will be used for the Studio City Senior Living Center currently accommodates the tennis courts (Lot 2), which were constructed outside of the period of significance of the site and are therefore not considered historic features. Therefore, the Project would result in a less-than-significant impact.

Standard #2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.

The proposed Project meets Standard #2. As proposed, all character defining features of the Project Site will be retained. Proposed Lot 1, which is the portion of the site that includes the golf course, clubhouse, driving range, putting green, and light standards, will be retained with only minor alterations. Should any of the golf ball light standards be removed from the Project Site in the process of removing part of the surface parking lot located at the eastern boundary of the Project Site, the Project may result in a significant impact. However, implementation of a Mitigation Measure to retain and relocate any removed golf ball light standards onsite would reduce the impact to a less-than-significant level.

Standard #3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

The proposed Project meets Standard #3. The Project would not suggest conjectural features or elements from other historic properties, thus resulting in a less-than-significant impact.

Standard #4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.

The proposed Project meets Standard #4. No changes that have acquired historic significance were identified, thus resulting in a less-than-significant impact.

Standard #5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposed Project meets Standard #5. Those elements that were determined to be character defining features will be retained in Lot 1. Therefore, a less-than-significant impact would result

Standard #6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The proposed Project meets Standard #6. It does not include the modification or replacement of elements that were determined to be character defining features, thus resulting in a less-than-significant impact.

Standard #7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed Project meets Standard #7. The Project would not indicate chemical or physical treatments will be used. If any treatments that could cause damage to historic materials are used, a significant impact could result. As such, a Mitigation Measure with a requirement that usage of any possibly damaging treatments would be reviewed by a qualified professional in order to ensure conformance with this Standard would reduce the impact to a less-than-significant level.

Standard #8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Compliance Measures imposed by the City of Los Angeles require that a qualified archeological monitor will be present during construction to observe for potential archaeological resources and take appropriate measures to evaluate and process any archeological resources encountered during construction.

Standard #9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

The proposed Project meets Standard #9. The proposed new senior housing development will occur apart from those features that have been determined to characterize the Project Site. None of the buildings, landscape elements, or site features that were determined to be character-defining features will be destroyed by the proposed Project, thus resulting in a less-than-significant impact.

The lot subdivision, including the proposed siting of Building 4 and a necessary fire lane, necessitates the relocation of the sixth tee and fifth hole, which will be moved approximately 90 feet and 25 feet, respectively, to the northwest along the Project Site's south boundary. The fifth and sixth holes are not in their historic locations, owing to the 1970s reconfiguration of the southeastern portion of the course to make room for the construction of the tennis courts. No major landscape features (such as stands of trees) would be removed due to the development's encroachment. Similarly, the fence of the driving range may be moved north by approximately 21 feet to accommodate a proposed and necessary fire lane, thus possibly eliminating three existing driving range tee stands. However, the driving range has previously been altered to make room for the existing tennis courts, and the proposed change does not constitute a significant change to the driving range in that the driving range will not be demolished and the general size and character of the driving range and Project Site will be largely maintained, thus resulting in a less-than-significant impact.

Because the Project is located to the southeast of the existing golf course and driving range on what will become a separate parcel (Lot 2), the proposed Studio City Senior Living Center would appear separate from the adjacent historic features left undisturbed on proposed Lot 1. In order to physically distinguish and differentiate between the two parcels, the Project Applicant is including as a Project Design Feature, that appropriate landscaping be used to create a buffer between the two parcels, such as the placement of trees or shrubs at the parcel boundary to act as a natural screen between the two properties.

The proposed Project also calls for the elimination of some of the surface parking spaces at the eastern edge of the Project Site. The golf ball light standards, which are located at this parking lot and were determined to be character-defining features, are intended to be retained in place. If they must be removed for the Project, a significant impact may result. However, if they are relocated within the Project Site and retained onsite, the potential significant impact would be reduced to a less-than-significant level.

Standard #10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed Project meets Standard #10. If in the future the Studio City Senior Living Center were to be removed, the adjacent driving range, golf course and

associated buildings in Lot 1 would remain unimpaired, thus resulting in a less-than-significant impact.

(3) Consistency with Adopted Plans and Policies

The Project is consistent with the objectives and policies of the Community Plan, which encourages private owners of historic properties/resources to conserve the integrity of such resources. Because the Project is proposed to be developed on Lot 2, removing only the non-historic tennis courts, the integrity of the Weddington Golf Course, including its potentially historic eligible components of the golf course, clubhouse, and driving range, will remain intact.

d. Cumulative Impacts

The Project will not have an incremental effect on historic resources.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measure is a reasonably anticipated standard condition that is based on local, State, and federal regulations or laws that serves to offset or prevent specific cultural resource impacts. This Compliance Measure is applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- Standard conditions imposed by the City of Los Angeles require that a qualified archeological monitor will be present during construction to observe for potential archeological resources and take appropriate measures to evaluate and process any archeological resources encountered during construction.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential cultural resource impacts.

PDF CUL-1: In order to physically distinguish and differentiate between the two proposed parcels, appropriate landscaping, such as the placement of trees or shrubs at the parcel boundary to act as a natural screen between the two properties, shall be used to create a buffer between Lot 1 and Lot 2.

c. Mitigation Measures

The Studio City Senior Living Center has been designed specifically to limit development to Lot 2, thus avoiding disturbance of the potential historic components associated with the golf course on Lot 1. It should be noted that the siting of Building 4 and a necessary fire lane for the Project, necessitates the relocation of the sixth tee and fifth hole, which will be moved approximately 90 feet and 25 feet, respectively, to the northwest along the Project Site's south boundary, as well as

removal of three tee stands in the driving range and the movement of the driving range fence to the north. However, these components have been previously altered and will not be removed from the Project Site. The overall look, character. And size of the golf course, driving range, and mature foliage/trees would be maintained. Because the proposed Project has been designed to avoid disturbance of the potentially historic golf course components, and in general would comply with *The Secretary of the Interior's Standards*, potential impacts are already reduced to less-than-significant levels. Although the Project design would ensure that cultural resource impacts are less-than-significant, the following Mitigation Measures are required to ensure that any unforeseen potential adverse impacts are avoided or minimized. It should also be noted that the Project may require removal of golf ball light standards in the surface parking lot. As such, a Mitigation Measure below is required to ensure that any removed light standards are retained and relocated onsite.

MM CUL-1: To the extent feasible, all of the golf ball light standards, which are located in the existing surface parking lot and are a character defining feature, shall be retained in place. If any light standard must be moved, it shall be retained and relocated to an unaffected portion of Lot 1.

MM CUL-2: Any modifications to the Project design and layout shall be reviewed to confirm compliance with the *Secretary of the Interior's Standards*.

MM CUL-3: Any treatments that could cause damage to historic materials shall require review by a qualified professional in order to ensure conformance with the *Secretary of the Interior's Standards*.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Under CEQA, resources that meet the criteria for listing on the California Register and National Register of Historic Places are considered historic resources. The Weddington Golf Course appears to be eligible for the California Register under Criterion 1, as a privately-owned community recreation (golf) center built to serve the growing community of Studio City in the mid-1950s; and under Criterion 3, as a property that embodies the distinctive characteristics of a type as a typical example of a post-war community golf course. Therefore, the Weddington Golf Course appears to be significant at the local level and an historic resource under CEQA. Because the Project has been designed to avoid significant impacts to the eligible historic components of the Weddington Golf and Tennis Club, as established per the *Secretary of the Interior's Standards for Rehabilitation*, and Mitigation Measures have been required to ensure that all golf ball light standards are retained onsite and building materials will not be deteriorated, the Project will not result in a significant adverse effect under CEQA and thus impacts are less-than-significant. Implementation of the Compliance Measures and additional PDFs and Mitigation Measures would ensure that impacts remain less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

E. GEOLOGY, SOILS, AND SEISMICITY

1. INTRODUCTION

Geological, soils and seismic information presented in this section is derived primarily from the “*Geotechnical Engineering Investigation Proposed Studio City Senior Living Center 4141 Whitsett Avenue, Studio City, California*” report prepared by Geotechnologies, Inc. (Glendale, California) and dated December 12, 2011 (see *Appendix D: Geotechnical and Soils Report of this Draft EIR*).

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Geological Conditions

The Project Site, located in the community of Studio City in the City of Los Angeles, consists of a golf course, driving range, clubhouse, and tennis center generally located at the southwest corner of Whitsett Avenue and Valley Spring Lane. The Development Site (i.e., the area of the Project Site that will be physically disturbed) for the Studio City Senior Living Center Project is located at the southeast corner of the Project Site, in an area currently occupied by a maintenance facility, tennis courts, small tennis house, minor portions of the golf course, and a surface parking lot. The proposed Project would retain the existing golf course and driving range on the Project Site, although the configurations of small portions of the golf course and driving range within the Development Site (areas adjacent to proposed Lot 2) would be slightly altered for the Project. Due to the fact that the areas of the Project Site that are outside of the Development Site will not be physically disturbed, most of the geologic impact discussion below is pertinent to only the Development Site. However, the undisturbed portion of the Project Site or the Project Site as a whole, will be discussed as necessary and pertinent.

The entire Project Site is located in the Transverse Ranges Geomorphic Province, which are characterized by east-west trending mountains and the northern and southern boundaries formed by reverse fault scarps. The features of the Transverse Ranges are a result of plate tectonics movements that have resulted in localized folding and uplift of the mountains. The intervening valleys have been filled with sediments derived from the bordering mountains.

The Project Site is roughly level, with total relief of approximately five to six feet. South of the Project Site, a 10- to 15-foot-high, 2:1 slope descends towards the Los Angeles River channel. There is an existing level area, approximately 25 feet wide, adjacent to the vertical channel walls. Drainage is by sheetflow along the existing contours generally southward, or towards area drains.

(2) Existing Seismic Hazards

Since year 1800 there have been approximately 60 damaging earthquakes in the Los Angeles region. After a brief hiatus between major events (circa 1940-1972), the greater Los Angeles area has experienced a number of moderate events, which have resulted in considerable disruption of the infrastructure, impact on social and economic life, loss of lives, and extensive property damage within the City of Los Angeles, the greater metropolitan area, and the adjacent region. The most recent of these was the 6.7 magnitude 1994 Northridge earthquake, which was centered in the northwest part of the City of Los Angeles, in the general vicinity of the 1971 San Fernando (Sylmar) quake.

The U.S. Geological Survey has estimated the probability of a ten to thirty percent potential for a 7.5 or more magnitude quake along the southern portion of the San Andreas Fault within the next five to thirty years.¹ The Alquist-Priolo Act requires the State Geologist to map active earthquake fault zones. Those faults in the Los Angeles area typically are visible, above ground faults. However, it is the quakes along the unmapped faults, such as the buried thrust fault associated with the Northridge earthquake, which increasingly are becoming the focus of study and concern. The concept of blind thrust faults has been recognized only recently by seismologists and the full potential of effects is still under study.

Based on criteria published by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those that show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, although seismic design standards may still apply to critical structures along inactive faults.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface rupture potential of these buried thrust faults is low; however, the seismic risk is not well established, thus the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

Figure IV.E-1: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas shows the Alquist-Priolo Special Study Zones and the Fault Rupture Study Areas in the City of Los Angeles. As shown in *Figure IV.E-1*, the Project Site is neither within an Alquist-Priolo Special Study Zone nor a Fault Rupture Study Area.

Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength during conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. *Figure IV.E-2: Areas Susceptible to Liquefaction* shows areas in the City of Los Angeles that are susceptible to liquefaction. As

¹ United States Department of the Interior, U.S. Geologic Survey, *2009 Earthquake Probability Mapping*, <https://geohazards.usgs.gov/eqprob/2009/index.php> (2009).



SAFETY ELEMENT EXHIBIT B
Areas Susceptible to Liquefaction
 In the City of Los Angeles

- Liquefiable Areas (cent alluvial deposits; ground water less than 30 feet deep)
- Potentially Liquefiable Areas (cent alluvial deposits; ground water 30-50 feet deep)
- ★ PROJECT SITE

NOTES
 The Safety Element's seismic and landslide exhibits, along with any official geologic or seismic hazard maps prepared by the City Building Safety Department are used in determining if additional soils and geologic hazards and mitigations, as a part of the development permit process.
 Sources: Environmental Impact report, Framework Element, Los Angeles City General Plan, May 1995; County of Los Angeles, General Plan Safety Element Technical Appendix Vol. 2, plate 4 "Liquefaction Susceptibility", January 1990.

Prepared by the General Plan Framework Section • City of Los Angeles Planning Department • Citywide Graphics • October, 1993 • Council File No. 89-2104

SAFETY ELEMENT EXHIBIT B
 Areas Susceptible to Liquefaction

FIGURE IV.E-2
AREAS SUSCEPTIBLE TO LIQUEFACTION

shown on *Figure IV.E-2*, the Project Site is located within an area that is susceptible to liquefaction.

(3) Soils and Stability

Previous Project Site development and uses have changed the onsite soil characteristics over time. During boring explorations conducted as part of the geotechnical study for the Project (see *Appendix D: Geotechnical and Soils Report*), fill materials were encountered to depths between 1 and 7 feet below the existing ground surface. The fill consists of sandy silt and silty sand, which range from light brown to black, and are slightly moist to moist, medium dense to dense, and fine to coarse grained. The native soils underlying the site consist of silty sand, clayey silt, silty clay, clayey sand, sandy silt and sand, which range from light brown to grey to dark brown, and are slightly moist to wet, soft to very dense, and fine to coarse grained. The native earth materials consist of alluvial sediments deposited by river and stream action typical to this area of the San Fernando Valley. Bedrock was encountered below the native soils in some of the exploratory borings at depths ranging from approximately 42.5 to 55 feet below the existing site grade. The bedrock consists of shale, siltstone and mudstone of the Miocene Monterey formation. The bedrock is light brown to grayish green to black, moist to very moist, and hard to very hard.

Landslides can be triggered by natural causes such as earthquakes, ocean wave action or saturation by storm, or can be induced by the undercutting of slopes during construction, improper artificial compaction or saturation from sprinkler systems or broken pipes. *Figure IV.E-3: Landslide Inventory & Hillside Areas* shows areas in the City of Los Angeles that have hillsides and areas that are prone to landslides. As shown in *Figure IV.E-3*, the Project Site is not located on a hillside nor is it located in an area prone for landslides.

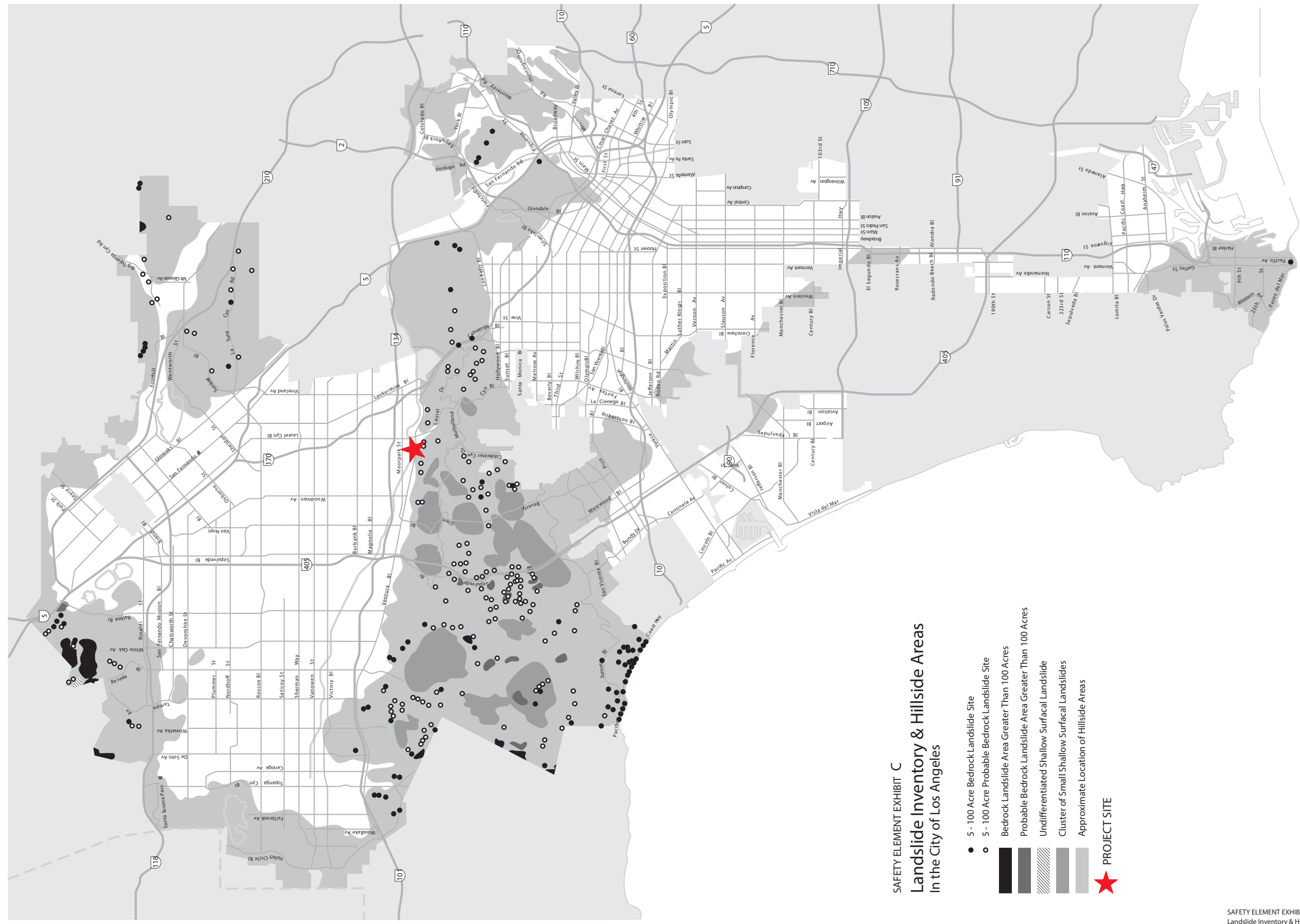
b. Regulatory and Policy Setting

(1) California Geological Survey

Under the Seismic Hazards Mapping Act², the CGS is tasked with compiling maps that identify seismic hazard zones, which in turn are provided to all affected cities, counties, and State agencies for review and consideration. The intent is to protect the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes.

Each city and county, in preparing the safety element to its general plan pursuant to subdivision (g) of Section 65302 of the Government Code, and in adopting or revising land use planning and permitting ordinances, shall take into account the information provided in available seismic hazard maps.

² California Public Resources Code, Chapter 7.8 Seismic Hazard's Mapping Act.



SAFETY ELEMENT EXHIBIT C
Landslide Inventory & Hillside Areas
 In the City of Los Angeles

- 5 - 100 Acre Bedrock Landslide Site
- 5 - 100 Acre Probable Bedrock Landslide Site
- Bedrock Landslide Area Greater Than 100 Acres
- ▨ Probable Bedrock Landslide Area Greater Than 100 Acres
- ▧ Undifferentiated Shallow Surficial Landslide
- ▩ Cluster of Small Shallow Surficial Landslides
- Approximate Location of Hillside Areas
- ★ PROJECT SITE

NOTES
 The Safety Element seismic and landslide exhibits, along with any official geologic or seismic hazard maps prepared by the State and any other potential hazard areas identified by the City Building Safety Department are used in determining if additional soils and geology prepared to help assess potential hazards and mitigations, as a part of the development permit process.

Sources: Environmental Impact Report, Framework Element, Los Angeles City General Plan, May 1995; County of Los Angeles Geologic Development Technical Appendix Vol. 2 Part 1 Landslide Inventory, January 1990; County of Los Angeles/Plan Safety Element Technical Appendix, Hazard Reduction in Los Angeles County, December 1990 California Environmental Quality Act of 1970 (CEQA) with guideline, Public Resources Code Section 17020.1(a) as amended; City of Los Angeles, Planning and Zoning Code Section 17.05(c), as amended 10-13-99

Prepared by the General Plan Framework Section • City of Los Angeles Planning Department • Citywide Graphics • June, 1999 • Council File No. 89-2104

SAFETY ELEMENT EXHIBIT C
 Landslide Inventory & Hillside Areas

FIGURE IV.E-3
LANDSLIDE INVENTORY & HILLSIDE AREAS

(2) *City of Los Angeles General Plan/Community Plan*

The Safety Element of the City of Los Angeles General Plan³ relates to the entire City of Los Angeles. The Safety Element establishes goals, objectives and policies to protect citizens and buildings from potential geological hazards. The following goal, objective and policies would be applicable to the Development Site and the Project for reducing building loss and human injury or death during a hazardous geological event:

Goal 1: A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic events, geologic conditions or release of hazardous materials disasters is minimized.

Objective 1.1: Implement comprehensive hazard mitigation plans and programs that are integrated with each other and with the City's comprehensive emergency response and recovery plans and programs.

Policy 1.1.1: Coordination. Coordinate information gathering, program formulation and program implementation between City agencies, other jurisdictions and appropriate public and private entities to achieve the maximum mutual benefit with the greatest efficiency of funds and staff.

Policy 1.1.2: Disruption reduction. Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure and information resource disruption due to natural disaster.

Policy 1.1.3: Facility/systems maintenance. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions.

Policy 1.1.5: Risk reduction. Reduce potential risk hazards due to natural disaster to the greatest extent feasible within the resources available, including provision of information and training.

Policy 1.1.6: State and federal regulations. Assure compliance with applicable State and federal planning and development regulations, e.g., Alquist-Priolo Earthquake Fault Zoning Act, State Mapping Act and Cobey-Alquist Flood Plain Management Act.

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

The Community Plan does not provide specific goals, objectives or policies addressing loss of buildings and human injury or death due to hazardous geological conditions. However, the

³ Department of City Planning Los Angeles, California, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.

Community Plan does identify recommended actions be promoted by the City of Los Angeles regarding Natural Disasters and Earthquake Preparedness.⁴

Natural Disasters Natural disasters such as the 1971 Sylmar-San Fernando and the 1994 Northridge earthquakes, floods, and fires have impacted, and will continue to impact, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass community. City government, other governmental agencies, the private sector, disaster relief agencies, and the citizens of Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass should be encouraged to work together to minimize the impacts of a disaster in terms of land development practices, providing essential services, preventing transportation and communication blockages, and to ensure that recovery will proceed as expeditiously as possible.

Earthquake Preparedness The 1994 Northridge earthquake devastated portions of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass area. The magnitude 6.8 (Richter scale) earthquake caused extensive and widespread property damage to residences, businesses, nonprofit organizations, public facilities, and infrastructure, including freeways, water lines, power lines, and natural gas lines. Recovery and rebuilding efforts began shortly after the Northridge earthquake and will continue over the next several years.

(4) *Los Angeles Municipal Code*

Specific grading requirements and geotechnical hazard regulations are provided in the Los Angeles Municipal Code (LAMC). Chapter IX, Division 70⁵ of the LAMC includes general construction, grading, and site excavation requirements that would apply to the proposed Project.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Representatives from Geotechnologies, Inc. completed field testing for the Project (see *Appendix D: Geotechnical and Soils Report*). The Project Site was explored on March 30 and 31, 2000, and June 4, 6, and 12, 2007 by drilling 15 exploratory borings, performing five Cone Penetrometer Test (CPT) soundings and excavating one test pit. The borings varied in depth from 30 to 60 feet below the existing site grade, and the CPT soundings were all pushed to refusal, which occurred at depths between 45 and 72 feet below the site grade. The borings were excavated with the aid of a truck mounted, hollow stem auger drilling rig, and were approximately eight inches in diameter.⁶ Further geotechnical testing methodology is described on pages 46 through 49 of the *Geotechnical Engineering Investigation (Appendix D: Geotechnical and Soils Report)*.

⁴ City of Los Angeles Planning Department, City of Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998, pg. IV-3

⁵ City of Los Angeles Municipal Code, Chapter IX Building Regulations, Division 70 Grading, Excavations and Fills.

⁶ *Geotechnical Engineering Investigation for the Proposed Studio City Senior Living Center at 4141 Whitsett Avenue, Studio City, California.*

b. Thresholds of Significance

The thresholds of significance identified below for geological/soil resources are based on Appendix G of the State CEQA Guidelines and the 2006 LA CEQA Thresholds Guide. In accordance with Appendix G of the State CEQA Guidelines and the 2006 LA CEQA Thresholds Guide, the Project would have significant impact on geological/soil resources if it would cause any of the following conditions to occur⁷:

- 1.) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - ii.) Strong seismic ground shaking.
 - iii.) Seismic-related ground failure, including liquefaction.
 - iv.) Landslides.
- 2.) Result in substantial soil erosion or the loss of topsoil.
- 3.) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- 4.) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- 5.) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

c. Project Impacts

(1) Seismic Hazards and Groundshaking

No known active or potentially active faults underlie the proposed Development Site or Project Site.⁸ Nor are the Development Site and Project Site located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, impacts related to ground rupture would be less-than-significant.

Although the Development Site is not located in an area identified as an Alquist-Priolo Earthquake Fault Zone nor does a known active or potentially active fault underlie the

⁷ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2012).

⁸ *Geotechnical Engineering Investigation for the Proposed Studio City Senior Living Center at 4141 Whitsett Avenue, Studio City, California*.

Development Site, the Project would still be exposed to moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults that are located nearby. However, it is assumed that the proposed Project structures would be developed in accordance with the 2010 California Building Code Seismic Parameters to reduce the potential for building loss, and human injury or death. With implementation of all required Compliance Measures, impacts related to seismic activity would be less-than-significant.

To determine the risk of building loss, or human injury/death involving seismic-related ground failure such as liquefaction, a magnitude 6.4 earthquake was used in modeling as the Design-Based Earthquake (DBE) for ground motion in this area of Los Angeles.⁹ The historic high groundwater level was obtained from review of CGS Seismic Hazard Evaluation Report 98-08. Review of this report indicates that the historically highest groundwater level is 0 feet below grade at the Development Site. Liquefaction analysis of the soils underlying the site was performed using the spreadsheet “templateLIQ2_30.WQ1”^{10,11}. The testing and modeling indicates that soils underlying the Development Site could be subject to liquefaction during the ground motion expected during the Design-Based Earthquake. As such, Mitigation Measures (below) will be implemented to reduce the potential for liquefaction of the underlying soils during a seismic event. Without such Mitigation Measures, the Project could result in a significant geological impact related to liquefaction and seismic-related ground failure at the Development Site.

(2) *Landslides and Soil Stability*

The probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the general lack of elevation difference and slope geometry across and adjacent to the Project Site. Building loss or human injury or death involving landslides are not expected to occur on the Project Site; therefore impacts would be less-than-significant.

Lateral spreading is the most pervasive type of liquefaction-induced ground failure. Saturated cohesionless sediments that underlie the Development Site, and would have the greatest potential for liquefaction-induced ground failure, have a corrected $(N_1)_{60}$ that is greater than 15. Therefore, the potential for lateral spread is considered remote at the Development Site and impacts would be less-than-significant.

Seismically-induced settlement or compaction of dry or moist, cohesionless soils can be an effect related to earthquake ground motion, but also occurs naturally. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Some settlement of the Project structures should be expected as a result of strong ground-shaking; however, due to the uniform nature of the underlying earth materials, excessive differential settlements are not expected to occur and impacts would be less-than-significant.

⁹ *Geotechnical Engineering Investigation for the Proposed Studio City Senior Living Center at 4141 Whitsett Avenue, Studio City, California.*

¹⁰ Developed by Thomas F. Blake in 1996.

¹¹ *Geotechnical Engineering Investigation for the Proposed Studio City Senior Living Center at 4141 Whitsett Avenue, Studio City, California.*

The existing fill material and upper native soils are not suitable to support the proposed Project's foundations, floor slabs or additional fill. If the Project were to be developed on this native soil and existing fill material, there would be potential for collapse of the buildings associated with the proposed Project, resulting in a significant geologic impact. Mitigation Measures (below) will be required for removal and replacement of engineered and recompacted fill to ensure a stable base for onsite development.

(3) *Soils and Local Geotechnical Issues*

Based on field testing results, the Development Site is not located on expansive soils as defined in Table 18-1-B of the 1994 Uniform Building Code.¹² However, as noted above, the existing fill materials and upper native soils are not suitable to support the proposed Project's foundations, floor slabs or additional fill. However, excavation for the proposed subterranean parking lot would remove the unsuitable materials on the Development Site. Mitigation Measures (below) will be required to replace the removed unsuitable materials with engineered and recompacted fill to ensure a stable base for onsite development.

Because the Project would connect to an existing sewer system located in Whitsett Avenue and Valley Spring Lane, the use of septic tanks or an alternative water disposal system is not proposed. Therefore, the Project would not be located in an area where soils are incapable of adequately supporting such alternative sewage disposal systems and there would be no impact.

(4) *Consistency with Adopted Plans and Policies*

City General Plan and Community Plan policies encourage adequate disaster preparedness and service planning to support the community in the event of a major disaster. Because the Project would be developed in accordance with all applicable and required building requirements and Compliance Measures, the potential for serious damage to buildings, and the risk to life and property from seismic-induced building damage, would be reduced to a less-than-significant level. Due to the existing stability of the soil under the Development Site, without appropriate and required Mitigation Measures (below), the potential for serious damage due to seismic-induced ground failure, and the risk to life and property from ground failure, would be significant. However, implementation of Mitigation Measures would reduce impacts to a less-than-significant level. Consequently, the potential to interfere with citywide disaster response is minimized. The proposed Project would also be consistent with adopted General Plan Safety Element Goal 1 (and its related objectives and policies) and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan recommended actions for natural disasters and emergency preparedness; therefore, impacts related to plans and policies affecting geotechnical and geological issues would be less-than-significant.

d. *Cumulative Impacts*

Geological and soil hazards are generally considered to be site-specific issues and thus do not have potential to be cumulatively considerable. Implementation of Compliance Measures and

¹² *Geotechnical Engineering Investigation for the Proposed Studio City Senior Living Center at 4141 Whitsett Avenue, Studio City, California.*

required Mitigation Measures MM GEO-1 through MM GEO-71 listed below would adequately mitigate against geological and soil hazards to ensure that building loss and human injury or death due to the proposed Project is reduced to the extent practically feasible and to a less-than-significant level. Other Related Projects would be required to complete similar geotechnical investigations to determine site-specific geological hazards and provide adequate Mitigation Measures to reduce building loss or human injury or death. Furthermore, each Related Project would be required to abide by development standards and Compliance Measures in the Los Angeles Municipal Code's Building Code and the Uniform Building Code to reduce impacts associated with geological and soil hazards. Cumulative geotechnical and geological impacts associated with concurrent development of the Project and Related Projects are not anticipated and would be less-than-significant.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific geotechnical and geological impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to Project residents and surrounding uses:

- Design and construction of the Project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.
- All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork Specifications in an approved Geotechnical Report.

b. Project Design Features (PDFs)

There are no PDFs included with respect to geology, soils, and seismicity.

c. Mitigation Measures

The Project will result in less-than-significant geological impacts related to building and structural integrity in the event of seismic or other geologic activity. To ensure that the geological impacts are less-than-significant in relation to ground failure due to seismic or other geologic activity, the following Mitigation Measures shall be implemented:

General Mitigation Measures

MM GEO-1: In order to mitigate against the effects of liquefaction, the Project structures shall be supported on a mat foundation, which shall be designed to resist one inch of differential settlement that could result due to seismic shaking.

- MM GEO-2: In order to reduce differential settlement between the shallow and deep foundations, the developer shall create a compacted fill blanket. In areas of the shallow foundations, all existing fill materials shall be removed and recompacted. Where existing fill materials are shallower than four feet in depth, all soils shall be removed to a minimum of three feet below the proposed foundations and recompacted as controlled fill prior to foundation excavation.
- MM GEO-3: Foundations for small outlying structures not tied to the main structure, such as property line walls or maintenance sheds, shall be supported on conventional foundations bearing in native earth materials.

Fill Soil Mitigation Measures

- MM GEO-4: Fill material, including any fill material generated during demolition of existing structures on the Development Site, shall be removed during the excavation of the subterranean parking level and removed from the Project Site. Where not removed by the proposed excavations, this material and any fill material generated during demolition shall be removed and recompacted as controlled fill prior to foundation excavation. All existing fill materials and any disturbed geologic materials resulting from grading operations shall be removed and properly recompacted prior to foundation excavation.

Water-Soluble Sulfate Mitigation Measure

- MM GEO-5: A water-cement ratio of 0.5 shall be maintained in the poured concrete used for development of the Project. Minimum concrete strength for moderate sulfate exposure shall be a minimum of 4,000 pounds per square inch (psi).

Site Preparation Mitigation Measures

- MM GEO-6: All vegetation, existing fill, and soft or disturbed geologic materials shall be removed from the areas to receive controlled fill. Any vegetation or associated root system located within the footprint of the Development Site shall be removed during grading. The excavated areas shall be carefully observed and monitored by a geotechnical engineer prior to placing compacted fill.
- MM GEO-7: Any existing or abandoned utilities located within the Development Site shall be removed or relocated as appropriate.
- MM GEO-8: Any at-grade portions of proposed structures within the Development Site shall be excavated to a minimum depth of three feet below the bottom of all foundations. The excavations shall extend at least five feet beyond the edge of the foundations or for a distance equal to the depth of fill below the foundations, whichever is greater. All positions of the proposed structure shall be accurately located so that the limits of the graded area are accurate and the grading operation proceeds efficiently.

- MM GEO-9: Subsequent to the surface soil removals, the exposed grade shall be scarified to a depth of six inches, moistened to optimum moisture content and recompactd in excess of the minimum required comparative density.
- MM GEO-10: All fill shall be mechanically compacted in layers not more than eight inches thick. All fill shall be compacted to at least 90 or 95 percent of the maximum laboratory density for the materials used. The maximum density shall be determined by a qualified professional using test method ASTM D 1557-07 or equivalent.
- MM GEO-11: Any imported material shall be observed and tested by the representative of the geotechnical engineer prior to use in fill areas. Imported materials shall contain sufficient fines so as to be relatively impermeable and result in a stable subgrade when compacted. Any required import materials shall consist of geologic materials with an expansion index of less than 50. The water-soluble sulfate content of the import materials shall be less than 0.1 percentage by weight.
- MM GEO-12: Imported materials shall be free from chemical or organic substances, which could affect the Project structures. A competent professional shall be retained in order to test imported materials and address environmental issues and organic substances which may effect development at the Development Site.
- MM GEO-13: Utility trenches shall be backfilled with controlled fill. The utility shall be bedded with clean sands at least one foot over the crown. The remainder of the backfill may be onsite soil compacted to 90 or 95 percent of the laboratory maximum density. Utility trench backfill shall be tested by a qualified professional in accordance with ASTM D-1557-07.
- MM GEO-14: Pumping (yielding or vertical deflection) of the high-moisture content soils at the bottom of the excavation may occur during operation of heavy equipment. Where pumping is encountered, angular minimum ¾-inch gravel shall be placed and worked into the subgrade. The exact thickness of the gravel would be a trial and error procedure, and shall be determined in the field. It would most likely be on the order of one to two feet thick.
- MM GEO-15: Rubber tire construction equipment shall not attempt to operate directly on the pumping subgrade soils prior to placing the gravel. Direct operation of rubber tire equipment on the soft sub-grade soils will likely result in excessive disturbance to the soils, which in turn could result in a construction schedule delay. Extreme care shall be utilized to place gravel as the sub grade becomes exposed.
- MM GEO-16: When rain is forecast, all fill that has been spread and awaits compaction shall be properly compacted prior to stopping work for the day or prior to stopping due to inclement weather. These fills, once compacted, shall have the surface sloped to drain to an area where water can be removed.

- MM GEO-17: Temporary non-erosive drainage devices shall be installed to collect and transfer excess water from the graded work area. Drainage shall not be allowed to pond anywhere on the Development Site, and especially not against any foundation or retaining wall. Drainage shall not be allowed to flow uncontrolled over any descending slope.
- MM GEO-18: When delayed due to periods of rainfall, resumption of grading activity shall be held until the Development Site has been reviewed by a qualified geotechnical monitor. Any soils saturated by the rain shall be removed and aerated so that the moisture content will fall within three percent of the optimum moisture content.
- MM GEO-19: Surface materials previously compacted before the rain shall be scarified, brought to the proper moisture content and recompact prior to placing additional fill, as determined appropriate by a qualified geotechnical monitor.
- MM GEO-20: If abandoned seepage pits are encountered during grading, options to permanently abandon seepage pits shall include complete removal and backfill of the excavation with compacted fill, or drilling out the loose materials and backfilling to within a few feet of grade with slurry, followed by a compacted fill cap. If the subsurface structures are to be removed by grading, the entire structure shall be demolished. The resulting void may be refilled with compacted soil. Concrete and brick generated during the seepage pit removal may be reused in the fill as long as all fragments are less than six inches in longest dimension and the debris comprise less than 15 percent of the fill by volume. All grading shall comply with the recommendations of the approved Geotechnical Report.
- MM GEO-21: Compliance with the design concepts, specifications or recommendations during construction shall be reviewed by a qualified geotechnical monitor during the course of construction. Any fill which is placed shall be observed, tested, and verified if used for engineered purposes.
- MM GEO-22: In compliance with credit requirements for LEED Certification, demolition debris shall be crushed onsite in order to reuse it in the ongoing grading operations. Onsite recycled demolition debris shall be limited to concrete, asphalt and other non-deleterious materials. All deleterious materials shall be removed including, but not limited to, paper, garbage, ceramic materials and wood.
- MM GEO-23: For structural fill applications, the materials shall be crushed to two inches in maximum dimension or smaller. The crushed materials shall be thoroughly blended and mixed with onsite soils prior to placement as compacted fill. The amount of crushed material shall not exceed 20 percent. The blended and mixed materials shall be tested by a qualified geotechnical monitor prior to placement to insure it is suitable for compaction purposes and during placement to insure that it has been compacted in a suitable manner.

Foundation Design Mitigation Measures

MM GEO-24: Conventional foundations for structures such as privacy walls or trash enclosures which will not be rigidly connected to the Project buildings may bear in native soils. Continuous footings shall be designed for a bearing capacity of 1,000 pounds per square foot, and shall be a minimum of 12 inches in width, 18 inches in depth below the lowest adjacent grade and 18 inches into the recommended bearing material.

MM GEO-25: Since the recommended bearing capacity is a net value, the weight of concrete in the foundations shall be taken as 50 pounds per cubic foot and the weight of the soil backfill may be neglected when determining the downward load on the foundations.

MM GEO-26: Resistance to lateral loading may be provided by friction acting at the base of foundations and foundations, and by passive earth pressure. An allowable coefficient of friction of 0.2 shall be used with the dead load forces. Passive earth pressure for the sides of foundations and footings poured against undisturbed or recompacted soil shall be computed as an equivalent fluid having a density of 300 pounds per cubic foot with a maximum earth pressure of 3,000 pounds per square foot. When combining passive and friction for lateral resistance, the passive component shall be reduced by one third. A one-third increase in the passive value shall be used for wind or seismic loads.

MM GEO-27: All foundation excavations shall be observed and inspected by a qualified geotechnical monitor to verify penetration into the recommended bearing materials. The observation shall be performed prior to the placement of reinforcement. Foundations shall be deepened to extend into satisfactory earth materials, if necessary. Foundation excavations shall be cleaned of all loose soils prior to placing steel and concrete. Any required foundation backfill shall be mechanically compacted. Flooding shall not be permitted.

Foundation Design –Mat Foundation Mitigation Measures

MM GEO-28: The mat shall be founded exclusively in native soils found 10 feet below existing site grades. For the at-grade portion of any proposed structure, the mat shall bear in a minimum of newly placed compacted fill, subsequent to the recommended grading. The bottom of the mat foundation shall be a minimum of 18 inches in depth below the lowest adjacent grade at the perimeter of the proposed structure. An allowable bearing pressure of 850 pounds per square foot shall be utilized in the design of the proposed mat foundation. The mat foundation shall be designed utilizing a modulus of subgrade reaction of 100 pounds per cubic inch.

Dewatering Mitigation Measure

MM GEO-29: Because the basement of the proposed Project structures will be on the order of 20 feet below grade and historic high groundwater levels may be less than 20 feet,

the building shall be designed for potential hydrostatic and buoyancy pressures or a drainage system shall be installed which would operate in the unlikely event that the reported historic high groundwater level is attained again.

Retaining Wall Mitigation Measures

MM GEO-30: Retaining walls supporting a level backslope shall be designed utilizing a triangular distribution of pressure. Cantilever retaining walls shall be designed for 31.5 pounds per cubic foot for walls retaining up to 6 feet of earth. For this equivalent fluid pressure to be valid, walls which are to be restrained at the top shall be backfilled prior to the upper connection being made. Additional active pressure shall be added for a surcharge condition due to sloping ground, vehicular traffic or adjacent structures.

MM GEO-31: Retaining walls shall be provided with a sub-drain covered with a minimum of 12 inches of gravel, and a compacted fill blanket or other seal at the surface. The onsite geologic materials are acceptable for use as retaining wall backfill provided they shall be compacted to a minimum of 90 or 95 percent of the maximum density as determined by ASTM D 1557-07 or equivalent.

MM GEO-32: The type and brand of sub-drain pipe shall be cleared with the City Engineer. Sub-drainage pipes shall outlet to an acceptable location.

MM GEO-33: Restrained retaining walls shall be designed to resist a triangular pressure distribution of at-rest earth pressure and hydrostatic pressure as indicated in the diagram on page 28 of the Geotechnical Report (*Appendix D* of the Draft EIR), or as otherwise approved by the City Engineer. The at-rest soils pressure for design purposes shall be 41 pounds per cubic foot. Additional earth pressure shall be added for a surcharge condition due to sloping ground, vehicular traffic or adjacent structures.

MM GEO-34: The upper ten feet of the retaining wall adjacent to streets, driveways or parking areas shall be designed to resist a uniform lateral pressure of 100 pounds per square foot, acting as a result of an assumed 300 pounds per square foot surcharge behind the walls due to normal street traffic. If the traffic is kept back at least ten feet from the retaining walls, the traffic surcharge shall be neglected.

MM GEO-35: Where necessary, the retaining walls shall be designed to accommodate any surcharge pressures that may be imposed by existing buildings on the adjacent property.

MM GEO-36: The retaining walls shall be waterproofed. Waterproofing design and inspection of its installation is not the responsibility of the geotechnical engineer. A qualified waterproofing expert shall be consulted in order to recommend a product or method that would provide protection to below grade walls.

MM GEO-37: Any required backfill shall be mechanically compacted in layers not more than 8 inches thick, to at least 90 or 95 percent of the maximum density obtainable by the ASTM Designation D 1557-07 method of compaction. Flooding shall not be permitted. Proper compaction of the backfill shall be necessary to reduce settlement of overlying walks and paving. Some settlement of required backfill shall be anticipated, and any utilities supported therein shall be designed to accept differential settlement, particularly at the points of entry to the structure.

Temporary Excavations Mitigation Measures

MM GEO-38: Excavations on the order of 10 to 25 feet in vertical height shall be required for the subterranean levels of the Project considering the proposed foundation and the recommended recompaction. The excavations are expected to expose fill and dense native soils, which are suitable for vertical excavations up to 5 feet where not surcharged by adjacent traffic or structures. Excavations, which will be surcharged by adjacent traffic or structures shall be shored.

MM GEO-39: Where sufficient space is available, temporary unsurcharged embankments shall be cut at a uniform 1:1 slope gradient. A uniform sloped excavation does not have a vertical component. Where sloped embankments are utilized, the tops of the slopes shall be barricaded to prevent vehicles and storage loads near the top of slope within a horizontal distance equal to the depth of the excavation.

MM GEO-40: If temporary construction embankments are to be maintained during the rainy season, berms shall be made along the tops of the slopes to prevent runoff water from entering the excavation and eroding the slope faces. Water shall not be allowed to pond on top of the excavation nor to flow towards it.

MM GEO-41: Because the structure will extend to a maximum depth of 20 feet below existing site grades, continuous groundwater could be encountered locally in the deeper portions of the excavation. Temporary dewatering shall be installed as necessary. Temporary dewatering shall consist of gravel-filled drainage trenches leading to a sump area. The collected water shall be pumped to an acceptable disposal area. Where the exposed sub-grade is wet, pumping shall be required.

MM GEO-42: It is critical that the soils exposed in the cut slopes shall be observed by a qualified geotechnical monitor during excavation so that modifications of the slopes can be made if variations in the earth material conditions occur. All excavations shall be stabilized within 30 days of initial excavation.

Shoring Design Mitigation Measures

MM GEO-43: The City Engineer shall review the final shoring plans and specifications. Consistent with the Preliminary Geotechnical Report, one acceptable method of shoring shall consist of steel soldier piles, placed in drilled holes and backfilled

with concrete. The soldier piles shall be designed as cantilevers or laterally braced utilizing drilled tied-back anchors or raker braces.

MM GEO-44: Drilled cast-in-place soldier piles shall be placed no closer than two diameters on center. The minimum diameter of the piles shall be 18 inches. Structural concrete shall be used for the soldier piles below the excavation; lean-mix concrete may be employed above that level. As an alternative, lean mix concrete may be used throughout the pile where the reinforcing consists of a wide flange section. The slurry shall be of sufficient strength to impart the lateral bearing pressure developed by the wide flange section to the earth materials. For design purposes, an allowable passive value for the earth materials below the bottom plane of excavation may be assumed to be 600 pounds per square foot per foot. To develop the full lateral value, provisions shall be implemented to assure firm contact between the soldier piles and the undisturbed earth materials.

MM GEO-45: Groundwater was encountered during exploration at a depth of 23 feet below grade. Because proposed piles may be in excess of 23 feet in depth, groundwater may be encountered within that depth. Piles placed below the water level shall require the use of a tremie to place the concrete into the bottom of the hole. A tremie shall consist of a water-tight tube having a diameter of not less than 10 inches with a hopper at the top. The tube shall be equipped with a device that will close the discharge end and prevent water from entering the tube while it is being charged with concrete. The tremie shall be supported so as to permit free movement of the discharge end over the entire top surface of the work and to permit rapid lowering when necessary to retard or stop the flow of concrete. The discharge end shall be closed at the start of the work to prevent water entering the tube and shall be entirely sealed at all times, except when the concrete is being placed. The tremie tube shall be kept full of concrete. The flow shall be continuous until the work is completed and the resulting concrete seal shall be monolithic and homogeneous. The tip of the tremie tube shall always be kept about five feet below the surface of the concrete and definite steps and safeguards shall be taken to insure that the tip of the tremie tube is never raised above the surface of the concrete.

MM GEO-46: A special concrete mix shall be used for concrete to be placed below water. The design shall provide for concrete with strength of 1,000 psi over the initial job specification. An admixture that reduces the problem of segregation of paste/aggregates and dilution of paste shall be included. The slump shall be commensurate to any research report for the admixture, provided that it shall also be the minimum for a reasonable consistency for placing when water is present.

MM GEO-47: Casing may be required should caving be experienced in saturated earth materials. If casing is used, extreme care shall be employed so that the pile is not pulled apart as the casing is withdrawn. At no time shall the distance between the surface of the concrete and the bottom of the casing be less than 5 feet.

- MM GEO-48: The frictional resistance between the soldier piles and retained earth material may be used to resist the vertical component of the anchor load. The coefficient of friction may be taken as 0.2 based uniform contact between the steel beam and lean-mix concrete and retained earth. The portion of soldier piles below the plane of excavation may also be employed to resist the downward loads. The downward capacity may be determined using a frictional resistance of 400 pounds per square foot. The minimum depth of embedment for shoring piles shall be five feet below the bottom of the footing excavation or seven feet below the bottom of excavated plane whichever is deeper.
- MM GEO-49: It is possible that lagging between soldier piles could be omitted within more cohesive earth materials where the clear spacing between soldier piles does not exceed four feet. In less cohesive earth materials, such as sands and gravels, lagging shall be necessary. A qualified geotechnical monitor shall observe the exposed earth materials to verify their nature and establish areas where lagging could be omitted, if any. At this time, it is expected that most of the excavation will require continuous lagging. Soldier piles and anchors shall be designed for the full anticipated pressures. Due to arching in the earth materials, the pressure on the lagging will be less. The lagging shall be designed for the full design pressure but is limited to a maximum of 400 pounds per square foot.
- MM GEO-50: Cantilevered shoring supporting a level backslope shall be designed utilizing a triangular distribution of pressure as indicated in the table on page 36 of the Geotechnical and Soils Report (*Appendix D* of the Draft EIR). A trapezoidal distribution of lateral earth pressure shall be appropriate where shoring is to be restrained at the top by bracing or tie backs, with the trapezoidal distribution as shown in the diagram in the 'Restrained Retaining Walls' section of the approved Geotechnical Report. Restrained shoring supporting a level backslope shall be designed utilizing a trapezoidal distribution of pressure as indicated in the table on page 37 of the Geotechnical Report.
- MM GEO-51: Where a combination of sloped embankment and shoring is utilized, the pressure will be greater and must be determined for each combination. Additional active pressure shall be applied where the shoring will be surcharged by adjacent traffic or structures.
- MM GEO-52: It should be realized that some deflection of a shored embankment will occur and that the estimated deflection could be on the order of one inch at the top of the shored embankment. If greater deflection occurs during construction, additional bracing shall be necessary to minimize settlement of adjacent buildings and utilities in adjacent street and alleys. If desired to reduce the deflection, a greater active pressure shall be used in the shoring design. Where internal bracing is used, the rakers shall be tightly wedged to minimize deflection. The raker braces and the wedging shall be installed properly as their proper installation will be critical to the performance of the shoring.

MM GEO-53: Because of the depth of the excavation, there shall be some means of monitoring the performance of the shoring system. The monitoring shall consist of periodic surveying of the lateral and vertical locations of the tops of all soldier piles and the lateral movement along the entire lengths of selected soldier piles. Also, some means of periodically checking the load on selected anchors shall be necessary, where applicable. Some movement of the shored embankments shall be anticipated as a result of the relatively deep excavation. Photographs of the existing buildings on the adjacent properties shall be taken during construction to record any movements for use in the event of a dispute.

MM GEO-54: It is critical that the installation of shoring shall be observed by a qualified geotechnical monitor. The observations shall insure that the recommendations of the approved Geotechnical Report are implemented and so that field modifications of the recommendations can be made if variations in the earth material or groundwater conditions warrant. The observations shall allow for a report to be prepared on the installation of shoring for the use of the local building official, where necessary.

Slabs on Grade Mitigation Measures

MM GEO-55: Concrete floor slabs shall be a minimum of five inches in thickness. Slabs-on-grade shall be cast over undisturbed natural earth materials or properly controlled fill materials. Any earth materials loosened or over-excavated shall be wasted from the site or properly compacted to 90 or 95 percent of the maximum dry density.

MM GEO-56: Outdoor concrete flatwork shall be a minimum of four inches in thickness. Outdoor concrete flatwork shall be cast over undisturbed natural earth materials or properly controlled fill materials. Any earth materials loosened or over-excavated shall be wasted from the site or properly compacted to 90 or 95 percent of the maximum dry density.

MM GEO-57: A qualified monitor in the field of moisture vapor transmission shall be consulted to evaluate the general and specific moisture vapor transmission paths and any impact on the construction of the proposed Project. The qualified consultant shall provide recommendations for mitigation of potential adverse impacts of moisture vapor transmission on various components of the proposed structure. Where dampness would be objectionable, the floor slabs shall be waterproofed. A qualified waterproofing expert shall be consulted in order to recommend a product or method which would provide protection for concrete slabs-on-grade.

MM GEO-58: All concrete slabs-on-grade shall be supported on vapor retarder. The design of the slab and the installation of the vapor retarder shall comply with ASTM E 1643-98 and ASTM E 1745-97. Where a vapor retarder is used, a low-slump concrete shall be used to minimize possible curling of the slabs. The barrier shall be covered with a layer of trimmable, compactable, granular fill, where it is thought to be beneficial.

MM GEO-59: The recommendations of the approved Geotechnical Report shall be implemented to reduce the potential for cracking of concrete slabs-on-grade due to settlement. However even where these recommendations have been implemented, foundations, stucco walls and concrete slabs-on-grade may display some cracking due to minor soil movement and/or concrete shrinkage. The occurrence of concrete cracking shall be reduced and/or controlled by limiting the slump of the concrete used, proper concrete placement and curing, and by placement of crack control joints at reasonable intervals, in particular, where entrant slab corners occur.

MM GEO-60: For standard crack control maximum expansion joint spacing of eight feet shall not be exceeded. Lesser spacing would provide greater crack control. There shall be joints at curves and angle points. The crack control joints shall be installed as soon as practical following concrete placement. Crack control joints shall extend a minimum depth of one-fourth the slab thickness. Construction joints shall be designed by a structural engineer.

MM GEO-61: Complete removal of the existing fill soils beneath outdoor flatwork such as walkways or patio areas shall not be required; however, due to the rigid nature of concrete, some cracking, a shorter design life and increased maintenance costs shall be anticipated. In order to provide uniform support beneath the flatwork, 12 inches of the exposed subgrade beneath the flatwork shall be scarified and recompacted to 90 percent relative compaction.

MM GEO-62: Concrete slabs-on-grade shall be reinforced with a minimum of #4 steel bars on 16-inch centers each way. Outdoor flatwork shall be reinforced with a minimum of #3 steel bars on 18-inch centers each way.

Pavements Mitigation Measures

MM GEO-63: Prior to placing paving, the existing grade shall be scarified to a depth of 12 inches, moistened as required to obtain optimum moisture content, and recompacted to 90 percent of the maximum density as determined by ASTM D 1557-02. Removal of all existing fill in the area of new paving is not required; however, pavement constructed in this manner will most likely have a shorter design life and increased maintenance costs.

MM GEO-64: Aggregate base shall be compacted to a minimum of 95 percent of the ASTM D 1557-laboratory maximum dry density. Base materials shall conform with Sections 200-2.2 or 200-2.4 of the "Standard Specifications for Public Works Construction", (Green Book), 1991 Edition.

MM GEO-65: The performance of pavement is highly dependent upon providing positive surface drainage away from the edges. Ponding of water on or adjacent to pavement can result in saturation of the sub grade materials and subsequent pavement distress. If planter islands are planned as part of the Project, the

perimeter curb shall extend a minimum of 12 inches below the bottom of the aggregate base.

Design Review Mitigation Measures

MM GEO-66: Engineering of the Project shall not begin until approval of the geotechnical report is obtained in writing from the Department of Building and Safety. Significant changes in the geotechnical recommendations may result during the building department review process. Any additional recommendations identified in the final approved geotechnical report shall be implemented during Project development.

MM GEO-67: Geotechnical aspects of the Project shall be reviewed by a qualified geotechnical expert during the design process. This review provides assistance to the design team by providing specific recommendations for particular cases, as well as review of the proposed construction to evaluate whether the intent of the recommendations presented in the Geotechnical Report are satisfied.

Construction Monitoring Mitigation Measures

MM GEO-68: Geotechnical observations and testing during construction are considered to be a continuation of the geotechnical investigation. It is critical that a qualified geotechnical expert review the geotechnical aspects of the project during the construction process. Compliance with the design concepts, specifications or recommendations during construction shall require review by a qualified geotechnical monitor during the course of construction.

MM GEO-69: If conditions encountered during construction appear to differ substantially from those disclosed in the approved Geotechnical Report, the developer shall notify the City Engineer and/or qualified geotechnical expert, as appropriate, immediately so the need for modifications may be considered in a timely manner.

MM GEO-70: It shall be the responsibility of the developer's contractor to ensure that all excavations and trenches are properly sloped or shored. All temporary excavations shall be cut and maintained in accordance with applicable OSHA rules and regulations.

Excavation Characteristics Mitigation Measure

MM GEO-71: Since the exploration performed for in the preliminary Geotechnical Report is limited to the geotechnical excavations described therein and the direct exploration of the entire site is not feasible, the Project team shall understand that differing excavation and drilling conditions may be encountered based on boulders, gravel, oversize materials, groundwater and many other conditions. Fill materials, especially when they were placed without benefit of modern grading codes, regularly contain materials which could impede efficient grading and drilling. The appropriateness of all recommended geotechnical mitigation

measures shall be evaluated against infield observations encountered during construction, and any and all adjustments shall be coordinated through the City Engineer.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Based on implementation of Compliance Measures and application of standard rules and regulations of the City of Los Angeles (i.e., Building Code and the Uniform Building Code), development of the proposed Project would result in less-than-significant geological impacts relating to structural integrity during a seismic or other geologic event.

In addition, implementation of recommended Mitigation Measures MM GEO-1 through MM GEO-71, or their equivalent as provided in the final approved Geotechnical and Soils Report, would further reduce the risk of building loss, and human injury or death during a strong seismic ground shaking event. The Mitigation Measures would reduce all potential significant impacts related to liquefaction or ground failure of the underlying soils (and subsequent building collapse) during a seismic event to less-than-significant levels. With implementation of the Compliance Measures and required Mitigation Measures, or their equivalent as provided in the final approved Geotechnical and Soils Report, impacts related to seismic activity, geology, and the potential for building loss and risk of human injury or death, would be less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

F. GREENHOUSE GAS EMISSIONS

1. INTRODUCTION

The following analysis of greenhouse gas (GHG) emission impacts is based primarily upon the *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates and dated June 27, 2013, and which is incorporated herein. The report, including the applicable calculation sheets, are provided in *Appendix B: Air Quality and Noise Assessments* of this Draft EIR. Analysis of other air quality conditions, pollutants, and impacts associated with the Project can be found in *Section IV.B: Environmental Impact Analysis – Air Quality* of this Draft EIR.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) *GHG Terms and Components*

This section examines the degree to which the proposed Project may result in significant adverse changes in greenhouse gas emissions. Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. Earth's natural warming process is known as the "greenhouse effect." Simply put, the greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). Without the greenhouse effect, the Earth would be a frozen globe with an average surface temperature of about 5°F.

In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. CO₂ comprised 81 percent of the total GHG emissions in California in 2002 and non-fossil fuel CO₂ comprised 2.3 percent.¹ The other GHGs are less abundant but have higher global warming potential than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. The CO₂e of CH₄ and N₂O represented 6.4 and 6.8 percent, respectively, of the 2002 California GHG emissions. Other high global warming potential gases represented 3.5 percent of these emissions.² In addition, there are a number of man-made pollutants, such as CO, NO_x, non-methane VOC, and SO₂, that have indirect effects on terrestrial or solar radiation absorption by influencing the formation or destruction of other climate change emissions.

¹ California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.

² *Ibid.*

(2) *Greenhouse Gas Emissions in California*

California is the fifteenth largest emitter of greenhouse gases (GHG) on the planet, representing about two percent of the worldwide emissions.³ *Table IV.F-1: California Greenhouse Gas Emissions Inventory* shows the California GHG emissions inventory for years 2000 to 2008. statewide GHG emissions slightly decreased in 2008 due to a noticeable drop in on-road transportation emissions. Also, 2008 was the beginning of the economic recession and fuel prices spiked.

TABLE IV.F-1
CALIFORNIA GREENHOUSE GAS EMISSIONS INVENTORY¹

SOURCES	CO ₂ E EMISSIONS (MILLION METRIC TONS)								
	2000	2001	2002	2003	2004	2005	2006	2007	2008
Transportation	171	174	180	178	182	184	184	184	175
Electric Power	104	121	106	110	120	111	108	111	116
Commercial and Residential	44	41	44	41	43	41	41	42	43
Industrial	97	95	97	96	91	91	90	94	93
Recycling and Waste	6.2	6.3	6.2	6.3	6.2	6.5	6.6	6.5	6.7
High Global Warming Potential	11	11	12	13	14	14	15	15	16
Agriculture	25	25	28	28	29	29	30	28	28
Forest Net Emissions	(4.7)	(4.5)	(4.4)	(4.3)	(4.3)	(4.2)	(4.0)	(4.1)	(4.0)
Emissions Total	453	469	470	469	480	473	471	477	474

[1] Source : CARB, *California Greenhouse Gas Inventory*, 2011

The transportation sector – largely the cars and trucks that move people and goods – is the largest contributor with 37 percent of the State’s total GHG emissions in 2008. On-road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total emissions. On-road emissions grew to a maximum of 171 million metric tons of CO₂e in 2005, plateaued until 2007, and decreased in 2008 to 163 million. The amount of gasoline and diesel fuel consumed by on-road vehicles followed a similar trend.

The electricity and commercial/residential energy sectors combine to form the next largest contributor with more than 30 percent of the statewide GHG emissions. In-State generation accounts for 47 percent of GHG emissions and emissions associated with imported electricity accounts for 53 percent of GHG emissions. Electricity imported into California accounts for only about a quarter of the State’s electricity but imported electricity represents more than half of the GHG emissions. This is because much of it is generated by coal-fired power plants, which is among the highest electricity generation sources of GHG emissions. Assembly Bill (AB) 32 specifically requires CARB to address emissions from electricity sources both inside and outside of the State.

³ CARB, *Climate Change Scoping Plan*, December 2008.

California's industrial sector includes refineries, cement plants, oil and gas production, food processors, and other large industrial sources. This sector contributes almost 20 percent of California's GHG emissions, but the sector's emissions are not projected to grow significantly in the future as the State focuses on renewable energy.

The sector termed recycling and waste management is a unique system, encompassing not just emissions from waste facilities but also the emissions associated with the production, distribution, and disposal of products throughout the economy.

Although high global warming potential gases (e.g., PFCs, HFCs, and SF₆) are a small contributor to historic GHG emissions, levels of these gases are projected to increase sharply over the next several decades making them a significant source by 2020. These gases are used in growing industries such as semiconductor manufacturing.

The forest sector greenhouse gas inventory includes CO₂ uptake and greenhouse gas emissions from wild and prescribed fires, the decomposition and combustion of residues from harvest and conversion/development, and wood products decomposition. The forest sector is unique in that forests both emit GHGs and absorb CO₂ through carbon sequestration. While the current inventory shows forests absorb 4.7 million metric tons of CO₂e, carbon sequestration has declined since 1990. For this reason, the 2020 projection assumes no net emissions from forests. The agricultural GHG emissions shown are largely methane emissions from livestock, both from the animals and their waste. Emissions of GHG from fertilizer application are also important contributors from the agricultural sector. Opportunities to sequester CO₂ in the agricultural sector may also exist; however, additional research is needed to identify and quantify potential sequestration benefits.

b. Regulatory and Policy Setting

In response to growing scientific and political concern with global climate change, California adopted a series of laws to reduce emissions of GHGs into the atmosphere.

Assembly Bill 1493 (AB 1493). In September 2002, AB 1493 was enacted, requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State.

Executive Order (E.O.) S-3-05. On June 1, 2005, E.O. S-3-05 set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The Executive Order establishes State GHG emission targets of 1990 levels by 2020 (the same as AB 32) and 80 percent below 1990 levels by 2050. It calls for the Secretary of California Environmental Protection Agency (Cal/EPA) to be responsible for coordination of State agencies and progress reporting. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major "decarbonization" of electricity supplies and fuels, and major improvements in energy efficiency.

In response to the Executive Order, the Secretary of the Cal/EPA created the Climate Action Team (CAT). California's CAT originated as a coordinating council organized by the Secretary for Environmental Protection. It included the Secretaries of the Natural Resources Agency, and the Department of Food and Agriculture, and the Chairs of the Air Resources Board, Energy Commission, and Public Utilities Commission. The original council was an informal collaboration between the agencies to develop potential mechanisms for reductions in GHG emissions in the State. The council was given formal recognition in E.O. S-3-05 and became the CAT.

The CAT is responsible for preparing reports that summarize the State's progress in reducing GHG emissions. The most recent CAT Report was published in December 2010. The CAT Report discusses mitigation and adaptation strategies, State research programs, policy development, and future efforts.

Assembly Bill 32 (AB 32). In September 2006, the State passed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the ARB to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB 32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills. On October 25, 2007, CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing perfluorocarbons from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emission from the non-electricity sector. The CARB has determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO₂e. The 2020 target reductions are currently estimated to be 174 million metric tons of CO₂e.

The CARB AB 32 Scoping Plan contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by the CARB with input from the CAT and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies

contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. Key approaches for reducing greenhouse gas emissions to 1990 levels by 2020 include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable electricity standard of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets; and
- Adopting and implementing measures to reduce transportation sector emissions, including California's.

CARB has also developed the GHG mandatory reporting regulation, which required reporting beginning on January 1, 2008 pursuant to requirements of AB 32. The regulations require reporting for certain types of facilities that make up the bulk of the stationary source emissions in California. The regulation language identifies major facilities as those that generate more than 25,000 metric tons of CO₂ per year. Cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, and hydrogen plants and other stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year, make up 94 percent of the point source CO₂ emissions in California.

CEQA Guidelines Amendments. California Senate Bill (SB) 97 required the Governor's Office of Planning and Research (OPR) to develop California Environmental Quality Act (CEQA) Guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." The CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. Noteworthy revisions to the CEQA Guidelines include:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB's recommended CEQA thresholds;

- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

Senate Bill 375 (SB 375). SB 375, adopted in September 30, 2008, provides a means for achieving AB 32 goals through the reduction in emissions by cars and light trucks. SB 375 requires new RTPs to include Sustainable Communities Strategies (SCSs). This legislation also allows the development of an Alternative Planning Strategy (APS) if the targets cannot be feasibly met through an SCS. The APS is not included as part of the RTP. In adopting SB 375, the Legislature expressly found that improved land use and transportation systems are needed in order to achieve the GHG emissions reduction target of AB 32. Further, the staff analysis for the bill prepared for the Senate Transportation and Housing Committee's August 29, 2008 hearing on SB 375 (hereby incorporated by reference) began with the following statement: "According to the author, this bill will help implement AB 32 by aligning planning for housing, land use, transportation and greenhouse gas emissions for the 17 MPOs in the State."

CARB Guidance. The CARB has published draft guidance for setting interim GHG significance thresholds (October 24, 2008). The guidance is the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). The CARB believes that thresholds in these important sectors will advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the State.

SCAQMD Guidance. The SCAQMD has convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies.

Green LA Action Plan. The City of Los Angeles has issued guidance promoting green building to reduce GHG emissions. The goal of the Green LA Action Plan (Plan) is to reduce greenhouse

gas emissions 35 percent below 1990 levels by 2030.⁴ The Plan identifies objectives and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations, and create a framework to address City-wide GHG emissions. The Plan lists various focus areas in which to implement GHG reduction strategies. Focus areas listed in the Plan include energy, water, transportation, land use, waste, port, airport, and ensuring that changes to the local climate are incorporated into planning and building decisions. The Plan discusses City goals for each focus area, as follows:

Energy

- Increase the generation of renewable energy;
- Encourage the use of mass transit;
- Develop sustainable construction guidelines;
- Increase City-wide energy efficiency; and
- Promote energy conservation.

Water

- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation

- Power the City vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals

- Create a more livable City through land use regulations;
- Increase recycling, reducing emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more City parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

The City adopted an ordinance to establish a green building program in April 2008. The ordinance establishes green building requirements for projects involving 50 or more dwelling units. The Green Building Program was established to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program addresses the following five areas:

- **Site:** location, site planning, landscaping, stormwater management, construction and demolition recycling;
- **Water Efficiency:** efficient fixtures, wastewater reuse, and efficient irrigation;
- **Energy and Atmosphere:** energy efficiency, and clean/renewable energy;
- **Materials and Resources:** materials reuse, efficient building systems, and use of recycled and rapidly renewable materials;

⁴ City of Los Angeles, Green LA: An Action Plan to Lead the Nation in Fighting Global Warming, May 2007.

- Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and thermal comfort/control.

3. ENVIRONMENTAL IMPACTS

a. Methodology

For the purpose of this analysis, GHG emissions were quantified from construction and operation of the proposed Project using SCAQMD's CalEEMod. Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. The GHG and climate change analysis considered Project emissions and consistency with applicable GHG reduction plans and policies.

b. Thresholds of Significance

The SCAQMD has not approved a GHG significance threshold for the development of non-SCAQMD and non-industrial projects. The significance threshold is based on the methodologies recommended by the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change white paper (January 2008). CAPCOA conducted an analysis of various approaches and significance thresholds, ranging from a zero threshold (all projects are cumulatively considerable) to a high of 40,000 to 50,000 metric tons of CO₂e per year. For example, an approach assuming a zero threshold and compliance with AB 32 2020 targets would require all discretionary projects to achieve a 33 percent reduction from projected "business-as-usual" emissions to be considered less-than-significant. A zero threshold approach could be considered on the basis that climate change is a global phenomenon, and not controlling small source emissions would potentially neglect a major portion of the GHG inventory. However, the CEQA Guidelines also recognize that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact (CEQA Guidelines, Section 15130 (a)). Therefore, a threshold of greater than zero is considered more appropriate for the analysis of GHG emissions under CEQA.

Another method would use a quantitative threshold of greater than 900 metric tons CO₂e per year based on a market capture approach that requires mitigation for greater than 90 percent of likely future discretionary development. This threshold would generally correspond to office projects of approximately 35,000 square feet, retail projects of approximately 11,000 square feet, or supermarket space of approximately 6,300 square feet. Another potential threshold would be the 10,000 metric tons standard used by the Market Advisory Committee for inclusion in a GHG Cap and Trade System in California. A 10,000-metric-ton significance threshold would correspond to the GHG emissions of approximately 550 residential units, 400,000 square feet of office space, 120,000 square feet of retail, and 70,000 square feet of supermarket space. This threshold would capture roughly half of new residential or commercial development. The basic concepts for the various approaches suggested by CAPCOA are used herein to determine whether or not the proposed project's GHG emissions are "cumulatively considerable."

CAPCOA’s suggested quantitative thresholds are generally more applicable to development on sites at the periphery of metropolitan areas, also known as “greenfield” sites, where there would be an increase in vehicle miles traveled (VMT) and associated GHG emissions than to infill development, which would generally reduce regional VMT and associated emissions. As the City of Los Angeles is generally built out, most commercial development within the City is infill or redevelopment and would be expected to generally reduce VMT and reliance on the drive-alone automobile use as compared to further suburban growth at the periphery of the region. A reduction in vehicle use and vehicle miles traveled can result in a reduction in fuel consumption and in air pollutant emissions, including GHG emissions. Recent research indicates that infill development reduces VMT and associated air pollutant emissions, as compared to greenfield sites. For example, a 1999 simulation study conducted for the USEPA, comparing infill development to greenfield development, found that infill development results in substantially fewer VMT per capita (39 percent to 52 percent) and generates fewer emissions of most air pollutants and greenhouse gases.

For this reason, the most conservative (i.e., lowest) thresholds, suggested by CAPCOA, would not be appropriate for the proposed Project given that it is located in a community that is highly urbanized. Similarly, the 900-ton threshold was also determined to be too conservative for general development in the South Coast Air Basin. Consequently, the threshold of 10,000 metric tons CO₂e is used as a quantitative benchmark for significance.

c. Project Impacts

(a) GHG Emissions

Greenhouse gas emissions were calculated for mobile sources, natural gas consumption, general electricity consumption, electricity consumption associated with the use and transport of water, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. As shown in *Table IV.F-2: Greenhouse Gas Emissions*, the proposed Project would result in 1,919 metric tons of CO₂e per year under the Future Cumulative with Project Conditions (2016). Existing With Project Conditions would result in 1,986 metric tons of CO₂e per year. Estimated GHG emissions would be less than the 10,000 metric tons of CO₂e per year quantitative significance threshold. Therefore, the proposed Project would result in a less-than-significant impact related to GHG emissions.

TABLE IV.F-2
GREENHOUSE GAS EMISSIONS¹

SOURCE	CARBON DIOXIDE EQUIVALENT (METRIC TONS PER YEAR)
EXISTING CONDITIONS (Current Year)	
Mobile	988
General Electricity	< 1
Water Cycle Electricity	120
Natural Gas	< 1
Solid Waste Decomposition	7
Total	1,115

TABLE IV.F-2 (CONTINUED)
GREENHOUSE GAS EMISSIONS¹

EXISTING WITH PROJECT CONDITIONS (Current year)	
Mobile	2,085
General Electricity	509
Water Cycle Electricity	159
Natural Gas	265
Solid Waste Decomposition	42
Total	3,060
Net Operational Emissions	1,945
Construction Emissions Amortized	41
Net Emissions	1,986
Regional Significance Threshold	10,000
Exceed Threshold?	No
FUTURE CUMULATIVE PRE-PROJECT CONDITIONS (2016)	
Mobile	995
General Electricity	< 1
Water Cycle Electricity	120
Natural Gas	< 1
Solid Waste Decomposition	7
Total	1,122
MARKET INCENTIVES/COMPLIANCE FLEXIBILITY	
Mobile	2,032
General Electricity	509
Water Cycle Electricity	159
Natural Gas	265
Solid Waste Decomposition	42
Total	3,007
Net Operational Emissions	1,885
Construction Emissions Amortized	34
Net Emissions	1,919
Regional Significance Threshold	10,000
Exceed Threshold?	No

¹ Source: Terry A. Hayes and Associates, 2013.

(b) *GHG Reduction Plans and Policies*

The proposed Project would meet many of the objectives and overall intent of reducing greenhouse gases consistent with direction/measures of the California Air Pollution Control Officers Association (CAPCOA) and the California Climate Action Team (CAT). Additionally, the proposed Project incorporates many “sustainable” or “green” strategies incorporated as voluntary Project Design Features (PDFs) that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. These strategies are listed in *Section II: Project Description* of this Draft EIR and are not required to demonstrate consistency with GHG reduction plans and policies, but will further reduce GHG emission impacts resulting from the Project. Project consistency with

GHG reduction policies are in shown in *Tables IV.F-3: Project Consistency with Climate Action Team Greenhouse Gas Emission Reduction Strategies* and *Table IV.F-4: Project Consistency with CAPCOA Greenhouse Gas Reduction Measures*. Therefore, the proposed project would result in a less-than-significant impact related to GHG reduction plans and policies.

TABLE IV.F-3
PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM
GREENHOUSE GAS EMISSION REDUCTION STRATEGIES¹

STRATEGY	PROJECT CONSISTENCY
CALIFORNIA AIR RESOURCES BOARD (CARB)	
<p>Vehicle Climate Change Standards: AB 1493 required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the CARB in September 2004.</p>	<p>Not Applicable: These are CARB enforced standards for vehicle manufacturing. Therefore, this strategy is not applicable to the Project.</p>
<p>Diesel Anti-Idling: The CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling in July 2004.</p>	<p>Consistent: Current State law restricts diesel truck idling to five minutes or less. Diesel trucks making deliveries to the Project Site would be subject to this statewide law. Construction vehicles would also subject to this regulation.</p>
<p>Hydrofluorocarbon Reduction: 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.</p>	<p>Not Applicable: This strategy applies to the sale, manufacturing and regulation of consumer products. Therefore, this strategy is not applicable to the Project.</p>
<p>Alternative Fuels: Biodiesel Blends: CARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.</p>	<p>Not Applicable: These are CARB strategies for regulating the use of alternative fuels and increasing heavy duty vehicle efficiency. Therefore, this strategy is not applicable to the Project.</p>
<p>Alternative Fuels: Ethanol: Increased use of E-85 fuel.</p>	
<p>Heavy-Duty Vehicle Emission Reduction Measures: Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.</p>	
<p>Achieve 50 Percent Statewide Recycling Goal: Achieving the State’s 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills.</p>	<p>Consistent: As a Compliance Measure and in accordance with the City of Los Angeles Construction and Demolition Waste Recycling Ordinance, during construction, non-hazardous construction and demolition debris will be recycled and/or salvaged.</p>
<p>Zero Waste – High Recycling: Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.</p>	<p>Although the Project will be consistent with this Strategy through the above Compliance Measure, as a PDF, the Project will also contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling, including paper, corrugated cardboard, glass, plastics, metals and landscaping debris.</p>

TABLE IV.F-3 (CONTINUED)
PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM
GREENHOUSE GAS EMISSION REDUCTION STRATEGIES¹

STRATEGY	PROJECT CONSISTENCY
DEPARTMENT OF FORESTRY	
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	Consistent: The Project would include the planting of new landscape trees throughout Lot 2 of the Project Site and possibly Lot 1.
DEPARTMENT OF WATER RESOURCES	
Water Use Efficiency: Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions. Use both potable and non-potable water to maximum extent practicable; low flow appliances (i.e., toilets, dishwashers, showerheads, washing machines, etc); automatic shut off valves for sinks in restrooms; drought resistant landscaping; Place "Save Water" signs near water faucets.	Consistent: The Project will comply with the City's Green Building Ordinance, which includes energy efficiency requirements to exceed 2008 Title 24 Energy Code by 15%. In addition, the proposed Project's landscaping would be required to comply with the City's Landscape Ordinance and Irrigation Guidelines. Although the Project will be consistent with this Strategy through the above Compliance Measures, as PDFs, the Project will be 20 percent more effective than required by Title 24 Standards, 2010 Edition; the Project will include stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows; and the Project will use water-efficient landscaping and native drought-tolerant plants.
ENERGY COMMISSION (CEC)	
Building Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	Consistent: The Project will comply with the City's Green Building Ordinance, which requires that the Project exceed the 2008 Title 24 Energy Code by 15%. Although the Project will be consistent with this Strategy through the above Compliance Measure, as a PDF, the Project will be 20 percent more effective than required by Title 24 standards.
Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	Not Applicable: This strategy is aimed at sellers of devices, equipment, or appliances using energy in California. Therefore, this strategy is not applicable to the Project. There are no current requirements to use energy efficient appliances in dwelling units and it is at the discretion of the owner of the Project.
Fuel-Efficient Replacement Tires & Inflation Programs: State legislation established a statewide program to encourage the production and use of more efficient tires.	Not Applicable: This strategy is aimed at manufacturers and sellers of tires. Therefore, this strategy is not applicable to the Project.

TABLE IV.F-3 (CONTINUED)
PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM
GREENHOUSE GAS EMISSION REDUCTION STRATEGIES¹

STRATEGY	PROJECT CONSISTENCY
<p>Municipal Utility Energy Efficiency Programs/Demand Response: Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.</p>	<p>Consistent: The Project will comply with the City’s Green Building Ordinance with regard to energy efficiency.</p>
<p>Municipal Utility Renewable Portfolio Standard: California’s Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.</p>	<p>Although the Project will be consistent with this Strategy through the above Compliance Measure, as PDFs, the Project’s air filtration will be applied to process both return and outside air that is to be delivered as supply air; the Project will provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction; and the Project will be constructed adjacent to the existing golf course, which will allow utilization of existing greenery as a heat absorption source to potentially reduce air-conditioning and energy usage.</p>
<p>Municipal Utility Combined Heat and Power: Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of onsite power production to meet both heat and electricity loads.</p>	
<p>Alternative Fuels: Non-Petroleum Fuels: Increasing the use of non-petroleum fuels in California’s transportation sector, as recommended as recommended in the CEC’s 2003 and 2005 Integrated Energy Policy Reports.</p>	<p>Not Applicable: These strategies are aimed at the transportation sector. Therefore, this strategy is not applicable to the Project.</p>
BUSINESS, TRANSPORTATION, AND HOUSING	
<p>Smart Land Use and Intelligent Transportation Systems (ITS): Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.</p>	<p>Consistent: The Project would be located in proximity to basic commercial services and public transit opportunities. The Project Site has pedestrian access to banks, groceries and restaurants within half a mile. Future residences will also have easy access to the Metropolitan Transit Authority bus service stops along adjacent roadways.</p>
STATE AND COUNSUMER SERVICE AGENCY (DEPARTMENT OF GENERAL SERVICES)	
<p>Green Buildings Initiative: Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions State agencies are to take with State-owned and -leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.</p>	<p>Consistent: The Project will comply with the City’s Green Building Ordinance.</p> <p>Although the Project will be consistent with this Strategy through the above Compliance Measure, as PDFs, the Project will use natural light as the primary source of light in all dwelling units and any lighting systems will be controllable to achieve maximum efficiency. Additionally, the Project design will incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption</p>
<p>¹ Source: Terry A. Hayes and Associates, 2013.</p>	

**TABLE IV.F-4
 PROJECT CONSISTENCY WITH CAPCOA GREENHOUSE GAS REDUCTION MEASURES¹**

CAPCOA-SUGGESTED MEASURE	PROJECT CONSISTENCY
<p>T1: Bike Parking at Multi-Unit Residential: Long term bicycle parking is provided at apartment complexes or condominiums without garages (e.g., one long-term bicycle parking space for each unit without a garage). Long term facilities shall consist of one of the following: a bike locker, a locked room with standard racks and access limited to bicyclists only, or a standard rack in a location that is staffed and/or monitored by video surveillance 24 hours per day).</p>	<p>Consistent: As a Compliance Measure, and in accordance with the City’s Bicycle Parking Ordinance, the Project will provide bicycle facilities as required.</p>
<p>T2: Proximity to Bike Path/ Bike Lanes: The Project is located within 0.5 miles of an existing/planned Class I or Class II bike lane and Project design includes a network that connects the Project uses to the existing offsite facility. Project design includes a designated bicycle route connecting all units, onsite bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within 0.5 miles. Bicycle route connects to all streets contiguous with the Project Site.</p>	<p>Consistent: As a Compliance Measure, and in accordance with the City’s Bicycle Parking Ordinance, the Project will provide bicycle facilities as required, including a lockable storage room in each Project building for long-term parking and bike racks for short-term parking near the entrance to proposed Lot 2 along Whitsett Avenue.</p>
<p>T3: Minimum Parking: Provide minimum amount of parking required.</p>	<p>Consistent: The proposed Project would include 613 subterranean parking spaces underneath the senior housing community. The parking structure will include 13 handicapped parking spaces to comply with the Americans with Disabilities Act. The 613 parking spaces will exceed the 500 parking spaces required by the LAMC for the senior housing Project.</p>
<p>T4: Residential Density: Employ Sufficient Density for New Residential Development to Support the Use of Public Transit. Project provides safe and convenient bicycle/pedestrian access to all transit stop(s) within 0.25 miles of the Project border.</p>	<p>Consistent: The proposed Project is located in a developed area. The Project Site is near and accessible from nearby commercial uses (e.g., retail, restaurants, etc.) and other amenities along the Ventura Boulevard corridor, as well as adjacent to public bus transit stops. Pedestrian walkways within the Project and adjacent sidewalks will be landscaped to provide a friendly walking environment.</p>
<p>T5: Suburban Mixed-Use: Have at least three of the following on site and/offsite within 0.25 miles: Residential Development, Retail Development, Park, Open Space, or Office.</p>	<p>Consistent: The proposed Project is located in a developed area. The Project Site is near and accessible from nearby commercial uses (e.g., retail, restaurants, etc.). The proposed Project will also include outdoor amenities, such as a lap pool and children’s playground.</p>
<p>T6: Wood Burning Fireplaces/ Stoves: Project does not feature fireplaces or wood burning stoves.</p>	<p>Consistent: The Project would not include fireplaces or wood burning stoves.</p>
<p>T7: Low-Water Use Appliances: Require the installation of low-water Use Appliances.</p>	<p>Consistent: The proposed Project would comply with the City’s Low Impact Development Standards.</p>

TABLE IV.F-4 (CONTINUED)

PROJECT CONSISTENCY WITH CAPCOA GREENHOUSE GAS REDUCTION MEASURES [1]

CAPCOA-SUGGESTED MEASURE	PROJECT CONSISTENCY
<p>T8: Landscaping: Project shall use drought resistant native trees, trees with low emissions and high carbon sequestration potential.</p>	<p>Consistent: The proposed Project’s landscaping would be required to comply with the City’s Landscape Ordinance and Irrigation Guidelines. Landscaping will include water efficient and native drought tolerant plants.</p>
<p>T9: LEED Certification: Promote building approach to sustainability by recognizing performance in sustainable site development, water savings, energy efficiency, materials selection, and indoor environment quality.</p>	<p>Consistent: The proposed Project will be designed to achieve LEED certification as noted in Project Design Feature PDF AQ-10 in <i>Section IV.B.4: Environmental Impact Analysis - Air Quality</i> of this Draft EIR. A sample LEED Checklist is included herein as <i>Appendix K</i> of this Draft EIR.</p>
<p>T10: Energy Star Roof: Project installs Energy Star labeled roof materials, where feasible.</p>	<p>Consistent: The Project design will incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.</p>
<p>T11: Exceed Title 24: Project exceeds title 24 requirements.</p>	<p>Consistent: The Project will comply with the City’s Green Building Ordinance, which requires that the Project exceed the 2008 Title 24 Energy Code by 15%.</p> <p>Although the Project will be consistent with this measure through the above Compliance Measure, as a PDF, the Project will be 20 percent more effective than required by Title 24 standards.</p>
<p>T12: Energy Efficient Appliance Standard: Project uses energy efficient appliances.</p>	<p>To Be Determined: The use of energy efficient appliances within each dwelling unit is not required and will be determined at a later point.</p>
<p>T13: Green Building Materials: Project uses materials which are resource efficient and recycled, with long life cycles and manufactured in environmentally friendly way.</p>	<p>Consistent: As a Compliance Measure and in accordance with the City of Los Angeles Construction and Demolition Waste Recycling Ordinance, during construction, non-hazardous construction and demolition debris will be recycled and/or salvaged. Additionally, the Project will attempt to use as many regional construction materials as possible.</p>

¹ Source: Terry A. Hayes and Associates, 2013.

d. Cumulative Impacts

A project’s GHG emissions typically would be relatively very small in comparison to State or global GHG emissions and, consequently, it would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause adverse environmental effects. Accordingly, the threshold of significance for GHG emissions determines whether a project’s contribution to global climate change is “cumulatively considerable.” As such, GHG emissions and climate change should be evaluated as a potentially significant cumulative, rather than project direct impact. Accordingly, the greenhouse gas emissions and global climate change analysis in this section already considers cumulative conditions of the Project under Future Cumulative Pre-Project Conditions and Future Cumulative

With Project Conditions, which take into account emissions from Related Projects and general ambient growth. Therefore, as determined in the above analysis, the proposed Project's generation of GHG emissions would not be cumulatively considerable and cumulative impacts would be less-than-significant.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific air quality impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- The Project shall comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Construction & Demolition (C&D) Waste Recycling Ordinance.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Green Building Code.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Bicycle Parking Ordinance.
- The Project shall comply with the applicable regulations and standards of the City of Los Angeles Landscape Ordinance and associated Irrigation Guidelines.

b. Project Design Features (PDFs)

PDFs are specific design and/or operational characteristics included to avoid or reduce potential air quality impacts. All PDFs applicable to GHG emissions are already included as part of the Mitigation Program in *Section IV.B: Environmental Impact Analysis – Air Quality* of this Draft EIR.

c. Mitigation Measures

Cumulative construction and operation impacts with relation to greenhouse gas emissions would be less-than-significant, and no Mitigation Measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of all required Compliance Measures for the Project would reduce all cumulative greenhouse gas impacts to a less-than-significant level with respect to emissions and consistency with GHG education plans and policies. Voluntary implementation of the Project Design Features (PDFs) spelled out in *Section IV.B: Environmental Impact Analysis – Air Quality* of this Draft EIR would further reduce GHG impacts. Therefore, no Mitigation Measures are required and GHG impacts would remain less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

G. HYDROLOGY AND WATER QUALITY

1. INTRODUCTION

The information contained in this section is derived primarily from the *Hydrology and Water Quality Civil Narrative* prepared by KPFF Consulting Engineers (Los Angeles, California) and dated January 2012 (see *Appendix F: Hydrology and Water Quality Civil Narrative* of this Draft EIR).¹

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) *Urban Runoff and Surface Water Flows*

The Project Site is located in an urbanized area in the community of Studio City in the City of Los Angeles, and bordered to the north by Valley Spring Lane; to the east by Whitsett Avenue; and to the south by the Los Angeles River Channel. The Project Site is occupied by an existing 9-hole pitch-and-putt golf course, a driving range, a clubhouse, a surface parking lot, 16 tennis courts, a small tennis house, and a small maintenance building. Approximately 25 percent of the Project Site's 16.11 acres is impervious surface area. Almost 100 percent of proposed Lot 1, which represents approximately 72 percent of the Project Site, is permeable surface area. Conversely, proposed Lot 2, which represents approximately 28 percent of the Project Site, and is developed with tennis courts and facilities, sidewalks, and parking, is almost 100 percent impervious.

The topography of the Project Site is considered shallow sloping with elevations ranging from approximately 629 feet above mean sea level at its northwest corner (at Bellaire Avenue) to 620 feet above mean sea level in its southeast corner (at the Fire Station and Valleyheart Drive). The elevation change in the topography of the Project Site results in a cross-slope decrease across the site of approximately 1.2 percent. Based on the existing Project Site topography, stormwater runoff sheet flows across the site from the high point in the northwest corner to the low point at the southeast corner and then discharges to the Los Angeles River. Under existing conditions, the Project Site experiences a flow rate of surface water across the site during a 25-year storm event of 33.43 cubic feet per second (cfs) with a total volume of 3.21 acre-feet. During a 50-year storm event under existing conditions, the Project Site experiences a flow rate of surface water of 41.15 cfs with a total volume of 3.74 acre-feet.

(2) *Surface Water Runoff Quality*

Water quality may be impacted by pollutants discharged directly into receiving waters. Industrial flows discharged from manufacturing activities and other activities, such as dewatering of groundwater encountered during construction, can usually be directed to an outfall or pipe and

¹ KPFF Consulting Engineers (Los Angeles, California), *Hydrology and Water Quality Report*, February 2012.

are therefore categorized as “point sources.” Water quality may also be affected by pollutants found in surface water runoff originating from a wide range of dispersed or “nonpoint sources.” In urban settings, this runoff is typically guided into a storm drain system and ultimately discharged to the receiving waters at a specific location(s). Hence, while the generic urban runoff is a nonpoint source, the outfall points of storm drain system discharges are treated as point sources.

Although stormwater runoff is part of the natural hydrologic cycle, natural drainage patterns and pollutant concentrations are frequently altered through processes such as urbanization. Stormwater runoff is recognized as a significant source of water pollution, which may result in declines in fisheries and other aquatic life, restrictions on recreational activities, and general impairment of the existing and potential beneficial uses of receiving waters. Reference to stormwater runoff also includes a subcomponent of “urban runoff,” which is the discharge of pollutants to water bodies from non-storm (or “dry weather”) related activities such as irrigation, hosing of paved areas, draining swimming pools, and washing cars. Dry weather flows also include illegal discharges to the storm drain system, often tied to unauthorized connections, leaks, or spills.²

The Project Site currently generates stormwater runoff from both storm events and urban runoff activity. Potential pollutants from the Project Site include fertilizers and pesticides from the golf course, fluid residues from vehicles using the surface parking area, and trash.

b. Regulatory and Policy Setting

(1) Water Quality Regulation

Clean Water Act

The Clean Water Act (CWA), first introduced in 1948 as the Water Pollution Control Act, authorizes federal, State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of State waters and tributaries. The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation’s waters and to make all surface waters fishable and swimmable. As such, the CWA forms the basic national framework for the management of water quality and the control of pollutant discharges. The CWA also sets forth a number of objectives in order to achieve the above-mentioned goals. These objectives include regulating pollutant and toxic pollutant discharges; providing for water quality that protects and fosters the propagation of fish, shellfish, and wildlife; developing waste treatment management plans; and developing and implementing programs for the control of non-point sources of pollution.³

² City of Los Angeles 2006 LA CEQA Thresholds Guide, Section G2-Surface Water Quality, Introduction, pgs. 245 and 246.

³ Non-point sources of pollution are carried through the environment via elements such as wind, rain, or stormwater and are generated by diffuse land use activities (such as runoff from streets and sidewalks or agricultural activities) rather than from an identifiable or discrete facility.

Since its introduction, major amendments to the CWA have been enacted (e.g., 1961, 1966, 1970, 1972, 1977, and 1987). Amendments enacted in 1970 created the U.S. Environmental Protection Agency (USEPA), while amendments enacted in 1972 deemed the discharge of pollutants into waters of the United States from any point source unlawful unless authorized by a USEPA National Pollutant Discharge Elimination System (NPDES) permit. Amendments enacted in 1977 mandated development of a “Best Management Practices” program at the State level and provided the Water Pollution Control Act with the common name of “Clean Water Act,” which is universally used today. Amendments enacted in 1987 required the USEPA to create specific requirements for discharges.

In response to the 1987 amendments to the CWA and as part of Phase I of its NPDES permit program, the USEPA began requiring NPDES permits for: (1) municipal separate storm sewer systems (MS4) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. Phase II of the USEPA’s NPDES permit program, which went into effect in early 2003, extended the requirements for NPDES permits to: (1) numerous small MS4s⁴ (2) construction sites of one to five acres, and (3) industrial facilities owned or operated by small MS4s. The NPDES permit program is typically administered by individual authorized states.

In 2008, the USEPA published draft Effluent Limitation Guidelines (ELGs) for the construction and development industry. On December 1, 2009, the EPA finalized its 2008 Effluent Guidelines Program Plan.⁵

In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB). The SWRCB was created by the Legislature in 1967. The joint authority of water distribution and water quality protection allows the SWRCB to provide protection for the State’s waters through its nine Regional Water Quality Control Boards (RWQCBs). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California’s waters, acknowledging areas of different climate, topography, geology, and hydrology. The RWQCBs develop “basin plans” for their hydrologic areas, issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality.⁶

National Pollution Discharge Elimination Systems (NPDES) Permit Program

The NPDES permit program was first established under authority of the CWA to control the discharge of pollutants from any point source into the waters of the United States. As indicated

⁴ A small municipal separate storm sewer system (MS4) is any MS4 not already covered by the Phase I program as a medium or large MS4. The Phase II Rule automatically covers on a nationwide basis all small MS4s located in “urbanized areas” as defined by the Bureau of the Census (unless waived by the NPDES permitting authority), and on a case-by-case basis those small MS4s located outside of urbanized areas that the NPDES permitting authority designates.

⁵ USEPA, <http://water.epa.gov/scitech/wastetech/guide/construction/index.cfm>

⁶ USEPA. U.S. Environmental Protection Agency - Clean Water Act. July 2011
<http://www.epa.gov/lawsregs/laws/cwa.html>.

above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs.

General Permit. SWRCB Order No. 2009-0009-DWQ known as “The General Permit” was adopted on September 2, 2009. This NPDES permit establishes a risk-based approach to stormwater control requirements for construction projects by identifying three project risk levels. The main objectives of the General Permit are to:

- Reduce erosion
- Minimize or eliminate sediment in stormwater discharges
- Prevent materials used at a construction site from contacting stormwater
- Implement a sampling and analysis program
- Eliminate unauthorized non-stormwater discharges from construction sites
- Implement appropriate measures to reduce potential impacts on waterways both during and after construction of projects
- Establish maintenance commitments on post-construction pollution control measures

California mandates requirements for all construction activities disturbing more than one acre of land be required to develop and implement Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of Best Management Practices (BMPs) for a specific construction project, charging owners/developers with stormwater quality management responsibilities. A construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit.^{7, 8}

Los Angeles County Municipal Stormwater System (MS4) Permit

USEPA regulations require that MS4 permittees implement a program to monitor and control pollutants being discharged to the municipal system from both industrial and commercial projects that contribute a substantial pollutant load to the MS4.

On December 13, 2001, the LARWQCB adopted Order No. 01-182 under the CWA and the Porter-Cologne Act. This Order is the NPDES Permit or MS4 permit for municipal stormwater and urban runoff discharges within Los Angeles County. The requirements of this Order (the “Permit”) cover 84 cities and most of the unincorporated areas of Los Angeles County. Under the Permit, the Los Angeles County Flood Control District (LACFCD) is designated as the Principal Permittee. The Permittees are the 84 Los Angeles County cities (including the City of Los Angeles) and Los Angeles County. Collectively, these are the “Co-Permittees”. The Principal Permittee facilitates activities necessary to comply with the requirements outlined in the Permit but is not responsible for ensuring compliance of any of the Permittees or Co-Permittees.

⁷ State Water Resources Control Board. State Water Resources Control Board. July 2011
http://www.swrcb.ca.gov/water_issues/programs/npdes/

⁸ USEPA. U.S. Environmental Protection Agency - NPDES. July 2011 <http://cfpub.epa.gov/npdes/>

Standard Urban Stormwater Mitigation Plan (SUSMP)

Under the Los Angeles County Municipal NPDES Permit, permittees are required to implement a development planning program to address stormwater pollution. These programs require project applicants for certain types of projects to implement SUSMPs throughout the operational life of their projects. The purpose of SUSMP is to reduce the discharge of pollutants in stormwater by outlining BMPs which must be incorporated into the design plans of new development and redevelopment projects. A project is subject to SUSMP if it falls under one of the categories listed below:

- Single-family hillside homes
- Ten or more unit homes (including single family homes, multifamily homes, condominiums, and apartments).
- Automotive service facilities
- Restaurants
- 100,000 square-feet or more of impervious surface area in industrial/commercial development.
- Retail gasoline outlet
- Parking lots with 5,000 square feet or more of surface area or with 25 or more parking spaces
- Redevelopment projects in subject categories that meet redevelopment thresholds
- Location within or directly adjacent to or discharging directly to an environmentally sensitive area if the discharge is likely to impact a sensitive biological species or habitat and the development creates 2,500 square feet or more of impervious surface.

Permittees are required to adopt the requirements set herein in their own SUSMP. Additional BMPs may be required by ordinance or code adopted by the Permittee and applied in a general way to all projects or on a case-by-case basis.

Low Impact Development (LID)

In October 2011, the City of Los Angeles passed an ordinance (Ordinance No. 181899) amending City of Los Angeles Municipal Code Chapter VI, Article 4.4, Sections 64.70.01 and 64.72 to expand the applicability of the existing SUSMP requirements by imposing rainwater Low Impact Development (LID) strategies on projects that require building permits.

LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.

The intent of the City's LID standards is to:

- Require the use of LID practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reduce stormwater/urban runoff while improving water quality;
- Promote rainwater harvesting;
- Reduce offsite runoff and provide increased groundwater recharge;
- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

LID design has become a leading practice for stormwater pollution prevention. The RWQCB, SWRCB, USEPA, and City of Los Angeles have prioritized the use of LID as the preferred approach to stormwater management. On September 28, 2011, the City of Los Angeles adopted an LID Ordinance that was based on standards issued by the LARWQCB and the City of Los Angeles Department of Public Works.⁹ The LID Ordinance, which became effective May 12, 2012, conforms to the regulations outlined in the NPDES Permit and SUSMP.

County of Los Angeles Hydrology Manual

Per the City's Special Order No. 007-1299, December 3, 1999, the City has adopted the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual (County Hydrology Manual) as its basis of design for storm drainage facilities. The County Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.¹⁰ The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit, and these limitations are enforced on all new developments that discharge directly into the County's storm drain system. Any proposed drainage improvements of County owned storm drain facilities, such as catch basins and storm drain lines, require the approval/review from the Los Angeles County Flood Control District (LACFCD).

(2) *Los Angeles General Plan*

The 1994 LARWQCB's Basin Plan is the document that outlines the regulatory process for the protection of the beneficial uses of all regional waters. The Basin Plan sets forth the regulations under which the Los Angeles General Plan establishes specific goals, objectives, and policies to reduce impacts from stormwater. According to the Basin Plan, the City of Los Angeles is located within three of the four major watersheds that make up the Los Angeles-San Gabriel Hydrologic Unit: the Ballona Creek, Dominguez Channel, and the Los Angeles River. The revised Basin Plan also recognized the Santa Monica Bay Watershed Management Area, which is comprised of the Ballona Creek and Malibu Creek watersheds (consistent with the Santa Monica Bay Restoration Project boundary). Storm drains within the City are constructed by both the City and

⁹ City of Los Angeles Ordinance No. 181899, adopted September 2011 and effective May 2012.

¹⁰ Los Angeles County Department of Public Works Hydrology Manual, January 2006, <http://ladpw.org/wrd/publication/index.cfm>, accessed October 19, 2011.

the LACFCD, managed by the Los Angeles County Department of Public Works. The LACFCD constructs the major storm drains and open flood control channels, and the City constructs local interconnecting tributary drains. The City designs the storm drain system so that flows from a 10-year event will not exceed the curb height, and flows from a 50-year event will be within the street right-of-way, while the County designs for a 50-year storm event and the Federal government (Army Corps of Engineers) designs for a 100-year event. The City's storm drain system must abide by the provisions set forth in the City of Los Angeles General Plan. The following goals, objectives, and policies have been established in the City of Los Angeles General Plan to reduce impacts associated with stormwater runoff:

Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

Policy 9.5.1: Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas).

Policy 9.5.2: Assign the cost of stormwater system improvements proportionately to reflect the level of runoff generated and benefits.

Policy 9.5.3: Implement programs to correct any existing deficiencies in the stormwater collection system.

Policy 9.5.4: Ensure that the City's drainage system is adequately maintained.

Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.

Policy 9.6.1: Pursue funding strategies which link the sources of revenues for stormwater system improvement to relevant factors including sources of runoff and project beneficiaries.

Policy 9.6.2: Establish standards and/or incentives for the use of structural and non-structural techniques which mitigate flood-hazards and manage stormwater pollution.

Policy 9.6.3: The City's watershed-based approach to stormwater management will consider a range of strategies designed to reduce flood hazards and manage stormwater pollution. The strategies considered will include, but not necessarily be limited to:

- a. Support regional and City programs which intercept runoff for beneficial uses including groundwater recharge;

- b. Protect and enhance the environmental quality of natural drainage features;
- c. Create stormwater detention and/or retention facilities which incorporate multiple-uses such as recreation and/or habitat;
- d. Onsite detention/retention and reuse of runoff;
- e. Mitigate existing flood hazards through structural modifications (floodproofing) or property buyout (acquisition);
- f. Incorporate site design features which enhance the quality of offsite runoff;
- g. Use land use authority and redevelopment to free floodways and sumps of inappropriate structures which are threatened by flooding and establish appropriate land uses which benefit or experience minimal damages from flooding.

Policy 9.6.4: Proactively participate in inter-agency efforts to manage regional water resources, such as the Santa Monica Bay Restoration Project, the Los Angeles River Master Plan, the Los Angeles River Parkway Project and the Los Angeles County Drainage Area Water Conservation and Supply Feasibility Study.

Objective 9.7: Continue to develop and implement a management practices based stormwater program which maintains and improves water quality.

Policy 9.7.1: Continue the City's active involvement in the regional NPDES municipal stormwater permit.

Policy 9.7.2: Continue to aggressively develop and implement educational outreach programs designed to foster an environmentally-aware citizenry.

Policy 9.7.3: Investigate management practices which reduce stormwater pollution to identify technically feasible and cost effective-approaches, through:

- a. Investigation of sources of pollution using monitoring, modeling and special studies;
- b. Prioritization of pollutants and sources;
- c. Conducting research and pilot projects to study specific management practices for the development of standards; and
- d. Developing requirements that establish implementation standards for effective management practices.

(3) *Los Angeles Municipal Code*

Any proposed drainage improvements within the street right-of-way or any other property owned by, to be owned by, or under the control of the City requires the approval of a B-permit (Section 62.105, LAMC). Under the B-permit process, storm drain installation plans are subject to review and approval by the City of Los Angeles Department of Public Works, Bureau of Engineering. Additionally, any connections to the City's storm drain system from a property line to a catch basin or a storm drain pipe requires a storm drain permit from the City of Los Angeles Department of Public Works, Bureau of Engineering.

River Improvement Overlay (RIO) District

The Project Site is adjacent to the Los Angeles River. As such, it is subject to the design guidelines established in the River Improvement Overlay (RIO) District. The RIO is a proposed special use district comprised of the following:

- Property Improvement Guidelines - projects must receive clearance from the Department of City Planning prior to obtaining a building permit by meeting a required threshold of twenty (20) points assigned in three (3) design categories: Watershed, Urban Design, and Mobility.
- In the Watershed category, points can be accrued for stormwater management, stream enhancement, landscaping, water conservation, hardscape, landscape/hardscape maintenance, and open space design.
- In the Urban Design category, points can be accrued from vehicle parking, transparency, site lighting, and visual clutter design.
- Lastly, in the Mobility category, points can be accrued from connectivity, pedestrian, transit, bicycle and vehicular design.
- Complete Green Street Standards - these standards apply to the area between the property line and the edge of the curb for all new projects. They include the implementation of pedestrian street lights, bicycle racks, trees, and landscaping.
- Complete Green Street Guidelines - these guidelines serve as options to mitigate the environmental impact of a project, as well as guide the design of street improvements. They include pedestrian scale improvement; water conservation; street calming; bicycle lanes; and, transit amenity improvements.

The RIO District is established to implement the urban design goals and principles outlined in the Los Angeles River Revitalization Master Plan (LARRMP). It is intended to promote sustainability of the Los Angeles River and the Greenway; establish a positive transition and interface between properties adjacent to the Greenway and the River Greenway; and, create active pedestrian streets that lead to the River.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The Hydrology and Water Quality Civil Narrative (see *Appendix F* of this Draft EIR) includes a detailed description of the methodology to determine hydrological and water quality impacts associated with development of the Project. The methodology is summarized below.

Surface Water Hydrology Methodology

The Project Site is located within the City of Los Angeles. Drainage collection, treatment, and conveyance are regulated by the City. Per the City's Special Order No. 007-1299, December 3, 1999, the City adopted the County Hydrology Manual as its basis of design for storm drainage facilities. The County Hydrology Manual requires projects to have drainage facilities that meet the Urban Flood level of protection. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed. A 25-year frequency design storm has a probability of 1:25 of being equaled or exceeded in any year. The City's CEQA Thresholds Guide, however, establishes the 50-year frequency design storm event as the threshold to analyze potential impacts on surface water hydrology as a result of development. To provide a more conservative analysis, the Hydrology and Water Quality Civil Narrative prepared for the Project analyzed the larger storm event threshold, the 50-year frequency design storm event.

The Modified Rational Method was used to calculate stormwater runoff. The "peak" (maximum value) runoff for a drainage area is calculated using the formula, $Q = CIA$
Where,

- Q = Volumetric flow rate (cubic feet per second (cfs))
- C = Runoff coefficient (dimensionless)
- I = Rainfall Intensity at a given point in time (inches/hour (in/hr))
- A = Basin area (acres)

The Modified Rational Method assumes that a steady, uniform rainfall rate will produce maximum runoff when all parts of the basin area are contributing to outflow. This occurs when the storm event lasts longer than the time of concentration. The time of concentration (T_c) is the time it takes for rain in the most hydrologically remote part of the basin area to reach the outlet. The method assumes that the runoff coefficient (C) remains constant during a storm. The runoff coefficient is a function of both the soil characteristics and the percentage of impervious surfaces in the drainage area.

The L.A. County Department of Public Works developed a time of concentration calculator (i.e., T_c Calculator) to automate time of concentration calculations as well as the peak runoff rates and volumes using the Modified Rational Method design criteria as outlined in the Hydrology Manual. The data input requirements include: sub-area size, soil type, land use, flow path length, flow path slope, and rainfall isohyets. The T_c Calculator was used to calculate the stormwater peak runoff flow rate for the Project conditions by evaluating an individual sub-area independent of all adjacent subareas.

Surface Water Quality Methodology

The SUSMP Method is used to analyze the peak mitigated flow rate as well as the mitigated volume. The SUSMP Method requires that projects must select source control and, in most cases, treatment control BMPs from the list approved by the LARWQCB. The BMPs must control peak flow discharge to provide stream channel and over bank flood protection, based on flow design criteria selected by the local agency. Further, the source and treatment control BMPs must be sufficiently designed and constructed to collectively treat, infiltrate, or filter stormwater runoff to meet or exceed the requirements of the City of Los Angeles, Watershed Protection Division. Equations used to determine the peak mitigated flow rate and volume mitigated flow rate are provided in the Hydrology and Water Quality Civil Narrative (see *Appendix F*).

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on hydrology and water quality if it would cause any of the following conditions to occur:¹¹

- a.) Violate any water quality standards or waste discharge requirements
- b.) Substantially deplete groundwater supplies or interfere 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)
- c.) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site
- d.) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
- e.) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
- f.) Otherwise substantially degrade water quality
- g.) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map

¹¹ State of California, California Environmental Quality Act: Guidelines, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2011).

- h.) Place within a 100-year flood hazard area structures which would impede or redirect flood flows
- i.) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam
- j.) Inundation by seiche, tsunami, or mudflow

Furthermore, as set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

(1) Hydrology

- Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or,
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

(2) Surface Water Quality

- Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

c. Project Impacts

(1) Hydrology

The following hydrology analysis discussion is based on information provided in the Hydrology and Water Quality Civil Narrative dated January 2012 (see *Appendix F* of this Draft EIR). The following analysis provides a good basis for the potential hydrology impacts of the Project, from which the City can determine the appropriate measures to require in approving the final engineering design of the Project.

As discussed above, the Project Site slopes from the northwest corner to the southeast corner at 1.2 percent decrease in elevation. For the Project, proposed Lot 1, consisting of the 9-hole golf course, clubhouse, and driving range, would remain intact with minimal changes to accommodate the Project. Proposed Lot 2, where the tennis courts and tennis house are currently located, would involve demolition of the tennis courts, tennis house, sidewalks, and a portion of the surface parking lot followed by development of the proposed Studio City Senior Living

Center. Because post-Project conditions for Lot 1 would be essentially unchanged, no net increase in the rate and quantity of stormwater runoff is expected from Lot 1.

A net increase from pre-development to post-development conditions on Lot 2 is anticipated. During a 50-year storm event, Lot 2 would result in a net increase of runoff of 9.97 cfs. And a net increase of 9.16 cfs would result during a 25-year storm event. However, with implementation of Compliance Measures, including requirements to implement a SUSMP and related design BMPs, LID Standards, a SWPPP, and obtaining a NPDES Permit, any net-increase of waterflow expected to occur during a 50- or 25-year storm event would be minimized to a less-than-significant level.

(2) *Surface Water Quality*

Construction Phase

During the construction of the Project at the Development Site, the existing tennis courts, tennis house, paved sidewalks, and a portion of the surface parking area would be demolished and approximately 82,000 cubic yards of grading and soil export would occur. As development occurs, if rainy days are encountered, the potential exists for stockpiled soil to be exposed and cause contaminated surface water to enter the stormwater conveyance system that serves the Project Site. Additionally, dust-watering activities during construction could contribute to contaminated surface water entering the stormwater conveyance systems. However, as a Compliance Measure, prior to the start of any construction, the Project would be required to obtain an NPDES General Construction Permit, which in turn would require that a SWPPP be developed to address methods to minimize water quality impacts during construction activity. The SWPPP would require the use of BMPs and other erosion control measures to reduce the surface water from being contaminated and flowing into the stormwater conveyance system. Also, the SWPPP would be required to be compliant with the SWRCB and the City of Los Angeles' Development Best Management Practices Handbook. Finally, construction activity on the Development Site would be required to comply with additional Compliance Measures through the City of Los Angeles grading permit regulations as described in the Los Angeles City Municipal Code. With implementation of the Compliance Measures, contamination or pollution of surface water during construction activities would be reduced and impacts during construction would be less-than-significant.

Occupancy and Operational Phase

Occupancy and operational activities on Lot 2 would be similar to other surrounding urbanized properties. It is possible that activity associated with the Studio City Senior Living Center would contribute to polluted surface water entering the stormwater conveyance system. Urban-related pollutants may include grease, oil, suspended solids, metals, solvents, phosphates, pesticides, and fertilizers.

However, there are measures in place, which are required by City, State, and federal regulations, and will have to be complied with for the Project to obtain the appropriate permits for operation. As a Compliance Measure, and in accordance with the City of Los Angeles, Watershed Protection Division Infiltration Requirements and Guidelines, BMPs

will be required for implementation into the Project. The first priority for BMP selection related to stormwater treatment is an infiltration system, when feasible. Infiltration systems are preferred as they provide for percolation and infiltration of the stormwater into the ground, which not only reduces the volume of the stormwater runoff entering into the Municipal Separate Storm Sewer Systems (MS4), but, in some cases, can contribute to groundwater recharge. Infiltration may not be feasible due to the Development Site having low permeability or impervious soils, or groundwater within 10 feet of existing grade.¹² The second priority for BMP selection is biotreatment and filtration. BMPs such as bio-swailes and bioretention cells are acceptable forms of treatment to meet this second tier treatment level. The determination for infiltration feasibility for the Project will depend on the final grading plans for the Development Site. Utilization of mechanical water treatment systems remains a viable option.

As a second Compliance Measure, and in accordance with the City of Los Angeles Low Impact Development (LID) Standards, which aim to remove nutrients, bacteria, and metals from stormwater, while also reducing the quantity of stormwater flows, the use of various infiltration strategies will minimize impervious surface area. Where infiltration is not feasible, the use of capture and reuse BMPs or biofiltration BMPs that will store, evaporate, detain, and/or treat runoff can be used.¹³

As a final Compliance Measure, and in accordance with NPDES permit requirements, the Project Applicant would develop a SUSMP that would be in place for the life of the Project, thus reducing surface water contaminants entering the stormwater conveyance system. BMPs of the SUSMP that would be in place as Compliance Measures are described below. Additionally, the Project would be designed to be compliant with the Clean Water Act and Order No. 90-079 of the RWQCB, which both regulate surface water quality.

With implementation of the Compliance Measures established through the Los Angeles Watershed Protection Division Infiltration Requirements and Guidelines, the Los Angeles Low Impact Development Standards, and SUSMP, it is anticipated that the Project would not result in discharges that would create pollution, contamination or nuisance of surface water and therefore, surface water quality impacts during operation of the Project would be less-than-significant.

(3) *Consistency with Adopted Plans and Policies*

Development of the proposed Project would not be inconsistent with plans and policies addressing water quality and hydrology on the Project Site. The Project demonstrates compliance and consistency with the applicable parts of the Clean Water Act, NPDES, Los Angeles County Municipal Stormwater System, SUSMP, LID, County of Los Angeles Hydrology Manual, Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, RIO District Guidelines, and the Los Angeles Municipal Code. Compliance and consistency with these various requirements will also be required for the Project to obtain building and grading permits. The permitting plan check process and implementation of the

¹² City of Los Angeles Watershed Protection Division. "City of Los Angeles Standard Urban Stormwater Mitigation Plan Infiltration Requirements & Guidelines." n.d.

¹³ City of Los Angeles. "Low Impact Development Best Management Practices Handbook." June, 2011

Compliance Measures below will ensure that the Project is consistent with all adopted plans and policies applicable to the Project Site.

d. Cumulative Impacts

Hydrological and water quality impacts are typically discussed on a regional level in urbanized locations. Individual sites are required to abide by regulations and development standards to reduce contribution of hydrological sheetflow and surface water quality concerns in urbanized areas. The *Hydrology and Water Quality Civil Narrative (Appendix F* of this Draft EIR) was developed by KPFF Consulting Engineers to determine site-specific hydrological and surface water quality characteristics at the proposed Development Site. This report has required that the Compliance Measures listed below be implemented to mitigate against hydrological and surface water quality issues during construction and operation of the Project. It is expected that the Related Projects associated with the Project would each be required to have a hydrology and water quality report completed to determine site-specific hydrological and water quality issues and provide Mitigation Measures to reduce such issues and impacts. Furthermore, each Related Project in the City would be required to abide by development standards and Compliance Measures in the Los Angeles Municipal Code, the NPDES, and the RWQCB to reduce impacts associated with hydrological and water quality issues. Significant cumulative hydrological and water quality impacts associated with concurrent development of the proposed Project and Related Projects are not anticipated.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations and laws that serve to offset or prevent specific hydrological impacts. The Compliance Measures have been discussed in the *Hydrology and Water Quality Civil Narrative* prepared for the SCSLC Project and shall be incorporated into the design of the Project, as required, to reduce the impacts on hydrological and water quality issues on and in the vicinity of the Project Site.

- The Project Applicant shall be required to implement a SUSMP, which shall outline the stormwater treatment measures or post-construction Best Management Practices (BMPs) required to control pollutants associated with storm events up to the 3/4-inch precipitation level.
- The Project shall comply with the Low Impact Development (LID) Standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, including, but not limited to, high-flow biotreatment devices, vegetated swales, filter strips, bioretention facilities, planter boxes, bioinfiltration facilities, and dry wells.

- The Project's stormwater management features shall focus on meeting or exceeding the goals of the General Construction Permit, as well as SUSMP and LID.
- Since Lot 2 accounts for approximately 4.52 acres, the Project shall implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall be designed to address the following objectives:
 - All pollutants and their sources, including sources of sediment associated with construction, construction site erosion and all other activities associated with construction activity shall be controlled;
 - Where not otherwise required to be under a Regional Water Quality Control Board (RWQCB) permit, all non-stormwater discharges shall be identified and either eliminated, controlled, or treated;
 - BMPs are effective and shall be used in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity to the Best Available Technology/Best Control Technology (BAT/BCT) standard;
 - Calculations and design details as well as BMP controls for the site run-off shall be complete and correct;
 - Stabilization BMPs installed to reduce or eliminate pollutants after construction shall be completed;
 - Shall identify post-construction BMPs, which are those measures to be installed during construction that are intended to reduce or eliminate pollutants after construction is completed (post-construction BMPs are required for all sites by Section XIII.B); and
 - Shall identify and provide methods to implement BMP inspection, visual monitoring, Rain Event Action Plans (REAPs) and Construction Site Monitoring Program (CSMP) requirements to comply with the General Permit.
- In order to implement a SWPPP, the sediment and receiving water risk factors shall be calculated to determine the overall combined risk level for this Project.
- Since the Project is adjacent to the Los Angeles River, the combined risk level for this Project can be hypothesized to be a minimum of Risk Level 2; it may also be determined to be a Risk Level 3 based on final calculations of the sediment risk factor. As such, the following Risk Level 2 or 3 requirements shall be met:

- Compliance with narrative effluent standards;
 - Good site management “housekeeping”
 - BMP implementation to control all non-stormwater discharges during construction;
 - Erosion control BMP implementation;
 - Sediment control BMP implementation;
 - Effectively manage all run-on, runoff within the site and all runoff that discharges off the site;
 - Ensure all inspection, maintenance, repair and sampling activities are performed or supervised by a Qualified SWPPP Practitioner (QSP) certified and trained by the California Stormwater Quality Association;
 - Ensure the Qualified SWPPP Practitioner develops a Rain Event Action Plan (REAP) forty-eight (48) hours prior to any likely precipitation event;
 - Develop and implement a Construction Site Monitoring Program (CSMP);
 - Collect water quality samples or runoff that is discharged offsite;
 - Prepare and electronically submit an Annual Report no later than September 1st of each year for the duration of construction.
- Construction BMPs shall be designed and maintained as part of the implementation of the SWPPP in compliance with the General Construction Permit. Implementation of the SWPPP shall begin when construction commences, before any site clearing and grubbing or demolition activity. During construction, the SWPPP shall be referred to regularly and amended as changes occur throughout the construction process. The Notice of Intent (NOI), Amendments to the SWPPP, Annual Reports, Rain Event Action Plans (REAPs), and Non-Compliance Reporting shall be posted to the State’s SMARTS website in compliance with the requirements of the General Construction Permit. All of the following BMPs shall be included as part of the Project to manage construction stormwater run-off:
 - **Erosion Control BMPs** protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMP shall be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels.
 - **Sediment Control BMPs** are treatment controls that trap soil particles that have been detached by water or wind. Selection of

the appropriate sediment control BMP shall be based on keeping sediments on site and controlling the site boundaries.

- **Wind Erosion Control BMPs** consists of applying water to prevent or minimize dust nuisance.
- **Tracking Control BMPs** consists of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. All sites shall have a stabilized construction entrance to prevent off-site tracking of sediment and debris.
- **Non-Stormwater Management BMPs** are also referred to as “good housekeeping practices,” which involve keeping a clean, orderly construction site.
- **Waste Management and Materials Pollution Control BMPs** consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.
- The proper disposal, storage or use of hazardous materials such as cleaners, agents, solvents, or other construction or operations related activities shall occur in accordance with regulatory requirements. Any non-stormwater discharge shall be controlled and properly disposed of through either approved connections to the sanitary sewer system or transported to an approved processing facility to prevent the contamination of the Project Site’s soils or groundwater. In addition, loading docks and storage areas shall be designed to provide spill containment and prevent contaminants from reaching the groundwater.
- The following BMPs shall be included as part of the SUSMP for the Project to manage post-construction stormwater run-off:
 - Promote evapotranspiration and infiltration by increasing the overall footprint of landscaped areas and promoting the use of native and/or drought tolerant plants.
 - Provide storm drain system stenciling and signage to discourage illegal dumping.
 - Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system.

- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing.
 - Design post-construction structural or treatment control BMPs to either treat or infiltrate stormwater runoff. Stormwater treatment facilities and systems shall be designed to meet the requirements of the SUSMP manual.
 - Volumetric Treatment Control BMPs shall be designed to capture the volume of runoff from a 0.75-inch storm event, prior to discharging to the public storm drain system.
 - Flow based Treatment Control BMPs shall be designed to the same standards as the volume-based control BMPs. The flow of runoff produced from the storm event shall be equal to or at least 0.2 inches per hour.
 - Treatment devices shall be sized and designed to meet the above requirements outlined in the SUSMP manual.
- The Project shall be designed to comply with all local and State regulations regarding the control of pollutants of concern that may affect the quality of groundwater underlying the Development Site. Compliance with both the Construction General Construction Permit and Los Angeles County SUSMP shall require the implementation of both construction related and post-construction Best Management Practices (BMPs) for the safe handling and disposal of contaminants and pollutants of concern.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to further avoid or reduce potential hydrological impacts.

PDF HYD-1: Stormwater from the roofs shall be reclaimed by conveying runoff through roof downspouts via an underground storm drain pipe network to a pre-treatment system to remove debris and sediment from runoff and then conveyed to an infiltration trench and/or drywell for infiltration purposes. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that would store, evaporate, detain, and/or treat runoff may be used.

PDF HYD-2: Various landscape areas shall be developed along the building perimeters. Landscaped areas shall be graded, where possible, to flow directly to an infiltration trench and/or drywell, for infiltration purposes, or intercepted by a series of planter drains, area drains, etc., and conveyed to the selected infiltration

system through a subsurface PVC storm drain pipe. An overflow pipe shall be provided to discharge excess stormwater that cannot be infiltrated during a heavy storm event. Overflow from the infiltration trench shall be discharged to the Los Angeles River open channel. If infiltration is found not feasible, the use of capture and reuse BMPs or biofiltration BMPs that will store, evaporate, detain, and/or treat runoff may be used.

PDF HYD-3: Hardscaped pedestrian walkways shall be graded in coordination with existing topography to sheet flow storm runoff into landscaped areas, where possible, or to various catch basins and curb inlet catch basins with filter inserts to be treated prior to discharging into a bio-retention basin. A series of cleanouts shall be provided for the new subsurface pipe network at appropriate distances and/or bends.

c. Mitigation Measures

Implementation of the above required Compliance Measures incorporated as part of the design of the Project would result in less-than-significant impacts to hydrological and water quality conditions. No additional Mitigation Measures are required to reduce impacts.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

As required by City, State, and federal regulations, the Project would incorporate into its design the above Compliance Measures. With implementation of the Compliance Measures, no additional Mitigation Measures would be required. Additionally, due to the proximity of the Project to the Los Angeles River and the adjacent use of the golf course on the Project Site, the Project Applicant has included certain PDFs that would further reduce environmental impacts related to hydrology. Therefore, impacts on hydrology and water quality would be less-than-significant with development of the proposed Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. LAND USE AND PLANNING

1. INTRODUCTION

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

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Onsite Land Uses

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

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

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

(2) Local Context and Surrounding Land Uses

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

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

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

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

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

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

b. Regulatory and Policy Setting

(1) Regional Plans

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

(a) SCAG Regional Comprehensive Plan

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

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

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

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

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

(b) *SCAQMD Air Quality Management Plan*

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

(c) *MTA Congestion Management Plan*

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

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

(2) *Local Plans and Regulations*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Los Angeles Municipal Code (LAMC)

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

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

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

(c) Special Plans

LA River Revitalization Master Plan and River Improvement Overlay

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

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

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

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

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

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

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

Walkability Checklist

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

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

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

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

3. ENVIRONMENTAL IMPACTS

a. Methodology

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

b. Thresholds of Significance

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

- a) Physically divide an established community;

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

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

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

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

Land Use Consistency

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

Land Use Compatibility

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

c. Project Impacts

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

Lot 1

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

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

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

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

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

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

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

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

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

Lot 2

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) *Land Use Compatibility*

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

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

(a) *Change in Land Use*

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

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

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

(b) Intensity of Proposed Use

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

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

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

(c) Scale and Massing of Development

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

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

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

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

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

(d) *Community Role and Relationship*

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

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

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

(e) *Operational Characteristics*

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

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

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

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

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

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

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

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

⁷ LAMC §12.24.E

⁸ LAMC §12.24.F

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

(2) ***Consistency with Adopted Plans and Policies***

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

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

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

TABLE IV.H-1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Watershed	10 points
Building Design	5 points
Mobility	5 points

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

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

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

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

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		<p>As a Compliance Measure, the City of Los Angeles Tree Protection Guidelines and landscape requirements will require that new landscaping, including trees, be integrated into the new construction area, and would require at a minimum a 1:1 replacement for any tree removed. The Applicant will be required to submit a Landscape Plan for City review and approval. Such review will ensure that the Project conforms to the City's policies and guidelines for tree protection and replacement.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>		
5.1.2(b)	Select indigenous native plants, per the County's Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.	<p>New trees integrated into the Project will be selected to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the transitioning character or the Los Angeles River interface. Hence, the Project tree program will attempt, when feasible, to incorporate recommendations of the Cal-IPC (California Invasive Plant Council-www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>	3	3
5.1.2(c)	Contract with a licensed landscape architect to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.	<p>New trees and plants integrated into the Project will be selected by a licensed landscape architect to minimize the potential for impacts and incompatibility with other existing, remaining trees, to reflect native and indigenous species, and to reflect the</p>	2	2

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		<p>transitioning character or the Los Angeles River interface. Hence, the Project tree program will attempt, when feasible, to incorporate recommendations of the Cal-IPC (California Invasive Plant Council- www.caHpc.org) for avoiding non-native and invasive tree species and incorporating a variety of native trees that encourage and support California native wildlife habitat.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: The Project landscaping will use water efficient landscaping and native drought tolerant plants.</p>		
5.1.2(d)	Contract with a garden designer to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.	This measure is applicable only to single-family development.	-	-
5.1.2(e)	Remove existing exotic weedy plants such as identified by the California Invasive Plant Council (CAL-IPC). Examples of include the Mexican fan palm (<i>Washingtonia robusta</i>) and fountain grass (<i>Pennisetum setaceum</i>).	The Project will not or cannot comply with this measure.	2	0
5.1.2(f)	Complete a class related to native plant gardening at a local nursery or college.	<p>The applicable Project Design Feature includes:</p> <p>PDF: The Applicant will require that landscape maintenance contractors employed at the SCSLC complete a class related to native plant gardening to ensure that they are qualified to maintain the health of native vegetation employed into the landscape palette.</p>	1	1
5.1.3 Watershed-Water Conservation				
5.1.3(a)	Develop and implement a strategy to establish native and/or other drought tolerant species that do not require regular irrigation.	<p>The Project will incorporate landscaping that utilizes plants identified as native and/or drought tolerant.</p> <p>As a Compliance Measure, the City of Los Angeles Tree Protection Guidelines and landscape requirements will require that new landscaping, including trees,</p>	2	2

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

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	webversion.pdf. River rock and decomposed granite are especially recommended.			
5.1.5 Watershed-Landscape/Hardscape Maintenance				
5.1.5(a)	Prepare and implement a maintenance manual and/or program that follows the Landscape Maintenance Guidelines defined on page 48, Part II-LAR Planting Guidelines of the LARMP Design Guidelines. This includes information about supplemental irrigation, extended maintenance, pruning, weeding and supplemental mulch.	The Project will not or cannot comply with this measure.	1	0
5.1.5(b)	Prepare a maintenance manual and/or program for parking lots and structures that establishes regular and ongoing procedures to maintain the surfaces free of chemical residues and debris.	The Project will not or cannot comply with this measure.	1	0
5.1.5(c)	Prepare and implement a maintenance manual and/or program that uses best management practices to provide sustainable organic horticulture, making pesticides and chemical fertilizers unnecessary.	The Project will not or cannot comply with this measure.	2	0
5.1.6 Watershed- Open Space				
5.1.6(a)	Provide a rear-and/or side-yard easement adjacent to the River. The easement area shall be used to maximize open space for native landscaping, create active plazas or courtyards and/or provide additional pedestrian amenities visible and accessible from the River. One point will be accrued for every 1% of easement relative to the overall property depth.	The Project will not or cannot comply with this measure.	1 per each 1%	0
5.2 URBAN DESIGN				
5.2.1 Urban Design-Connectivity				
5.2.1(a)	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the street and is open and easily accessible during business hours.	The Project provides three primary pedestrian accesses to the development, including a main access directly from Whitsett Avenue (between buildings 1 and 2) and secondary access points at the northeast corner (adjacent to the driving range/golf parking lot) and southwest corner (at the public playground and adjacent to the LA River easement) of Lot 2. Incidental	Required	Consistent

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

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5.2.1(b)	Configure the entrance to be fully accessible per the American Disabilities Act (ADA), such that the auxiliary entrance (such as a ramp next to the main path to the primary entry) for persons with mobility limitations would not be necessary.	<p>The three primary pedestrian accesses to the development are established to accommodate ADA compliance and allow for residents requiring special mobility accommodations to easily and safely transition from the SCSLC to the public interface and transit pick-ups/drop-offs at those key pedestrian linkage points. Also, incidental pedestrian access from the subterranean parking structure will be served by multiple elevator corridors offering direct access to each residential building above.</p> <p>Before obtaining a building permit for the Project, the Applicant will be required to undergo review and approval by the Department of Building and Safety for compliance with ADA requirements.</p> <p>See also responses 5.3.1(a) and (b) below.</p>	Required	Consistent
5.2.1(c)	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the greenway and is open and easily accessible during business hours.	The Project will not or cannot comply with this measure.	1	0
5.2.1(d)	Design, build, and provide for the on-going maintenance of a permanent pedestrian easement (paseo) to the Greenway that is publicly accessible during daylight hours and is open to the sky. Easement should be a minimum 7' in width and provide visible connections between the street and the River.	The Project will not or cannot comply with this measure.	3	0
5.2.1(e)	Design the paseo to include amenities such as: outdoor dining and seating areas; tables for board and card games; sun and shade; landscaping; sculptures and fountains.	The Project will not or cannot comply with this measure.	1	0
5.2.1(f)	Create convenient access between the River and the property that is available for public and/or private use, where a property line is coterminous with the River.	<p>See responses 5.2.1(a), 5.2.1(b) and 5.2.1(c) above.</p> <p>The applicable Project Design Feature includes:</p> <p>PDF: Pedestrian walkways within the Project and the adjacent sidewalks will be appropriately landscaped and</p>	2	2

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

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

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	incorporates transparent features, as follows:			
5.2.5(a)	Ground level retail: at least 50% transparency.	Applies only to commercial and public facility projects.	-	-
5.2.5(b)	Ground level offices and other commercial uses: at least 35% transparency.	Applies only to commercial and public facility projects.	-	-
5.2.5(c)	Multi-family residential, industrial and public facility uses: at least 25% transparency.	The Project will not or cannot comply with this measure.	2	0
5.2.5(d)	Upper floors: at least 20% transparency.	The Project will not or cannot comply with this measure.	1	0
5.2.6 Urban Design-Visibility				
5.2.6(a)	Locate and design the building to protect views of surrounding urban landmarks and natural features to and from the Greenway and/or street.	The Project will not or cannot comply with this measure.	1	0
5.2.6(b)	Design landscape, signage and architectural elements so that they do not obstruct pedestrian movement or views from the Greenway and/or street.	The Project will not or cannot comply with this measure.	1	0
5.2.7 Urban Design-Site Lighting				
5.2.7(a)	Include permanent attachments to site lighting so that the light sources are not visible from a public right of way and any off-site glare is prevented.	The Project will provide lighting throughout the site that will distribute light evenly across the Property and shall be positioned to prevent harsh glares on public right-of-ways or adjacent properties. The applicable Project Design Feature includes: PDF: The proposed Project would include exterior lighting that would minimize nighttime illumination.	Required	Consistent
5.2.7(b)	Provide site lighting that distributes light evenly and avoids harsh shadows and glare.	See response 5.2.7(a).	1	1
5.2.7(c)	Provide site lighting that is integrated into the architecture.	See response 5.2.7(a).	1	1
5.2.8 Urban Design-Visual Clutter				
5.2.8(a)	Design trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street.	As a Compliance Measure, the Project design integrates trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street. Trash/recycling bin storage areas will be incorporated within the subterranean parking area with bins ported to	Required	Consistent

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		Valleyheart Drive for pick-up. Any trash enclosure area not entirely screened within the parking structure will be screened from view by the general public through architecturally treated enclosures and/or landscaping.		
5.2.8(b)	Screen from public view all exterior rooftop and ground-level mechanical equipment, which includes HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes.	As a Compliance Measure, the Project design will screen from public view all exterior rooftop and ground-level mechanical equipment, including HVAC equipment, exhaust fans, wireless telecommunication facility equipment cabinet enclosures and antennas, and satellite dishes. Rooftop equipment will be located within rooftop wells and screened by the perimeter mansard roof treatment. Ground level equipment will be screened with architectural enclosures and/or landscaping as appropriate. Building mounted equipment (such as antennas) will be incorporated into the architectural treatment of the building façade to blend and reduce visibility from the street, river greenway and golf course views.	Required	Consistent
5.2.8(c)	Limit building or site signage to address identification, business and operational identification, and the name of the building.	The applicable Project Design Feature includes: PDF: The Project will provide building or site signage limited only to that necessary to provide address identification, business and operational identification, building name, wayfinding, and transit information. See also responses 5.2.1(a), 5.2.6(b) and 5.3.1(b).	1	1
5.2.8(d)	Design security features to deter criminal activity but maintain a positive image for the community. Design security grills so that they are recessed completely into pockets that conceal the grill when they are retracted. Design the pockets to be integrated into the design of the building.	The Project will support and enhance pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through the strategic design and placement of pedestrian entrances. Pedestrian activity would be further enhanced through a more varied and extensive landscape treatment (than what currently exists) along Whitsett Avenue that would create a pleasant street experience for	1	1

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

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

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		variety of transportation modes for residents, visitors and employees/service providers associated with the Project.		

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

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

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

(c) *Los Angeles Walkability Checklist*

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

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

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

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

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

TABLE IV.H-3
CONSISTENCY WITH WALKABILITY CHECKLIST

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

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

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

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

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

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

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

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

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

(d) *Other Local Programs*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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	<ul style="list-style-type: none"> ○ Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	

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

(e) Other Regional Programs

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

d. Cumulative Impacts

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

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

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

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

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

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

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

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

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

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

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

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

b. Project Design Features (PDFs)

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

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

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

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

c. Mitigation Measures

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

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

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. NOISE

1. INTRODUCTION

The following analysis of noise impacts is based primarily upon the *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates, dated June 27, 2013, and incorporated fully herein. The noise report, including the applicable noise calculation sheets are provided in *Appendix B: Air Quality and Noise Assessments* of this Draft EIR.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

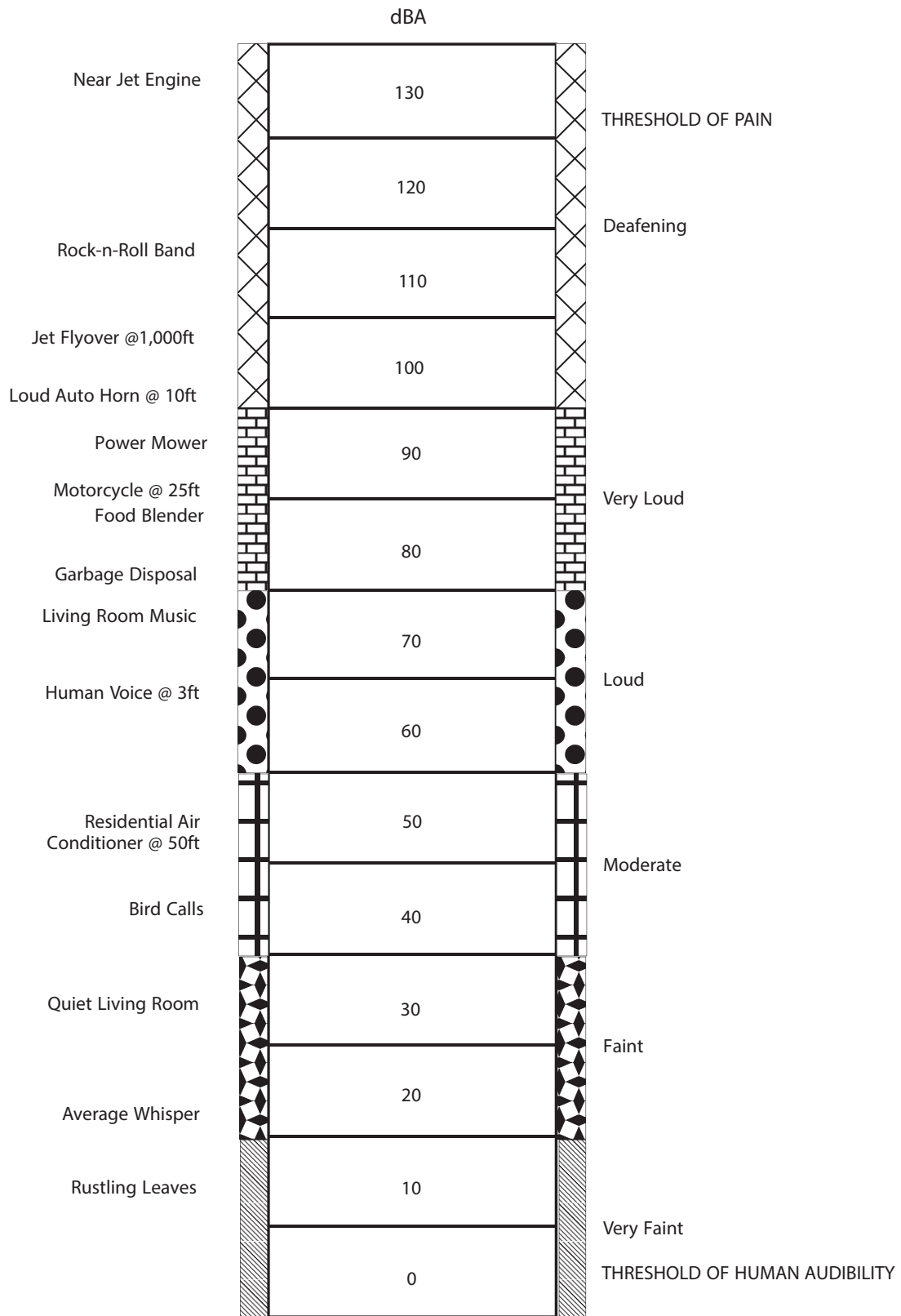
The following discussion focuses on providing noise and ground-borne vibration background information. In addition, existing noise and ground-borne conditions are characterized.

(1) *Characteristics of Sound*

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. *Figure IV.I-1: A-Weighted Decibel Scale* provides examples of A-weighted noise levels from common sounds. This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if the sound were actually 5 decibels higher than if it occurred from 7:00 A.M. to 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 P.M. to 10:00 P.M. and 10 dBA to sound levels in the night between 10:00 P.M. and 7:00 A.M. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.



SOURCE: Cowan, James P., Handbook of Environmental Acoustics

FIGURE IV.I-1
A-WEIGHTED DECIBEL SCALE

SOURCE: TERRYA.HAYES ASSOCIATES INC.



(a) *Effects of Noise*

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

(b) *Audible Noise Changes*

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., pavement) and 7.5 dBA over soft surfaces (e.g., grass) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Generally, noise is most audible when traveling by direct line-of-sight.¹ Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver greatly reduces noise levels from the source since sound can only reach the receiver by bending over the top of the barrier (diffraction). Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced. In situations where the source or the receiver is located three meters (approximately ten feet) above the ground, or whenever the line-of-sight averages more than three meters above the ground, sound levels would be reduced by approximately 3 dBA for each doubling of distance.

(2) *Characteristics of Vibration*

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common

¹ Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.

sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the affect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.²

(a) *Effects of Vibration*

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of vibration may damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes).

To counter the effects of vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to vibration levels of 0.3 inches per second PPV without experiencing structural damage.³

(b) *Perceptible Vibration Change*

In contrast to noise, vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 Vdb RMS or lower, well below the threshold of perception for humans which is around 65 Vdb RMS.⁴ Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

(3) *Existing Local Noise Conditions*

The existing noise environment of the Project area is characterized by vehicular traffic and noises typical to a dense urban area (e.g., tennis facilities and sirens from the adjacent fire station). Sound measurements were taken using a SoundPro DL Sound Level Meter between 11:20 A.M. and 1:20 P.M. on January 12, 2012 to determine existing ambient daytime noise levels in the Project vicinity. These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating noise impacts. As shown in *Table IV.I-1*:

² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

³ Federal Railway Administration, *High-Speed Ground Transportation Noise and Vibration Impact Assessment*, October 2005.

⁴ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

Existing Noise Levels, the existing ambient sound levels range between 53.3 and 68.6 dBA L_{eq} . Noise monitoring locations are shown in *Figure IV.I-2: Noise Monitoring Locations*.

A 24-hour sound measurement was taken from 10:30 A.M., Wednesday, January 18, 2012 to 10:30 A.M., Thursday, January 19, 2012. The recorded CNEL was 69.5 dBA.

TABLE IV.I-1
EXISTING NOISE LEVELS¹

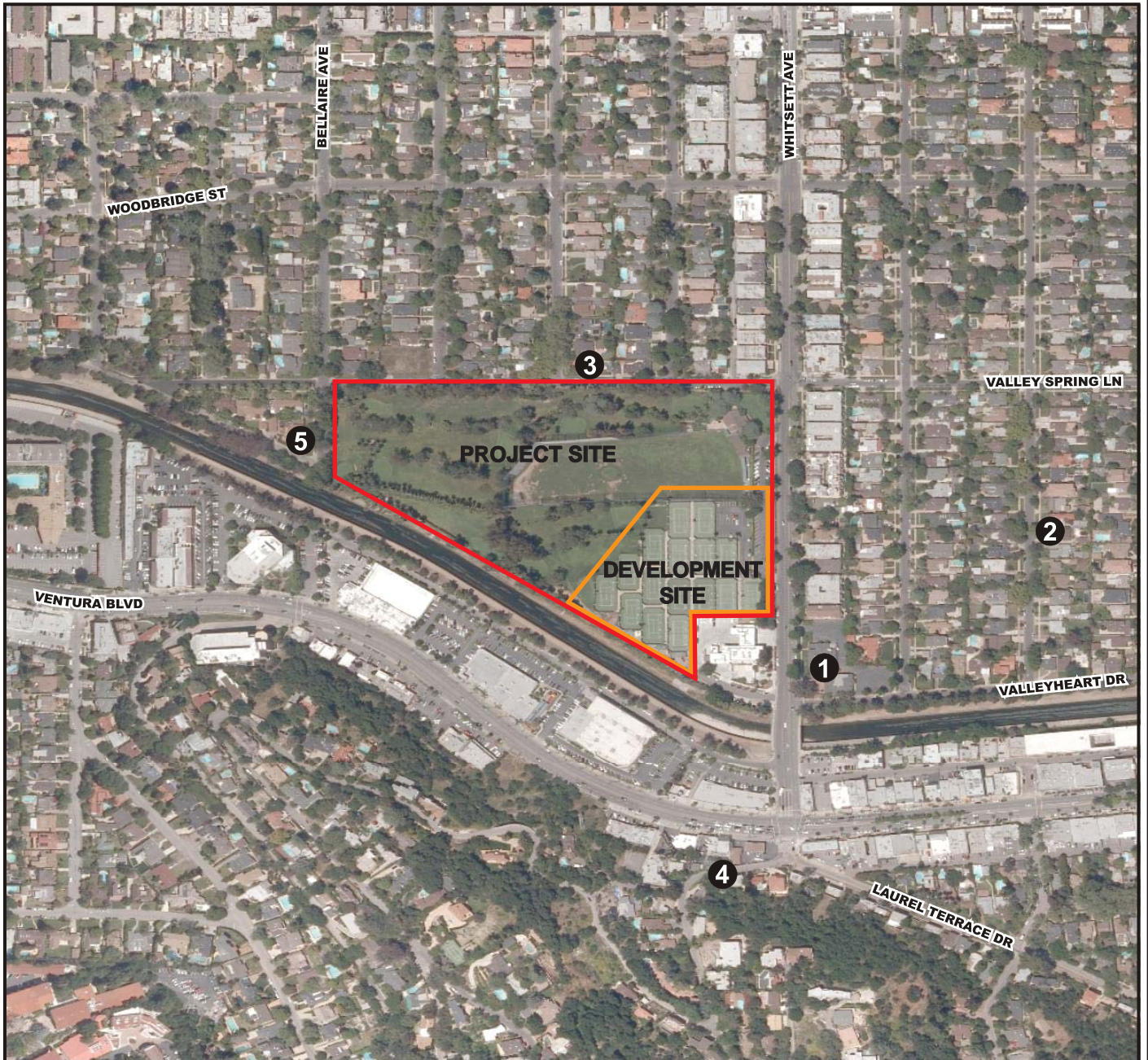
KEY TO FIGURE IV.I-2: NOISE MONITORING LOCATIONS	NOISE MONITORING LOCATION	SOUND LEVEL (dBA, L_{EQ})
1	Christian Science Church – 4032 Whitsett Avenue	68.6
2	Single-Family Residence – 4118 Wilkinson Avenue	53.3
3	Single-Family Residence – 4202 Beeman Avenue	57.5
4	Single- and Multi-Family Residence – 12464 Sunswept Drive	66.5
5	Single-Family Residence – 4155 Bellaire Avenue	55.1
¹ Source: Terry A. Hayes Associates LLC, <i>Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report</i> , June 2013.		

(4) Existing Local Vibration Conditions

Similar to the environmental setting for noise, the vibration environment is dominated by traffic from nearby roadways. Heavy trucks can generate vibrations that vary depending on vehicle type, weight, and pavement conditions. As heavy trucks typically operate on major streets, existing vibration in the Project vicinity is largely related to heavy truck traffic on the surrounding roadway network. Field observations indicate that truck travel is minimal on Whitsett Avenue. Vibration levels from adjacent roadways are not perceptible at the Project Site.

(5) Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive, and may warrant unique measures for protection from intruding noise. As the uses and activities on proposed Lot 1 (i.e., golf course, driving range, clubhouse, putting green, and surface parking area) would not change with development of the Project, the existing ambient noise and vibration from these uses would remain status quo for the sensitive receptors. As such, the impacts from construction and operational noise and vibration on sensitive receptors are measured from the Development Site, which is the southeast portion of the Project Site that will undergo change for the Project and may have new potential noise and vibration impacts on sensitive receptors. As shown in *Figure IV.I-3: Noise Sensitive Receptor Locations*, sensitive receptors near the Development Site include the following:



LEGEND:

- Project Site
- Development Site
- # Sensitive Receptors

- 1. Christian Science Church
- 2. Single-Family Residence
- 3. Single-Family Residence
- 4. Single- and Multi-Family Residence
- 5. Single-Family Residence

SOURCE: ESRI and TAHA, 2012

FIGURE IV.I-2
NOISE MONITORING LOCATIONS

SOURCE: TERRYA.HAYES ASSOCIATES INC.





LEGEND:

 Project Site  Development Site  Sensitive Receptors

- 1. Single- and Multi-Family Residences
- 2. Christian Science Church
- 3. Single- and Multi-Family Residences
- 4. Single-Family Residences
- 5. Single-Family Residences

SOURCE: ESRI and TAHA, 2012

FIGURE IV.I-3
NOISE SENSITIVE RECEPTOR LOCATIONS

SOURCE: TERRYA.HAYES ASSOCIATES INC.



- Single- and multi-family residences located 120 feet to the east
- Christian Science Church located 180 feet to the southeast
- Single- and multi-family residences located 415 feet to the north
- Single-family residences located 595 feet to the south
- Single-family residences located 995 feet to the northwest

The above sensitive receptors represent the nearest residential land uses with the potential to be impacted by the proposed Project. Additional sensitive receptors are located further from the Development Site in the surrounding community and would be less impacted by noise and vibration than the above sensitive receptors.

b. Regulatory and Policy Setting

(1) Noise

Noise Element of the City of Los Angeles General Plan. The City of Los Angeles has developed a Noise Element of the General Plan to guide in the development of noise regulations.⁵ It addresses noise mitigation regulations, strategies and programs and delineates federal, State, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. Programs included in the Noise Element that are relevant to the proposed Project include:

- For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with CEQA and City procedures.
- When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the CEQA so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.
- Use, as appropriate, the “Guidelines for Noise Compatible Land Use”, or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter, within a CNEL of 65 dB airport noise exposure areas and within a line of sight of freeways, major highways, railroads or truck haul routes.

City of Los Angeles Municipal Code (LAMC). The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) of the Los Angeles Municipal Code

⁵ City of Los Angeles, Noise Element of the Los Angeles City General Plan, February 3, 1999.

(LAMC) indicates that no construction or repair work shall be performed between the hours of 9:00 P.M. and 7:00 A.M., since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence. No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 A.M. or after 6:00 P.M. on any Saturday or on a federal holiday, nor at any time on any Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) of the LAMC also specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

(2) *Vibration*

There are no adopted City standards for ground-borne vibration. The County of Los Angeles vibration standard is stated in Title 12 (Environmental Protection), Chapter 12.08 (Noise Control), Section 12.08.560 (Vibration) of the Los Angeles County Code. The County Code states that, “Operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The perception threshold shall be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.”

3. ENVIRONMENTAL IMPACTS

a. Methodology

The noise and vibration analysis considers construction and operational sources. The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. Reference noise levels for equipment were provided by the United States Environmental Protection Agency (USEPA). Mobile source noise levels were estimated using guidance provided by the Federal Highway Administration. Operational vibration is qualitatively discussed based on guidance in the FTA *Transit Noise and Vibration Impact Assessment*. Construction vibration levels are estimated using equipment reference levels and propagation formulas provide by the FTA.

b. Thresholds of Significance

Based on the City of Los Angeles Noise Ordinance (LAMC Chapter XI), the City of Los Angeles *LA CEQA Thresholds Guide* (2006) and the State Land Use Compatibility Matrix,⁶ the proposed Project would result in significant noise and vibration impacts if it would generate noise and vibration levels in excess of the following thresholds.

(1) Construction Phase Significance Criteria

A significant construction noise impact would result if:

- Construction activity would occur outside of the hours permitted by the City’s Noise Ordinance (i.e., between the hours of 9:00 P.M. and 7:00 A.M. on weekdays, before 8:00 A.M. or after 6:00 P.M. on Saturday or any federal holiday, or anytime on Sunday);
- Construction activity would occur within 500 feet of a residential zone on Saturday unless an after-hours construction permit has been issued by the City. An after-hours permit could be issued by the City for low noise level construction activities (e.g., painting and interior improvements); and/or
- Construction activity would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

(2) Operations Significance Criteria

A significant operational noise impact would result if:

- The proposed Project causes the ambient noise level measured at the property line of the affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” category or any 5 dBA or more increase in noise level. As shown in *Table IV.I-2: Land Use Compatibility for Community Noise Environments*, “normally unacceptable” ranges from 70 to 75 dBA CNEL for single- and multi-family residences, and 70 to 80 dBA CNEL for medical uses, which include hospitals and medical offices. “Clearly unacceptable” ranges from 70 to 85 dBA CNEL or greater for single- and multi-family residences, and 80 dBA CNEL or greater for medical uses; and/or
- The proposed Project would expose new sensitive receptors to interior noise levels greater than 45 dBA.


⁶ California Office of Noise Control, Department of Health Services.

(3) *Vibration Significance Criteria*

There are no adopted State or City of Los Angeles vibration standards. Based on federal guidelines, the proposed Project would result in a significant construction or operational vibration impact if:

- The proposed Project would expose buildings to the FTA building damage threshold level of 0.3 inches per second.⁷

TABLE IV.I-2
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS¹

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (dBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						
<p>KEY:</p> <p> Normally Acceptable</p> <p>Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.</p>						

⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

TABLE IV.I-2 (CONTINUED)
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS¹

	<p>Conditionally Acceptable</p> <p>New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditionally will normally suffice.</p>
	<p>Normally Unacceptable</p> <p>New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.</p>
	<p>Clearly Unacceptable</p> <p>New construction or development should generally not be undertaken.</p>

¹ Source: California Office of Noise Control, Department of Health Services

c. Project Impacts

(1) Construction Phase Activity (Short-Term)

(a) General Construction Noise

Construction of the Project would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby residents during the approximate 24-month construction schedule. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities typically require the use of numerous pieces of noise-generating equipment. Typical noise levels from various types of equipment that may be used during construction are listed in *Table IV.I-3: Maximum Noise Levels of Common Construction Machines*. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

TABLE IV.I-3
MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES¹

NOISE SOURCE	NOISE LEVEL (dBA) ²	
	50 FEET	100 FEET
Jackhammer	90	84
Crane	88	82
Street Paver	87	81
Backhoe	84	78
Street Compressor	81	75
Front-end Loader	80	74
Grader	87	81

TABLE IV.I-3 (CONTINUED)
MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES¹

NOISE SOURCE	NOISE LEVEL (dBA) ²	
	50 FEET	100 FEET
Idling Haul Truck	89	83
Cement Mixer	82	76
Impact Pile Driving	101	95
Auger Drilling	77	71

¹ Source: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.
² Assumes a 6-dBA drop-off rate for noise generated by a “point source” and traveling over hard surfaces. Actual measured noise levels of the equipment listed in this table were taken at distances of ten and 30 feet from the noise source.

The noise levels shown in *Table IV.I-4: Typical Outdoor Construction Noise Levels* take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA L_{eq} at a reference distance of 50 feet.

TABLE IV.I-4
TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS¹

CONSTRUCTION PHASE	NOISE LEVEL AT 50 FEET (dBA)
Ground Clearing	84
Grading/Excavation	89
Foundations	78
Erection	85
Finishing	89

¹ Source: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. The estimated construction noise levels at sensitive receptors are shown in *Table IV.I-5: General Construction Noise Levels – Unmitigated*. Noise levels related to construction activity would exceed the 5 dBA significance threshold at three of the five nearby sensitive receptors. The Project would result in a significant construction noise impact without incorporation of Mitigation Measures.

**TABLE IV.I-5
 GENERAL CONSTRUCTION NOISE LEVELS – UNMITIGATED¹**

KEY TO FIGURE IV.I-2:	SENSITIVE RECEPTOR	DISTANCE (FEET) ²	MAXIMUM CONSTRUCTION NOISE LEVEL (dBA) ³	MONITORED EXISTING AMBIENT (dBA, L _{EQ}) ⁴	ADD NEW AMBIENT (dBA, L _{EQ}) ⁵	INCREASE ⁶
1	Christian Science Church 4032 Whitsett Avenue	180	77.9	68.6	78.4	9.8
2	Single-Family Residence 4118 Wilkinson Avenue	415	58.6	57.5	59.7	6.4
3	Single Family Residence 4202 Beeman Avenue	595	69.5	65.5	69.8	12.3
4	Single- and Multi-Family Residence 12464 Sunswept Drive	753	66.4	66.5	69.5	3.0
5	Single-Family Residence 4155 Bellaire Avenue	995	51.0	55.1	56.5	1.4

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.

² Distance of noise source from receptor.

³ Construction noise source's sound level at receptor location, with distance and building adjustment.

⁴ Pre-construction activity ambient sound level at receptor location.

⁵ New sound level at receptor location during the construction period, including noise from construction activity.

⁶ An incremental noise level increase of 5 dBA or more would result in a significant impact.

(b) *Pile Driving Noise*

Pile driving activity would potentially occur during the construction process. Impact pile driving typically generates noise levels of 101 dBA L_{eq} at 50 feet. As shown in *Table IV.I-6: Pile Driving Noise Levels -- Unmitigated*, the Project would increase the ambient noise levels during pile driving activity between 2.5 and 21.3 dBA L_{eq} at sensitive receptors in the Project vicinity. Although temporary and intermittent, pile driving noise levels would exceed the 5 dBA significance threshold at four of the five nearby sensitive receptors. Therefore, the Project would result in a significant construction noise impact without incorporation of Mitigation Measures.

Table IV.I-6
PILE DRIVING NOISE LEVELS – UNMITIGATED¹

KEY TO FIGURE IV.I-2:	SENSITIVE RECEPTOR	DISTANCE (FEET) ²	MAXIMUM CONSTRUCTION NOISE LEVEL (dBA) ³	MONITORED EXISTING AMBIENT (dBA, L _{EQ}) ⁴	ADD NEW AMBIENT (dBA, L _{EQ}) ⁵	INCREASE ⁶
1	Christian Science Church 4032 Whitsett Avenue	180	89.9	68.6	89.9	21.3
2	Single-Family Residence 4118 Wilkinson Avenue	415	70.6	57.5	70.8	13.3
3	Single Family Residence 4202 Beeman Avenue	595	81.5	65.5	81.6	16.1
4	Single- and Multi-Family Residence 12464 Sunswept Drive	753	65.4	66.5	69.0	2.5
5	Single-Family Residence 4155 Bellaire Avenue	995	74.3	55.1	74.3	19.2

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.

² Distance of noise source from receptor.

³ Construction noise source's sound level at receptor location, with distance and building adjustment.

⁴ Pre-construction activity ambient sound level at receptor location.

⁵ New sound level at receptor location during the construction period, including noise from construction activity.

⁶ An incremental noise level increase of 5 dBA or more would result in a significant impact.

(2) Operations Activity (Long-Term)

(a) Vehicular Noise

The predominant noise source for the proposed Project is vehicular traffic. According to the traffic impact study prepared by Linscott, Law, and Greenspan, Engineers, the Project would generate 624 net daily vehicle trips.⁸ *Table IV.I-7: Operational Mobile Source Noise Levels – Future Cumulative Pre-Project and With Project Conditions* shows peak hour mobile source noise levels along the analyzed roadway segments for Future Cumulative Pre-Project Conditions and Future Cumulative with Project Conditions (Project build-out anticipated to be 2016). The greatest Project-related noise increase would be 0.1 dBA L_{eq} along both Whitsett Avenue between Moorpark Street and Ventura Boulevard and Moorpark Street between Whitsett and Coldwater Canyon Avenues. This would not exceed the most conservative roadway noise threshold of 3-dBA. Therefore, the operation of the Project after 2016 build-out would result in a less-than-significant impact related to mobile noise levels.

⁸ Linscott, Law & Greenspan, Engineers, *Studio City Senior Living Center Project Traffic Impact Study*, February 2, 2012.

TABLE IV.I-7
OPERATIONAL MOBILE SOURCE NOISE LEVELS –
FUTURE CUMULATIVE PRE-PROJECT AND WITH PROJECT CONDITIONS¹

ROADWAY	ESTIMATED dBA, Leq		
	NO PROJECT (2016)	PROJECT (2016)	PROJECT IMPACT
Whitsett Ave between Riverside Dr and Moorpark St	70.4	70.4	0
Whitsett Ave between Moorpark St and Ventura Blvd	69.8	69.9	0.1
Moorpark St between Coldwater Canyon and Whitsett Ave	70.7	70.7	0
Moorpark St between Whitsett Ave and Laurel Canyon Blvd	70.4	70.5	0.1

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.

Table IV.I-8: Operational Mobile Source Noise Levels – Existing Conditions and Existing With Project Conditions shows peak hour mobile source noise levels along the analyzed roadway segments for Existing Conditions (without the Project) and Existing with Project Conditions in the current year. The greatest Project-related noise increase would be 0.1 dBA L_{eq} along Whitsett Avenue. This would not exceed the most conservative roadway noise threshold of 3-dBA. Therefore, the operation of the Project under the scenario of being developed in existing noise conditions would result in a less-than-significant related to mobile noise levels.

TABLE IV.I-8
OPERATIONAL MOBILE SOURCE NOISE LEVELS –
EXISTING CONDITIONS AND EXISTING WITH PROJECT CONDITIONS¹

ROADWAY	ESTIMATED dBA, Leq		
	NO PROJECT	PROJECT	PROJECT IMPACT
Whitsett Ave between Riverside Dr and Moorpark St	69.9	70	0.1
Whitsett Ave between Moorpark St and Ventura Blvd	69.3	69.4	0.1
Moorpark St between Coldwater Canyon and Whitsett Ave	70.2	70.2	0
Moorpark St between Whitsett Ave and Laurel Canyon Blvd	70	70	0

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.

(b) *Stationary Noise*

Potential stationary noise sources related to the long-term operations of the Project include mechanical equipment and parking areas. Mechanical equipment (e.g., parking structure air vents and HVAC equipment) would be designed, per Compliance Measures, so as to be located within an enclosure or confined to the rooftop of the proposed structure. HVAC equipment typically generates a noise level of approximately 60 dBA L_{eq} at 50 feet. Mechanical equipment would be

screened from view as necessary to comply with provisions of the LAMC for onsite stationary sources. Operation of mechanical equipment would not be anticipated to increase ambient noise levels by 5 dBA or more. Therefore, the Project would result in a less-than-significant impact related to stationary equipment noise levels.

The Project would also include common outdoor amenities such as a lap pool and a small children's playground. However, the pool and playground would generally be surrounded by the proposed buildings and would not be in the direct line-of-site of any nearby sensitive receptors. As such, it is anticipated that noise generated at these land uses would not be audible at adjacent noise-sensitive land uses. Therefore, the proposed Project would result in a less-than-significant impact related to outdoor amenity noise levels.

(c) *Parking Noise*

The proposed Project would include 613 subterranean parking spaces underneath the senior housing community. Subterranean parking would be enclosed on all sides and noise generated by this facility would be inaudible at sensitive receivers. As such, parking structure activity would not be anticipated to incrementally increase ambient noise levels at sensitive receptors by 5 dBA or more. Therefore, the Project would result in a less-than-significant impact related to parking noise.

(d) *Land Use/Noise Compatibility*

It is important that new residential land uses are located in noise compatible environments. Two residential buildings would be located at the Project Site's property line along Whitsett Avenue. The existing CNEL along Whitsett Avenue is 69.5 dBA. As shown previously in *Table IV.I-3: Maximum Noise Levels of Common Construction Machines*, this noise level is conditionally acceptable for multi-family residences. Conditionally acceptable means that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice. The Project would be constructed to current design standards and regulations, and each unit would include an air conditioning system. Therefore, the Project would result in a less-than-significant impact related to land use and noise compatibility.

The Project Site is adjacent to City of Los Angeles Fire Station No. 78. Noise generated by fire station activity was accounted for in the 24-hour measurement and the analysis presented above. Occasional siren activity may generate audible noise during daytime and nighttime hours. However, operational policy for the City's fire department is to limit the use of sirens and horns, as practical, when traveling past noise sensitive areas⁹. Due to the temporary and necessary nature of fire engine sirens, noise generated by this source is not considered a significant impact.

⁹ Department of City Planning Los Angeles, *Noise Element of the Los Angeles City General Plan*, February 3, 1999.

(3) **Vibration**

(a) *General Construction*

Heavy-duty equipment activity on the Development Site would generate vibration. As shown in *Table IV.I-9: Vibration Velocities for Construction Equipment*, typical heavy-duty equipment (e.g., a large bulldozer) generates vibration levels of 0.089 inches per second PPV at a distance of 25 feet. The closest sensitive receptor that can be potentially impacted from heavy equipment activity is a multi-family residence along Whitsett Avenue, located approximately 120 feet away from the Development Site. This sensitive receptor could experience a vibration level of 0.008 inches per second PPV. Vibration levels would not exceed the potential building damage threshold of 0.3 inches per second PPV. Therefore, the Project would result in a less-than-significant impact related to general construction vibration.

TABLE IV.I-9
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT¹

EQUIPMENT	PPV AT 25 FEET (INCHES/SECOND) ²
Pile Driving (Impact)	0.644
Pile Driving (Sonic)	0.170
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
¹ Source: Federal Transit Authority, <i>Transit Noise and Vibration Impact Assessment</i> , May 2006. ² Fragile buildings can be exposed to vibration levels of 0.5 inches per second PPV without experiencing structural damage.	

(b) *Pile Driving*

Construction of the Project would require drilled or driven piles. Based on the noise analysis presented above, the construction contractor would be required to use a drilling technique to place piles, as opposed to a driving, or impact, technique. Caisson drilling would generate a vibration level of 0.008 inches per second at the nearest sensitive receptor. Vibration levels would not exceed the potential building damage threshold of 0.3 inches per second PPV. Therefore, the Project would result in a less-than-significant impact related to drilling construction vibration.

(c) *Operations*

The proposed Project would not include significant stationary sources of vibration, such as heavy equipment operations. Operational vibration in the Project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less-than-significant impact.

d. Cumulative Impacts

Development of the Project in combination with Related Projects would result in an increase in construction-related and traffic-related noise in the area. However, each of the Related Projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the Related Projects would be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. Thus, the Project would not have a cumulatively considerable effect regarding violation of noise ordinances. With conformance with LAMC noise ordinances, the cumulative construction noise impact related to the violations of the City's noise standards would be less-than-significant.

Nevertheless, future construction associated with the Related Projects could result in a cumulatively significant impact with respect to temporary or periodic increases in ambient noise levels. Most of the Related Projects are approximately one mile from the Development Site and the nearest Related Project is Related Project No. 1. Similar to the Project, these Related Projects would likely require the use of heavy construction equipment that would generate increased noise levels. As discussed above, the Project would result in significant construction noise impacts on sensitive receptors located in the Project area. Due to the possibility that construction of these identified Related Projects could potentially occur at times that overlap with Project construction, Project related construction noise levels could combine with Related Project construction noise levels to create a cumulatively considerable temporary noise impact upon noise sensitive receptors. As such, cumulative construction noise impacts would be considered significant.

With regards to cumulative operational noise impacts, as previously discussed, when determining mobile source noise levels from the Project, the noise analysis directly used future traffic impacts taken from the Project's Traffic Impact Study (see *Appendix I: Traffic Impact Study* of this EIR). The same was done to calculate cumulative mobile source noise levels from the Project in conjunction with other projects (or potential projects) and general ambient growth in the area. When calculating future traffic impacts, the traffic consultant took into consideration all Related Projects (on city record) and general ambient growth in the community through Project build-out in 2016. Thus, the future traffic results with and without the Project already account for this cumulative impact analysis. Consequently, since the noise impacts are generated directly from the traffic analysis results, the future noise impacts with and without the Project, as described in this analysis, already reflect cumulative impacts.

Table IV.I-10: Cumulative Mobile Source Noise Levels presents the cumulative increase in future traffic noise levels at various intersections (i.e., Existing Conditions and Future Cumulative with Project Conditions). The maximum cumulative roadway noise increase would be 0.6 dBA L_{eq} and would occur along Whitsett Avenue between Moorpark Street and Ventura Boulevard. Cumulative roadway noise levels would not exceed the 3 dBA threshold increment and would

not result in a perceptible change in noise level. Therefore, the proposed Project would result in a less-than-significant cumulatively considerable impact related to roadway noise and Project operations.

TABLE IV.I-10
CUMULATIVE MOBILE SOURCE NOISE LEVELS¹

ROADWAY	ESTIMATED dBA, Leq		
	EXISTING	PROJECT	CUMULATIVE IMPACT
Whitsett Ave between Riverside Dr and Moorpark St	69.9	70.4	0.5
Whitsett Ave between Moorpark St and Ventura Blvd	69.3	69.9	0.6
Moorpark St between Coldwater Canyon and Whitsett Ave	70.2	70.7	0.5
Moorpark St between Whitsett Ave and Laurel Canyon Blvd	70	70.5	0.5

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.

With regards to cumulative construction and operational vibration impacts, as discussed earlier, the Project would not exceed the potential building damage thresholds for construction and pile driving vibration, and would result in less-than-significant construction vibration impacts. As such, the Project will not cumulatively contribute to the vibration impacts of the Related Projects. Further, the predominant operational vibration source near the Project Site is heavy truck travel on the local roadways. Neither the Project nor any Related Projects would substantially increase heavy-duty vehicle traffic near the Project Site and would not cause a substantial increase in heavy-duty trucks on local roadways. Therefore, the Project would result in less-than-significant cumulatively considerable impacts related to both construction and operational vibration.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific noise impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- The Project shall comply with the City’s Noise Ordinance (Ord. No. 156,363) to ensure that construction activities are conducted in accordance with the Los Angeles Municipal Code (LAMC).
- In compliance with the LAMC, construction activity shall be limited to between 7:00 A.M. and 9:00 P.M. on weekdays and 8:00 A.M. and 6:00 P.M. on Saturdays. Construction activity shall be prohibited on Sundays and federal holidays.

b. Project Design Features (PDFs)

There are no PDFs included with respect to noise and vibration impacts.

c. Mitigation Measures

The Project will result in less-than-significant construction vibration impacts and operational noise and vibration impacts. To ensure that the noise impacts resulting from the construction phase of Project are reduced to the extent possible, the following Mitigation Measures shall be implemented:

MM NOI-1: All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

MM NOI-2: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

MM NOI-3: All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

MM NOI-4: A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

MM NOI-5: The construction contractor shall utilize caisson drilling instead of pile driving on the Development Site.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

(1) Construction Phase Activity (Short-Term)

(a) General Construction Noise

Mitigation Measure MM NOI-1 would reduce construction noise levels by 3 dBA. Implementation of the required Compliance Measures and Mitigation Measures MM NOI-2 through MM NOI-4 would assist in attenuating construction noise levels. *Table IV.I-11: General*

Construction Noise Levels – Mitigated shows mitigated general construction noise levels. Construction noise levels would still exceed the significance threshold at various sensitive receptors. Therefore, general construction noise would result in a significant and unavoidable impact after incorporation of Mitigation Measures. However, this significant and unavoidable impact would be temporary during the construction phase of the Project.

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.

**TABLE IV.I-11
 GENERAL CONSTRUCTION NOISE LEVELS – MITIGATED¹**

KEY TO FIGURE IV.I-2:	SENSITIVE RECEPTOR	DISTANCE (FEET) ²	MAXIMUM CONSTRUCTION NOISE LEVEL (dBA) ³	MONITORED EXISTING AMBIENT (dBA, L _{EQ}) ⁴	ADD NEW AMBIENT (dBA, L _{EQ}) ⁵	INCREASE ⁶
1	Christian Science Church 4032 Whitsett Avenue	180	74.9	68.6	75.8	7.2
2	Single-Family Residence 4118 Wilkinson Avenue	415	55.6	57.5	59.7	2.2
3	Single Family Residence 4202 Beeman Avenue	595	66.5	65.5	69.0	3.5
4	Single- and Multi-Family Residence 12464 Sunswept Drive	753	54.9	66.5	66.8	0.3
5	Single-Family Residence 4155 Bellaire Avenue	995	54.8	55.1	58.0	2.9

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.
² Distance of noise source from receptor.
³ Construction noise source’s sound level at receptor location, with distance and building adjustment.
⁴ Pre-construction activity ambient sound level at receptor location.
⁵ New sound level at receptor location during the construction period, including noise from construction activity.
⁶ An incremental noise level increase of 5 dBA or more would result in a significant impact.

(b) *Pile Driving Noise*

Mitigation Measure MM NOI-5 would require caisson drilling instead of impact pile driving. Drilling would typically generate a noise level of 71 dBA L_{eq} at 50 feet. *Table IV.I-12: Pile Driving Noise Levels – Mitigated* shows drilling noise levels after mitigation. Construction noise levels would still exceed the significance threshold at various sensitive receptors. Therefore, drilling noise would result in a significant and unavoidable impact after incorporation of mitigation measures. However, this significant and unavoidable cumulative impact would be temporary during the construction phase of the Project.

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.

TABLE IV.I-12
PILE DRIVING NOISE LEVELS – MITIGATED¹

KEY TO FIGURE IV.I-2:	SENSITIVE RECEPTOR	DISTANCE (FEET) ²	MAXIMUM CONSTRUCTION NOISE LEVEL (dBA) ³	MONITORED EXISTING AMBIENT (dBA, L _{EQ}) ⁴	ADD NEW AMBIENT (dBA, L _{EQ}) ⁵	INCREASE ⁶
1	Christian Science Church 4032 Whitsett Avenue	180	65.9	68.6	70.5	1.9
2	Single-Family Residence 4118 Wilkinson Avenue	415	46.6	68.6	68.6	0.0
3	Single Family Residence 4202 Beeman Avenue	595	57.5	57.5	60.5	3.0
4	Single- and Multi-Family Residence 12464 Sunswept Drive	753	41.4	66.5	66.5	0.0
5	Single-Family Residence 4155 Bellaire Avenue	995	50.3	55.1	56.3	1.2

¹ Source: Terry A. Hayes Associates, *Weddington Golf and Senior Housing Project Air Quality and Noise Impact Report*, June 2013.
² Distance of noise source from receptor.
³ Construction noise source's sound level at receptor location, with distance and building adjustment.
⁴ Pre-construction activity ambient sound level at receptor location.
⁵ New sound level at receptor location during the construction period, including noise from construction activity.
⁶ An incremental noise level increase of 5 dBA or more would result in a significant impact.

(2) Operations Activity (Long-Term)

The Project-related operational noise would result in a less-than-significant impact without the need for mitigations.

(3) Vibration

The Project-related construction and operational vibration impacts would result in less-than-significant impacts without the need for mitigations.

IV. ENVIRONMENTAL IMPACT ANALYSIS

J. POPULATION AND HOUSING

1. INTRODUCTION

Population and housing data and forecasts are compiled by a number of agencies, including the U.S. Census Bureau, the Southern California Association of Government (SCAG), and the City of Los Angeles.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area within the City of Los Angeles. The Community Plan Area is comprised of five community subareas, each with its own identity. Within the Community Plan Area, the Project Site is within the Studio City subarea. Specifically, the community of Studio City is located approximately 11 miles northwest of downtown Los Angeles, and bound by the communities of North Hollywood, Van Nuys, and Valley Village on the north; Toluca Lake, Universal City, and a portion of the City of Burbank on the east; Sherman Oaks, Encino, and Tarzana on the west; and Bel-Air, Hollywood, and West Hollywood to the south. Studio City is characterized as a collection of production and post-production businesses, containing the majority of industrially zoned properties found within the Community Plan Area. Properties located along Ventura Boulevard are developed with a mix of pedestrian-oriented storefronts and office structures.

The Citywide General Plan Framework, the umbrella concept and overall guiding vision for Los Angeles, is based on a directed growth strategy that targets residential and commercial growth along boulevards and corridors, as well as clustered development around community focal points and high activity centers. The General Plan Framework incorporates forecasts for population, employment, and housing number estimates that are derived from regional data, which in turn were disaggregated to the City and then the community level. Overall, for the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area, the General Plan Framework forecasts the following population, housing and employment levels for the year 2010:¹

<i>Population (2010) Projection</i>	90,582
<i>Employment (2010) Projection</i>	55,810
<i>Housing (2010) Projection</i>	45,401

¹ City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998, p. II-4. It can be reasonably assumed that the population, employment and housing estimates for the current year are substantially similar to the projections for the year 2010 in the Framework.

According to the 2010 Census, the Studio City area (as defined by the 91604 postal ZIP code boundary) has a population of approximately 29,034 residents.² This is an increase of approximately 2,897 residents, or 11 percent, over the 2000 Census population of 26,137. According to the 2010 Census, this area currently supports approximately 14,292 households, which is a five percent increase from the 13,620 households reported under the 2000 Census.³ Population in the area is assumed to include only the permanent population, residing within housing units.

The median age in the City of Los Angeles has been increasing steadily over time. In 1990, the City's median age was 30.6 years. In 2000, it was 31.6 years, and by 2005, it was 33.3 years.⁴ The Studio City area follows this trend, but is represented by an overall higher local median age relative to the citywide observations. According to the 2010 Census, the median age within the Studio City area was 40.2 years compared to 39.2 years in 2000.⁵

More specifically, the Project Site is located within U.S. Census Bureau Tract 1435, which is generally bound on the north by Moorpark Street, on the east by Laurel Canyon Boulevard, on the south by the Los Angeles River, and on the west by Fulton Avenue. According to 2010 Census data, the total population within Census Tract 1435 was 4,708 persons within 2,388 total households, resulting in an average household size of 1.97 persons per household.

The U.S. Census only provides population and housing estimates for 2010 and does not project anticipated levels for the years following 2010. The U.S. Census does retain historical data (i.e., for 2000, 1990, etc.) and therefore, it is possible to evaluate historical trends in order to predict future growth levels, if needed.

The City of Los Angeles also utilizes regional growth projections provided by SCAG to help guide the City with its land use and housing goals and policies. SCAG projects future population and housing growth in Southern California through the year 2035 as part of its *Regional Transportation Plan (RTP) 2012-2035, Sustainable Communities Strategy, Towards a Sustainable Future*.

The Project Site is currently zoned A1-1XL with an Open Space land use designation, and developed with open space and recreational uses, including a golf course, driving range, clubhouse, tennis courts, and related facilities. As such, the Project Site does not currently support any housing units or residential population. Population at the Project Site is limited to a temporary "daytime" population of employees and visitors utilizing facilities at the Weddington Golf and Tennis Club.

The Project Site is located amidst an established residential community with single-family residential neighborhoods to the north and west and multiple-family residential complexes to the

² Population information reported for postal zip code area 91604. This area general includes the areas between U.S. Highway 101 and Mullholland Drive, and Fulton Street and Tujunga Avenue. Source: <http://www.zip-codes.com/zip-code/91604/zip-code-91604.asp>

³ United States Census Bureau, ZIP-Codes.com, <http://www.zip-codes.com/zip-code/91604/zip-code-91604.asp>

⁴ Los Angeles Department of City Planning, *Housing Element of the General Plan 2006-2014*. http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Final/HE_Final.pdf

⁵ United States Census Bureau, ZIP-Codes.com, <http://www.zip-codes.com/zip-code/91604/zip-code-91604.asp>

east, along Whitsett Avenue. The area south of the Project Site is comprised primarily of commercial land uses and the Los Angeles River.

b. Regulatory and Policy Setting

The regulatory and policy setting for population and housing are discussed in the context of land use under *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this Draft EIR. Relevant policy information for population and housing forecasts are identified above in the context of physical setting.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The following housing and population analysis relies on the characterization of onsite and surrounding land uses based on field observations and review of aerial photos. Characterization of community population and housing characteristics is based on publicly available U.S. Census data or similar data and forecasts derived from census data. Review of City and regional agency planning documents was completed to identify the housing and growth policy and regulatory setting for the Property.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant impact on population and housing if it would cause any of the following conditions to occur:⁶

- a) Induce substantial population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- b) Displace a substantial number of existing housing, necessitating the construction of replacement housing elsewhere.
- c) Displace a substantial number of people, necessitating the construction of replacement housing elsewhere.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

Population

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;

⁶ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

Housing

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the proposed project, in terms of net loss of market-rate and affordable units;
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographic characteristics of the project area and the appropriateness of housing in the area; and
- Whether the project is consistent with adopted City and regional housing policies such as the Framework and Housing Elements, HUD Consolidated Plan and CHAS policies redevelopment plan, Rent Stabilization Ordinance, and the Regional Comprehensive Plan and Guide (RCP & G).

c. Project Impacts

The thresholds of significance regarding the demolition, conversion, or removal of housing do not apply to the proposed Project because there are no existing residential units on the Project Site. Further analysis of this issue is not required. For the same reason, development of the proposed Project would not have the potential to displace (either temporarily or permanently) housing or people and no impacts in this regard would occur. Further analysis of this issue is also not required.

Due to the need for housing within the City of Los Angeles, the addition of housing units, especially those serving special needs such as for the elderly, could be considered a beneficial effect of the proposed Project.

Potential impacts related to growth, both direct and indirect, and consistency with policies addressing housing and population, are discussed below.

(1) Direct Growth

The proposed Project involves construction of 200 multiple-family dwelling units for senior citizens on Project Site that is currently developed with a golf course, driving range, clubhouse, tennis courts, and related amenities, but no residential uses. The Project proposal also includes retention of 11.6 acres for continued community recreational uses, for which future development (and therefore growth) would be discouraged. The 200 senior housing units will replace the existing 16 tennis courts and appurtenant uses (Lot 2) on the Project Site. The entitlement application for the Project is requesting a Zone Change on proposed Lot 2 from A1-1XL to R3-1 and a General Plan Amendment from Open Space to Medium Density Residential to accommodate the new dwelling units. The Community Plan anticipated that the average household size for Medium Density Residential uses within the Plan area was approximately

1.70 persons per dwelling unit in 2010. It can be reasonably assumed that the project average household size in the current year is substantially similar to the projection for 2010. Based on the 2010 projection, approximately 340 persons are anticipated to reside on Lot 2 of the Project Site at full occupancy of the Project.⁷ As the Project Site is currently without any residential density, this increase in residential population would represent all of the population (permanent) and housing on the Project Site.

The population increase of 340 persons is not considered to be substantial relative to the current built-out conditions of the Studio City community and the immediate neighborhood around the Project Site. Based on the 2010 Census population of 29,034 residents within the Studio City area, the increase of 340 residents due to the 200-unit SCSLC would result in a population increase of approximately 1.2 percent within the community.

The Los Angeles Citywide General Plan Framework EIR projected a resident population in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area of 90,582 residents by 2010. In the worst case scenario that the proposed increase of 340 residents was not planned for in the Community Plan projections, the population increase represents less than one percent of the 90,582 residents in the Community Plan Area, and thus will result in a less-than-significant impact to the existing population or public services in the area as a result of the population increase. The proposed population associated with the Project would be consistent with area-wide population (and housing) forecasts, because it would be consistent with the City General Plan, Community Plan, and SCAG RCP/RTP.

The proposed Project and the requested General Plan Amendment to change the land use designation of the 4.5-acre proposed Lot 2 from Open Space (A1-1XL zone) to Medium Density Residential (R3-1 zone) would be consistent with the projected housing goals in the Community Plan. The Community Plan estimated a density of approximately 55 to 109 Medium Density Residential units per net acre within the Medium Density Residential land in the Community Plan Area projected through year 2010. As an urbanized, highly built out Plan Area, it can be reasonably assumed that the density projection would be substantially similar in the year of Project build-out, 2016. The housing projections in the Community Plan are based on the midpoint (Community Plan-wide average) of the anticipated density projection, which is approximately 82 Medium Density Residential units per net acre. Based on the midpoint density and an assumed 2.71 net acres (development estimated at 60 percent of the overall gross 4.5 acres on Lot 2), a total of 222 units could be reasonably expected on Lot 2 using the projections of the Community Plan. The proposed Project, which proposes 200 units, would represent a

⁷ The SCSLC Project population is based on an anticipated household size of 1.70 persons per unit and a total Project size of 200 residential dwelling units. The 1.70 persons per unit household size is from the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan projections for the year 2010 Plan population and dwelling unit capacity for low to medium density residential land uses. [Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (1998), page III-2]. It is anticipated that the household size for senior living units may actually be closer to 1.5 persons per unit (for a total Project population of 300 persons) based on other demographic studies, and also supported by the 2010 Census statistics that indicate that almost 25 percent of all single-occupant households within the Studio City area (ZIP Code 91604) are occupied by residents aged 65 years and older. However, for worst case scenario, an anticipated household size of 1.70 persons per unit (for a total Project population of 340 persons) is being used for the analysis.

density that would be below the midpoint density, and therefore is consistent with density and growth expectations.

The City of Los Angeles Citywide General Plan Framework EIR projected approximately 45,401 housing units in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area by 2010, which would be substantially similar in the current year and the Project build out year 2016. An increase of 200 units in the Community Plan Area would increase the total to approximately 45,601 housing units as a result of the proposed Project, representing an increase of less than one percent of projected housing units. The negligible projected increase in housing units does not exceed the number of housing units that would be permitted on Lot 2 by the Los Angeles Municipal Code and does not adversely impact the character of the area, the ratio of single-family uses to multi-family uses in the Plan Area, or the stock of housing in the neighborhood as projected by the Community Plan. Therefore, the proposed Project will result in a less-than-significant impact to housing at the Project Site.

The proposed population associated with the Project would be consistent with area-wide housing (and population) forecasts, because it would be consistent with the City General Plan, Community Plan and SCAG RCP/RTP. As a result, development of the proposed Project would not directly induce substantial population growth, and impacts related to population and housing would be less-than-significant.

(2) Indirect Growth

The proposed Project would extend roadways and other infrastructure (e.g., water, sewer, and energy services) to and within the Project Site as needed to ensure adequate access and support for the Project. However, these services and infrastructure are already in place within the established Studio City community. Further, the Project Site is already connected to the existing infrastructure for the existing golf course, driving range, clubhouse, and tennis court uses. The extension and minor configuration adjustments necessary for the proposed Project to effectively connect to the available infrastructure within Whitsett Avenue would not induce growth because they would serve only the Project within proposed Lot 2. The access road to serve the Project along Valleyheart Drive would utilize an existing easement for a roadway that was previously planned, but never built. Hence, Project-related roads would not induce growth because they would serve only the Project and would not open up access to new areas not previously contemplated for connection to the City's roadway and circulation system. Existing services and infrastructure are already adequate to serve the projected growth contemplated by the proposed Project (see *Section IV.M: Environmental Impact Analysis – Transportation and Circulation*, and *Section IV.N: Environmental Impact Analysis – Utilities*). As a result, development of the proposed Project would not indirectly induce substantial population growth and impacts related to population and housing would be less-than-significant.

(3) Consistency with Adopted Plans and Policies

The City's Community Plan and General Plan Housing Element address housing goals for the Project area. *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this

Draft EIR discusses in detail the proposed Project's consistency with community and regional plans and policies, including those specific to housing and population.

In summary, the proposed Project would be consistent with applicable housing related goals, objectives, and policies because the Project would preserve existing housing and add new housing types that target diverse populations. Also, the Project would preserve the existing community character through the retention of the existing golf course/driving range uses and by incorporating architecture and landscape design features that are sensitive and non-intrusive to the surrounding residential community, thus protecting the longevity of the existing residential neighborhoods. Further, the introduction of 200 new residential units for senior residents would contribute to the diversification of housing opportunities in the Project vicinity as it would target the needs for a select and underserved segment of the population. The Project would result in the establishment of a senior residential community that would fulfill a senior housing void currently present in the community.

The Project Applicant requests a change from A1-1XL to R3-1 zoning on proposed Lot 2 of the Project Site, which would be consistent with the underlying zoning and the Community Plan designations (e.g., R-3 and Medium Density Residential, respectively) for other residential properties in the immediate vicinity (i.e., across the street toward the east and to the north), especially along Whitsett Avenue. The Community Plan reflects previous land use patterns considered appropriate for the Project area. For example, the Community Plan Map identifies lands where only single-family residential development is permitted and it protects these areas from encroachment by designating, where appropriate, transitional residential densities which serve as buffers. The proposed Project, although consistent with the residential patterns already established in the area, would not physically encroach on surrounding residential areas as it would remain buffered from single-family residential to the north and west by the existing golf course, driving range, and clubhouse, which would remain on the Project Site largely unaffected. As a result, the Project represents an effective application of housing policy at the Project Site and within the Project vicinity.

Further, the Project can be characterized as infill development on a large underutilized parcel in the Studio City area, in which development would be located within an established urban area that offers a mix of uses. The Project would be conveniently located near residential neighborhoods, commercial retail and services, recreation facilities, and public transit corridors (i.e., Ventura Boulevard), thus allowing for reduced commuting distances and facilitating opportunity for walkability. The Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within Studio City. As such, the proposed Project would implement the City's vision for compact growth within community core areas.

d. Cumulative Impacts

Of the ten Related Projects in the area, six include housing components that might affect the resident population in the Project area.

Based on City records, and as consistent with the traffic analysis conducted for the proposed Project in *Section IV.M: Environmental Impact Analysis – Transportation and Circulation* of this Draft EIR, it is assumed that approximately 907 dwelling units have been filed for entitlement, are undergoing issuance of a building permit, or are under construction. All of these units would be multiple-family units, the majority of which would be located along major corridors including Ventura Boulevard, Laurel Canyon Boulevard, and Riverside Drive. Additionally, up to 76 existing multiple-family dwelling units, including 54 units for senior citizens, would be demolished to accommodate construction of the Campbell Hall School on Laurel Canyon Boulevard. As such, a total of 831 net new dwelling units could potentially be added to the Community Plan Area as a result of Related Projects.

The Related Projects would introduce approximately 1,455 residents into the Community Plan Area.⁸ Assuming the worst-case scenario that the Community Plan did not consider or plan for development of these Related Projects or the proposed Project, the Related Projects would increase the population in the Community Plan Area to approximately 92,037 residents, based on the Framework EIR projection for the Community Plan Area of approximately 90,582 residents by 2010. With the proposed Project added, the Community Plan Area population would increase to 92,377 residents, representing a total 1.94 percent increase from the 2010 projection of the Framework EIR as a result of the Project and Related Projects. This approximately 1.98 percent increase would not be a substantial enough growth beyond normal population growth to trigger a significant impact and thus would result in a less-than-significant impact on population in the area. Additionally, due to the urbanized nature of the community and the infill of the Related Projects and proposed Project, the population increase would not result in unplanned infrastructure not previously adopted by the Community Plan and would therefore result in a less-than-significant impact to population in the area.

The Related Projects would add approximately 831 new multiple-family housing units to the Community Plan Area. Assuming the worst-case scenario that the Community Plan did not consider or plan for development of these Related Projects or the proposed Project, the Related Projects would increase the housing stock in the Community Plan Area to approximately 46,232 housing units, based on the Framework EIR projection for the Community Plan Area of approximately 45,401 housing units by 2010. With the proposed Project added, the Community Plan Area housing stock would increase to 46,432 housing units, representing a total 2.27 percent increase from the 2010 projection of the Framework EIR as a result of the Project and Related Projects. This approximately 2.27 percent increase would not be a substantial enough growth beyond normal housing stock growth to trigger a significant impact and thus would result in a less-than-significant impact on housing stock in the area. Additionally, due to the urbanized nature of the community and the infill of the Related Projects and proposed Project, the housing stock increase would not result in unplanned infrastructure not previously adopted by the Community Plan and would therefore result in a less -than -significant impact to housing in the area.

⁸ Based on 1.70 persons per unit from the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan projections for the year 2010 Plan population and dwelling unit capacity for low to medium density residential land uses. [Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (1998), page III-2]

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The Project will not be required to comply with Compliance Measures related to population and housing. Any Compliance Measures related to land use impacts are presented in *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this Draft EIR.

b. Project Design Features

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential population and housing impacts. These PDFs relate to maintaining the Project for a specific, underserved segment of the community:

PDF POP-1: The Project shall be age-restricted for seniors aged 55 and older and shall target support for a resident population with an average age of approximately 75 years (upon move-in).

PDF POP-2: The Project shall provide for resident ownership of individual dwelling units and an undivided interest in the residential common areas. Individual resident-occupant ownership (rather than rental arrangement) shall be arranged through purchase agreements coordinated by the Project Applicant/Manager. Resale of units shall be facilitated and/or monitored through the Project Applicant/Manager to ensure that ownership is reserved for senior residents 55 years and older. For example, when an owner of a dwelling unit passes away or needs to relinquish ownership, the unit shall be transferred back (at market value to the owner or beneficiaries) to the Project Applicant/Manager and resold to another senior resident.

c. Mitigation Measures

The Project will result in less-than-significant population and housing impacts. Therefore, no Mitigation Measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to population and housing would be less-than-significant as a result of development of the Project at the Project Site. There are no existing housing units located on the Project Site that would be demolished for the Project. Due to the need for housing within the City of Los Angeles, the addition of housing units, especially those serving special needs, such as for the elderly, could be considered a beneficial effect of the proposed Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS

K.1. PUBLIC SERVICES: FIRE PROTECTION

1. INTRODUCTION

This section discusses the physical setting and provides analysis of fire protection services in the area where the proposed Project would be developed. The information contained in this section is derived primarily from the correspondence with the Los Angeles City Fire Department (LAFD).¹

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Fire protection and emergency medical services are provided to the Project Site by the Los Angeles Fire Department (LAFD). The LAFD responds to incidents requiring fire protection and emergency medical care with LAFD firefighters, emergency medical technicians, and paramedics. The LAFD has 3,562 uniformed personnel and 388 non-uniformed support staff that protect approximately 4 million citizens within its 470 square-mile jurisdiction.² A total of 1,051 uniformed Firefighters (including 218 serving as Firefighter/Paramedics), are always on duty at Fire Department facilities citywide, including 103 Neighborhood Fire Stations.³

Fire protection and medical service is typically provided to a project site by the three nearest fire stations, thus providing the shortest response time in the event of an emergency. The three primary fire stations serving the Project Site, their distances from the site, their addresses, and the type of equipment and number of personnel that each station is staffed with are shown in *Table IV.K.1-1: LAFD Fire Stations Serving the Project Site*. *Figure IV.K.1-1: Location of Nearest LAFD Fire Stations* shows the location of the three nearest fire stations compared to the location of the Project Site.

¹ Inspector Robert Duff, Los Angeles Fire Department, personal meeting, 12 January 2012.

² LAFD LA's Hottest Job Website, About the LAFD, <http://www.joinlafd.org/>. Accessed April 26, 2012.

³ LAFD LA's Hottest Job Website, About the LAFD, <http://www.joinlafd.org/>. Accessed April 26, 2012.

TABLE IV.K.1-1
LAFD FIRE STATIONS SERVING THE PROJECT SITE¹

FIRE STATION	ADDRESS	DISTANCE FROM PROPERTY	EQUIPMENT/STAFF
Station No. 78	4041 Whitsett Avenue, Studio City, CA 91604	Adjacent to the Property, southeast of the Development Site	1 Ladder Truck/1 Pumper Engine/1 Paramedic/ 9 staff ²
Station No. 86	4305 Vineland Avenue, Studio City, CA 91602	2.4 miles	1 Engine/1 Rescue/6 staff ³
Station No. 102	13200 Burbank Boulevard, Van Nuys, CA 91401	2.7 miles	1 Engine/1 Rescue/6 staff ⁴

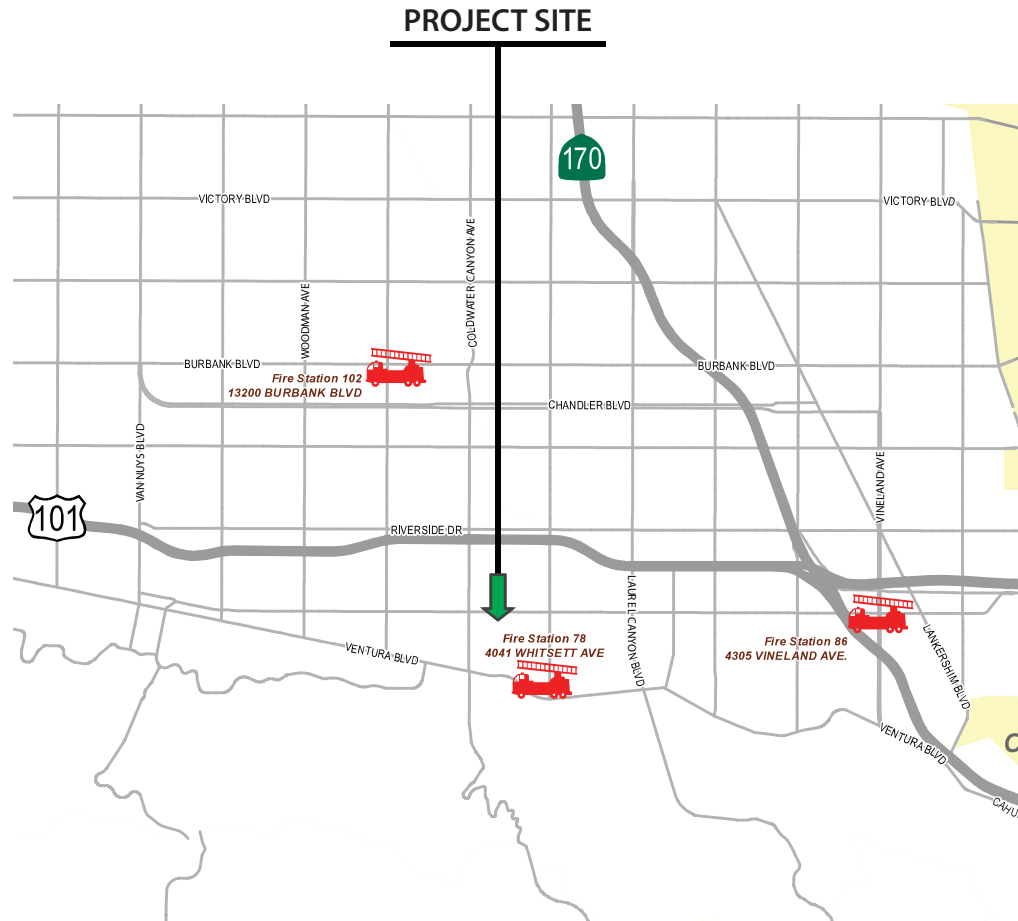
¹ Source: Los Angeles City Fire Department Website, *Fire Station Locator Tool*, <http://lafd.org/find-a-fire-station/275-fire-station-locator>. Accessed April 26, 2012.
² Captain Souter, Los Angeles Fire Department, Station No. 78, personal communication, 6 September 2012.
³ Captain Vosberg, Los Angeles Fire Department, Station No. 86, personal communication, 6 September 2012.
⁴ Captain Stanley, Los Angeles Fire Department, Station No. 102, personal communication, 6 September 2012.

Station No. 78, located adjacent to the southeast corner of the Project Site, is the closest jurisdictional LAFD fire station that would serve the Project. Station No. 78 is staffed with a Light Force Task Group, a Paramedic Ambulance, and one full-time EMS Captain. The Light Force Task Group consists of a 100-foot ladder truck, which is accompanied by a Pumper Engine. The ladder truck has a crew of one Captain, one Apparatus Operator, and two Firefighters. The Pumper Engine has a crew of one Engineer/Firefighter and one Firefighter/Paramedic. The Paramedic Ambulance has a crew of two Firefighter Paramedics. Although the LAFD considers Station No. 78 to be the primary service provider to the Project Site, any one of the three stations identified above in *Table IV.K.1-1* could provide initial response under normal conditions. If necessary during a major emergency, additional fire protection and emergency services would be provided by other stations within the LAFD's jurisdiction.

The adequacy of fire protection is based on the required fire-flow (measured in gallons per minute (gpm)), response distance from existing fire stations, and the LAFD's judgment of assessing needs in the area. The City of Los Angeles Municipal Code (Fire Code) sets standards for fire-flow and response distances by type of land development and land use types, respectively. Fire-flow ranges from 2,000 gpm for Low Density Residential land development to 12,000 gpm for High Density Industrial and Commercial land development.⁴ Adequate response distances are also based on the type of land use that is found on a property. According to the Fire Code, a response distance within 1.5 miles from an LAFD station which houses an Engine or Truck Company would provide adequate service for residential land uses. Commercial and industrial land uses would require that an LAFD station housing an Engine Company to be located within a range of 0.75 to 1 mile and an LAFD station housing a Truck Company to be located within 1 mile in order to demonstrate adequate response distance provisions.⁵ Based on

⁴ City of Los Angeles Municipal Code, Article 7 Fire Protection and Prevention (Fire Code), Division 9 Access, Hydrants, and Fire-Flow Requirements, Section 57.09.06 Fire Flow. Accessed April 26, 2012.

⁵ City of Los Angeles Municipal Code, Article 7 Fire Protection and Prevention (Fire Code), Division 9 Access, Hydrants, and Fire-Flow Requirements, Section 57.09.07 Response Distances that if Exceeded Require Installation of an Automatic Fire Sprinkler System. Accessed April 26, 2012.



Legend




-  Nearest Fire Stations
-  Freeways
-  Major Streets

FIGURE IV.K.1-1
LOCATION OF NEAREST LAFD FIRE STATIONS

SOURCE: DEPARTMENT OF CITY PLANNING WEBSITE



preliminary discussions with the LAFD, the Project Site is currently considered to be adequately served.⁶

b. Regulatory and Policy Setting

(1) California Department of Forestry and Fire Protection (CAL-FIRE)

The California Department of Forestry and Fire Protection (CAL-FIRE) is responsible for the stewardship and fire protection of over 31 million acres of California's privately owned wildlands. In addition, CAL-FIRE provides emergency services in 36 of the State's 58 counties via contracts with local governments.

The CAL-FIRE Director's responsibility includes identification of Very High Fire Hazard Severity (VHFHS) Zones, transmitting this information to local agencies, and periodically reviewing the recommendations. CAL-FIRE is currently remapping fire hazard severity zones for lands where the State has fiscal responsibility for wildland fire protection (State Responsibility Areas) and is preparing VHFHS recommendations for Local Responsibility Areas (LRAs). The purpose of the VHFHS zone recommendations is to classify lands in accordance with whether a VHFHS is present so that public officials are able to identify measures that would mitigate the rate of spread, and reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property. CAL-FIRE staff has been instructed to assist local agencies in the review of the draft map recommendations. In addition to the VHFHS maps, CAL-FIRE has mapped High and Moderate Fire Hazard Severity areas.

It should be noted that the Project Site is located in an urbanized setting and CAL-FIRE designates the area as LRA Unzoned.

(2) Los Angeles City General Plan

The Framework Element of the City of Los Angeles General Plan provides regulations on fire protection services in the City of Los Angeles. Fire prevention, fire protection, and Emergency Medical Service (EMS) for the City of Los Angeles are provided by the LAFD. Fire Department services are based on the community's needs, as determined by ongoing evaluations. When an evaluation indicates increased response time, the acquisition of equipment, personnel, and/or new stations is considered. As development occurs, the Fire Department reviews environmental impact reports and subdivisions applications for needed facilities. Where appropriate, construction of new facilities is required as a condition of development. The following Goals, Objectives, and Policies are provided in the Framework Element of the City of Los Angeles General Plan to ensure adequate fire protection service is being provided to residents.

Goal 9J: Every neighborhood has the necessary level of fire protection service, emergency medical service and infrastructure.

Objective 9.16: Monitor and forecast demand for existing and projected fire facilities and service.

⁶ Inspector Robert Duff, Los Angeles Fire Department, personal meeting, 12 January 2012.

Policy 9.16.1: Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.

Objective 9.17: Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.

Policy 9.17.2: Identify areas of the City with deficient fire facilities and/or service and prioritized the order in which these areas should be upgraded based on established fire protection standards.

Policy 9.17.3: Develop an acquisition strategy for fire station sites in areas deficient in fire facilities.

Policy 9.17.4: Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing general plan amendments and zone changes, or considering discretionary land use permits.

The Safety Element of the City of Los Angeles General Plan addresses fire prevention.⁷ The Fire Protection and Prevention Plan (FPPP) of the City of Los Angeles provides an official guide to City Departments, other government agencies, developers, and interested citizens for the construction, maintenance, and operation of fire facilities. It is intended to promote fire prevention by maximizing fire safety education and minimizing loss of life through fire prevention programs. Pursuant to their plan it may be necessary to expand or relocate existing facilities as land patterns change.

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

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) addresses fire protection for the Community Plan Area.⁸ Fire protection in the Community Plan Area is provided by five Single Engine Company Stations. The adequacy of fire protection is based on the required fire-flow, (measured in gallons per minute), response distance from existing fire stations and the Fire Department's judgment for needs in the area. The Los Angeles Fire Department currently considers some portions of the Community Plan Area inadequate in terms of existing staffing and response distances from existing facilities. The following goal, objective, and policy are considered for adequate fire protection services in the Community Plan:

Goal 9: Protect the community through a comprehensive fire and Life safety program.

Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.

⁷ Department of City Planning Los Angeles, California, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.

⁸ City of Los Angeles Planning Department, City of Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998.

Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

Implementation of the Community Plan requires that decision makers include a finding as to the impact on fire service demands for all plan amendments. This coordination with the Fire Department is currently in effect for projects which are subject to the subdivision process and for plan amendments which must be reviewed by the General Plan Advisory Board which includes representation from the Fire Department.

(4) Los Angeles Municipal Code

The Los Angeles Municipal Code and the Building Code include many regulations that address fire protection including adequate response distances, fire flow requirements, and building construction types. *Table IV.K.1-2: Fire Station Distance and Fire Flow Requirements* provides guidelines of fire flows and distances that fire stations must be located in order to provide adequate fire protection services and adequate response times for residential land uses.

**TABLE IV.K.1-2
 FIRE STATION DISTANCE AND FIRE FLOW REQUIREMENTS¹**

LAND USE	REQUIRED FIRE FLOW	MAXIMUM RESPONSE DISTANCE TO LAFD FIRE STATION (HOUSING AND ENGINE OR TRUCK COMPANY)
Low Density Residential	2,000 gallons per minute (gpm) from three adjacent hydrants flowing simultaneously	1.5 miles
High Density Residential and Commercial Neighborhood	4,000 gallons per minute (gpm) from three adjacent hydrants flowing simultaneously	1.5 miles

¹ Source: Los Angeles Municipal Code, Chapter V Public Safety and Protection, Article 7 Fire Protection and Prevention (Fire Code), Division 9 Access, Hydrants, and Fire-Flow Requirements. Accessed April 30, 2012.

A minimum residual water pressure of 20 pounds per square inch is required to remain in the water system with the required gallons per minute of fire flow as indicated above in *Table IV.K.1-2*.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Analysis of fire protection services is concerned with response distances, water fire flow service, and fire department access to a project site. The LAFD, along with the City of Los Angeles Municipal Code, sets distance standards from LAFD fire stations to ensure that developments are

adequately served for fire protection. Additionally the LAFD and Los Angeles Municipal Code set standards for fire department access onto sites and fire flows.

The LAFD was contacted for their review and input into design features of the proposed Project. Analysis of impacts to fire services was determined through contact with the LAFD, and information provided from the LAFD website, City of Los Angeles Municipal Code (Fire Code), the City of Los Angeles General Plan, and the Community Plan.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on fire services if it would cause any of the following conditions to occur:⁹

- a.) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

- a.) If the proposed project would require the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

c. Project Impacts

The following section provides analysis of fire protection services for the proposed Project. The analysis is based on the significance thresholds of the L.A. CEQA 2006 Threshold Guide and provides a discussion on response distance, fire flow, and CAL-FIRE land designated as Very High Fire Hazard Severity Zones.

(1) LAFD Response Distances and Site Access

The Project Site is located at 4141 Whitsett Avenue in the City of Los Angeles' Studio City community. The Project Site is 16.1 acres in size and will be split into two lots: Lot 1 and Lot 2. Lot 1 will continue to be occupied by a 9-hole pitch-and-putt golf course, golf driving range, golf clubhouse, and a surface parking lot with little change in its current layout. Lot 2 is currently occupied by 16 tennis courts, a small tennis house, and a surface parking lot, which will be demolished and replaced by 200 senior housing condominium units within six new buildings on 4.5 acres. Each of these buildings will be developed at a maximum height of 45 feet and will consist of four-stories of living area.

⁹ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

The nearest LAFD fire station that would serve the Project is Fire Station No. 78. Fire Station No. 78 is located adjacent to and directly south of Lot 2. Station No. 78 would be the primary responding unit to any fire or medical emergency occurring on the Project Site. Additionally, if required, fire protection services would also be available by two other LAFD fire stations in the vicinity, including Fire Stations Nos. 86 and 102. According to the City of Los Angeles Fire Code, a fire station housing an engine company or truck company would provide adequate fire protection services if it is within 1.5 miles of a low density or high density residential area. Considering Fire Station No. 78 is within 1.5 miles of the proposed Project (and is directly adjacent to and south of the Project Site), adequate fire protection services will be available if a fire or medical emergency occurs. No new LAFD fire stations would be required to be developed nor would an existing station need to be expanded to provide adequate fire and emergency medical protection service to the Project. Therefore, impacts regarding fire protection service response distances would be less-than-significant.

The Project will also incorporate numerous fire lanes and entry points into its design to allow ease of access for firefighting equipment in the event of a fire. Two access gates will be designed for entrance into the Project from Whitsett Avenue. These access driveways will be developed in accordance with the Fire Code requirements for site access widths to allow for firefighting equipment to adequately enter the Project Site. Additionally, the proposed Project will incorporate fire lanes on the northern, southern, and western boundaries of Lot 2 allowing firefighting equipment to reach all portions of Lot 2 and its future condominium buildings. These fire lanes will be designed at a width of between 20 to 28 feet, which is compliant with the Los Angeles Municipal Code requirements. Furthermore, the fire lanes surrounding Lot 2 can be accessed from Valley Heart Drive, just southwest of Fire Station No. 78 and at two points along Whitsett Avenue. With incorporation of these access points and fire lanes in the design of the Project, it is expected that fire department access will be adequately provided onsite. Therefore, impacts would be less-than-significant.

(2) *Fire Flows*

Required fire flow is an estimate of the amount of water that may be needed in any part of a city to provide adequate fire protection.¹⁰ Fire departments base their fire flow requirements on their need to furnish homes with streams between 250 and 300 gallons per minute to adequately fight structure fires. Requirements for fire flow are typically stated in the zoning law and building code of municipalities where fire departments are located. According to the Los Angeles Fire Code, low-density residential land uses are required to have fire flows of 2,000 gallons per minute (gpm) of water from three adjacent fire hydrants flowing simultaneously. For high-density residential land uses, fire flows of 4,000 gpm of water from four adjacent fire hydrants flowing simultaneously, is required.¹¹ Additionally, low-density residential land uses that are 150,000 square feet or less in size and high-density residential land uses that are 100,000 square

¹⁰ Municipal Fire Administration, International City Manager's Association, 1967, pg. 103 to 104.

¹¹ City of Los Angeles Municipal Code (Fire Code), Chapter V Public Safety and Protection, Article 7 Fire Protection and Prevention, Division 9 Access, Hydrants, and Fire-Flow Regulations.

feet or less in size require the placement of 2.5-inch by 4-inch Double Fire Hydrants every 600-feet and 300 to 450 feet, respectively, on roads and fire lanes serving a site.¹²

The Los Angeles Fire Department reviewed the conceptual plan for the Project and made a preliminary assessment that at least two public fire hydrants would be required on the west side of Whitsett Avenue along the property line of the Project Site, and possibly one public fire hydrant along Valleyheart Drive along the property line. It is doubtful that any public fire hydrants would be required along Valley Spring Lane or Bellaire Avenue adjacent to the Project Site due to the retention of the golf course. Several additional private fire hydrants within the Studio City Senior Living Center complex would also be required to provide adequate fire protection service to the Project.¹³ Furthermore, a minimum residual water pressure of 20 pounds per square inch would be required to remain in the systems with the required gpm of fire flow eventually recommended by the LAFD. Fire flow requirements and locations of the additional fire hydrants would be determined with more defined plans during the building permit process for the Project.

The Project Site is located in an area that currently has adequate existing fire flow pressure to provide adequate fire protection service for the existing uses in the neighborhood. The existing water system at the Project Site has a fire flow capacity of approximately 1,500 gpm with a water pressure of 150 psi for the existing golf course and tennis court uses on the Project Site.¹⁴ The existing water pressure meets the LAFD requirements for the existing uses on Lot 1. The fire flow capacity will need to be increased at the Project Site with development of the SCSLC on Lot 2; however, since the area has adequate existing fire flow pressure in general, this can be accomplished with the inclusion of additional fire hydrants for the Project, as anticipated by the LAFD. Additionally, the Project would comply with required Compliance Measures that would ensure adequate fire flow for the Project. Therefore, with implementation of required Compliance Measures, requirements of the LAFD during the final building design phase, and general availability of adequate existing fire flow in the Project area, the Project would result in a less-than-significant impact related to fire flow.

(3) *CAL-FIRE Very High Fire Hazard Severity Zones*

The California Department of Forestry and Fire Protection (CAL-FIRE) has begun a program to map Very High Hazard Severity Zones in Local Responsibility Areas and State Responsibility Areas. These maps show the locations of susceptibility to wildland fires for State controlled land and for local municipalities. The Project Site is located in an area mapped as LRA Unzoned, indicating that the area is urbanized and not susceptible to wildland conflagrations. Because the Project is located within an LRA Unzoned area, according to CAL-FIRE, no wildland fire protection measures would be required with development of the proposed Project. Therefore, impacts would be less-than-significant.

¹² City of Los Angeles Municipal Code (Fire Code), Chapter V Public Safety and Protection, Article 7 Fire Protection and Prevention, Division 9 Access, Hydrants, and Fire-Flow Regulations.

¹³ Inspector Robert Duff, Los Angeles Fire Department, personal meeting, 12 January 2012.

¹⁴ Captain Souter, Los Angeles Fire Department, Station No. 78, personal communication, 6 September 2012.

(4) Consistency with Adopted Plans and Policies

Development of the Project with implementation of required Compliance Measures and requirements of the LAFD would ensure that the Project is consistent with the Plans and policies addressing the service requirements of fire protection services, including the Los Angeles City General Plan, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, and the LAMC Fire Code. Therefore, the Project would have a less-than-significant impact relating to consistency with adopted Plans and Policies.

d. Cumulative Impacts

The Project, in combination with the ten Related Projects, would increase the need for fire protection services from the LAFD in the community. Specifically, there would be a demand to increase staffing ratios, equipment, fire station construction, and fire station expansion to better serve the proposed Project and Related Projects in the future. The demand for such increased service to the LAFD would be met through existing mechanisms such as property taxes and government funding to which the Project and Related Projects would contribute.

Similar to the Project, the Related Projects would each be reviewed by the LAFD and would be required to implement Compliance Measures of the Los Angeles Municipal Code to reduce impacts to fire protection services. All Related Projects would be required to be within 1.5 miles of an LAFD fire station and, if not, would be required to develop an automatic sprinkler system to slow down the spread of fire. Additionally, each Related Project would be required to abide by the fire flow requirements as presented in the Los Angeles Municipal Code along with site access requirements.

As discussed above, the proposed Project is located within 1.5 miles of an existing LAFD fire station, which would provide fire protection service. As shown in *Figure II-6: Proposed Site Plan* in *Section II: Project Description*, the Project includes adequate fire lanes and access points to allow for ingress and egress for the LAFD as well as for maneuverability around and on the Project Site. Finally, the proposed Project would require fire flows that would be available from the current water system serving the site and no new water conveyance infrastructure would be developed. Therefore, the proposed Project would have a less-than-significant impact on LAFD fire service and would not contribute to cumulative impacts.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific fire protection impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- The Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as established as an element of the City of Los Angeles General Plan.
- Adequate access to the site for fire protection service vehicles and personnel shall be provided. A diagram of the site shall be sent to the Fire Department for their review, and their recommendations and requirements shall be incorporated into the final design.
- If any portion of the first story exterior walls of any building structure is more than 150 feet from the edge of the roadway of an approved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane.
- When required access is provided by an improved street, fire lane or combination of both which results in a dead-end in excess of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished.
- Fire lanes shall be designated and maintained as follows:
 - Fire lanes shall have a minimum clear roadway width of 20 feet when no parking is allowed on either side.
 - Those portions of a fire lane which must accommodate the operation of Fire Department aerial ladder apparatus shall have a minimum clear roadway width of 28 feet when no parking is allowed on either side.
 - Those portions of a fire lane 30 feet on either side of a private fire hydrant shall have a minimum clear roadway width of 28 feet. No parking shall be permitted within those portions of the roadway which are within 30 feet of and on the same side of the roadway as a private fire hydrant.
 - Where parking is allowed on only one side of a required fire lane, parking shall be on the same side of the roadway as the hydrants.
 - Where parallel parking is allowed on either side of a fire lane, the roadway width shall be increased eight feet for each parking lane.
 - Where access requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
 - Fire lanes shall be paved to the City Engineer's standards for public alleys.

- Any person owning or having control of any facility, structure, group of structures or premises, shall maintain all fire lanes in an unobstructed manner.
- Fire lanes shall be posted with signs not less than 17 inches by 22 inches in size, with lettering not less than one inch in height, stating “*NO PARKING — DESIGNATED FIRE LANE. VIOLATORS WILL BE CITED VEHICLE CODE SECTION 22500.1. VEHICLES PARKED IN VIOLATION WILL BE TOWED AWAY AT OWNER’S EXPENSE.*” Signs shall also contain a telephone number of the Los Angeles Police Department which may be called by the person owning the vehicle to find out where it has been towed. Signs shall be in plain view at all entrances to required fire lanes and the spacing of signs shall be as required by the Chief. The bottom of such signs shall be six feet above the adjacent ground surface.
- The owner of the property shall be responsible for the installation of approved fire lane signs on private roadways.
- All fire hydrants shall have 2 1/2" x 4" outlets or 4" x 4" outlets and conform to the minimum standards of the American Water Works Association for wet barrel hydrants. A minimum of one fire hydrant is to be provided at each intersection. “Built-up” type single 2-1/2" outlet hydrants (6" pipe surmounted by an angle valve) shall be used in areas having a static water pressure of 210 P.S.I. or more.
- Where a response distance is greater than 1.5 miles, all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Chief.
- When access to or within a structure or premises is unduly difficult because of secured openings or where immediate access is necessary for lifesaving or fire fighting purposes, the Chief has the authority to order the owner or person having control of the structure or premises to install an access box in an approved location accessible to the Fire Department. The access box shall be of a type approved by the Chief and shall contain all keys, access cards, buttons, switches, locks, and actuators determined by the Chief to be necessary for access.

b. Project Design Features (PDFs)

There are no PDFs included with respect to fire protection impacts.

c. Mitigation Measures

The Project will result in less-than-significant fire protection impacts if compliant with all codes and regulations required by the Compliance Measures and by the Los Angeles Fire Department. However, to ensure that any potentially unforeseen fire protection impacts are reduced, the following Mitigation Measures shall be implemented into the Project:

- MM PSF-1: All buildings developed on Lot 2, including the subterranean parking structure, shall be equipped with automatic sprinkler systems.
- MM PSF-2: All landscaping associated with the Project shall be of indigenous plants and materials and shall be "fire-resistant" (as deemed by a Certified Landscape Architect or by the Metropolitan Water District of Southern California list of Fire-Resistant California Friendly Plants) to the extent possible.
- MM PSF-3: The Project shall be designed so that the Los Angeles Fire Department has adequate access to, and sufficient equipment space for, every building in the complex, which shall include providing fire lanes of required width (as determined by the LAFD) along the perimeter of the Project, and providing a central courtyard, which shall dually function as an open space plaza for residents and a path of travel for fire and emergency vehicles to traverse the site and enter and exit the complex.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of all required Compliance Measures will ensure that adequate fire protection service is provided to the proposed Project. Implementation of the Mitigation Measures, specific to the Project, shall also be required to ensure safety at the Project Site. As such, all potential impacts related to fire safety and fire protection resulting from the Project would be less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

K.2. PUBLIC SERVICES: POLICE PROTECTION

1. INTRODUCTION

This section discusses the physical setting and provides analysis of police protection services in the area where the proposed Project would be developed. The information contained in this section is derived primarily from correspondence with the Los Angeles City Police Department (LAPD), Discover Section.

2. ENVIRONMENTAL CONDITIONS

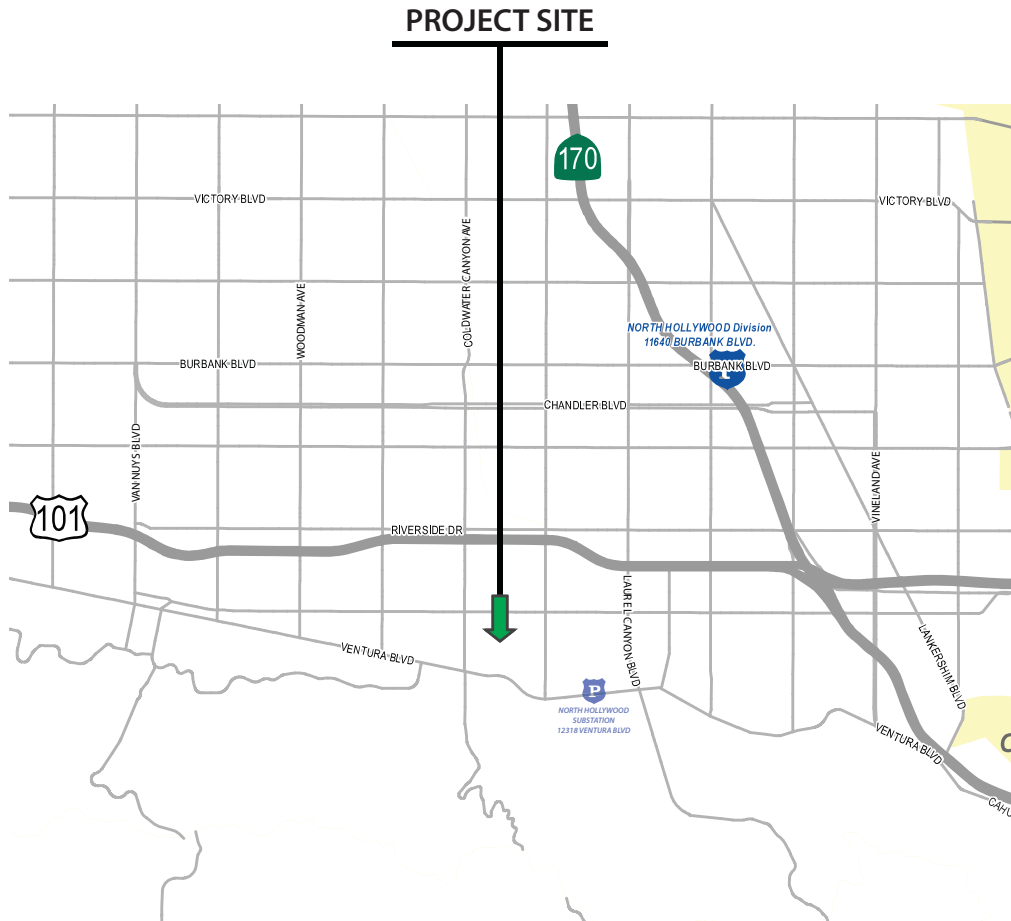
a. Physical Setting

The Project Site is served by the Los Angeles Police Department (LAPD) for police protection services. The LAPD operates 18 (area) stations citywide within four (regional) Bureaus. Specifically, the Project Site is located within the jurisdiction of the North Hollywood Community Police Station, which is within the Valley Bureau. The North Hollywood Community Police Station is located at 11640 Burbank Boulevard in the City of North Hollywood, approximately 2.9 miles from the Project Site. This station serves the communities of Cahuenga Pass, North Hollywood, Studio City, Sun Valley, Toluca Lake, Toluca Woods, Universal City, Valley Glen, Valley Village and West Toluca. It should also be noted that the North Hollywood Substation, located at 12318 Ventura Boulevard in Studio City, is approximately 0.5 miles from the Project Site. This substation acts as a “drop-in” office and was developed to better serve residents in the jurisdiction of the North Hollywood Community Police Station. *Figure IV.K.2-1: North Hollywood Community Police Station and Substation Locations* shows the location of the Project Site in relation to the North Hollywood Community Police Station and its nearest substation.

There are currently 300 sworn officers, 32 reserve officers, 31 civilians, and 28 citizen volunteers stationed at the North Hollywood Community Police Station.¹ The North Hollywood Community Police Station serves a population of approximately 220,000 residents in an area of 25 square miles. In the event of an emergency situation that requires additional staffing, additional officers can be called in from other LAPD Districts and Stations. The average current response time of the North Hollywood Community Police Station to emergency calls (Code 3) in the coverage area is 5.8 minutes, to urgent/non-emergency calls (Code 2) is 17.2 minutes, and to low priority calls (Code 1) is 37.2 minutes. These times are consistent with the Valley Bureau response times of 6.1 minutes for Code 3 calls, 17.8 minutes for Code 2 calls, and 36.7 minutes for Code 1 calls; as well as with the Citywide average response times of 5.8 minutes for Code 3 calls, 18 minutes for Code 2 calls, and 37.7 minutes for Code 1 calls.²

¹ The Los Angeles Police Department Website, North Hollywood Community Police Station, http://www.lapdonline.org/north_hollywood_community_police_station. Accessed April 26, 2012.

² Per phone call with Lieutenant Brian Wendling, Los Angeles Police Department, North Hollywood Community Police Station on October 19, 2012.



Legend





-  Police Stations
-  Police Substations
-  Freeways
-  Major Streets

FIGURE IV.K.2-1

**NORTH HOLLYWOOD COMMUNITY POLICE STATION
 AND SUBSTATION LOCATIONS**

SOURCE: DEPARTMENT OF CITY PLANNING WEBSITE



The North Hollywood Community Police Station currently has an officer-to-resident ratio of 1 officer per 734 residents³ which is slightly better than the City of Los Angeles' goal of 1 officer per 758 residents. The North Hollywood Community Police Station of the LAPD does not have any plans for facility expansion at this time. According to the LAPD at the North Hollywood Community Police Station, the Project Site is currently adequately served.⁴

The Project Site is located within Reporting District 1581 and Basic Car unit area 15A85 of the North Hollywood Community Police Station's jurisdiction.⁵

In 2010, the North Hollywood Community Police Station reported 6,242 Part 1 Offences which included crimes such as Homicide, Rape, Aggravated Assault, Robbery, Burglary, Larceny, and Vehicle Theft.⁶ This station reported a total of 13 Homicides, 42 Rapes, 314 Aggravated Assaults, 299 Robberies, 946 Burglaries, 3,681 Larceny crimes, and 847 Vehicle Thefts in 2010.⁷

Development at the Project Site currently consists of a golf course, golf driving range/practice facility, clubhouse, putting green, 16 tennis courts and related facilities, and a surface parking lot. The Project Site is surrounded by a chain link fence to reduce unauthorized access onto the golf course and onto the tennis courts and is also under surveillance by closed circuit television (CCTV).

b. Regulatory and Policy Setting

(1) City of Los Angeles General Plan

The City of Los Angeles General Plan Framework Element provides guidance regarding citywide land uses issues along with direction on infrastructure and public services.⁸ Police protection services in the City of Los Angeles are provided by the Los Angeles Police Department. Supplemental services are provided by the Los Angeles County Sheriff's Department, the California Highway Patrol, the Federal Bureau of Investigation (FBI), and the Drug Enforcement Administration. Goals, objectives, and policies for the provision of adequate police protection services and facilities to meet the needs of the City residents are as follows:

Goal 9I: Every neighborhood in the City has the necessary police services, facilities, equipment and manpower required to provide for the public safety needs of that neighborhood.

³ Officer to resident ratio is derived from: 220,000 residents/300 officers = 733.33 residents for every 1 officer. 733.33 is rounded to 734 residents.

⁴ Los Angeles Police Department, Discovery Section

⁵ The Los Angeles Police Department Website, North Hollywood Community Police Station, RD Map of North Hollywood Area and Basic Car Map of North Hollywood Area, http://www.lapdonline.org/north_hollywood_community_police_station. Accessed April 26, 2012.

⁶ Los Angeles Police Department Information Technology Division Management Report Unit, Statistical Digest 2010, pg. 12.

⁷ Los Angeles Police Department Information Technology Division Management Report Unit, Statistical Digest 2010, pgs. 13 through 23.

⁸ Department of City Planning Los Angeles, California, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.

Objective 9.13: Monitor and forecast demand for existing and projected police services and facilities.

Policy 9.13.1: Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.

Objective 9.14: Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.

Policy 9.14.1: Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.

Policy 9.14.2: Support the provision of additional sworn police officers to meet the safety needs of the City.

Policy 9.14.3: Pursue State, federal, and other non-conventional funding sources to expand the number of sworn police officers.

Policy 9.14.4: Complete all funded capital facilities in as short a time as possible.

Policy 9.14.5: Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.

Policy 9.14.6: Minimize the processing required to establish needed facilities and if necessary, modify facility standards to utilize existing available structures for this purpose.

Policy 9.14.7: Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.

Objective 9.15: Provide for adequate public safety in emergency situations.

Policy 9.15.1: Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.

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

Police protection services are provided by the LAPD within the Community Plan Area.⁹ The two police stations serving the Plan Area are North Hollywood and Van Nuys, both located outside

⁹ City of Los Angeles Planning Department, City of Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998.

of the Community Plan boundary. The Community Plan supports and encourages community-based crime prevention efforts such as Neighborhood Watch, through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, assistance in the formation of new neighborhood watch groups, and regular communication with neighborhoods and civic organizations. The following goal, objective, and policy provide standards on how the Community Plan ensures that police protections services are adequate for persons in its boundary.

Goal 8: A community with adequate police facilities and services to protect the community’s residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services.

Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands.

Policy 8-1.1: Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

Implementation of the Community Plan requires that decision makers include a finding that considers the impact on police service demands of a project or land use plan change. This consultation with the Police Department is currently in effect for plan amendments that must be reviewed by the General Plan Advisory Board, which includes representation from the Police Department.

(3) LAPD North Hollywood Community Police Station

The Los Angeles Police Department’s North Hollywood Community Police Station was contacted to determine the level of service the station provides in its jurisdictional boundary. Based on correspondence with personnel, this Police Station determines the need for additional officers per the City of Los Angeles’ goal of 1 officer per 758 residents. Additionally the LAPD generally suggests developing criminal deterrence devices and techniques for new developments that are going to be built within its jurisdiction. These devices are part of the “Design Out Crime” initiative by the LAPD, which implements techniques of Crime Prevention Through Environmental Design (CPTED). CPTED applies three key concepts, all of which are interrelated, including: 1) Natural surveillance – The placement of physical features, activities, and people in a way that maximizes visibility; 2) Natural access control – Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting; and 3) Territorial reinforcement – The use of physical attributes to define ownership and separate public and private space. Examples of criminal deterrence devices and techniques suggested by the LAPD through the Design Out Crime program include, but are not limited to:

- Housing units can be designed so as to allow neighbors to “self-patrol” their environments.
- Lighting and landscaping may be enhanced in parking lots to improve visibility.
- Fences around housing developments can be designed in ways that avoid creating hiding places for criminals.
- Vines or planted coverings may be placed on wall to deter graffiti.

Ultimately, in the final design of the SCSLC Project buildings, landscaping, and hardscaping on proposed Lot 2, the Applicant would consult with the LAPD, and specifically, the North Hollywood Community Police Station, to determine what criminal deterrence devices and techniques should be implemented into the Project design to aid the LAPD in crime prevention on the Property and in the vicinity.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Analysis of police protection services is concerned with service ratios, facility needs, crime reports, and crime prevention design features for the proposed Project and Project Site. The LAPD was contacted for their review and input into design features of the proposed Project. Analysis of impacts to police protection services was determined through contact with the LAPD, and information provided from the LAPD website, the City of Los Angeles General Plan, and the Community Plan.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on police services if it would cause any of the following conditions to occur:¹⁰

- a.) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

- a.) The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;

¹⁰ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

b.) The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project’s proportional contribution to the demand; and,

c.) Whether the project includes security/and or design features that would reduce the demand for police services.

c. Project Impacts

The following section provides analysis of police protection services in the area of the proposed Project. The analysis is based on the significance thresholds of the L.A. CEQA 2006 Threshold Guide and provides a discussion on response service ratios and facilities, and Project security and design features.

(1) LAPD Service Ratios and Facilities

The Project Site will be split into two lots. Lot 1 is approximately 11.6 acres in size and is currently occupied by a 9-hole pitch-and-putt golf course, a 24-stall golf driving range, a parking lot, a putting green, and a clubhouse. Lot 1 will remain intact with minor configuration changes during development of the proposed Project. Lot 2 is approximately 4.5 acres in size and is currently occupied by 16 tennis courts, a small tennis house, and a portion of an existing surface parking lot. Development of the Project will occur on Lot 2 of the Project Site and will include the removal of the existing 16 tennis courts, the tennis house, and a portion of the surface parking lot, and the subsequent development of a 200-unit senior housing condominium complex. The senior housing condominium units will be housed in six buildings on Lot 2. *Table IV.K.2-1: Project Components and Expected Population Increase* shows the number of one- and two-bedroom units in each of the buildings and the estimated population increase expected to occur with implementation of the Project. As shown, development of the Project would result in an increase of an estimated 340 residents in the jurisdictional service boundary of the LAPD’s North Hollywood Community Police Station.

**TABLE IV.K.2-1
 PROJECT COMPONENTS AND EXPECTED POPULATION INCREASE**

BUILDING NUMBER	NUMBER OF ONE-BEDROOM UNITS	NUMBER OF TWO-BEDROOM UNITS	POPULATION FACTOR ¹	NUMBER OF RESIDENTS
Building 1	9	21	1.70 persons/unit	51
Building 2	9	21	1.70 persons/unit	51
Building 3	11	28	1.70 persons/unit	66
Building 4	10	25	1.70 persons/unit	60
Building 5	10	25	1.70 persons/unit	60
Building 6	15	16	1.70 persons/unit	52
Total	64	136	--	340

¹ Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, City of Los Angeles General Plan, p. III-2

As stated earlier, the North Hollywood Community Police Station has a current officer-to-population ratio of 1 officer per 734 residents, serving a population of 220,000 residents with 300 sworn officers. With the development of the Project, the population served by the North Hollywood Community Police Station within its boundary would increase by 340, to 220,340 residents. With the projected population, the officer-to-population ratio would decline to 1 officer per 735 residents served.¹¹ This ratio would continue to be consistent with the service goal of 1 officer per 758 residents as required by the City of Los Angeles.

Representatives at the LAPD's North Hollywood Community Police Station were contacted to determine if any immediate or future expansion of the station was planned. As of October 2012, no expansion of the North Hollywood Community Police Station or development of a new police station that would serve the Project Site is expected to occur in the immediate or near future.¹² Considering the proposed Project would not cause a decline in the current officer-to-resident ratio above the City of Los Angeles' standard of 1 officer per 758 residents, it is expected that the North Hollywood Community Police Station would continue to adequately serve the community with development of the Project. Therefore, impacts from the development of the Project on police services would be less-than-significant.

(2) *Project Security and Design Features*

As part of the LAPD's Design Out Crime program, the Project will incorporate specific design features to reduce calls from the LAPD involving crime. The specific design features will be determined in final design of the Project and in consultation with the LAPD.

With implementation of the LAPD design features into the Project, it is expected that crime on the Project Site would be reduced. This in turn would reduce the number of calls to the LAPD to provide police protection services to the Project Site. Therefore, impacts would be less-than-significant.

(3) *Consistency with Adopted Plans and Policies*

Due to the fact that the Project will have less-than-significant impacts on police protection and police services related to population growth and Project design, development of the Project would be consistent with Plans and policies addressing the service requirements of police services.

d. *Cumulative Impacts*

The proposed Project and the ten Related Projects are all located in the jurisdictional service boundary of the LAPD's North Hollywood Community Police Station. As discussed above, the Project would increase the service population of this police station by 340, to 220,340 residents. This would cause the officer-to-population ratio to decline to 1 officer per 735 residents served.

¹¹ Officer to resident ratio with implementation of the Project is derived from: 220,340 residents/300 officers = 734.46 residents for every 1 officer. 734.46 is rounded to 735 residents.

¹² Per phone call with Lieutenant Brian Wendling, Los Angeles Police Department, North Hollywood Community Police Station on October 19, 2012.

The Related Projects (including residential construction and demolition) would add a net approximately 1,455 residents to the jurisdictional area of the police station resulting in an increased population served of up to 221,795 including the Project.¹³ The population increase would cause the officer-to-population ratio to decline to 1 officer per 740 residents resulting in a cumulative impact to the LAPD. However, this ratio would still be consistent with the service goal of 1 officer per 758 residents as required by the City of Los Angeles. The demand for such increased service from the LAPD would be met through existing mechanisms such as property taxes and government funding that the proposed Project and Related Projects would contribute.

Similar to the proposed Project, each Related Project would be reviewed by the LAPD. Project Design Features for each Related Project would be incorporated into their design to help reduce calls for police protection service from the LAPD. Furthermore, upon LAPD review, the department may suggest incorporating crime prevention features and techniques into each Related Project to further deter property crimes.

Implementation of the Project would only slightly increase the need for police protection services from the LAPD in the North Hollywood Community Police Department's jurisdiction. The proposed Project would have a less-than-significant impact on LAPD police protection services and thus would not contribute to cumulative impacts. In combination with the Related Projects, it is also anticipated that the overall cumulative impacts would not be considerable.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, or federal regulations or laws that serve to offset or prevent specific police services impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- As part of the LAPD "Design Out Crime" program and the techniques employed by the Crime Prevention Through Environmental Design Guidelines, the Project Applicant shall consult with the LAPD Crime Prevention Unit on any suggested crime prevention features appropriate to the design of the Project, and shall incorporate such measures to the extent feasible and practical.

b. Project Design Features (PDFs)

There are no PDFs included with respect to police protection impacts.

¹³ The number of residential dwelling units produced by the Related Projects can be found in *Table III-1: List of Related Projects* of this Draft EIR. The rates used to determine the number of residents that would be produced from the Related Projects can be found in the table *Plan Population and Dwelling Unit Capacity*, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, City of Los Angeles General Plan, p. III-2.

c. Mitigation Measures

The Project will result in less-than-significant police protection impacts due to population growth. With implementation of the Compliance Measure to coordination with the LAPD on Project design, no further Mitigation Measures would be required to reduce impacts to police protection services.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Incorporation of crime prevention features into the Project in consultation with the LAPD during the final design stages of the building plans would reduce the calls for police protection from the LAPD at the proposed Project Site. The cumulative population increase from the Project and the Related Projects would not significantly impact police coverage or emergency response times. Therefore, impacts would be less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

K.3. PUBLIC SERVICES: LIBRARY

1. INTRODUCTION

This section discusses the physical setting and provides analysis of library services in the area where the Project would be developed. The information contained in this section is derived primarily from research of the Los Angeles Public Library (LAPL) System.

2. ENVIRONMENTAL CONDITIONS

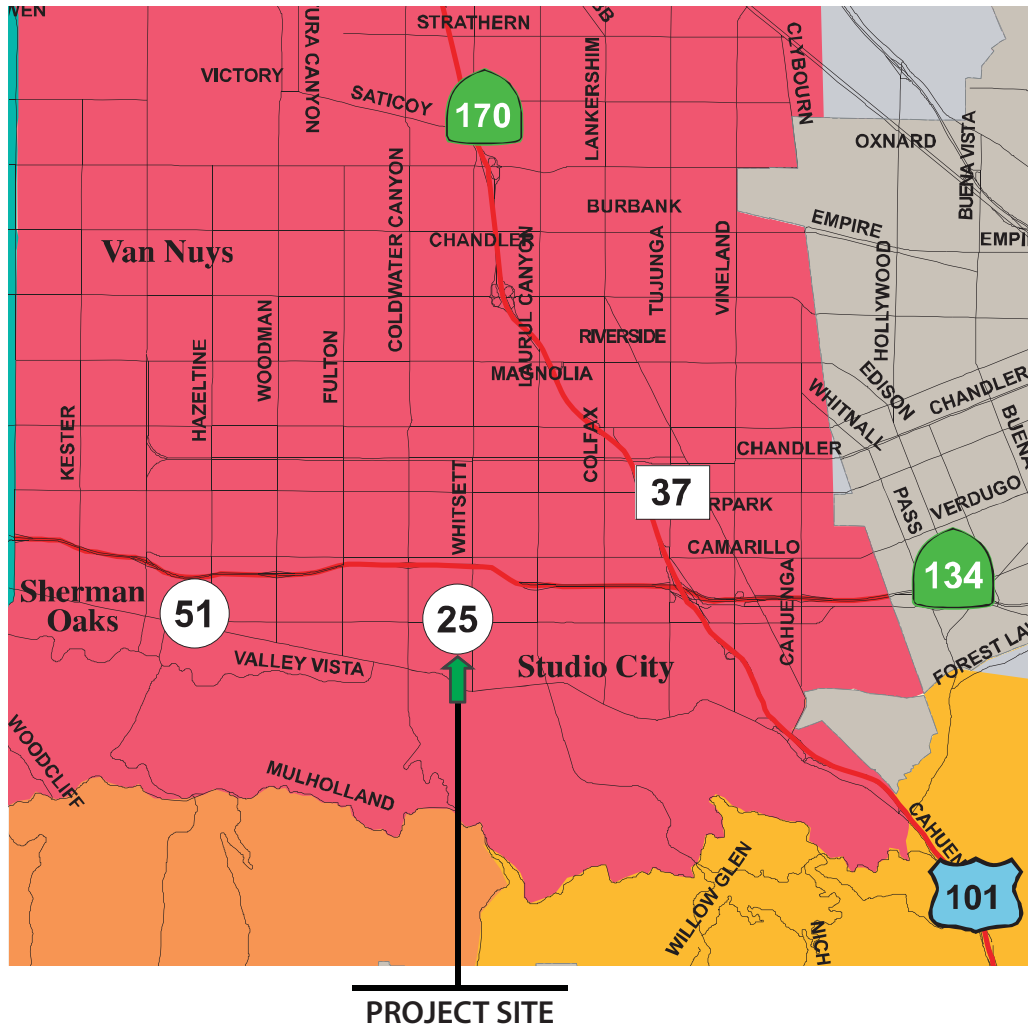
a. Physical Setting

Library service for the City of Los Angeles and the Project Site is provided by the Los Angeles Public Library (LAPL) System. The LAPL System provides library services at the Central Library and 72 branches throughout the City of Los Angeles. In 2007, the LAPL System welcomed 17 million visitors who borrowed 18 million items. The LAPL has a collection of 6.2 million books, CDs, DVDs, and downloadable books, music, and movies. Additionally, patrons of the LAPL can use 2,200 library computers with Internet access or bring their own computer and connect to library Wi-Fi systems.¹ The LAPL completed a Branch Facilities Plan in 2007 to guide the development of new libraries, expansion of existing libraries, and to determine the collection needs for the population it serves within its jurisdictional boundaries.

The LAPL Branch Facilities Plan requires that a population of 45,000 persons and above be served by a library branch that is 14,500 square feet in size and a population of below 45,000 persons be served by a library branch that is 12,500 square feet in size.

The Studio City Neighborhood Branch Library of the LAPL System is the closest library and currently serves the Project Site. Additionally, the North Hollywood Regional Branch Library and the Sherman Oaks Neighborhood Branch Library are near enough to the Project Site to provide library services. *Figure IV.K.3-1: Location of Nearest LAPL Libraries* shows these three closest libraries serving the Project Site. Additionally, *Table IV.K.3-1: LAPL Libraries Serving the Project Site* provides details of each of these libraries including their addresses, distances from the Project Site, building sizes, and item collection sizes.

¹ Library Foundation of Los Angeles, Los Angeles Public Library Annual Report 2008-2009, <http://www.lfla.org/annual-report/index.php>. Accessed April 26, 2012.



- East Valley Area
- Western Area
- Hollywood Area
- West Valley Area
- Out of City Area
- 37 North Hollywood Regional Branch Library
- 25 Studio City Neighborhood Branch Library
- 51 Sherman Oaks Neighborhood Branch Library

FIGURE IV.K.3-1
LOCATIONS OF NEAREST LAPL LIBRARIES

SOURCE: LOS ANGELES PUBLIC LIBRARY WEBSITE



TABLE IV.K.3-1
LAPL LIBRARIES SERVING THE PROJECT SITE¹

LIBRARY NAME	ADDRESS	DISTANCE FROM SITE (MILES)	LIBRARY BUILDING SIZE (SQ. FT.)	ITEM COLLECTION SIZE ²
Studio City Neighborhood Branch Library	12511 Moorpark Street Studio City, CA	0.3	10,500	62,529
North Hollywood Regional Branch Library	5211 Tujunga Avenue North Hollywood, CA	2.9	15,150	52,138
Sherman Oaks Neighborhood Branch Library	14245 Moorpark Street Sherman Oaks, CA	2.5	12,500	54,948

¹ Source: City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pgs. K.5-6 through K.5-12.
² Karen Pickard-Four, Acting Senior Librarian, Studio City Branch Library, personal communication, 10 July 2012.

The Studio City Neighborhood Branch Library, located approximately 0.3 miles to the north, is the closest library to the Project Site. The Studio City Neighborhood Branch Library was originally built in 1963, damaged in the 1994 Northridge earthquake, and rebuilt in its current location in 2001. The library was originally 5,230 square feet. It has since been expanded and this branch is now 10,500 square feet in size. This branch has a collection of approximately 62,529 items and also features reading areas for adults, teens, and children; 28 computers with Internet service (including four computers designated for children and four catalogue computers); a storytelling area; and a multipurpose meeting room. The library averages approximately 5,000 patrons a week or approximately 20,000 patrons a month.²

According to 2008 estimates by the City of Los Angeles Department of City Planning, the population of Studio City (including ZIP code 91604 and portions of ZIP codes 91602 and 91607) is approximately 37,201 persons. Per the standards set forth by the LAPL's Branch Facilities Plan, for a community population of less than 45,000 persons, the Studio City Library is currently undersized for the population that it is serving.

In addition to the Studio City Neighborhood Branch Library, the Sherman Oaks Neighborhood Branch and North Hollywood Regional Branch Libraries could also provide service to the Project. The Sherman Oaks Neighborhood Branch Library is located approximately 2.5 miles to the west of the Project Site at 14245 Moorpark Street in Sherman Oaks, houses a collection of 54,948 items³, and is 12,500 square feet in size. The North Hollywood Regional Branch Library is located approximately 2.9 miles to the northeast of the Project Site at 5211 Tujunga Avenue in North Hollywood, houses a collection of 52,138 items⁴, and is 15,150 square feet in size.

² Karen Pickard-Four, Acting Senior Librarian, Studio City Library, personal communication, 10 July 2012.

³ Personnel at Sherman Oaks Library, personal communication, 10 July 2012. Information as of April 2012.

⁴ Personnel at North Hollywood Regional Library, personal communication, 10 July 2012. Information as of April 2012.

b. Regulatory and Policy Setting

(1) City of Los Angeles General Plan

The City of Los Angeles General Plan Framework Element provides guidance regarding citywide land use issues along with direction on infrastructure and public services.⁵ The LAPL standard for determining the preferred library facility square footage is based upon ranges of population within a designated area. Objectives and policies for the provision of adequate library services and facilities to meet the needs of the City residents are as follows⁶:

Objective 9.20: Adopt a citywide library service standard by the year 2000.

Policy 9.20.1: Develop library standards dealing with the facilities' net floor area, the appropriate number of permanent collection books per resident, and their service radius.

Policy 9.20.2: Develop a citywide policy for locating non-English language permanent collections.

Objective 9.21: Ensure library services for current and future residents and businesses.

Policy 9.21.1: Seek additional resources to maintain and expand library services.

Policy 9.21.2: Encourage the expansion of non-traditional library services, such as book mobiles and other book sharing strategies, where permanent facilities are not adequate.

Policy 9.21.3: Encourage the inclusion of library facilities in mixed-use structures in community and regional centers, at transit stations, and in mixed-use boulevards.

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

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area is serviced by two public library branches, both neighborhood in scale. Each of the branches are located on small sites and are in need of expansion and updating. It should be noted that the North Hollywood Regional Branch Library lies within the North Hollywood-Valley Village Community Plan Area. The following goal, objective, and policy are provided by the Plan to ensure adequate library service to the population within its jurisdiction⁷:

Goal 7: Ensure adequate library facilities and services are provided to the area's residents.

⁵ Department of City Planning Los Angeles, California, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.

⁶ City of Los Angeles General Plan, Framework Element, Chapter 9 Infrastructure and Public Services, July 27, 1995.

⁷ City of Los Angeles General Plan, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998, pg. III-14.

Objective 7-1: To encourage the City's Library Department to provide adequate library service which response to the needs of the community.

Policy 7-1.1: Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian oriented areas, transit stations, office buildings, and similarly accessible facilities.

(3) *Los Angeles Public Library (LAPL) Branch Facilities Plan*⁸

The LAPL Branch Facilities Plan was adopted by the Board of Library Commissioners in 1988. It consists of two components: 1) a Site Selection Guidelines that set standards for the size and features of branches based on location and the population served in each community; and 2) a List of Projects, identifying the facility status and need of each existing branch library and identifying the need for branch libraries in communities without existing libraries.

The Branch Facilities Plan was implemented through back-to-back Bond Measures approved by more than two-third of the voters of Los Angeles. Phase I was the 1989 Bond Program, which provided \$53.4 million for 26 projects. Twenty-nine libraries were built in the 1989 bond program. The LAPL successfully obtained additional funds from the Community Development Block Grant award of federal funds, from the California State Library Proposition 85, and from Friends of the Library groups for a total branch construction program of \$108 million.

Phase II was the 1998 Bond Program. It provided \$178.3 million for 32 projects. The original 32 projects in the 1998 bond program were built on time and under budget. Four additional projects were added through managed savings, Friends of the Library contributions, and a California State Library Proposition 14 grant for a total construction program of \$226.3 million. Thus far, a total of 64 facilities have been built and/or renovated under the two Bond Programs. Through separate funding, during this same time period, the landmark Central Library was renovated and expanded to more than double the size of the historic building.

The 1998 Branch Facilities Plan became the blueprint for the most significant change in the LAPL infrastructure in its history. Based on the facilities plan and the construction funds obtained in the subsequent bond issues, 90 percent of the library infrastructure was replaced in a fifteen-year period. The LAPL completed the largest public library building program in the nation on time and under budget. Library space in new and renovated state-of-the-art facilities was more than doubled from 700,000 square feet to more than 1,400,000 square feet in the Central Library and 71 branch libraries in the City of Los Angeles.

In 2006, a preliminary revision to the Branch Facilities Plan was drafted and presented to the Board of Library Commissioners. As a result of public input, a number of changes have been made to the March 2006 Draft Revision to the Branch Facilities Plan. The Criteria for New Libraries was developed and proposes building larger libraries. The new recommended sizes for development of library branches in the LAPL System are 12,500 square feet for communities

⁸ Los Angeles Public Library Website, Summary of Branch Facilities Plan Revision, http://www.lapl.org/about/planning_overview.html. Accessed April 30, 2012.

with less than 45,000 population and 14,500 square feet facilities for communities with more than 45,000 population. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for that area.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Analysis of library services is concerned with availability of facilities and accessibility of services. The LAPL has established standards to serve its population. The LAPL was contacted for their review and input on the proposed Project.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have significant impact on aesthetics if it would cause any of the following conditions to occur:⁹

- a.) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

- a.) The net population increase resulting from the proposed Project;
- b.) The demand for library services anticipated at the time of Project buildout compared to the expected level of services available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the Project's proportional contribution to the demand; and
- c.) Whether the Project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct support to the LAPL).

c. Project Impacts

(1) Library Services

The Project will include the development of a 200-unit senior housing condominium complex within six proposed buildings. Development of the Project is expected to increase the area population by 340 residents.

⁹ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

The nearest library that would serve the residents of the Project is the Studio City Neighborhood Branch Library. According to standards set forth by the LAPL, the Studio City Library branch is currently undersized for the amount of residents that it serves within its jurisdictional boundary.

Development of the Project would increase the population of the area served by the Studio City Branch Library. As such, the increase in population would demand an increase in services from the branch, potentially resulting in a significant impact. However, the increase would be nominal compared to the overall population. Although the Studio City Neighborhood Branch Library is undersized, the LAPL indicates that this library branch adequately serves the population within its jurisdictional boundary.¹⁰ As such, the nominal increase in population from the Project would not cause the Studio City Neighborhood Branch Library to be overused or require construction of a new library. Additionally, two other LAPL branches (the Sherman Oaks Neighborhood Branch Library and the North Hollywood Regional Branch Library) are within three miles of the Project Site and would also be able to serve its residents adequately, as is the case currently.

Because the three library branches nearest to the Project Site would collectively and adequately serve the nominal increase in population due to the Project, the SCSLC Project is not anticipated to cause a substantial impact on library services or to the LAPL System; therefore, impacts would be less-than-significant.

However, regardless of the adequacy of the three nearest libraries to provide service to the existing and new Project population, the Studio City Neighborhood Branch Library is still considered to be undersized for the community and the population served, per the LAPL Branch Facilities Plan. As such, there is a possibility that the Project may have an unexpected impact on the undersized library, and therefore, the Mitigation Measure below shall be required. It should be noted that many senior housing facilities provide some form of library service to residents as part of the provided community services. The proposed Project may provide a small library for Project residents, and if so, may be exempt from the Mitigation Measure.

(2) Consistency with Adopted Plans and Policies

Due to the fact that the proposed Project residents would have less-than-significant impacts on the library services in the area and that the Studio City Neighborhood Branch Library would be able to absorb the new Project residents and continue to adequately serve the needs of the community in combination with the Sherman Oaks Neighborhood Branch and North Hollywood Regional Branch Libraries, development of the proposed Project would be consistent with the Plans and policies addressing the service requirements and siting of library services. No new libraries would have to be constructed to accommodate the Project.

d. Cumulative Impacts

The Project, along with the ten Related Projects (seven of which have residential or school components), would be served by the LAPL system for library services. The library branches in the LAPL system that would serve the Related Projects with residential and school components include: The Studio City Neighborhood Branch Library, the Sherman Oaks Neighborhood

¹⁰ Karen Pickard-Four, Acting Senior Librarian, Studio City Library, personal communication, 10 July 2012.

Branch Library, and the North Hollywood Regional Branch Library. The Studio City Neighborhood Branch Library would continue to be undersized due to the population increase of the proposed Project and Related Projects; however, the Sherman Oaks Neighborhood Branch Library and North Hollywood Regional Branch Library, which would absorb much of the patronage from the Related Projects, would be adequate to handle the new population. Each Related Project would be required to provide Mitigation Measures, if necessary, and as determined by the City of Los Angeles Public Library, to reduce any possible significant impacts on library services at the respective LAPL library branches that would provide service.

As indicated above, the proposed Project would cause a nominal increase in library service demand from the Studio City Neighborhood Branch Library. As such, the Project would have a less-than-significant impact on library services and would not contribute to cumulative impacts. In combination with the Related Projects, it is anticipated that overall cumulative impacts would not be considerable.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

Based on the analysis above, the Project's impacts to libraries would be less-than-significant. There are no Compliance Measures required or warranted for the Project.

b. Project Design Features (PDFs)

There are no PDFs included with respect to library service impacts.

c. Mitigation Measures

Because the population increase from the Project would not reduce the level of library service at the Studio City Neighborhood Branch Library, the Sherman Oaks Neighborhood Branch Library, or the North Hollywood Regional Branch Library, and would not require construction of a new library, all impacts would be less-than-significant. However, due to the fact that the Studio City Neighborhood Branch Library, the nearest library to the Project, is considered undersized for the community by the LAPL Branch Facilities Plan, the following Mitigation Measures shall be implemented:

MM PSL-1: The Project Applicant shall pay a mitigation fee of \$200 per capita based upon the Project population of the development to be used for books, computers, and other library materials. However, if a small library, adequate to serve the needs of the Project population, is provided as part of the Project, the \$200 per capita mitigation fee shall be waived.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project is anticipated to have a less-than-significant service impact on the three nearest libraries to the Project Site. However, due to the fact that the nearest library, the Studio City

Neighborhood Branch Library, is considered to be undersized for the community, there is the possibility that the Project will have an unexpected impact on this branch due to the increase in population resulting from the Project. However, implementation of the Mitigation Measures will ensure that any unexpected Project impacts are reduced to a less-than-significant level. Therefore, the Project will have a less-than-significant impact on library services.

IV. ENVIRONMENTAL IMPACT ANALYSIS

L. RECREATION AND PARKS

1. INTRODUCTION

This section discusses the physical setting and provides analysis of recreational services and parks in the area where the proposed Project would be developed. The information contained in this section is derived primarily from the City of Los Angeles Department of Recreation and Parks.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

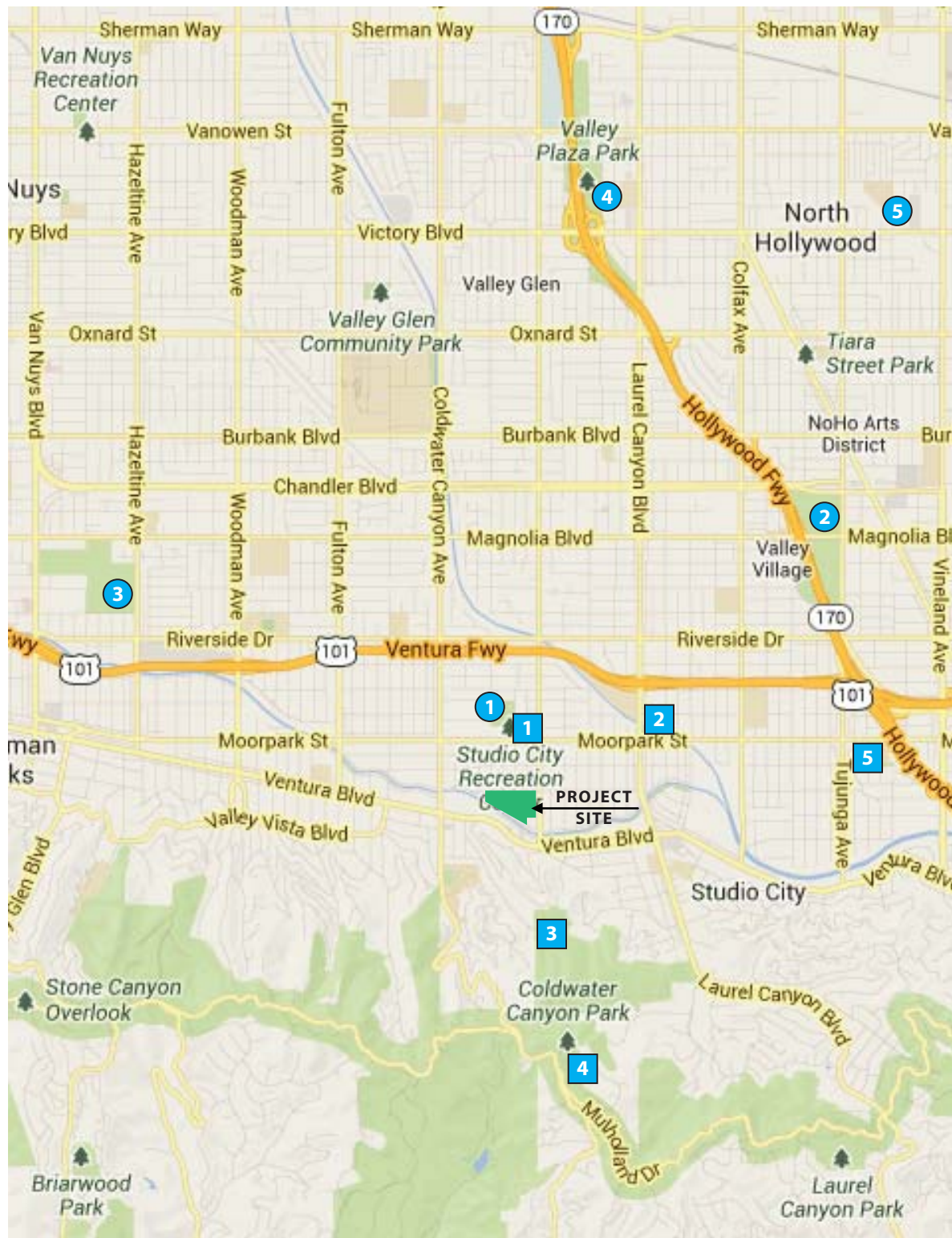
The City of Los Angeles Department of Recreation and Parks (DRP or the Department) is responsible for the operation, maintenance and provision of parks and recreational facilities throughout the City of Los Angeles, including the Project vicinity. The DRP's facilities are diverse and include approximately 15,000 acres of parkland with over 400 neighborhood and regional parks, eleven lakes, and more than 180 recreation and community centers. The Department operates two beaches plus the Venice Beach Ocean Front Walk. The City also operates Griffith Park, which includes the Observatory, the Greek Theater, three golf courses, the Equestrian Center, miles of hiking and riding trails, Travel Town, the Los Angeles Zoo, the Gene Autry Museum, a carousel, pony trail rides, a swimming pool, Friendship Auditorium, and other facilities. The DRP has, in addition to its parkland and numerous recreational facilities, programs, classes, and activities for children and adults. In addition to adult classes, sports leagues, and the country's largest municipal golf program, the DRP is a premier provider for children's programs in the City of Los Angeles, with after school programs, 26 licensed child care facilities, and sports programs at most of its facilities. The Department serves more than 1,000 children in its after school programs and more than 60,000 youths in its sports leagues.¹

The DRP completed its "2009 Citywide Community Needs Assessment" from which recommendations have been or will be implemented to develop more parks and recreational facilities and update facilities that are in disrepair.²

There are five parks within two miles of the Project Site and five tennis facilities within four miles that are operated and maintained by the DRP. *Table IV.L-1: Park and Tennis Facilities in the Project Site Vicinity* lists the nearest facilities and their attributes. *Figure IV.L-1: Location of Park and Tennis Facilities in the Project Site Vicinity* shows the location of these parks and tennis facilities.

¹ City of Los Angeles Department of Recreation and Parks Website, <http://www.laparks.org/dept.htm>. Accessed April 27, 2012.

² City of Los Angeles Department of Recreation and Parks, *2009 Citywide Community Needs Assessment*.



- # PARKS
- # TENNIS FACILITY

FIGURE IV.L-1
LOCATION OF PARK AND TENNIS FACILITIES
IN THE PROJECT SITE VICINITY

SOURCE: MAPS.GOOGLE.COM



**TABLE IV.L-1
 PARK AND TENNIS FACILITIES IN THE PROPERTY VICINITY¹**

NO. AND FACILITY NAME (KEYED TO FIGURE IV.L-1)	ADDRESS	SIZE	DISTANCE FROM PROJECT SITE (MILES)	AMENITIES
Parks				
1. Studio City Mini-Park	12505 Moorpark Street Studio City, CA	Pocket park	0.34	Information Not Available
2. Moorpark Park	12061 Moorpark Street Studio City, CA	Pocket park	0.63	Children's play area and picnic tables.
3. Wilacre Park	12601 Mulholland Drive Studio City, CA	128 acres	1.17	Open grass wild area that is maintained by the Santa Monica Conservancy.
4. Coldwater Canyon Park	12601 N. Mulholland Drive Beverly Hills, CA	45 acres	1.41	Bike path, hiking trails, jogging path.
5. Woodbridge Park	11240 Moorpark Street Studio City, CA	Pocket park	1.71	Children's play area and picnic tables.
Tennis Facilities				
1. Studio City Tennis Court (at Beeman Park)	12621 Rye Street Studio City, CA	N/A	0.41	Four unlighted tennis courts.
2. North Hollywood Tennis Court	11430 Chandler Blvd. North Hollywood, CA	N/A	2.08	Five lighted tennis courts.
3. Van Nuys Sherman Oaks Tennis Courts	14201 Huston Street Sherman Oaks, CA	N/A	2.31	Eight lighted tennis courts.
4. Valley Plaza Tennis Court	12240 Archwood Street North Hollywood, CA	N/A	3.12	Four lighted tennis courts.
5. Victory Vineland Tennis Courts	11117 Victory Boulevard North Hollywood, CA	N/A	3.46	Two lighted tennis courts.
¹ Source: City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/dept.htm . Accessed April 27, 2012.				

Additionally, there are seven pay tennis court complexes within a ten-mile radius of Studio City, including³:

- Balboa Pay Tennis Complex (16 courts) located at 16821 Burbank Boulevard in Encino;
- Cheviot Hills Tennis Courts (14 courts) located at 2551 Motor Avenue in Los Angeles;
- Griffith-Riverside Tennis Courts (12 courts) located at 3401 Riverside Drive in Los Angeles;
- Griffith-Vermont Tennis (12 courts) located at Vermont Entrance to Griffith Park in Los Angeles;
- Pacific Palisades Tennis Courts (8 courts) located at 851 Alma Real Drive in Pacific Palisades;

³ Correspondence letter from Manuel A. Mollinedo, City of Los Angeles, Privately-Owned Golf and Tennis Facilities/Study – CF 02-0974, July 9, 2002, contained in *Appendix O: Privately-Owned Golf and Tennis Facilities Study* of this Draft EIR.

- Poinsettia Tennis Courts (8 courts) located at 14201 Huston Street in Van Nuys; and,
- Westwood Tennis Complex (8 courts) located at 1350 Sepulveda Boulevard in Los Angeles.

The Project Site is currently occupied by the Weddington Golf and Tennis Club, a privately-owned recreational facility that has been in operation for nearly 60 years. The facility has a long history of providing recreational opportunities (primarily golf) for local schools, amateur leagues and the general public. Originally opened in 1956 with only golf facilities, tennis courts were added in the 1970s. Initially, four courts were installed. Additional courts were added for a total of twenty courts by the 1990s. In 1997, four of the tennis courts were demolished to accommodate construction of City of Los Angeles Fire Station No. 78, located adjacent to the southeast corner of the Project Site. With the closure of several tennis facilities, the Weddington Golf and Tennis Club has become one the few remaining privately-owned facilities in the City of Los Angeles that are open to the public for play. Currently, the Project Site remains developed with an executive 9-hole (3 par) pitch-and-putt golf course, 24-stall driving range, a clubhouse, and 16 lighted tennis courts and related facilities.

b. Regulatory and Policy Setting

(1) *Quimby Act*

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in order to promote the availability of park and open space areas in response to the state's rapid urbanization and the decreasing acres of parks and recreational facilities. The goal of the Quimby Act is to require developers to mitigate the impacts of property development and fund parkland improvements. The act gives authority for passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The in-lieu fees are paid and land conveyed directly to the local public agencies that provide park and recreation services on a community-wide basis.

In 1982, the Quimby Act was amended to hold local governments accountable for imposing park development fees. Assembly Bill (AB) 1600 requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or park land and the type of development project upon which the fee is imposed. Cities and counties were required to be more accountable and to show a strong direct relationship or nexus between the park fee exactions and the proposed project. Local ordinances must now include definite standards for determining the proportion of the subdivision to be dedicated and the amount of the fee to be paid.⁴

(2) *City of Los Angeles General Plan*

Recreation services are primarily provided by the City's Recreation and Parks Department. The City owns a total of approximately 15,000 acres of parkland, the largest being Griffith Park with over 4,000 acres. Included in these parklands are facilities such as horticulture centers, museums,

⁴ California State Parks, Planning Division, Quimby Act 101, By Laura Westrup, Summer 2002, Volume 8, No. 3, pg. 8.

and historic sites. Recreational services are also available to City residents from sites and facilities owned and operated by Los Angeles County (primarily beaches), the State of California, the National Park Service, and the National Forest.

In 1980, the City of Los Angeles adopted the Public Recreation Plan (PRP), which is a portion of the Service Systems Element of the Los Angeles City General Plan.⁵ The PRP emphasizes neighborhood and community recreation sites, community buildings, gymnasiums, swimming pools, and tennis courts. Additionally, the PRP sets forth recreation standards intended to provide a basis for satisfying the need for neighborhood and community recreational sites. The PRP emphasizes neighborhood and community recreational sites and parks because of their immediate importance to the daily lives of the City's people, especially its children. The objectives of the PRP are based on recognized planning principles and the extent and nature of deficiencies in the City's recreational facilities. These objectives include:

- To provide a guide for the orderly development of the City's public recreational facilities;
- To provide long-range standards for use in connection with new subdivisions, intensification of existing residential development, or redevelopment of blighted residential areas as described under general local recreation standards;
- To develop and locate public facilities to provide the greatest benefit to the greatest number of people at the least cost and with the least environmental impact;
- To provide a guide of priorities for the acquisition and development of public recreational facilities; and,
- To further refine and carry out the goals and objectives set forth in the Concept and Citywide Plan for recreation.

The PRP provides long-range standards for Neighborhood Recreational Sites and Community Recreational Sites. Both Neighborhood and Community Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons. The PRP also provides short and intermediate range community plan standards for Neighborhood and Community Parks. The short and intermediate plan standard for Neighborhood Parks is 1 acre per 1,000 persons in a 1-mile radius of the park and for Community Parks is 1 acre per 1,000 persons in a 2-mile radius.

Also, to ensure that the City of Los Angeles provides enough tennis courts to adequately service its recreational users, the following tennis court related policies are established in the PRP:

- Tennis service levels will be based on the needs of the local population between the ages of 10 to 61. It is this age range which most use tennis courts; and,

⁵ City of Los Angeles General Plan, Public Recreation Plan, Service Systems Element of the Los Angeles General Plan, 1980.

- Use of existing and future tennis courts should be maximized through design, lighting and operation.

The following programs are provided in the PRP to ensure an adequate number of tennis courts to service the City's recreational needs. These programs include:

- Use the areas of Public Tennis Court Deficiency identified in the PRP Background Report as guides for locating new tennis facilities as funds become available. A program for updating the Table and the Public Tennis Court Maps by the Department of Recreation and Parks and the Planning Department should be initiated as important changes in population, land use and facilities occur;
- Continue the program of designing new facilities with night lighting adequately shielded to assure the privacy of adjacent residential uses;
- Continue the program of illuminating unlighted public park tennis courts and encourage lighting of school tennis facilities in tennis court deficient areas when funds become available; and,
- Continue the program of building tennis courts in groups rather than one at a time.

According to the 2009 Needs Assessment, the City targets a guideline of providing 1 tennis court for every 10,000 population.

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

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan identifies regional, community and neighborhood parks in the Plan Area. There are five Neighborhood Parks and two Community Parks which serve the Community Plan Area. Additionally, two golf courses are also located within the Plan Area, one publicly-owned and the other privately-owned. The Community Plan Area, with its diverse topography, limits the placement of park sites south of Ventura Boulevard. Thus, those neighborhood parks located south of Ventura Boulevard offer limited recreational facilities for hillside homeowners. While the existing parks satisfy the needs of the current residents, according to the Community Plan, the community is still deficient in the number of neighborhood parks. The following goal, objective and policies are provided in this Community Plan to ensure that park and recreational facilities are adequately provided to the residents within the plan's jurisdiction.⁶

Goal 4: Adequate recreation and park facilities to meet the needs of the residents in the plan area.

Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities, which promote the recreational experience.

⁶ City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998, pgs. III-11 and III-12.

Policy 4-1.1: Preserve the existing recreational facilities and park space.

Policy 4-1.2: Increase accessibility to The Los Angeles River.

The DRP and Department of City Planning use the Community Plan to assist in preserving recreational facilities and park space by changing existing zoning and land use designation on chosen sites to the Open Space Zone and Open Space designation, as applicable. Specifically, the Project Site's land use designation of Open Space was derived from a General Plan Amendment on the Project Site, which changed the land use designation from Residential to Open Space in order to recognize the Project Site as a contributing community recreational feature.

The Community Plan identifies two classifications for open space: Publicly-owned and privately-owned open space. In the Community Plan, open space is broadly defined as land which is essentially free of structures and buildings and/or is natural in character and which functions in recreational, scenic, preservation, or similar public service manner. Applicable open space goals, objectives, and policies in the Community Plan include:

Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

Policy 5-1.1: Encourage the retention of passive and visual open space, which provides a balance to the urban development of the Plan Area.

Policy 5-1.2: Accommodate active parklands, and other open space uses.

Policy 5-1.3: Require development in major opportunity sites to provide public open space.

(4) *Los Angeles Municipal Code*

The Los Angeles Municipal Code (LAMC) provides standards for park and recreational facilities, the need for parks and recreational facilities based on the development of projects, and standards based on the Quimby Act. Section 12.21(u)(2) of the LAMC, which addresses senior independent housing provisions, requires that "at least ten square feet of indoor recreation space and at least 50 square feet of useable open space for each dwelling unit in the development, both of which shall be available and accessible to all residents of the development. The development of open space may be located on the ground, on terraces or on rooftops, but shall be landscaped or developed for active or passive recreation and may include roofed recreation areas, swimming pools, or unenclosed porches. The open space may also include walkways, but shall not include land used for required front or side yards, private streets, driveways, passageways, parking, loading or service areas."

LAMC Section 17.12, which addresses park and recreation site acquisition and development provisions, is based on the Quimby Act requirements to either dedicate park and recreational land or provide in-lieu fees for development of a project. Fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed.

Section 17.12 also provides for exemptions and credits to the dedication of park and recreational land and/or payment of in-lieu fees, if a development incorporates private park and recreational facilities into its design. Inclusive park and recreational uses of a development are required to meet the following standards to receive an exemption or credit: 1) each facility is available for use by all the residents of the project; and 2) the facilities satisfy the recreation and park needs of the project so as to reduce the need for public recreation and park facilities to serve the project's residents.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Analysis is based on an assessment of the onsite Project facilities, anticipated Project population, and evaluation against the threshold criteria.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant impact on park and recreation areas if it would cause any of the following conditions to occur:⁷

- a.) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks and recreational services.
- b.) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- c.) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering several factors, including population, demand for recreation and park services, and assessment of project features

⁷ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2011).

that would reduce demand for recreation facilities and park services. Based on these factors, the proposed Project would have a significant impact on parks and recreation, if:

- a.) The Project would generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and service; or,
- b.) The Project construction would interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area.

c. Project Impacts

The Project Site is approximately 16.11 acres in size, all of which includes some recreational use as either a golf course, driving range, tennis courts, open space, or supporting facilities (i.e., parking lot, clubhouse, and putting green) necessary to support such recreational uses. Proposed Lot 1 is approximately 11.6 acres and is occupied by a 9-hole pitch-and-putt golf course, a 24-stall golf driving range, a clubhouse, and a surface parking lot. Proposed Lot 2 is approximately 4.5 acres and currently occupied by 16 lighted tennis courts, a small tennis house, and a surface parking lot. Implementation of the proposed Project would involve removal of the 16 tennis courts, tennis house, and a portion of the parking lot on Lot 2, followed by development of the 200-unit Studio City Senior Living Center (SCSLC) Project. Under the Project, existing golf course and driving range uses on Lot 1 would remain essentially unchanged and there would be no impact to golf recreational uses as a result of the Project.

Potential impacts on recreation and parks facilities would be two-fold: 1) the potential effect on the community due to the loss of 16 privately operated tennis courts; and 2) the potential effect on Citywide recreation and parks services due to the demand created by Project residents.

(1) Impact on Citywide Tennis Facilities

With the closure of several other tennis facilities in the City, the Weddington Golf and Tennis Club has become one of the few remaining privately-owned facilities that are open to the public for play in the City of Los Angeles and within the community of Studio City. Although there are many exclusive private golf and tennis facilities in the City of Los Angeles, there are a limited number of privately-owned facilities that are open to the public.

In 2002, the City of Los Angeles Department of Recreation and Parks completed its most current survey of 30 tennis facilities and 102 golf courses within the City of Los Angeles and County of Los Angeles.⁸ Only seven tennis facilities and 18 golf courses met the conditions of private ownership with open public accessibility. The survey indicated that most of the seven private tennis facilities draw their customers from a radius of about ten miles. The tennis facility at the Project Site attracts 50 percent of its customers from outside a ten-mile radius. Therefore, decreasing the number of tennis courts due to implementation of the Project may inconvenience current clientele of the Weddington Golf and Tennis Club.

⁸ Mollinedo, Manuel A., General Manager, City of Los Angeles, Department of Parks and Recreation, letter dated July 9, 2002 regarding Privately-Owned Golf and Tennis Facilities Study, contained in *Appendix O: Privately-Owned Golf and Tennis Facilities Study* in this Draft EIR.

It should be noted that according to the *2009 Citywide Community Needs Assessment* Final Report published by the DRP, there is general shortage of publicly owned park land in the City of Los Angeles, which typically means, there is also a shortage of public recreational facilities. According to the report, there are 321 public tennis courts within the City, which results in approximately one public tennis court for every 12,176 persons. However, the report was not inclusive of privately-owned tennis courts, such as those on the Project Site. Therefore, decreasing the number of privately-owned and paid tennis courts due to the Project would not result in a recreational impact to, or cause a reduction in, the 321 City-owned public tennis courts available to the public. Nor would the Project worsen the Citywide ratio of one public tennis court for every 12,176 persons.

As noted above, seven comparable pay tennis facilities are available for public play within a 10-mile radius of the Studio City community. Demolition of the 16 paid tennis courts at the Project Site would reduce the inventory of tennis courts within Studio City, the City of Los Angeles, and the County of Los Angeles, but would not significantly impact the tennis court inventory overall. Furthermore, according to the DRP's *2009 Citywide Community Needs Assessment*, outdoor tennis courts and facilities are generally considered medium to low priority recreational uses in most communities across the City. Although, tennis courts are given high priority in the South Valley, where the Project Site is located, a sufficient number of tennis facilities will continue to remain available through public and private facilities, as well as within school facilities in Studio City, the South Valley, and Citywide. Patrons to local tennis courts may be inconvenienced by longer wait times to play, however, the inventory of tennis courts throughout the region, especially in the South Valley, is enough to support the shift in use to other facilities. Therefore, impacts would be less-than-significant with regards to removal of the 16 tennis courts and effect on other tennis facilities.

(2) *Demand on Recreation and Park Facilities*

The proposed Project is estimated to have a resident population of 340 residents⁹. The increase in residential population would increase demand for parks and recreational facilities serving the Studio City area.

The Project would be located in an area of Studio City that is served by five parks that are within a two-mile radius of the Project Site. According to the City of Los Angeles General Plan, neighborhood and community recreational facilities should be provided at a minimum of 2 acres per 1,000 persons. With an estimated population of 340 residents, under this standard, the Project would create a demand for 0.68 acres of neighborhood parkland or community recreational facilities. This demand would be considered non-substantial and negligible in comparison to the current amount of parks and recreational facilities currently provided in the community, including the Weddington Golf Course facilities, which will be retained on the Project Site, adjacent to the senior housing. Further, the restricted demographics of the Project residents (i.e., senior citizens) may result in less demand for active recreational facilities than would be the case for non-senior housing. As such, the demand from Project residents would not require

⁹ Project residential population based on a factor of 1.70 persons per household. See Section 4-I, Population and Housing, for discussion.

construction of new recreational facilities and would not burden existing recreational facilities with new population that cannot be accommodated. Therefore, the Project would result in a less-than-significant impact related to demand on existing recreation and park facilities.

The Project would also include recreational and open space facilities within its design. These recreational and open space facilities would further offset the demand by Project residents on citywide recreation and park services.

In particular, Project Design Features would include a pool/lounge area within the common area plaza, approximately 30,000 square feet of indoor common-use activity center, a public children's playground, and private balconies and patios in some of the residential units. The outdoor landscaped areas will be designed as an extension of the indoor living spaces by creating an atmosphere for active use, exercise, socializing, and coordinated events, and thus would function predominately as a common recreational area. Common landscape and hardscape area (inclusive of the pool and children's playground), totaling 109,176 square feet, would be provided.

When considered on a one-for-one basis, the proposed Project would incorporate the equivalent of 3.19 acres of area within proposed Lot 2 for common recreational uses. This represents almost four times the 0.68-acre demand for parkland calculated for the Project.

In addition (as mentioned above), and not part of the above calculation, the Project would retain the Weddington Golf Course essentially unchanged on the Project Site, inclusive of the existing 9-hole pitch-and-putt golf course, driving range, and clubhouse. The golf course would offer additional recreational opportunities for the SCSLC Project, continuing to serve the public as well as the new Project residents. It is anticipated that this facility would continue to be privately owned and made available for public use on a fee basis. Although the Project would not include any permanent commitment to preserve the golf course, the initial lot subdivision would allow for the golf course facilities and proposed Lot 1 to be managed and operated independently from the Studio City Senior Living Center.

(3) *Consistency with Adopted Plans and Policies*

The Project is consistent with the objectives and policies of the Community Plan, which encourage a balance of open space and adequate recreational area to meet resident needs.

The Project will be developed within proposed Lot 2 on the Project Site, which would require removal of 16 tennis courts and a tennis house. However, the Project will be developed adjacent to existing recreational uses on the Project Site, including approximately 11.6 acres of golf course, driving range, putting green, and clubhouse uses that will be available for use by the Project residents. It is anticipated that this facility would continue to be privately owned and made available for public use on a fee basis. The golf course would continue to serve as a prominent recreational facility within the Community Plan Area and would remain as a designated open space amenity for both the community and the Project residents. These existing recreational uses in combination with other existing recreational uses in the community would be able to accommodate the new Project residents. As such, the Project would not conflict with nor

impede the objectives or policies of the Community Plan, resulting in a less-than-significant impact related to consistency with adopted Plans and policies.

Furthermore, within the Studio City Senior Living Center development, 109,176 square feet (approximately 2.5 acres) of outdoor plaza area, which would include a pool, outdoor seating areas, and children's playground, would be provided. Although existing active-use recreational facilities (i.e., the tennis courts) would be lost, they would be replaced with both active and passive recreational facilities within the Project that are suitable for the specific resident population and are compatible with the senior residential use. Additionally, the site layout would include pedestrian access that would allow Project residents to access the Los Angeles River area.

d. Cumulative Impacts

With an estimated 340 residents, the Project would generate the need for 0.68 acres of parkland or recreational uses. The Related Projects would increase the population of the area by approximately 1,455 persons¹⁰ and would require an estimated demand for 2.91 acres of park or recreation area. The 0.68 acres of parkland demand for the Project represents 18.9 % (percent) of the total demand identified for the proposed Project and Related Projects, combined. However, because the Project would incorporate retention of the existing recreational uses on the Project Site as well as Project Design Features that are expected to entirely offset the Project's recreational needs/demand, the incremental increase to cumulative demand would be negligible. Therefore, the Project would not cumulatively contribute to the need for parkland and recreational facilities. To offset their respective impacts, each Related Project would be required to dedicate the required parkland, develop the recreational facilities, or pay in-lieu fees to satisfy the demand for parks and recreational services. With implementation of such Project Design Features or payment of in-lieu fees, cumulative impacts to parkland and recreational facilities would not be considerable.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific recreational impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- In accordance with LAMC Section 17.12, the Applicant shall implement one of the following: 1) dedicate parkland to meet the requirements of the City of Los Angeles General Plan and Los Angeles Municipal Code; 2) pay in-lieu fees for

¹⁰ The number of residential dwelling units produced by the Related Projects can be found in *Table III-1: List of Related Projects* of this Draft EIR. The rates used to determine the number of residents that would be produced from the Related Projects can be found in the table *Plan Population and Dwelling Unit Capacity*, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, City of Los Angeles General Plan, p. III-2.

any land dedication requirement shortfall; or, 3) provide onsite improvements equivalent in value to the in-lieu fees for recreation and parks facility credit.

b. Project Design Features (PDFs)

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

PDF REC-1: The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing, and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.

PDF REC-2: The Project shall include approximately 30,000 square feet of indoor common-use activity center area. These areas shall be used for exercise areas, craft rooms, organized social activities and similar recreational uses for the residents and their guests.

PDF REC-3: The Project shall include private balconies and small patios in some of the residential units that offer opportunities for private open space and recreation use.

PDF REC-4: The Project shall be designed to retain the golf course, driving range, and clubhouse currently on the Project Site, largely unchanged. Minor reconfiguration and modification are permitted. It is anticipated that these facilities shall continue to be privately-owned and made available for use by the public or the adjacent Project residents on a fee basis.

c. Mitigation Measures

In compliance with the required Compliance Measures, the Project will result in less-than-significant recreational impacts. Further, with implementation of Project Design Features, impacts will be further reduced. Therefore, no Mitigation Measures shall be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the above discussed Project Design Features and Compliance Measures, the Project impacts to park and recreational facilities would be less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

M. TRANSPORTATION AND CIRCULATION

1. INTRODUCTION

This section is based upon the *Traffic Impact Study Studio City Senior Living Center Project* that was prepared by Linscott, Law & Greenspan, Engineers, dated February 2, 2012 (provided in *Appendix I: Traffic Impact Study* of this Draft EIR), which report is incorporated fully herein. The traffic impact study was prepared through coordination with and reviewed by the City of Los Angeles Department of Transportation (“LADOT”). This section discusses potential impacts on transportation facilities and parking resulting from the proposed Project.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Local Street and Freeway System

The City of Los Angeles utilizes the roadway categories recognized by regional, State, and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways, with the highest capacity, to two-lane undivided roadways, with the lowest capacity. The roadway categories are summarized as follows:

Freeways. Freeways are limited-access and high-speed travel ways included in the State and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses. There are no regional freeways in the immediate Project area or adjacent to the Project Site. Within a 2/3-mile radius, however, the Ventura (101) Freeway runs east-west to the north of the Project Site.

Arterial. Arterials are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. For the City of Los Angeles, these are referred to as Major Highways Class II and Secondary Highways, respectively. Principal arterials (Major Highway Class II) are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials (Secondary Highways) are typically two-to-four lane streets that service local and commuter traffic. Ventura Boulevard is an example of a principal arterial or Major Highway. Whitsett Avenue is an example of a secondary arterial or Secondary Highway.

Collector. Collector streets provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking and/or provide access to abutting properties. Woodbridge Street and Beeman Avenue are examples of collector streets.

Local. Local roadways distribute traffic within a neighborhood or similar adjacent neighborhoods and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are generally fronted by residential uses and do not typically serve commercial uses. Valley Spring Lane, Bellaire Avenue, and Valleyheart Drive are examples of local streets.

Brief descriptions of the important roadways in the Project Site area and surrounding community are provided below:

Whitsett Avenue. A north-south oriented roadway that borders the Project Site to the east, and terminates just south of Ventura Boulevard. Whitsett Avenue is designated as a Secondary Highway in the City of Los Angeles Transportation Element of the General Plan in the Project vicinity. One through northbound lane and two through southbound lanes are provided on the roadway in the Project vicinity. Separate left-turn lanes are provided in both directions at the signalized intersections with Riverside Drive, Moorpark Street, and Ventura Boulevard, except at the southbound approach to Ventura Boulevard where dual left-turn lanes are provided on the roadway. Whitsett Avenue is posted for a 35 miles per hour speed limit in the Project vicinity.

Coldwater Canyon Avenue. A north-south oriented roadway that is located west of the Project Site. Coldwater Canyon Avenue is designated as a Secondary Highway in the City of Los Angeles Transportation Element of the General Plan in the Project area. Two through travel lanes are provided in each direction in the Project vicinity. Coldwater Canyon Avenue is posted for a 35 miles per hour speed limit near the Project Site.

Laurel Canyon Boulevard. A north-south oriented roadway that is located east of the Project Site. Laurel Canyon Boulevard is designated as a Major Highway Class II and Secondary Highway north and south of Ventura Boulevard, respectively, in the City of Los Angeles Transportation Element of the General Plan in the Project area. Two through travel lanes are provided in each direction in the Project vicinity. Laurel Canyon Boulevard is posted for a 35 miles per hour speed limit near the Project Site.

Moorpark Street. An east-west oriented roadway that is located north of the Project Site. Moorpark Street is designated as a Secondary Highway in the City of Los Angeles Transportation Element of the General Plan in the Project vicinity. One through travel lane is provided in each direction in the Project vicinity. Moorpark Street is posted for a 35 miles per hour speed limit near the Project Site.

Valley Spring Lane. An east-west oriented local roadway that borders the Project Site to the north. Valley Spring Lane is designated as a Local street by the City of Los Angeles. One through travel lane is provided in each direction in the Project vicinity. There is no posted speed limit on Valley Spring Lane in the Project vicinity, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

Ventura Boulevard. An east-west oriented roadway that is located south of the Project Site. Ventura Boulevard is designated as a Major Highway Class II in the City of Los Angeles Transportation Element of the General Plan in the Project vicinity. Two through travel lanes are provided in each direction near the Project Site. Separate left-turn lanes are provided in both

directions at the Whitsett Avenue intersection. Ventura Boulevard is posted for a 35 miles per hour speed limit near the Project Site.

(2) *Traffic Conditions and Levels of Service*

The traffic analysis study area is generally comprised of locations that have the greatest potential to experience significant traffic impacts due to the Project, as defined by the Lead Agency. In the traffic engineering practice, the study area generally includes those intersections that are:

- a. Immediately adjacent or in close proximity to the project site;
- b. In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and
- c. In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

(a) *Study Intersections*

After conferencing with City of Los Angeles Department of Transportation (LADOT) staff, five (5) study intersections were identified for evaluation of potential Project impacts during the weekday morning (“A.M.”) and afternoon (“P.M.”). Pursuant to the LADOT Traffic Study Policies and Procedures, only signalized intersections were selected for the project traffic impact analysis. Traffic count sub-consultants, City Traffic Counters and The Traffic Solution, conducted manual counts at the study intersections during January 2012 and November 2011. The observed peak hour traffic volumes for the two study intersections conducted in year 2011 were increased at an annual rate of two percent (2%) to reflect existing conditions. The five following study intersections, all of which are presently controlled by traffic signals, were selected for analyses in consultation with LADOT staff in order to determine potential impacts related to the proposed Project:

- | | |
|-------------|--|
| Int. No. 1: | Coldwater Canyon Avenue/Moorpark Street, |
| Int. No. 2: | Whitsett Avenue/Riverside Drive, |
| Int. No. 3: | Whitsett Avenue/Moorpark Street, |
| Int. No. 4: | Whitsett Avenue/Ventura Boulevard, |
| Int. No. 5: | Laurel Canyon Boulevard/Moorpark Street. |

The general location of the Project in relation to the study locations and surrounding street system is presented in *Figure IV.M-1: Study Intersection Map*. The existing lane configurations at the five study intersections are displayed in *Figure IV.M-2: Existing Lane Configurations at Study Intersections*. The existing weekday A.M. and P.M. peak commuter period manual counts of turning vehicles at the study intersections are summarized in *Table IV.M-1: Existing Traffic Volumes*. The existing traffic volumes at the study intersections during the weekday A.M. and P.M. peak commuter hours are shown in *Figure IV.M-3: Existing Traffic Volumes – Weekday A.M. Peak Hour* and *Figure IV.M-4: Existing Traffic Volumes – Weekday P.M. Peak Hour*, respectively. Summary data worksheets of the manual traffic counts at the study intersections are contained in *Appendix I: Traffic Impact Study* of this Draft EIR.

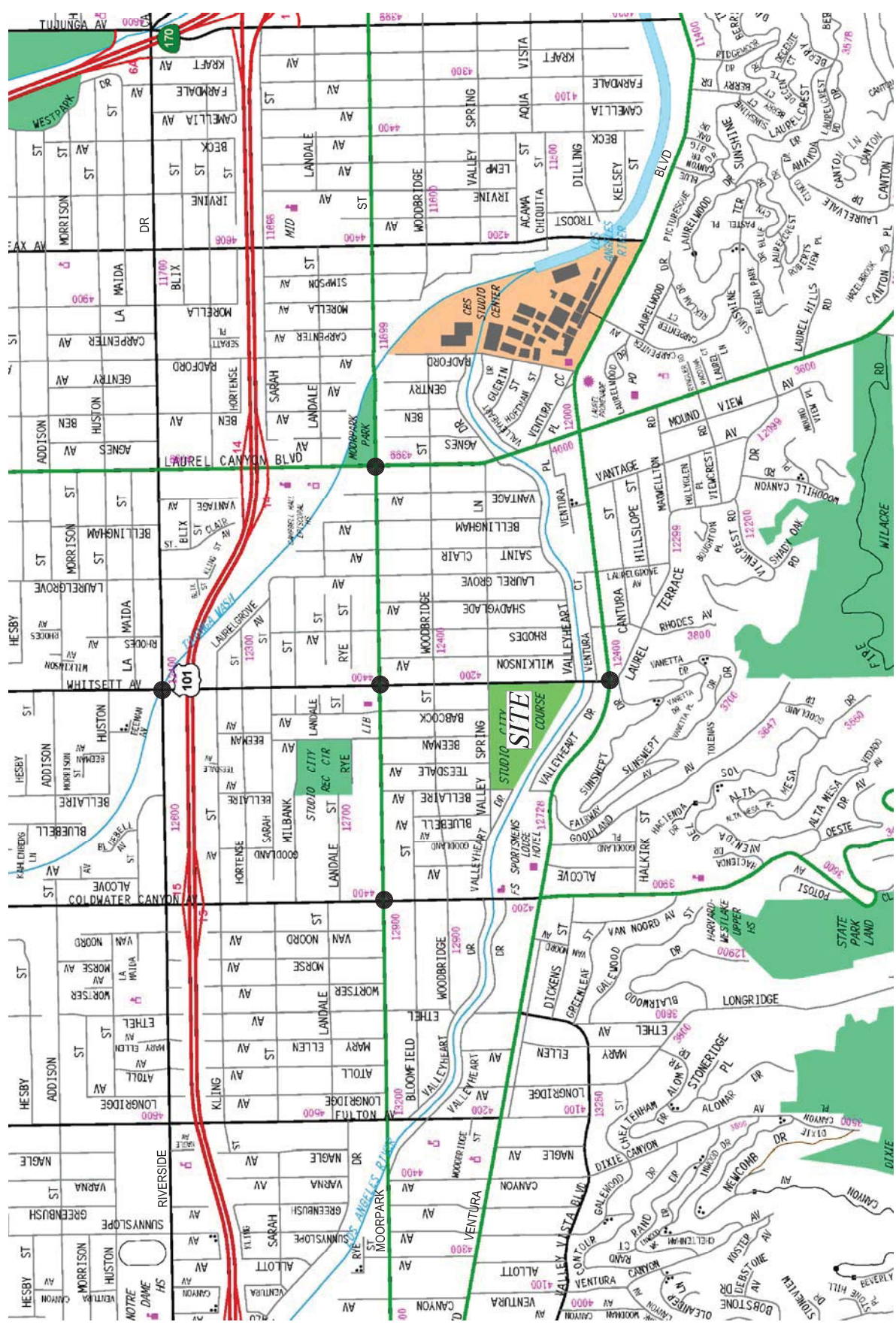
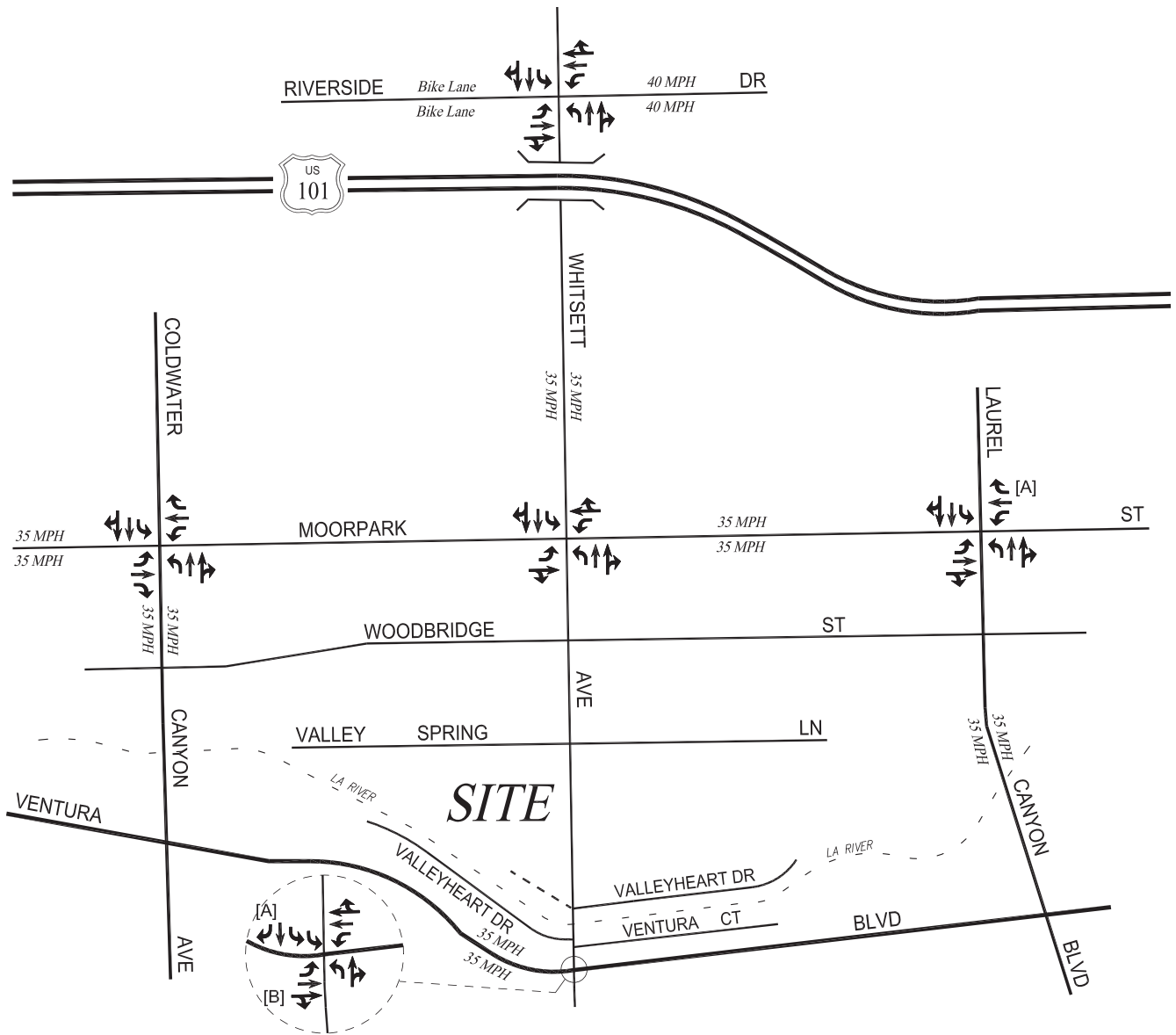


FIGURE IV.M-1
STUDY INTERSECTION MAP

● STUDY INTERSECTION
 SOURCE: RAND MCNALLY & COMPANY
 LINSKOTT, LAW & GREENSPAN, ENGINEERS



- NOTES:
- - - - PROPOSED DRIVEWAY
 - [A] OVERLAPPING PHASE
 - [B] NO RIGHT-TURN ON RED 7A-9A

FIGURE IV.M-2
EXISTING LANE CONFIGURATIONS AT STUDY INTERSECTIONS

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



TABLE IV.M-1
EXISTING TRAFFIC VOLUMES

NO.	INTERSECTION	DATE	DIR	AM PEAK HOUR		PM PEAK HOUR	
				BEGAN	VOLUME	BEGAN	VOLUME
1	Coldwater Canyon Avenue/Moorpark Street ¹	01/19/2012	NB	8:15	704	5:00	971
			SB		714		998
			EB		1,012		787
			WB		553		796
2	Whitsett Avenue/Riverside Drive ¹	01/19/2012	NB	7:45	520	3:15	868
			SB		1,385		582
			EB		1,333		1,150
			WB		987		1,185
3	Whitsett Avenue/Moorpark Street ²	11/17/2011	NB	8:00	377	4:00	912
			SB		1,179		547
			EB		988		679
			WB		556		740
4	Whitsett Avenue/Ventura Boulevard ²	11/17/2011	NB	8:00	165	5:00	294
			SB		1,320		566
			EB		1,158		1,363
			WB		900		1,435
5	Laurel Canyon Boulevard/Moorpark Street ¹	01/19/2012	NB	7:00	1,201	3:15	1,609
			SB		1,462		1,643
			EB		1,058		766
			WB		642		741

¹ Counts conducted by City Traffic Counters.

² Counts conducted by The Traffic Solution. NOTE: Year 2011 manual traffic counts were adjusted by a 2.0 percent (2.0%) ambient growth factor to reflect existing conditions.

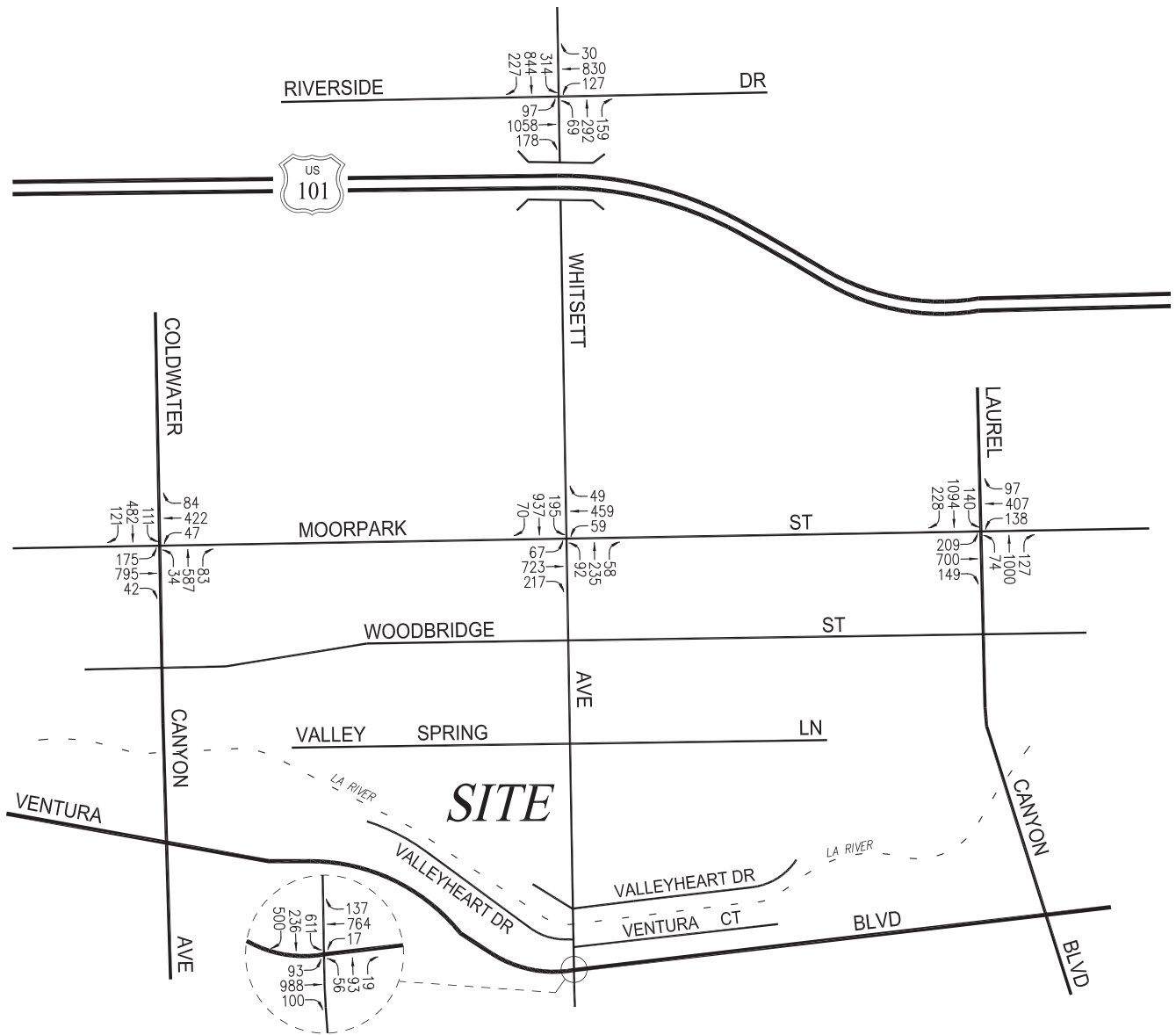


FIGURE IV.M-3
EXISTING TRAFFIC VOLUMES – WEEKDAY A.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



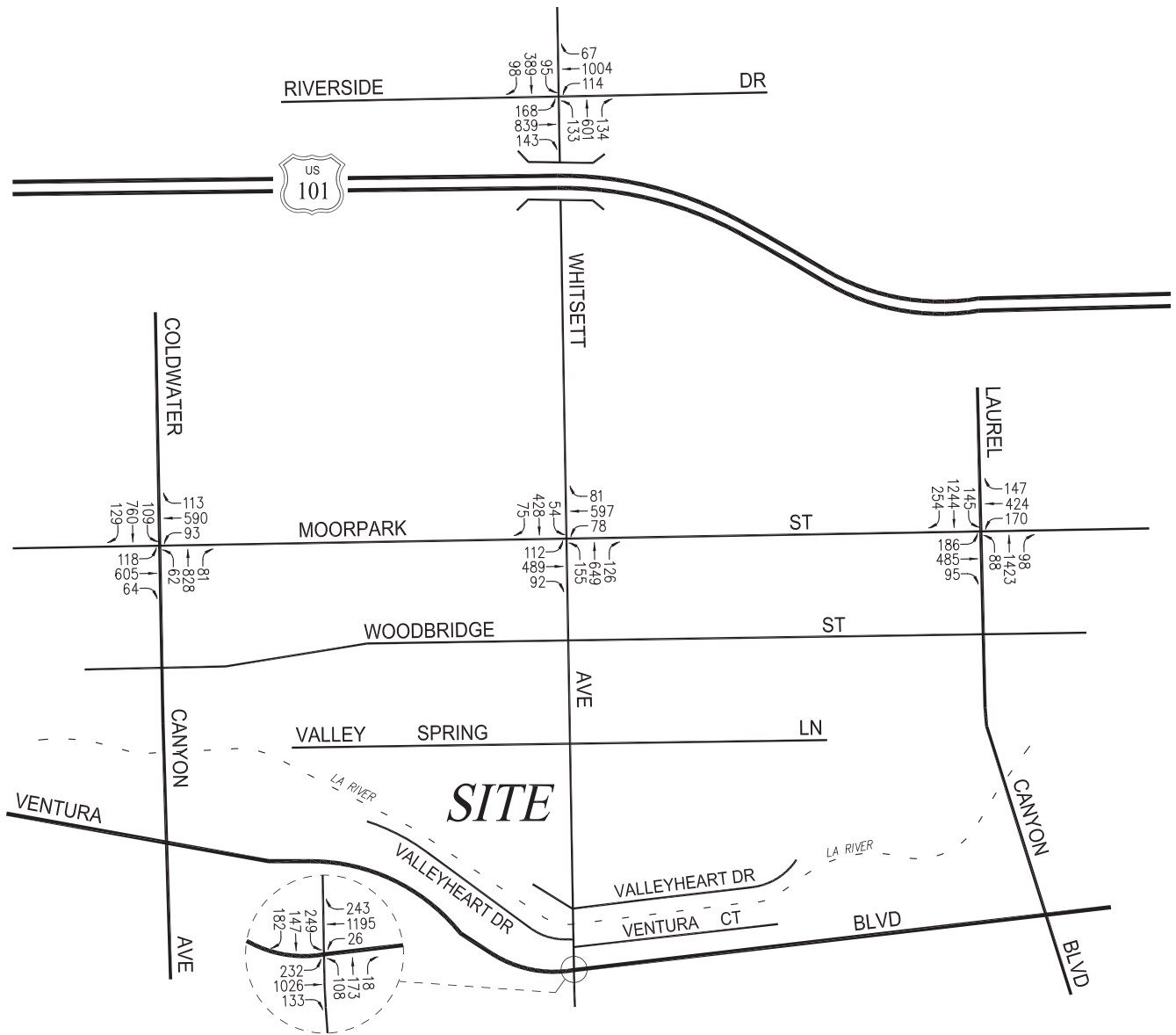


FIGURE IV.M-4
EXISTING TRAFFIC VOLUMES – WEEKDAY P.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



(4) Parking

A total of 92 parking spaces are currently provided within the surface parking lot on the Project Site. These parking spaces are unassigned and shared by all uses on the Project Site, including the golf course, driving range, tennis courts, putting green, and clubhouse.

(5) Public Transit

Public bus transit service within the Project study area is currently provided by Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT. A summary of existing transit service, including transit routes, destinations, and peak hour headways is presented in *Table IV.M-2: Existing Public Transit Routes* and illustrated in *Figure IV.M-5: Existing Public Transit Routes*. The location of the Project Site facilitates pedestrian activity, bicycle usage, and use of public transit services, particularly due to the proximity of nearby commercial corridors.

**TABLE IV.M-2
 EXISTING PUBLIC TRANSIT ROUTES¹**

ROUTE	DESTINATIONS	ROADWAY(S) NEAR SITE	NO. OF BUSES/TRAINS DURING PEAK HOUR		
			DIR	AM	PM
Metro Route 150/240	Universal City to Canoga Park	Ventura Blvd, Whitsett Ave, Laurel Canyon Blvd, Coldwater Canyon Ave	EB	4	6
			WB	5	5
Metro Route 155	Sherman Oaks to Burbank	Riverside Dr, Whitsett Ave, Laurel Canyon Blvd, Coldwater Canyon Ave	EB	2	2
			WB	2	2
Metro Route 167	Chatsworth to Studio City	Moorpark St, Whitsett Ave, Ventura Blvd	NB	2	2
			SB	2	2
Metro Route 218	Cedars-Sinai Medical Center to Studio City	Laurel Canyon Blvd, Ventura Blvd	NB	2	2
			SB	2	2
Metro Route 230	Sylmar to Studio City	Laurel Canyon Blvd, Ventura Blvd, Moorpark St, Riverside Dr	NB	3	3
			SB	3	3
Metro Rapid 750	Universal City Station to Warner Center Transit Hub	Ventura Blvd, Coldwater Canyon Ave	EB	5	5
			WB	10	5
Dash Van Nuys/Studio City (LDVAN)	Van Nuys to Studio City	Moorpark St, Whitsett Ave, Ventura Blvd, Coldwater Canyon Ave, Laurel Canyon Blvd, Riverside Dr	NB	2	2
			SB	2	1
			Total	46	42

¹ Sources: Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT) websites, 2012.

b. Regulatory and Policy Setting

(1) General Plan Transportation Element and Community Plan

The City of Los Angeles General Plan Transportation Element provides overall goals, objectives, and policies for the City, with emphasis on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, reduction of vehicle trips, and focus on growth in proximity to public transit. The primary general goals of the Transportation Element include providing adequate accessibility and mobility for residents, workers, and travelers in the City of Los Angeles; maintaining the street system in good to excellent condition; and providing an integrated system of pedestrian-oriented street segments, bikeways, and scenic highways. All private projects within the City of Los Angeles fall under the guidance of these general goals and shall not be in direct conflict with, or hinder the achievement of, any goals, policies, or programs set forth in the Transportation Element.

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”) was updated and adopted on May 13, 1998 to guide development specifically within the Project area and the surrounding community. The Community Plan includes goals, objectives, and policies pertaining to transportation issues, which focus predominantly on public transit, alternative transportation modes, transportation systems and congestion management, and parking.

Parts of the Community Plan’s transportation programs are derived from the Transportation Improvement and Mitigation Program (“TIMP”), which provides specific measures that are recommended to be undertaken during the life of the Community Plan. The TIMP recommends specific measures for roadway improvements, roadway redesignation, bus service improvements, metrolink service improvements, the creation of a community transit center, paratransit or shuttle bus service, transportation system management improvements such as the Automated Traffic Surveillance and Control (“ATSAC”) system, peak hour parking restrictions, the creation of neighborhood traffic control plans, and a transportation demand management (“TDM”) program which includes creating bikeways, forming transportation management associations, and a trip reduction ordinance.

With regard to the TDM, it is the City's objective that the traffic LOS on the street system in the community not exceed LOS E. TDM is a program designed to encourage people to change their mode of travel from single occupancy automotive vehicles to more efficient transportation modes. People are given incentives to utilize TDM measures such as public transit, ridesharing, modified work schedules, van pools, telecommuting, and non-motorized transportation modes such as the bicycle. The City actively enforces TDM requirements through a City-wide TDM Ordinance, participation in regional transportation management programs, and formation of localized transportation management associations.

(2) Regional Transportation System

The Congestion Management Program (the “CMP”) is a State-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990 to address the impact of local growth on the regional transportation system. On October 28, 2010, Metro adopted the 2010 CMP for Los Angeles County. The 2010 CMP includes Traffic Impact

Analysis (“TIA”) guidelines, which require that intersection and/or freeway monitoring locations be examined if a proposed project will add 50 or 150 more trips, respectively, during the A.M. or P.M. weekday peak periods.

The following CMP intersection monitoring locations in the Project area have been identified and will be discussed later in this chapter under the subheading *Congestion Management Program Traffic Impact Assessment*:

<u>CMP Station</u>	<u>Intersection</u>
No. 74	Ventura Boulevard/Laurel Canyon Boulevard
No. 76	Ventura Boulevard/Sepulveda Boulevard
No. 78	Ventura Boulevard/Woodman Avenue

The following CMP freeway monitoring locations in the Project area have been identified and will be discussed later in this chapter under the subheading *Congestion Management Program Traffic Impact Assessment*:

<u>CMP Station</u>	<u>Freeway</u>
No. 1038	101 Freeway at Coldwater Canyon Avenue
No. 1057	170 Freeway south of Sherman Way

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) Construction Analysis

To estimate the construction traffic impacts of the Studio City Senior Living Center Project, certain construction assumptions must be made, which are detailed in the construction analysis to follow. After assumptions are made, construction traffic trip generations are calculated for daily construction trips associated with worker vehicles, haul trucks, and miscellaneous trucks used during the construction process. A standard percentage of the daily construction trips generated are then assumed to be traveling during the weekday A.M. peak hour and P.M. peak hour. For miscellaneous construction trucks, a Passenger Car Equivalency (“PCE”) has been determined and has been applied to the truck trips to estimate the number of passenger vehicle trips that would be associated with these trucks. The final estimated weekday A.M. and P.M. peak hour trips are expressed in PCE vehicle trips.

(2) Intersection Analysis

To estimate the traffic impacts of the Project, a multi-step process was utilized. First, trip generation estimates are used to calculate the total arriving and departing traffic volumes on a peak hour (i.e., A.M. and P.M.) and daily basis. The traffic generation potential is forecast by applying the appropriate vehicle trip generation equations or rates to the Project development tabulation (i.e., 200 condominium units, 9-hole golf course, golf driving range).

Second, trip distribution identifies the origins and destinations of inbound and outbound Project traffic volumes. These origins and destinations are typically based on demographics and existing/anticipated travel patterns in the study area.

Third, traffic assignment involves the allocation of Project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway links and intersection turning movements throughout the study area.

With the forecasting process complete and project traffic assignments developed, the impact of the Project is isolated by comparing operational (i.e., LOS) conditions at the selected key intersections using expected future traffic volumes with and without the forecasted Project traffic. The need for site-specific and/or cumulative local area traffic improvements can then be evaluated and the significance of the Project's impacts identified.

As previously explained, the five study intersections were evaluated using the CMA method of analysis. The relative impact of the added traffic volumes to be generated by the Project during the A.M. and P.M. peak hours was evaluated based on analysis of future operating conditions at the five study intersections, with and without the forecasted Project traffic. The previously discussed capacity analysis procedures were utilized to evaluate the future V/C relationships and LOS characteristics at each study intersection.

Traffic impacts at the study intersections were analyzed for the following conditions:

- [a] Existing conditions.
- [b] Condition [a] with completion and occupancy of the Project ("Existing with Project").
- [c] Condition [b] with implementation of project mitigation measures where necessary and if required ("Existing with Project and Mitigation Conditions").
- [d] Condition [a] plus two percent (2%) annual ambient traffic growth through year 2016 and with completion and occupancy of the Related Projects ("Future Cumulative Pre-Project Conditions").
- [e] Condition [d] with completion and occupancy of the Project ("Future Cumulative with Project Conditions").
- [f] Condition [e] with implementation of Project mitigation measures where necessary and if required ("Future Cumulative with Project and Mitigation Conditions")

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the five study intersections. Thus, for instance, the Future Cumulative with Project Conditions analyze the cumulative impact of the proposed Project, taking into consideration impacts from all Related Projects in the area, and provide a

conservative and comprehensive analysis of the future conditions in the study area after anticipated full occupancy of the proposed Project in year 2016.

The traffic analysis follows the City of Los Angeles Department of Transportation's *Traffic Study Policies and Procedures*¹ and is consistent with the TIA guidelines set forth in the CMP for Los Angeles County.²

The forecast of future and cumulative conditions was prepared in accordance with procedures outlined in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines offer two options for developing the future and cumulative traffic volume forecast and providing an adequate discussion of the impacts:

“(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or

(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.”

Accordingly, the traffic analysis provides a highly conservative estimate of future and cumulative traffic volumes as it incorporates both the “A” and “B” options outlined in the CEQA Guidelines for purposes of developing the forecast and determining the impacts.

It should also be noted that ATSAC and Adaptive Traffic Control System (ATCS) system upgrades for all five study intersections have been implemented as part of the LADOT Victory ATSAC/ATCS system (System No. 6). The ATSAC and ATCS provide computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short term traffic timing changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. The ATCS further provides real time control of traffic signals and includes additional loop detectors, closed-circuit television, an upgrade in the communications links, and a new generation of traffic control software. LADOT estimates that the ATSAC system reduces the critical V/C ratios by seven percent (0.7). The ATCS system upgrade further reduces the critical V/C ratios by three percent (0.3) for a total of 10 percent (0.10). Accordingly, the Level of Service (LOS) calculations for all the following analysis scenarios reflect a 0.10 adjustment.

¹ City of Los Angeles Department of Transportation, *Traffic Study Policies and Procedures*, <http://www.ladot.lacity.org/pdf/pdf223.pdf> (August 2011).

² Los Angeles County Metropolitan Transportation Authority, *2010 Congestion Management Program for Los Angeles County*, http://www.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf (October 2010).

b. Thresholds of Significance

In accordance with Los Angeles CEQA Thresholds Guide (as adopted 2006), the Project would have significant impact on transportation and circulation if it would cause any of the following conditions to occur:

(1) Construction Thresholds

The determination of significance shall be made on a case-by-case basis, considering the following factors:

Temporary Traffic Impacts:

- Length of time of temporary street closures or closures of two or more traffic lanes;
- Classification of the street affected;
- Existing traffic levels and LOS on the affected streets and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other State highway;
- Potential safety issues involved with street or lane closures; and
- Presence of emergency services located nearby that regularly use the affected street.

Temporary Loss of Access:

- Length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- Availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and
- Type of land uses affected, and related safety, convenience, and/or economic issues.

Temporary Loss of Bus Stops

- Length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- Availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;
- Existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

Temporary Loss of On-Street Parking

- Current utilization of existing on-street parking;
- Availability of alternative parking locations or public transit options within ¼ mile of the project site; and
- Length of time that existing parking spaces would be unavailable.

(2) Intersection Traffic Thresholds

The significance of the potential impacts of Project generated traffic at each study intersection was identified using the traffic impact criteria set forth in LADOT’s *Traffic Study Policies and Procedures*, (August 2011). According to the City’s published traffic study guidelines, a significant transportation impact is determined based on the Sliding Scale criteria presented in *Table IV.M-3: City of Los Angeles Intersection Impact Threshold Criteria*.

**TABLE IV.M-3
 CITY OF LOS ANGELES INTERSECTION IMPACT THRESHOLD CRITERIA**

FINAL V/C	LEVEL OF SERVICE (LOS)	PROJECT RELATED INCREASE IN V/C
> 0.700 - 0.800	C	equal to or greater than 0.040
> 0.800 - 0.900	D	equal to or greater than 0.020
> 0.900	E or F	equal to or greater than 0.010

The City’s Sliding Scale Method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection Volume-to-Capacity (V/C) ratio by an amount equal to or greater than the values shown above.

(3) Access Thresholds

The Project would have a significant Project access impact if any of the studied intersections would be projected to deteriorate to LOS E or F during the A.M. or P.M. peak hour, under Future Cumulative with Project Conditions in comparison to Future Cumulative Pre-Project Conditions (as defined under Methodology herein).

(4) Parking Thresholds

The Project would have a significant impact on parking if the Project would provide less parking than required by the Los Angeles Municipal Code, or as otherwise required through conditional approval of the entitlements.

(5) Transit System Thresholds

The determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the proposed Project and available transit capacity.

c. Project Impacts

(1) Construction Activity³

(a) Construction Assumptions

Certain assumptions must be made about the demolition/construction process in order to determine the estimated traffic impacts caused by construction activities for the proposed Project. It is assumed that demolition and grading/excavation would occur on the Development Site (the area anticipated to be physically disturbed within the Project Site) during the first year of construction, in which it is estimated that approximately 82,000 cubic yards of dirt from the Development Site would be removed. It is also assumed that after the completion of the demolition and grading phase of construction, the final grading and structure construction phase would begin and would extend over a two-year period. It is also assumed that the equipment staging area during the initial phases of grading, as well as after the start of construction, would occur on and adjacent to the Development Site. Construction worker parking would occur within the Project Site, as well as on Valleyheart Drive North adjacent to the Development Site. Construction hours would be restricted from 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

(b) Construction Traffic Generation

Demolition, Construction Grading, and Material Export

It is assumed that heavy construction equipment would be located onsite during grading activities and would not travel to and from the Development Site on a daily basis. However, truck trips would be generated during the grading and export period, so as to remove material (from grading and demolition) from the Development Site. Trucks are expected to carry the export material to a receptor site located within 20 miles of the Development Site. The Project Applicant anticipates that 18-wheel bottom-dumping trucks and trailers (assuming a capacity of 20 cubic yards of material per truck) would be used during the export period between the hours of 7:00 A.M. and 4:00 P.M., Monday through Saturday. These estimated restriction hours for hauling activities are to be confirmed with the City of Los Angeles Department of Building and Safety. The export period is assumed to require approximately 20 workdays per month for approximately four months. During the peak grading and export activities, up to 102 truck trips per day (i.e., 51 inbound trips and 51 outbound trips) are anticipated. Of the 102 daily truck trips, it is estimated that approximately ten truck trips (five inbound trips and five outbound trips) would occur during each of the weekday A.M. peak hour and P.M. peak hour.

Final Grading and Structure Construction

Activities related to the final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and material export period. Thus, the greatest

³ All construction activity analysis and data was generated by Linscott Law & Greenspan Engineers, *Studio City Senior Housing Project Construction Traffic*, email to Planning Associates Inc., 22 February 2012 included as *Appendix N: Construction Traffic Analysis* of this Draft EIR.

potential for impact on the adjacent street system would occur during the final grading/structure construction period.

During the final grading and structure construction period, it is assumed that a trip generation rate of 0.32 worker vehicle trips per 1,000 square feet of building development per day is used. Construction workers are expected to typically arrive at the project site before 7:00 A.M. and most will depart before 3:00 P.M. Thus, these construction work trips generally would occur outside of the peak hour of traffic on the local street system. For example, as shown in the Project traffic impact study, the peak hour of traffic at the study intersections adjacent to the Project Site typically begins between 7:45 and 8:00 A.M. during the morning commute period, and between 3:15 and 5:00 P.M. during the afternoon commute period. It is also anticipated that construction workers would remain onsite throughout the day.

It is estimated that approximately 108 vehicle trips per day (i.e., 54 trips inbound and 54 trips outbound) would be generated by the construction workers during the peak construction phases at the Development Site. Of the peak daily trip generation of 108 daily trips, it is estimated that approximately 11 construction worker vehicle trips (i.e., ten percent of the daily construction worker inbound or outbound trips) would occur during each of the weekday A.M. peak hour and P.M. peak hour.

In addition to construction worker vehicles, additional trips may be generated by miscellaneous trucks traveling to and from the Development Site. These trucks may consist of larger vehicles delivering equipment and/or construction materials to the Development Site, or smaller pick-up trucks or four-wheel drive vehicles used by construction supervisors and/or City inspectors. During peak construction phases, it is estimated that approximately 50 trips per day (i.e., 25 trips inbound and 25 trips outbound) would be made by miscellaneous trucks. To conservatively estimate the equivalent number of vehicles associated with the trucks, a passenger car equivalency factor of 2.0 was utilized based on standard traffic engineering practice. Therefore, conservatively assuming 50 daily truck trips, it is estimated that the trucks would generate approximately 100 passenger car equivalent (PCE) vehicle trips (i.e., 50 trips inbound and 50 trips outbound) on a daily basis. It is estimated that of those 100 PCE vehicle trips, approximately 10 PCE vehicle trips (five inbound trips and five outbound trips) would occur during each of the weekday A.M. and P.M. peak hours, assuming ten percent of the daily truck trips occur during the peak hours.

Summed together, the construction worker vehicles and miscellaneous trucks are forecast to generate approximately 208 PCE vehicle trips per day (i.e., 104 inbound and 104 outbound) during peak final construction and structure construction phases at the site. During the weekday A.M. peak hour and P.M. peak hour, it is estimated that approximately 21 PCE vehicle trips would be generated during each of these peak hours. By comparison, it is noted in the Project traffic impact study that the removal of the existing tennis courts on the Project Site is forecast to result in a reduction of 27 A.M. peak hour trips and 62 P.M. peak hour trips.

(c) Future Project Construction Impact

Based on the relatively low number of generated construction related trips, traffic impacts due to construction activities are forecast to be less-than-significant at the five study intersections during the weekday A.M. and P.M. peak hours.

(d) *Construction Management and Haul Route Approval*

Approvals required by the City of Los Angeles for implementation of the proposed Project include a Truck Haul Route program approved by LADOT. According to Section 91.7006.7.4 of the Los Angeles Building Code, truck haul routes would only require a public hearing before the Board of Building and Safety Commissioners (BBSC) for any import or export of more than 1,000 cubic yards of earth material in a grading hillside area. Although import and export for the proposed Project would exceed the 1,000 cubic yards of earth material, the location of the Project Site is not within a grading hillside area; therefore, the proposed Project would not require a public hearing before the BBSC.

With regard to other construction traffic-related issues, construction equipment would be stored within the perimeter fence of the construction site. With the required haul route approval and other construction management practices described above, construction activity is considered to be less-than-significant.

(2) *Long-Term Operation*

(a) *Roadways and Intersections*

Project Traffic Generation

The trip generation rates and forecast of the vehicular trips to be generated by the proposed Project (including the existing golf course and driving range to remain onsite with minor modifications) are presented in *Table IV.M-4: Project Traffic Generation*. The Project trip generation forecast was submitted for review and approval by LADOT staff.

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Generation equations and/or rates used in the traffic forecasting procedure are found in the Eighth Edition of *Trip Generation*, published by the Institute of Transportation Engineers (ITE) [Washington D.C., 2008]. Traffic volume expectations to be generated by the Project were based upon rates per number of dwelling units in the SCSLC, number of tees in the driving range, and number of holes in the golf course. ITE Land Use Codes 230 (Residential Condominium/Townhouse), 432 (Golf Driving Range), 430 (Golf Course) trip generation average rates were used to forecast the traffic volumes expected to be generated by the Project, inclusive of golf course and driving range facilities. ITE Land Use Code 490 (Tennis Courts) was used to determine the number of trips being eliminated at the site due to demolition of the 16 existing tennis courts. It should be noted that ITE Land Use Code 230 (Residential Condominium/Townhouse) was utilized to represent a worst-case scenario for the Project in lieu of a lower generation rate that may be more accurate for senior housing. It should also be noted that the driving range will be slightly modified and will lose three golf tees to accommodate the Project, which has been reflected in *Table IV.M-4*.

TABLE IV.M-4
PROJECT TRAFFIC GENERATION¹

LAND USE	SIZE	DAILY TRIP ENDS VOLUME ²	AM PEAK HOUR VOLUMES ²			PM PEAK HOUR VOLUMES ²		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project								
Senior Housing ³	200 DU	1,162	15	73	88	70	34	104
Golf Driving Range ⁴	21 Tees	287	5	3	8	12	14	26
Golf Course ⁵	9 Holes	322	16	4	20	11	14	25
Subtotal Proposed Project		1,771	36	80	116	93	62	155
Existing Site Uses								
Golf Driving Range ⁴	(24) Tees	(328)	(6)	(4)	(10)	(14)	(16)	(30)
Golf Course ⁵	(9) Holes	(322)	(16)	(4)	(20)	(11)	(14)	(25)
Tennis Courts ⁶	(16) Courts	(497)	(14)	(13)	(27)	(31)	(31)	(62)
Subtotal Existing Site Uses		(1,147)	(36)	(21)	(57)	(56)	(61)	(117)
Total Net Increase		624	0	59	59	37	1	38
¹ Source: Institute of Transportation Engineers ("ITE"), <i>Trip Generation, 8th Edition</i> , 2008. ² Trips are one-way traffic movements, entering or leaving. ³ ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates. -Daily Trip Rate: 5.81 trips/Dwelling Units (DU); 50% inbound/50% outbound. -AM Peak Hour Trip Rate: 0.44 trips/ DU; 17% inbound/83% outbound -PM Peak Hour Trip Rate: 0.52 trips/DU; 67% inbound/33% outbound -It should be noted that in compliance with the RIO Guidelines, approximately two percent of the residential (i.e., excluding the overflow golf parking) parking spaces in the parking structure may be allocated for use by a third party shared car (or equivalent) program. However, for worst case purposes, the reduction in traffic anticipated from this shared car program is not included in the traffic generation estimates provided for the Senior Housing. ⁴ ITE Land Use Code 432 (Golf Driving Range) trip generation average rates. -Daily Trip Rate: 13.65 trips/Tee; 50% inbound/50% outbound. -AM Peak Hour Trip Rate: 0.40 trips/ Tee; 61% inbound/39% outbound -PM Peak Hour Trip Rate: 1.25 trips/Tee; 45% inbound/55% outbound ⁵ ITE Land Use Code 430 (Golf Course) trip generation average rates. -Daily Trip Rate: 35.74 trips/Hole; 50% inbound/50% outbound -AM Peak Hour Trip Rate: 2.23 trips/Hole; 79% inbound/21% outbound -PM Peak Hour Trip Rate: 2.78 trips/Hole; 45% inbound/55% outbound ⁶ ITE Land Use Code 490 (Tennis Courts) trip generation average rates. -Daily Trip Rate: 31.04 trips/Court; 50% inbound/50% outbound. -AM Peak Hour Trip Rate: 1.67 trips/Court; 50% inbound/50% outbound -PM Peak Hour Trip Rate: 3.88 trips/Court; 50% inbound/50% outbound								

As presented in *Table IV.M-4: Project Traffic Generation*, the Project is expected to generate 59 net new vehicle trips (0 inbound trips and 59 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Project is expected to generate 38 net new vehicle trips (37 inbound trips and 1 outbound trips). Over a 24-hour period, the Project is forecast to generate 624 net new daily trip ends during a typical weekday (approximately 312 inbound trips and 312 outbound trips).

Project Traffic Distribution and Assignment Analysis

Project traffic was assigned to the local roadway system based on a traffic distribution pattern developed in consultation with LADOT staff. The traffic distribution pattern reflects the

proposed Project land use, the proposed Project Site access scheme, existing traffic movements, characteristics of the surrounding roadway system, proximity to downtown Los Angeles, and nearby employment and residential areas. Project traffic volumes both entering and exiting the site have been distributed and assigned to the adjacent street system based on the following considerations:

- The site's proximity to major traffic corridors (i.e., U.S. 101 Freeway, Coldwater Canyon Avenue, Whitsett Avenue, Laurel Canyon Boulevard, Moorpark Street, and Ventura Boulevard);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress availability at the Project Site;
- The location of existing and proposed parking areas;
- Assuming the driving range land use component will be served by the planned Whitsett Avenue driveways (i.e., the existing site distribution pattern); and
- Input from LADOT staff.

The general, directional traffic distribution patterns for the proposed Project are presented in *Figure IV.M-6: Project Trip Distribution*. The forecast A.M. and P.M. peak hour traffic volumes associated with the Project are presented in *Figure IV.M-7: A.M. Peak Hour Project Traffic Volumes* and *Figure IV.M-8: P.M. Peak Hour Project Traffic Volumes*, respectively. The traffic volume assignments presented in *Figure IV.M-7* and *Figure IV.M-8* reflect the traffic distribution characteristics shown in *Figure IV.M-6* and the Project traffic generation forecast presented in *Table IV.M-4: Project Traffic Generation*.

Summary of Traffic Analysis

A determination of significance and a summary of the forecast V/C ratios and LOS values for the study intersections during the A.M. and P.M. peak hours using the CMA methodology and application of the City of Los Angeles significant traffic impact criteria are shown in *Table IV.M-5: Summary of Volume-To-Capacity Ratios and Levels of Service*. To follow are the analyses of the information in *Table IV.M-5*, which describe the traffic impacts under certain conditions, as explained in Section 3.a(2) above, including Existing Conditions, Existing with Project Conditions, Future Cumulative Pre-Project Conditions, and Future Cumulative with Project Conditions.

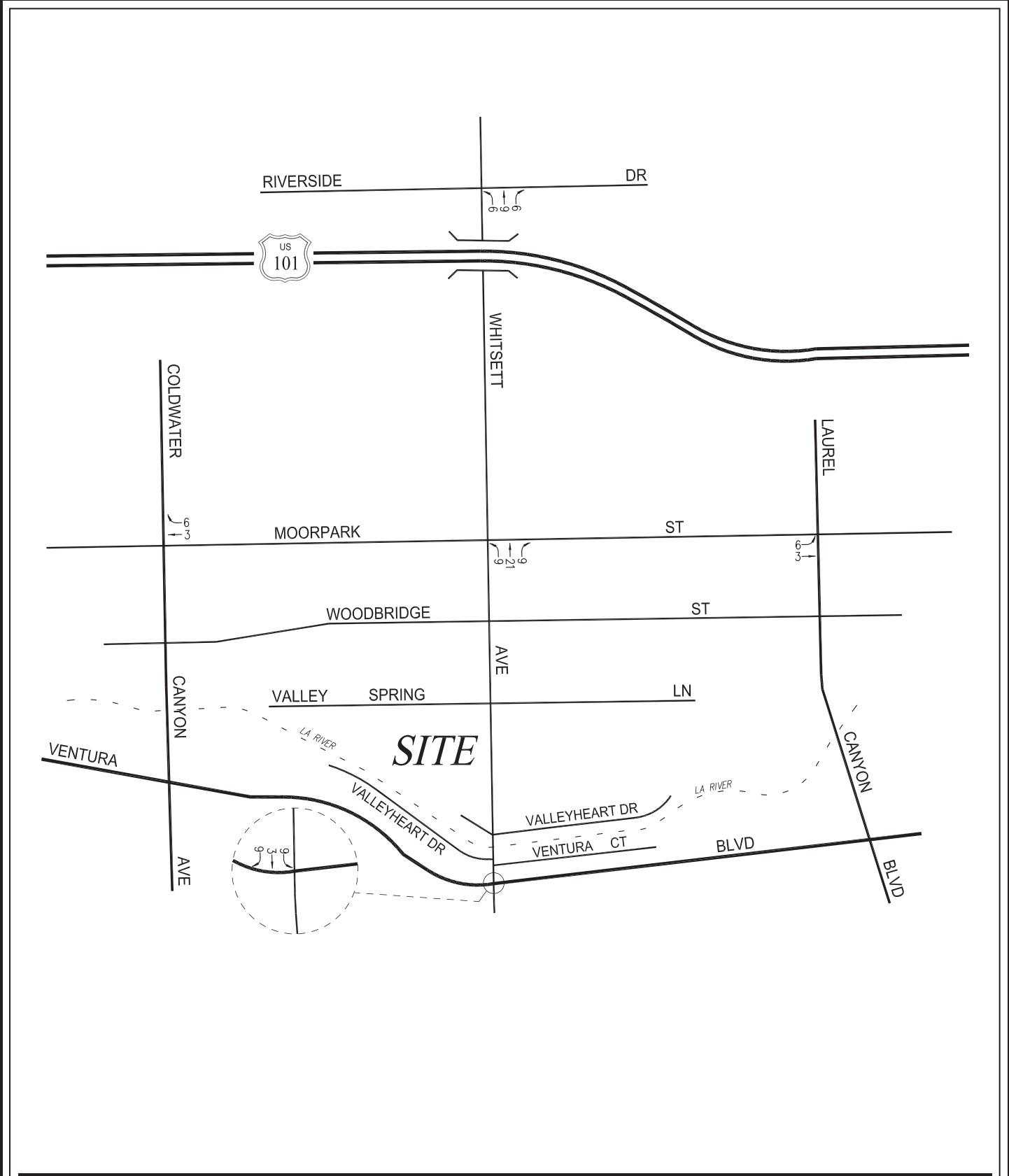


FIGURE IV.M-7
A.M. PEAK HOUR PROJECT TRAFFIC VOLUMES

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS





FIGURE IV.M-8
P.M. PEAK HOUR PROJECT TRAFFIC VOLUMES

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



**TABLE IV.M-5
 SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVELS OF SERVICE**

NO.	INTERSECTION	PEAK HOUR	[1] YEAR 2012 EXISTING		[2]				[3]		[4]			
			V/C	LOS	YEAR 2012 EXISTING W/ PROJECT		CHANGE V/C [(2) - (1)]	SIGNIF. IMPACT	YEAR 2016 FUTURE CUMULATIVE PRE-PROJECT		YEAR 2016 FUTURE CUMULATIVE W/ PROJECT		CHANGE V/C ([4] - [3])	SIGNIF. IMPACT
					V/C	LOS			V/C	LOS	V/C	LOS		
1	Coldwater Canyon Avenue/Moorpark Street	AM	0.759	C	0.759	C	0.000	NO	0.847	D	0.847	D	0.000	NO
		PM	0.748	C	0.750	C	0.002	NO	0.837	D	0.839	D	0.002	NO
2	Whitsett Avenue/ Riverside Drive	AM	0.800	C	0.804	D	0.004	NO	0.885	D	0.889	D	0.004	NO
		PM	0.678	B	0.678	B	0.000	NO	0.751	C	0.751	C	0.000	NO
3	Whitsett Avenue/ Moorpark Street	AM	0.963	E	0.969	E	0.006	NO	1.006	F	1.072	F	0.006	NO
		PM	0.721	C	0.721	C	0.000	NO	0.807	D	0.808	D	0.001	NO
4	Whitsett Avenue/ Ventura Boulevard	AM	0.645	B	0.651	B	0.006	NO	0.723	C	0.729	C	0.006	NO
		PM	0.830	D	0.838	D	0.008	NO	0.940	E	0.948	E	0.008	NO
5	Laurel Canyon Boulevard/Moorpark Street	AM	0.883	D	0.887	D	0.004	NO	1.020	F	1.024	F	0.004	NO
		PM	1.003	F	1.004	F	0.001	NO	1.131	F	1.133	F	0.002	NO

Existing Conditions

As indicated in column [1] of *Table IV.M-5: Summary of Volume To Capacity Ratios and Levels of Service*, three of the five study intersections are presently operating at LOS D or better during the A.M. and P.M. peak hours under existing conditions. The remaining study intersections are currently operating at LOS E or F during the peak hours as shown below under existing conditions (also see *Figure IV.M-3: Existing Traffic Volumes – Weekday A.M. Peak Hour* and *Figure IV.M-4: Existing Traffic Volumes - Weekday P.M. Peak Hour* in Section 2.a(2)(a)):

Int. No. 3: Whitsett Avenue/Moopark Street A.M. Peak Hour: $V/C = 0.963$, LOS E

Int. No. 5: Laurel Canyon Blvd/Moopark St P.M. Peak Hour: $V/C = 1.003$, LOS F

Existing With Project Conditions

As shown in column [2] of *Table IV.M-5: Summary of Volume To Capacity Ratios and Levels of Service*, application of the City's threshold criteria to the "Existing with Project" scenario indicates that the proposed Project is not expected to create significant impacts at any of the five study intersections. Incremental, but not significant, impacts are noted at the study intersections. Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections. The Existing with Project traffic volumes at the study intersections during the A.M. and P.M. peak hours are shown in *Figure IV.M-9: Existing with Project Traffic Volumes for A.M. Peak Hour* and *Figure IV.M-10: Existing with Project Traffic Volumes for P.M. Peak Hour*, respectively.

Future Cumulative Pre-Project Conditions

Related Projects: A forecast of on-street traffic conditions prior to occupancy of the proposed Project was prepared by incorporating the potential trips associated with other known development projects ("Related Projects") in the Project area. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. The list of Related Projects was based on information on file at the City of Los Angeles Departments of Transportation and City Planning. The list of Related Projects in the Project area is presented in *Table IV.M-6: List of Related Projects*. The location of the Related Projects is shown in *Figure IV.M-11: Location of Related Projects*. The estimated traffic generation of the Related Projects is presented in *Table IV.M-7: Related Projects Traffic Generation*. The list of Related Projects was submitted to LADOT staff for review and approval.

Traffic volumes expected to be generated by the Related Projects were calculated using rates provided in the Institute of Transportation Engineers' (ITE) *Trip Generation* manual⁴. The Related Projects' respective traffic generation for the weekday A.M. and P.M. peak hours, as well as on a daily basis for a typical weekday, is summarized in *Table IV.M-7*. The distribution of the Related Projects traffic volumes to the study intersections during the weekday A.M. and P.M. peak hours are shown on *Figure IV.M-12: Related Projects Traffic Volumes for A.M. Peak Hour* and *Figure IV.M-13: Related Projects Traffic Volumes for P.M. Peak Hour*, respectively.

⁴ Institute of Transportation Engineers *Trip Generation* manual, 8th Edition, Washington D.C., 2008.

Ambient Traffic Growth Factor: In order to account for unknown Related Projects not included in *Table IV.M-6*, the existing traffic volumes were increased at an annual rate of 2.0 percent (2.0%) per year to the year 2016 (i.e., the anticipated year of Project building-out). The ambient growth factor was based on general traffic growth factors provided in the *2010 Congestion Management Program for Los Angeles County* (the “CMP manual”) and determined in consultation with LADOT staff. It is noted that based on review of the general traffic growth factors provided in the CMP manual for the San Fernando Valley area, it is anticipated that the existing traffic volumes are expected to increase at an annual rate of less than 1.0% per year between the years 2010 and 2020. Thus, application of this annual growth factor allows for a conservative, worst case forecast of future traffic volumes in the area. Further, it is noted that the CMP manual’s traffic growth rate is intended to anticipate future traffic generated by development projects in the project vicinity.

The Future Cumulative Pre-Project Conditions were forecast based on the addition of traffic generated by the completion and occupancy of the Related Projects, as well as traffic from ambient growth, using the ambient traffic growth factor. The inclusion in this analysis of both a forecast of traffic generated by known Related Projects plus the use of an ambient growth traffic factor based on the CMP traffic model data results in a conservative estimate of future traffic volumes at the study intersections.

The V/C ratios at all of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the Related Projects. As presented in column [3] of *Table IV.M-5: Summary of Volume To Capacity Ratios and Levels of Service*, two of the five study intersections are expected to continue operating at LOS D or better during the weekday A.M. and P.M. peak hours under the Future Cumulative Pre-Project Conditions. The remaining study intersections are expected to operate at LOS E or F during the peak hours, as shown below:

Int. No. 3: Whitsett Avenue/Moopark Street	A.M. Peak Hour: V/C =1.066, LOS F
Int. No. 4: Whitsett Ave/Ventura Boulevard	P.M. Peak Hour: V/C=0.940, LOS E
Int. No. 5: Laurel Canyon Blvd/Moopark St	A.M. Peak Hour: V/C=1.020, LOS F P.M. Peak Hour: V/C =1.131, LOS F

The Future Cumulative Pre-Project (existing, ambient growth, and Related Projects) traffic volumes at the study intersections during the weekday A.M. and P.M. peak hours are also presented in *Figure IV.M-14: Future Cumulative Pre-Project Traffic Volumes in the A.M. Peak Hour* and *Figure IV.M-15: Future Cumulative Pre-Project Traffic Volumes in the P.M. Peak Hour*, respectively.

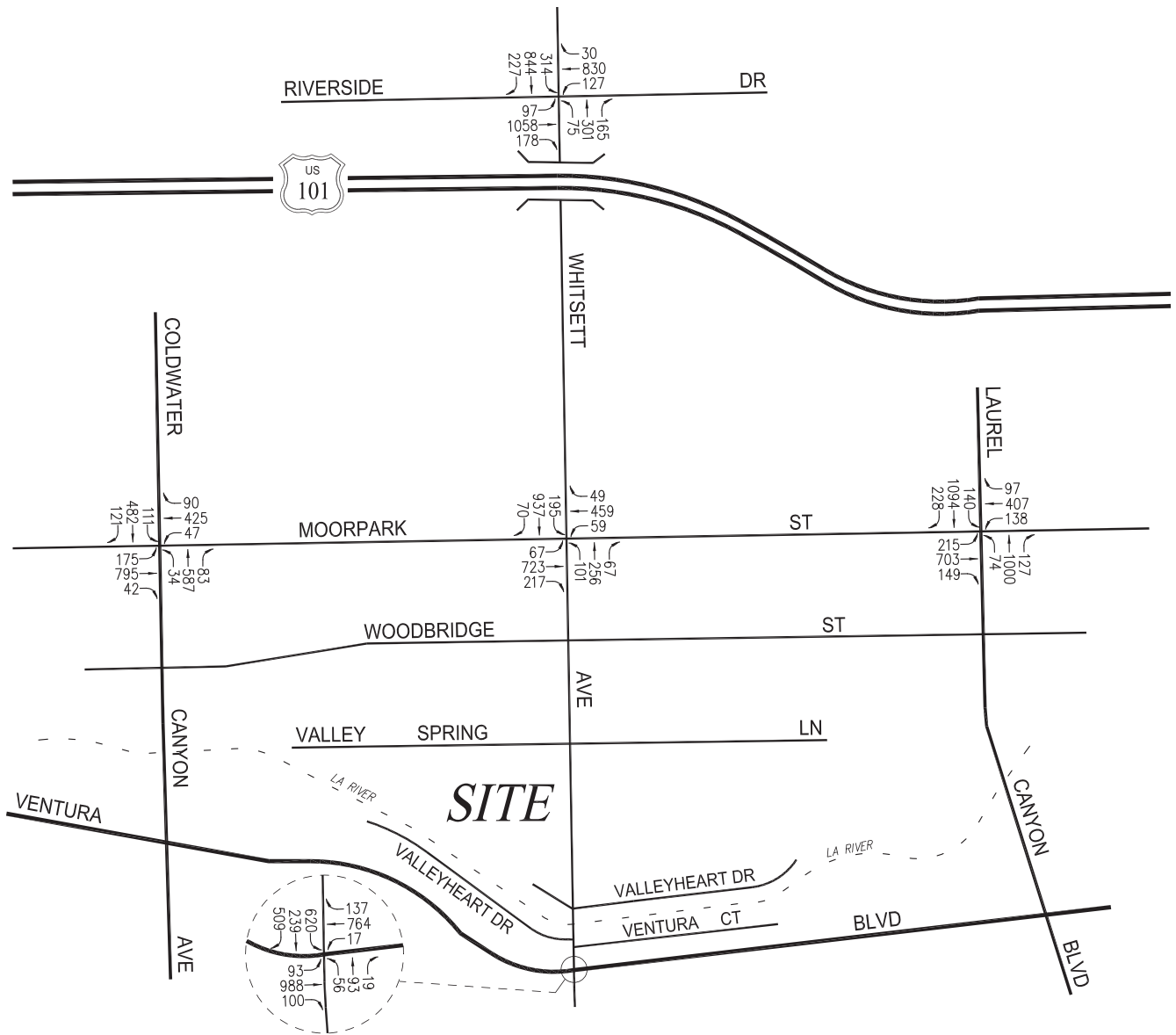


FIGURE IV.M-9

EXISTING WITH PROJECT TRAFFIC VOLUMES FOR A.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



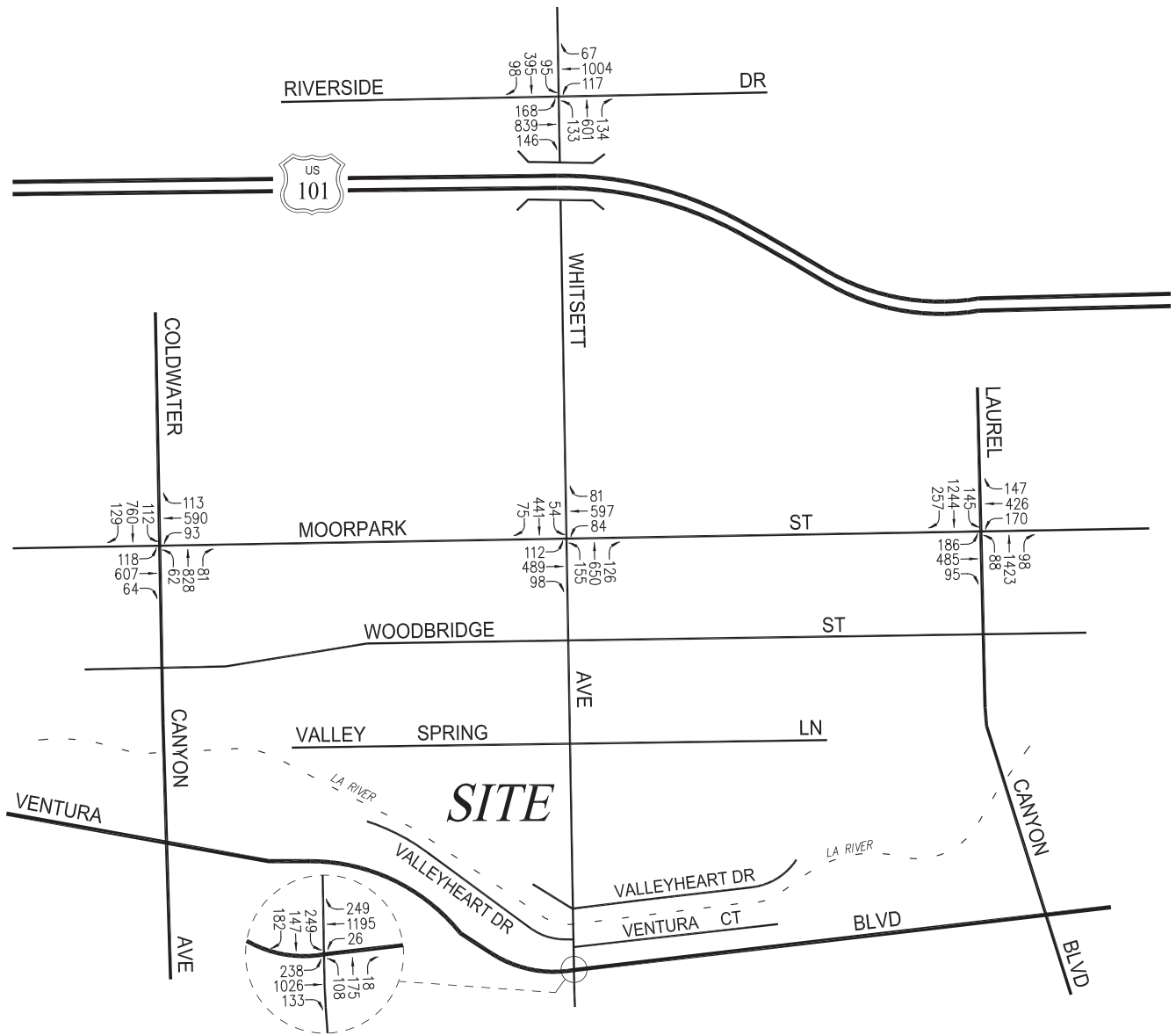


FIGURE IV.M-10

EXISTING WITH PROJECT TRAFFIC VOLUMES FOR P.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



TABLE IV.M-6
LIST OF RELATED PROJECTS¹

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME/NUMBER ADDRESS/LOCATION	LAND USE	SIZE ²	STATUS
LA1	VEN-2010-020	12548 Ventura Boulevard	Apartment Retail Existing Retail Other	62 DU 10,747 GLSF (3,000) GLSF 1,925 GSF	Proposed
LA2	VEN-2008-080	Credit Union 4061 Laurel Canyon Boulevard	Walk-In Bank	1,467 GSF	Proposed
LA3	SFV-2004-294	Campbell Hall School 4533 Laurel Canyon Boulevard	Private School (K-12) Existing Senior Housing Existing Apartment	400 Students (54) DU (22) DU	Under Construction
LA4	SFV-2006-130	Sherman Village 12629 Riverside Drive	Condominium TV program production	270 DU	Approved
LA5	VEN-2004-008	11617 Ventura Boulevard	Apartment Existing Office Coffee House Existing Retail Existing Car Service Existing Restaurant	391 DU (7,793) GSF 1,000 GSF (5,598) GSF (4,065) GSF (4,000) GSF	Inactive
LA6	SFV-2006-044	Meridian Evangelical School 13330 Riverside Drive	Private High School	383 Students	Approved
LA7	SFV-2011-025	11422 Moorpark Street	Restaurant	124 Seats	Proposed
LA8	VEN-2006-018	11331 Ventura Boulevard	Condominium Office	62 DU (21,694) GSF	Proposed
LA9	SFV-2007-032	Aqua Vista Condos 11163 Aqua Vista Street	Condominium	122 DU	Under Construction
LA10	VEN-2009-014	Ralph's Supermarket 14049 Ventura Boulevard	Supermarket Expansion	27,389 GSF	Approved

¹ Source: City of Los Angeles Department of Transportation Related Project List. It should be noted that this Table presents the same information as presented in *Table III-1: List of Related Projects* previously in this Draft EIR. It is reiterated here for discussion purposes.
² A number in parenthesis (i.e., "(3,000) GLSF" or "(54) DU") indicates removal of that use from the proposed project site.

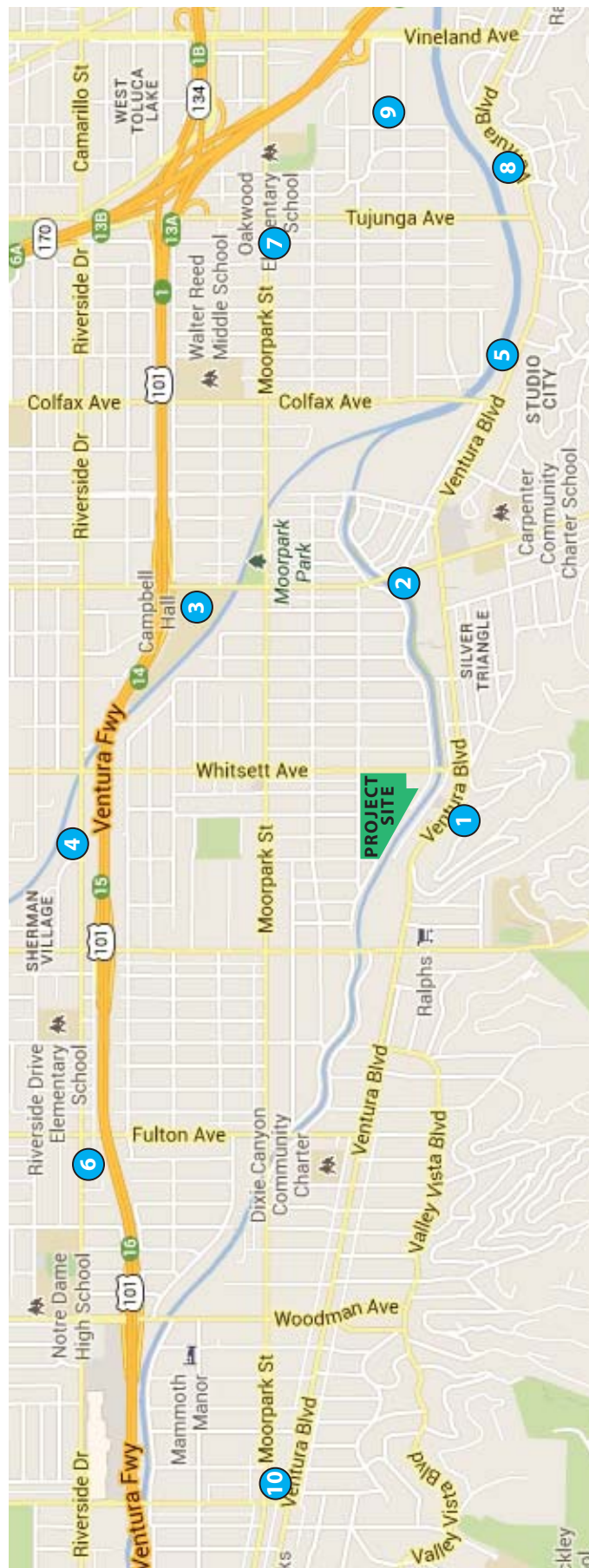


FIGURE IV.M-11
LOCATION OF RELATED PROJECTS

SOURCE: MAPS.GOOGLE.COM

TABLE IV.M-7
RELATED PROJECTS TRAFFIC GENERATION¹

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES ²	AM PEAK HOUR VOLUMES ²			PM PEAK HOUR VOLUMES ²		
				IN	OUT	TOTAL	IN	OUT	TOTAL
LA1	Apartment	62 DU	412	6	26	32	25	13	38
	Retail	10,747 GLSF	476	8	6	14	13	16	29
	Existing Retail	(3,000) GLSF	(133)	(2)	(2)	(4)	(4)	(4)	(8)
	Other	1,925 GSF	245	11	11	22	12	9	21
LA2	Walk-In Bank	1,467 GSF	230	4	2	6	20	29	49
LA3	Private School (K-12)	400 Students	992	193	123	316	90	130	220
	Existing Senior Housing	(54) DU	(174)	(2)	(2)	(4)	(3)	(3)	(6)
	Existing Apartment	(22) DU	(148)	(2)	(9)	(11)	(9)	(6)	(15)
LA4	Condominium TV program production	270 DU	1,850 (230)	28 (44)	112 (8)	140 (52)	111 (18)	60 (24)	171 (42)
LA5	Apartment	391 DU	2,628	40	159	199	157	85	242
	Existing Office	(7,793) GSF	(86)	(11)	(1)	(12)	(2)	(10)	(12)
	Coffee House	1,000 GSF	(465)	7	11	18	(19)	(13)	(32)
	Existing Retail	(5,598) GSF							
	Existing Car Service	(4,065) GSF							
Existing Restaurant	(4,000) GSF								
LA6	Private High School	383 Students	856	191	100	291	11	17	28
LA7	Restaurant	124 Seats	355	2	2	4	21	11	32
LA8	Condominium Office	62 DU (21,694) GSF	428 (239)	6 (30)	29 (4)	35 (34)	27 (5)	14 (27)	41 (32)
LA9	Condominium ³	122 DU	709	15	39	54	32	28	60
LA10	Supermarket Expansion ⁴	27,389 GSF	2,800	54	35	89	146	140	286
TOTAL			10,506	474	629	1,103	605	465	1,070

¹ Source: City of Los Angeles Department of Transportation Related Projects List, except as noted below. Trip generation for the Related Projects are based on ITE "Trip Generation", 8th Edition, 2008.

² Trips are one-way traffic movements, entering or leaving.

³ Daily trip ends based on ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates.

⁴ Daily trip ends based on ITE Land Use Code 850 (Supermarket) trip generation average rates.

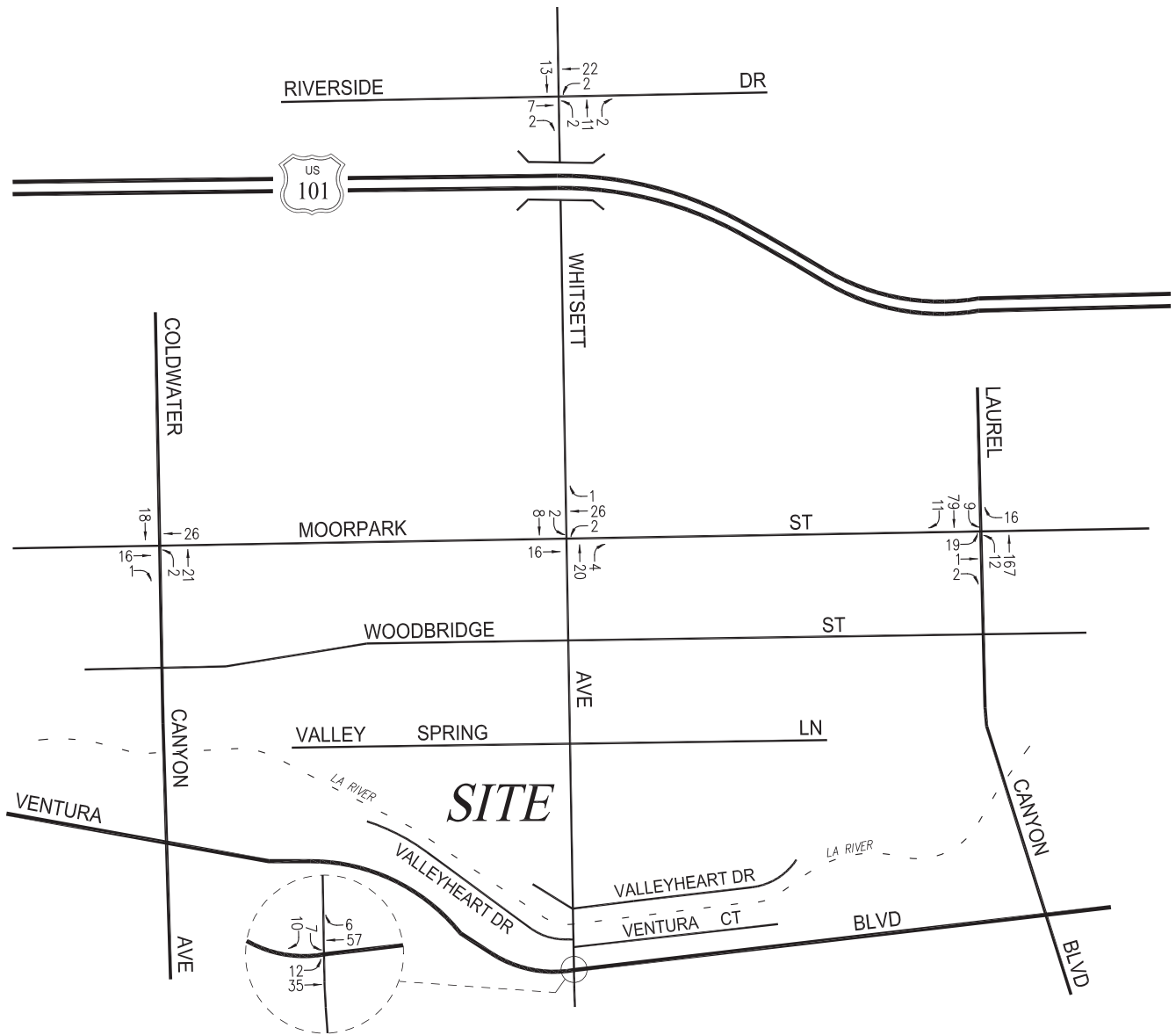


FIGURE IV.M-12

RELATED PROJECTS TRAFFIC VOLUMES FOR A.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



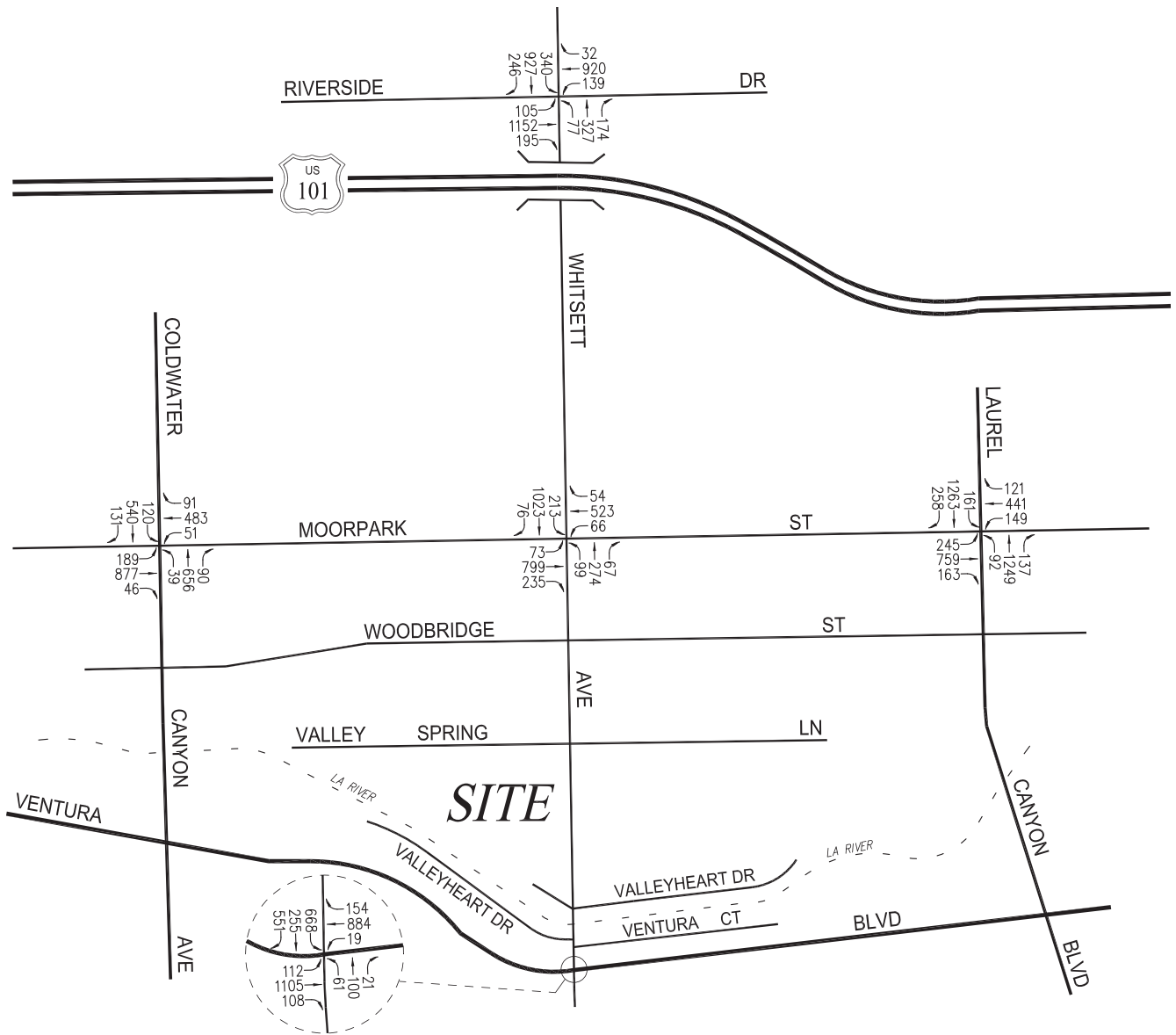


FIGURE IV.M-14

**FUTURE CUMULATIVE PRE-PROJECT TRAFFIC VOLUMES
 IN THE A.M. PEAK HOUR**

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



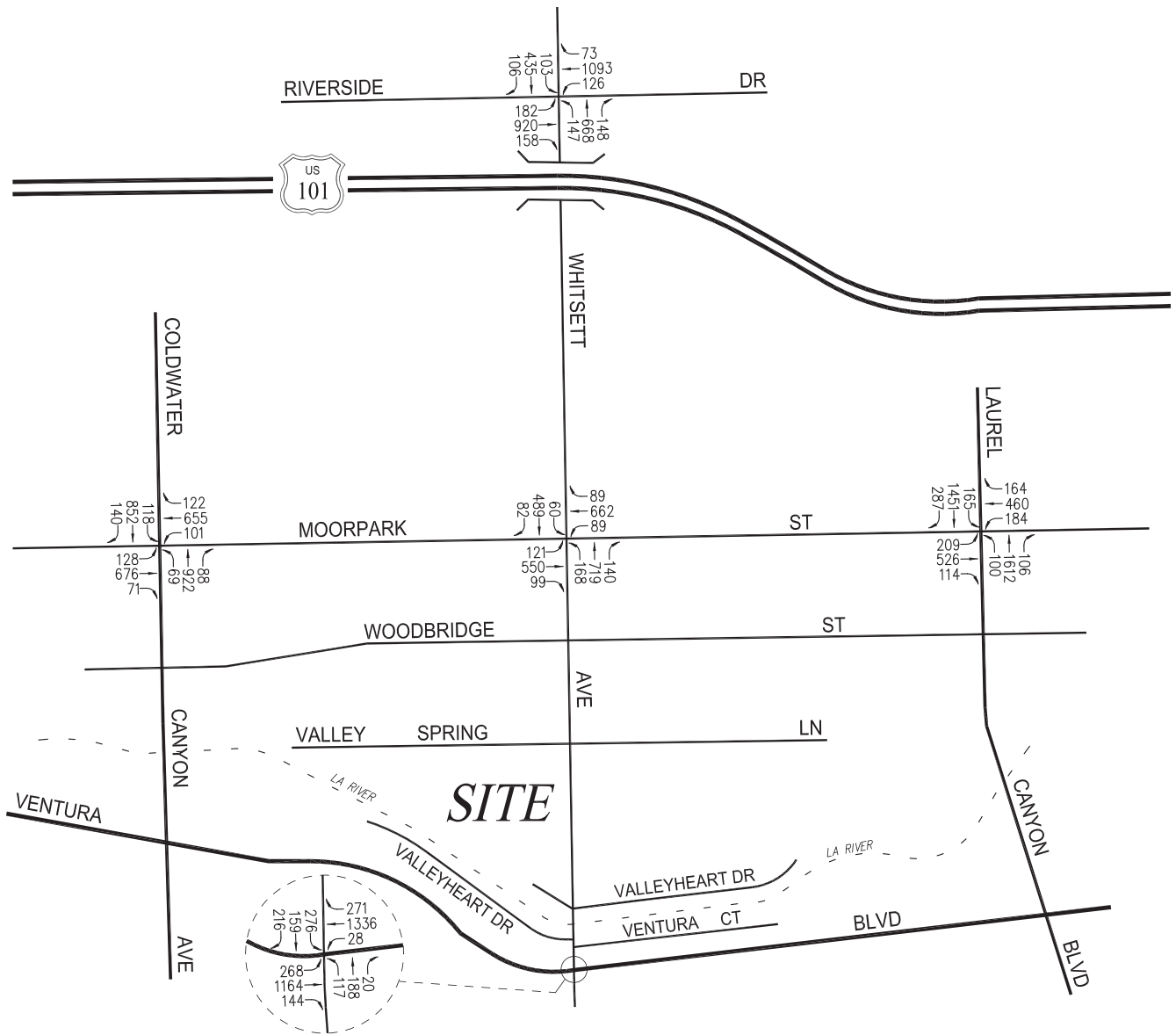


FIGURE IV.M-15
FUTURE CUMULATIVE PRE-PROJECT TRAFFIC VOLUMES
IN THE P.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



Future Cumulative with Project Conditions

As shown in column [4] of *Table IV.M-5: Summary of Volume-To-Capacity Ratios and Levels of Service*, application of the City’s traffic threshold criteria (see *Table IV.M-3: City of Los Angeles Intersection Impact Threshold Criteria*) to the Future Cumulative With Project scenario indicates that the proposed Project is not expected to create significant impacts at the five study intersections. Incremental, but not significant, impacts are noted at the study intersections and two of the five study intersections are expected to continue operating at LOS D or better during the weekday A.M. and P.M. peak hours with the addition of growth in ambient traffic, Related Project traffic, and Project traffic, as presented in *Table IV.M-5*.

The Future Cumulative with Project (existing, ambient growth, Related Projects, and Project) traffic volumes at the study intersections during the weekday A.M. and P.M. peak hours are illustrated in *Figure IV.M-16: Future Cumulative with Project Traffic Volumes in the A.M. Peak Hour* and *Figure IV.M-17: Future Cumulative with Project Traffic Volumes in the P.M. Peak Hour*, respectively.

Congestion Management Program Traffic Impact Assessment

This analysis has been prepared in accordance with procedures outlined in the *2010 Congestion Management Program for Los Angeles County*, County of Los Angeles Metropolitan Transportation Authority, 2010.

According to Section D.9.1 (Appendix D, page D-6) of the 2010 CMP manual, the criteria for determining a significant transportation impact is listed below:

“A significant transportation impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing or worsening LOS F ($V/C > 1.00$).”

The CMP impact criteria apply for analysis of both intersection and freeway monitoring locations.

The following CMP intersection monitoring locations in the Project vicinity have been identified:

<u>CMP Station</u>	<u>Intersection</u>
No. 74	Ventura Boulevard/Laurel Canyon Boulevard
No. 76	Ventura Boulevard/Sepulveda Boulevard
No. 78	Ventura Boulevard/Woodman Avenue

The CMP Traffic Impact Assessment (TIA) guidelines require that intersection monitoring locations be examined if the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hours. The proposed Project will not add 50 or more trips during either the A.M. or P.M. weekday peak hours (i.e., of adjacent street traffic) at the three CMP monitoring intersections in the Project vicinity. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

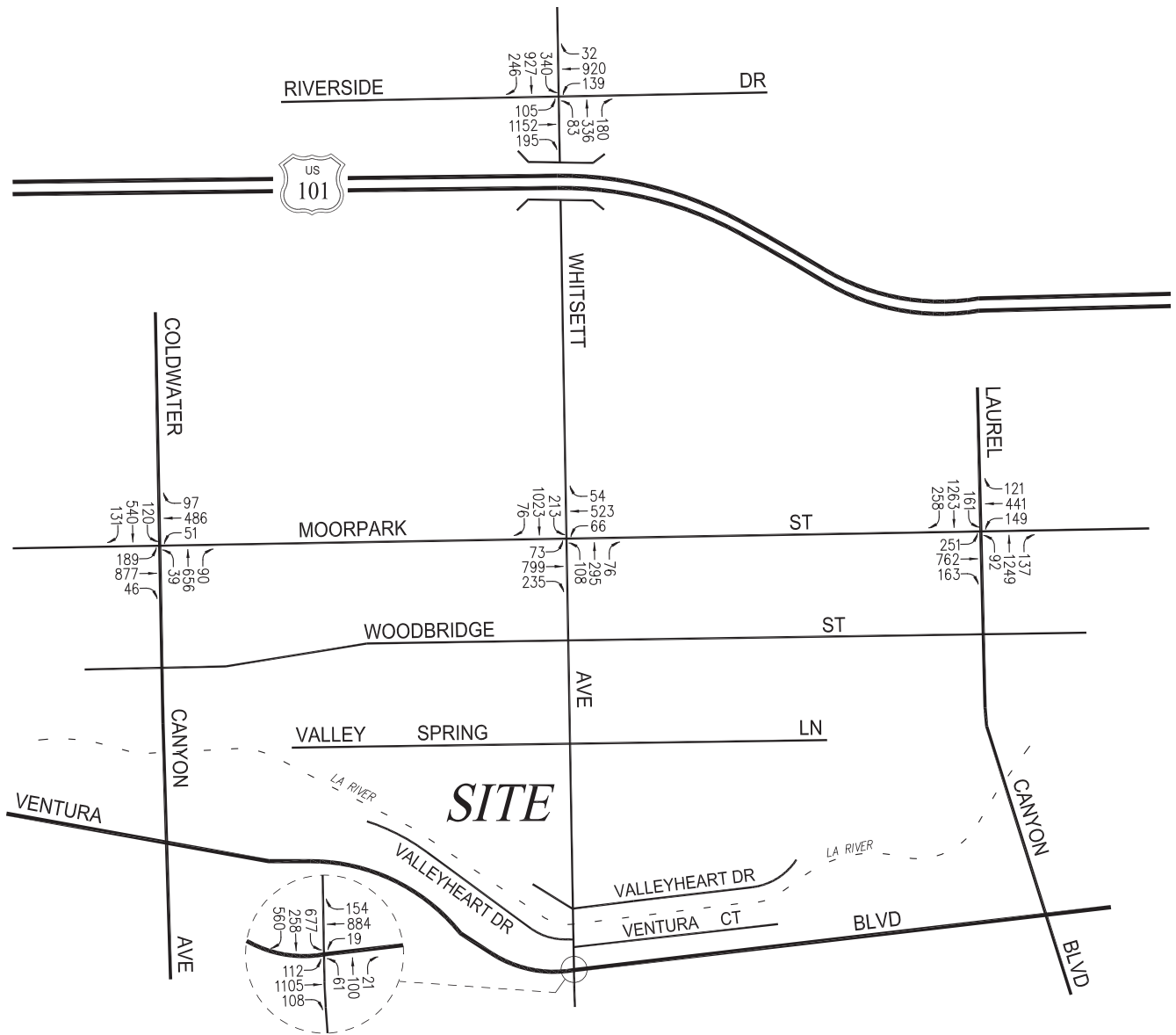


FIGURE IV.M-16
FUTURE CUMULATIVE WITH PROJECT TRAFFIC VOLUMES
IN THE A.M. PEAK HOUR

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



The following CMP freeway monitoring locations have been identified in the Project vicinity:

- | <u>CMP Station</u> | <u>Location</u> |
|--------------------|--|
| No. 1038 | 101 Freeway at Coldwater Canyon Avenue |
| No. 1057 | 170 Freeway south of Sherman Way |

The CMP TIA guidelines require that freeway monitoring locations be examined if the proposed project will add 150 or more trips (in either direction) during either the A.M. or P.M. weekday peak hours. The proposed Project will not add 150 or more trips (in either direction) during either the A.M. or P.M. weekday peak hours to CMP freeway monitoring locations. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

Residential Street Segment Analysis (Cut-Through Traffic)

In order to address the issue of regional through traffic using local streets in neighborhoods adjacent to the Project Site, two local residential street segments located near the Project Site have been analyzed for potential significant impacts associated with the proposed Project. The significance of the potential impacts of the project-generated traffic at the study street segments were identified using criteria set forth in the LADOT's *Traffic Study Policies and Procedures*, August, 2011. According to the City's published traffic study guidelines, a transportation impact on a local residential street shall be deemed significant based on an increase in the project Average Daily Traffic (ADT) volume as shown in *Table IV.M-8: City of Los Angeles Local Residential Street Segment Impact Threshold Criteria*.

The following two study street segment locations (as shown on *Figure IV.M-18: Residential Street Segment Locations*) were identified for analysis by LADOT staff for inclusion in the neighborhood residential street segment analysis:

1. Valley Spring Lane between Babcock Avenue and Whitsett Avenue
2. Valley Spring Lane between Whitsett Avenue and Wilkinson Avenue

Automatic 24-hour machine traffic counts of the two study street segments were conducted by a traffic count subconsultant. Copies of the current 24-hour machine traffic counts for the study street segment locations are contained in *Appendix A of Appendix I: Traffic Impact Study* of this Draft EIR. Additionally, the existing ADT traffic volumes for the two study street segments were increased at an additional rate of two percent (2.0%) to reflect existing conditions.

The potential Project-related traffic impacts at the two neighborhood street segments were analyzed for the following conditions:

- (a) Existing Conditions
- (b) Condition (a) with completion and occupancy of the proposed Project (Existing with Project Conditions)

- (c) Condition (a) plus 2.0 percent (2.0%) ambient traffic growth through year 2016 (Future Cumulative Pre-Project Conditions)
- (d) Condition (c) with completion and occupancy of the proposed Project (Future with Project Conditions)

TABLE IV.M-8
CITY OF LOS ANGELES
LOCAL RESIDENTIAL STREET SEGMENT IMPACT THRESHOLD CRITERIA

PROJECTED AVERAGE DAILY TRAFFIC WITH PROJECT (FINAL ADT)	PROJECT-RELATED INCREASE IN ADT
0 to 999	120 or more trips
1,000 or more	12 percent or more of final ADT
2,000 or more	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT

As noted above, the Future Cumulative Pre-Project Conditions were forecast using a 2.0 percent (2.0%) annual ambient growth factor to derive year 2016 conditions. Application of this ambient growth factor allows for a conservative forecast of future traffic volumes in that the analyzed street segments are situated within a well-established, built-out residential neighborhood, which for the most part does not offer direct cut-through opportunities. For purposes of estimating the potential contribution of Project-related traffic, it should be noted that one percent (1.0%) has been utilized as a default distribution percentage for the study street segments where no project-related traffic is expected or forecast in the traffic impact study. As nearly all project-related traffic is anticipated to travel along the key arterials providing direct access to the proposed Project Site, the use of this default factor is intended to account for potential trips associated with motorists unfamiliar with the area who inadvertently travel on a neighborhood street segment.

The forecast traffic conditions at the analyzed street segments for the Existing, Existing with Project, Future Cumulative Pre-Project, and Future with Project scenarios are summarized in *Table IV.M-9: Summary of Neighborhood Street Segment Analysis*. The year 2012 24-hour traffic count data were utilized to evaluate the Existing Conditions. As indicated in Column [6] of *Table IV.M-9*, for purposes of estimating Future Cumulative Pre-Project traffic volume, a two percent (2.0%) annual growth rate through the year 2016 was conservatively added to the existing ADT volume to account for traffic generated by the Related Projects, as well as increases in general ambient traffic.

As presented in Columns [4], [5] [8], and [9] of *Table IV.M-9*, the proposed Project daily trips will incrementally affect traffic volumes on the analyzed street segments for the Existing with Project and Future with Project Conditions, respectively. As shown in *Table IV.M-9*, application of LADOT’s threshold criteria for local residential street segment analysis indicates that the Project is not anticipated to significantly impact either of the analyzed street segments.

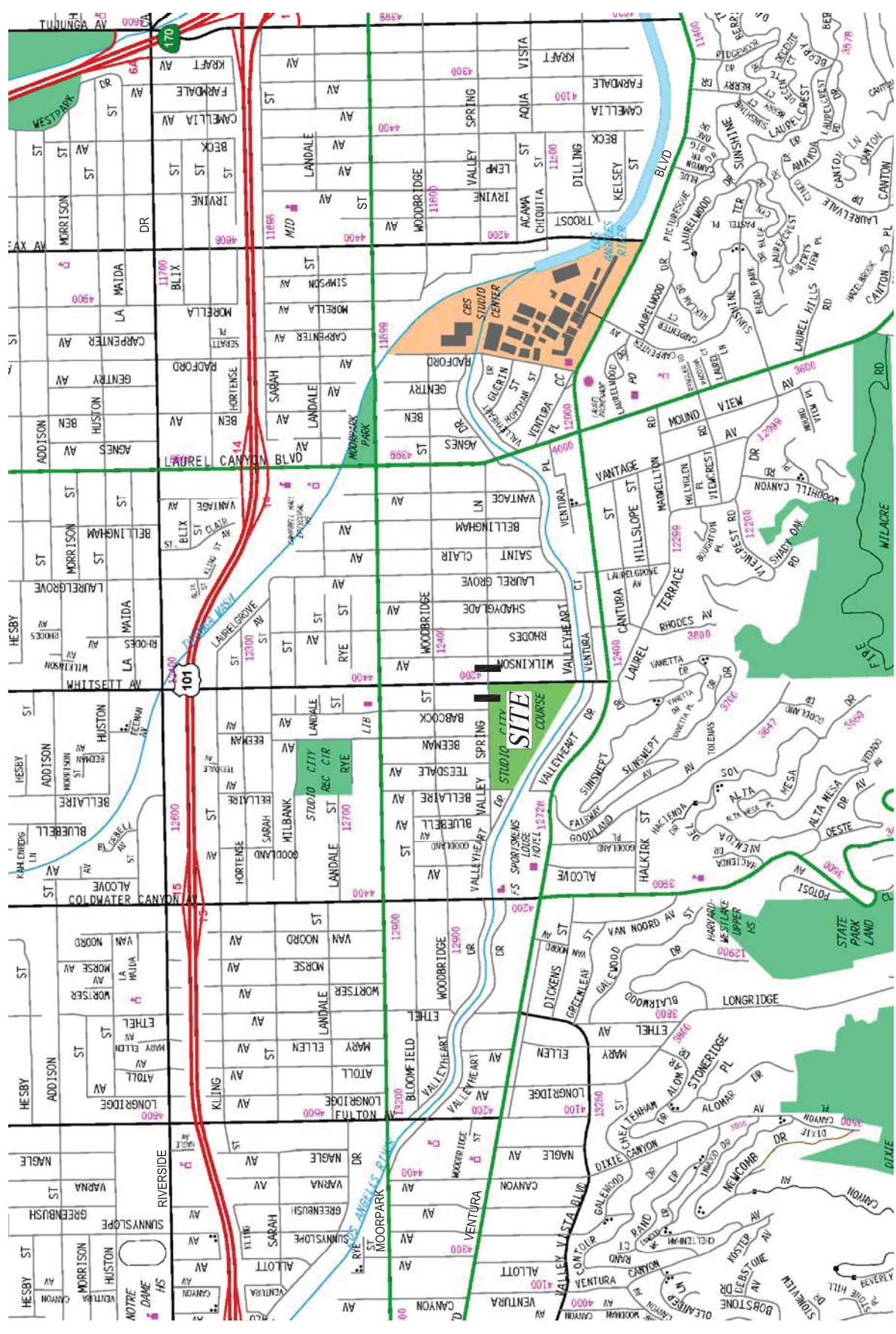


FIGURE IV.M-18
RESIDENTIAL STREET SEGMENT LOCATIONS

STUDY STREET SEGMENT

SOURCE: RAND MCNALLY & COMPANY
 LINSKOTT, LAW & GREENSPAN, ENGINEERS

TABLE IV.M-9
SUMMARY OF NEIGHBORHOOD STREET SEGMENT ANALYSIS

#	STREET SEGMENT	[1] YEAR 2012 EXISTING 24-HOUR VOLUME ^a	[2] DAILY PROJECT BUILD- OUT TRIP ENDS ^b	[3] YEAR 2012 EXISTING WITH PROJECT ^c [(1)+(2)]	[4] % ADT INCREASE WITH PROJECT ^d [(2)/(3)]	[5] EXISTING WITH PROJECT SEGMENT IMPACT ^e	[6] YEAR 2016 FUTURE PRE- PROJECT VOLUME ^f	[7] YEAR 2016 FUTURE WITH PROJECT ^g [(2)+(6)]	[8] % ADT INCREASE WITH PROJECT ^h [(2)/(7)]	[9] FUTURE WITH PROJECT SEGMENT IMPACT ⁱ
1	Valley Spring Lane between Babcock Ave & Whitsett Ave	868	6	874	0.7%	NO	894	900	0.7%	NO
2	Valley Spring Lane between Whitsett Ave & Wilkinson Ave	1,073	6	1,079	0.6%	NO	1,105	1,111	0.5%	NO

^a The existing average daily traffic (ADT) volumes were determined based on counts conducted by The Traffic Solution. Copies of the ADT count summary data worksheets are provided in *Appendix A of Appendix I: Traffic Impact Study* of this EIR. The year 2011 ADT volume data were adjusted by two percent (2.0%) to reflect existing conditions.

^b Net project build-out daily trip ends include inbound and outbound trips based on the project trip generation forecasts in *Table IV.M-4: Project Traffic Generation*. Please note that one percent (1.0%) has been utilized as a default distribution percentage for the neighborhood study street segments where no Project-related traffic is expected or forecast in the traffic study. As all Project-related traffic is anticipated to travel along the key arterials providing direct access to the Project Site, the use of this default factor is intended to account for potential trips associated with motorists who unexpectedly or inadvertently travel on a neighborhood street segment.

^c Total of columns [1] and [2].

^d Percent Project-related increased based on column [2] divided by column [3].

^e According to LADOT's "Traffic Study Policies & Procedures," August 2011: "A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes." See *Table IV.M-8: City of Los Angeles Local Residential Street Segment Impact Threshold Criteria*.

^f An ambient growth rate of two percent (2.0%) per year was assumed to derive the year 2016 future pre-project traffic volumes.

^g Total of columns [2] and [6].

^h Percent project-related increase based on column [2] divided by column [7].

ⁱ According to LADOT's "Traffic Study Policies & Procedures," August 2011: "A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes." See *Table IV.M-8: City of Los Angeles Local Residential Street Segment Impact Threshold Criteria*.

(b) *Project Access*

Vehicular Access

Project access refers mainly to vehicular access for the Project through surrounding streets, intersections and driveways. Vehicular access to the Project will be provided via the westerly extension of Valleyheart Drive, which will be constructed as part of the Project. Additionally, two driveways (one inbound and one outbound) will be provided on Whitsett Avenue to access the planned 22-space surface parking lot (modified version of the existing parking lot). A depiction of the access and driveway locations for the Project Site is shown in *Figure II-7: Site*

Access and Circulation in Section II: Project Description of this Draft EIR. A description of the proposed site access and circulation scheme is provided below.

Valleyheart Drive

Access to the Project will be provided from the proposed Valleyheart Drive roadway extension, which will extend westerly from Whitsett Avenue along the southern Project Site frontage. A portion of Valleyheart Drive is already constructed adjacent to the existing Los Angeles fire station site. The extension of Valleyheart Drive will form the west leg of the Whitsett Avenue/Valleyheart Drive intersection. The Valleyheart Drive extension will be constructed to City of Los Angeles roadway design standards.

Project Driveway No. 1: Subterranean Parking Access

This Project driveway will be located on the north side of Valleyheart Drive, along the southerly Project Site frontage, at the southeast corner of the Project Site. The Project driveway will be located approximately 230 feet west of Whitsett Avenue. This driveway will provide access to an internal ramp, which extends down to the subterranean parking garage situated beneath the senior housing buildings. The Project driveway will be constructed to City of Los Angeles design standards.

Project Driveway No. 2: Whitsett Avenue Inbound/Outbound Driveways

Additional Project access will be provided via inbound and outbound driveways to be provided along the west side of Whitsett Avenue, south of Valley Spring Lane. These driveways will provide access to and from the planned 22-space surface parking lot, which will serve the golf course, driving range, and clubhouse uses. The existing Whitsett Avenue inbound driveway is situated immediately south of Valley Spring Lane and will be retained. The Whitsett Avenue outbound driveway will be relocated approximately mid-way along the Project's Whitsett Avenue property frontage. The planned Project driveways on Whitsett Avenue will be constructed to City of Los Angeles design standards.

In addition to the above vehicular access points, fire lanes will be located along the northerly, westerly, and southwesterly boundaries of the SCSLC complex, as well as through the courtyard of the complex. In accordance with the City of Los Angeles Fire Department requirements, all through-fire lanes will be 20 feet in width and all fire lanes providing access to buildings will be 28 feet in width.

As indicated in *Table IV.M-5: Summary of Volume To Capacity Ratios and Levels of Service* and *Table IV.M-9: Summary of Neighborhood Street Segment Analysis*, application of the impact threshold criteria from the City of Los Angeles indicates that none of the five study intersections or two study street segments would be significantly impacted by the forecast Project traffic. As no significant impacts are expected due to development of the proposed Project, it can be reasonably assumed that vehicular access into the SCSLC Project, as well as the driveways and surrounding streets that are utilized for site access, will not be significantly impacted by congestion caused by the Project.

Furthermore, although the preceding traffic analysis accounts for the worst-case scenario in estimated traffic generation associated with the Project (see *Table IV.M-4: Project Traffic Generation*, which utilizes a worst-case traffic generation rate for "non-senior residential condos/townhouses"), it is less likely, as senior housing, that the occupants of the Project would

enter or exit the complex as frequently as would non-senior residents during peak hour times. Senior residents may also utilize public transportation to a greater extent than would non-senior condominium residents. Close proximity to commercial uses on Ventura Boulevard may also encourage the senior residents to walk to their destinations for commercial services. Further, as the existing 9-hole golf course, clubhouse, and driving range (to be reduced from 24 tees to 21 tees as part of the Project), are remaining largely intact, it can be reasonably assumed that a minimal amount of additional traffic would be generated from those uses after Project development. As such, the impact of Project traffic to the site or on surrounding streets would be less-than-significant.

Pedestrian Access and Environment⁵

Review of Existing Pedestrian Conditions

Existing pedestrian amenities in the Project area are provided along Whitsett Avenue adjacent to the Project Site. Specifically, the following pedestrian amenities are provided near the Project Site:

- Standard marked pedestrian crosswalks exist at all four approaches to the Whitsett Avenue/Ventura Boulevard intersection (i.e., 15 feet in width and painted white).
- Pedestrian movement push buttons are provided for walk movement across Ventura Boulevard at the Whitsett Avenue/Ventura Boulevard intersection.
- Americans With Disabilities Act (ADA) ramps are provided at four corners of the Whitsett Avenue/Ventura Boulevard intersection.
- Sidewalks and combination sidewalks/parkways are provided along the Project Site frontages as listed below:
 - Whitsett Avenue – combination 10.5-foot sidewalk/parkway (5 feet/5.5 feet) on the west side; combination 15-foot sidewalk/parkway (4.5 feet/10.5 feet) on the east side.
 - Valleyheart Drive – combination 10.5-foot sidewalk/parkway (5 feet/5.5 feet) on the north side west of Whitsett Avenue.
 - Ventura Boulevard – 15-foot sidewalk on both sides.

The widths of the sidewalks and crosswalks, as well as the location of bus stops and shelters, traffic signal pedestrian push buttons, etc. are shown in *Figure IV.M-19: Existing Pedestrian Conditions*. Photographs of the sidewalks/parkways along Whitsett Avenue adjacent to the

⁵ All pedestrian activity analysis and data was provided by Linscott, Law & Greenspan Engineers, *Traffic Impact Study Senior Living Center Project*, 2 February 2012 and *Pedestrian Safety Study – 4141 Whitsett Avenue, City of Los Angeles*, memo to City of Los Angeles Department of Transportation, Valley Development Review, 31 May 2012, provided in *Appendix G: Pedestrian Study* of this Draft EIR.

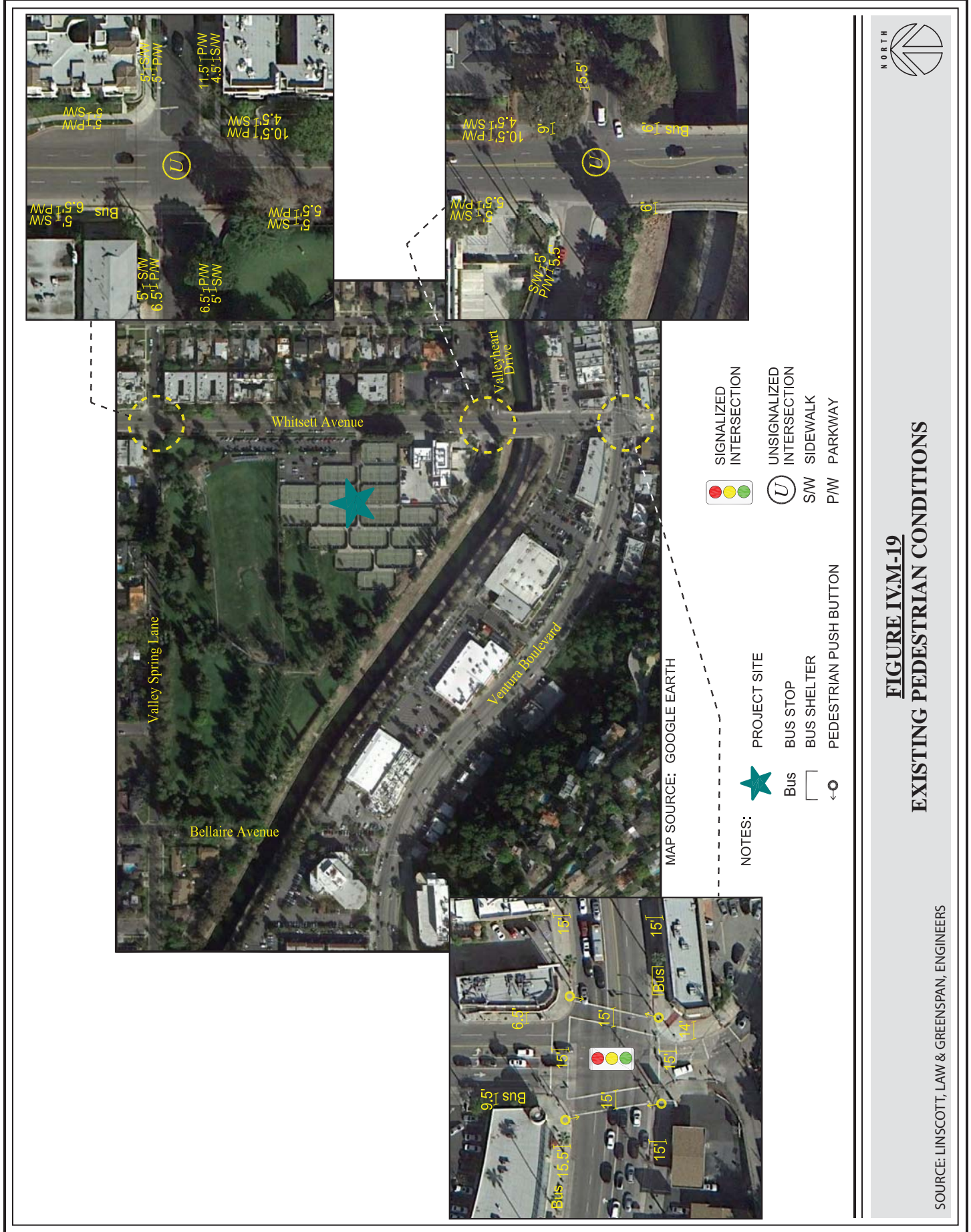


FIGURE IV.M-19
EXISTING PEDESTRIAN CONDITIONS

SOURCE: LINSKOTT, LAW & GREENSPAN, ENGINEERS

proposed Project are displayed in *Figure IV.M-20: Photographs of Adjacent Sidewalks of Whitsett Avenue*.

Existing Peak Period Pedestrian Traffic Volumes

Pedestrian traffic counts were conducted in conjunction with the weekday A.M. and P.M. peak period vehicle traffic counts conducted at the study intersections as analyzed in the traffic impact study (included as *Appendix E* to *Appendix I* of this Draft EIR). Specifically, the pedestrian traffic counts were conducted during the weekday A.M. peak period (7:00 A.M. to 10:00 A.M.) and P.M. peak period (3:00 P.M. to 6:00 P.M.) in November 2011. The existing weekday A.M. and P.M. peak hour pedestrian traffic volumes crossing each leg of the study location near the Project Site are presented in *Figure IV.M-21: Existing Peak Hour Pedestrian Volumes*.

As presented in *Figure IV.M-21*, a moderate level of pedestrian activity currently occurs at the Whitsett Avenue/Valley Spring Lane and Whitsett Avenue/Valleyheart Drive intersections along the easterly Project Site frontages. The total A.M. and P.M. peak hour pedestrian volumes observed at the three Project Site adjacent intersections along Whitsett Avenue are as follows:

- Whitsett Avenue/Valley Spring Lane: A.M. Peak Hour – 18 pedestrians; P.M. Peak Hour – 26 pedestrians.
- Whitsett Avenue/Valleyheart Drive: A.M. Peak Hour – 47 pedestrians; P.M. Peak Hour – 45 pedestrians.
- Whitsett Avenue/Ventura Boulevard: A.M. Peak Hour – 67 pedestrians; P.M. Peak Hour – 90 pedestrians.

The moderate level of pedestrian activity along the west side of Whitsett Avenue adjacent to the proposed SCSLC (i.e., on average one pedestrian every two to three minutes during the peak pcommute periods) indicates that future pedestrians related to the Project will “blend in” and enhance overall pedestrian safety based on the “safety in numbers” phenomenon documented in prior pedestrian safety studies.⁶

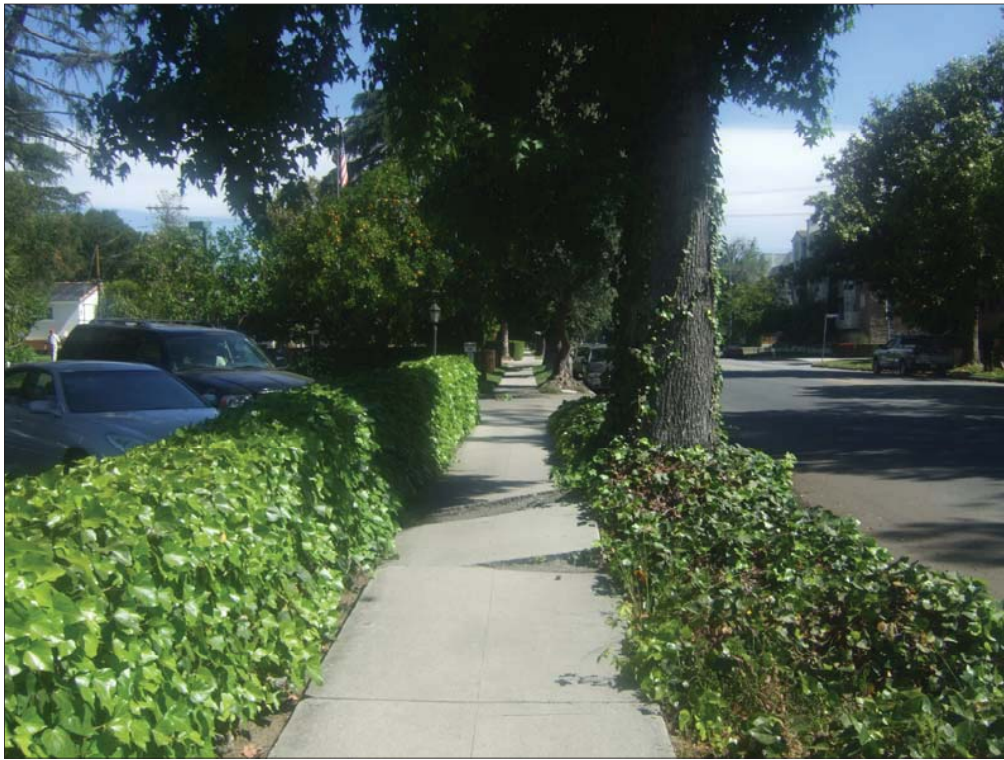
Project Pedestrian Amenities

The proposed Project Site has been designed to encourage pedestrian activity and walking as a transportation mode⁷. The underlying principle is that pedestrians should not be delayed, diverted, or placed in danger. Walkability is a term for the extent to which walking is readily available as a safe, connected, accessible, and pleasant mode of transport.⁸ There are five basic requirements that are widely accepted as key aspects of the walkability of urban areas that should

⁶ Peter L. Jacobsen, “Safety in Numbers: More Walkers and Bicyclists, Safer Walking and Bicycling,” *Injury Prevention*, September 1, 2003.

⁷ For example, refer to <http://www.walkscore.com/>, which generates a walkability score of approximately 82 (Very Walkable – most errands can be accomplished on foot) out of 100 for the Project Site. Walk Score calculates the walkability of an address by locating nearby stores, restaurants, schools, parks, etc. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking.

⁸ Chapter 4 of the *Pedestrian Network Planning and Facilities Design Guide*, Government of New Zealand, from the www.ltsa.govt.nz website.



West side of Whitsett Ave. Adjacent to Site - Looking North



West side of Whitsett Ave. Adjacent to Site - Looking South

FIGURE IV.M-20
PHOTOGRAPHS OF ADJACENTSIDEWALKS OF WHITSETT AVENUE

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS



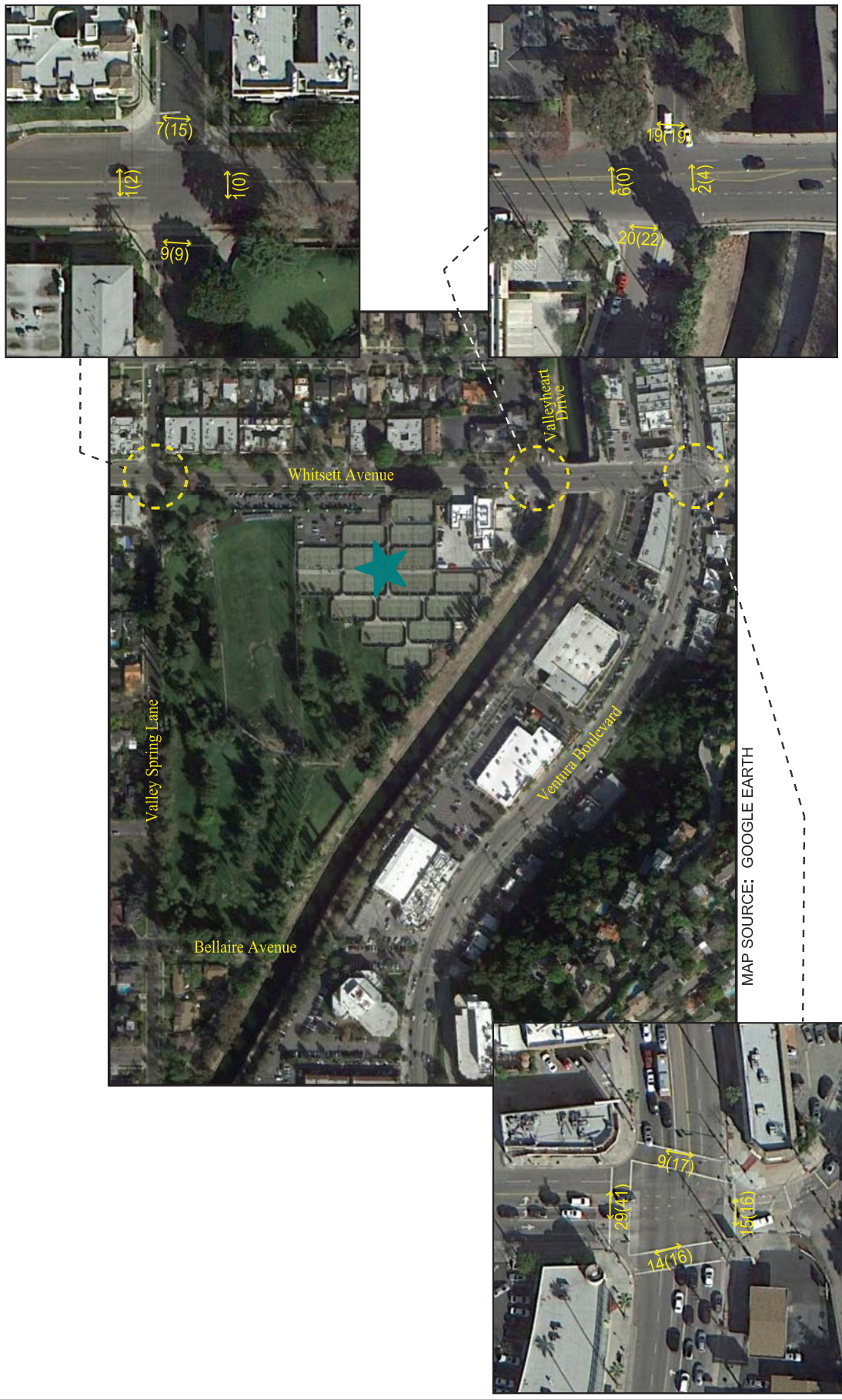


FIGURE IV.M-21
EXISTING PEAK HOUR PEDESTRIAN VOLUMES

SOURCE: LINSOTT, LAW & GREENSPAN, ENGINEERS

be satisfied. The underlying principle is that pedestrians should not be delayed, diverted, or placed in danger. A review of the Project site plan and pedestrian walkway network indicates that the Project accommodates the five primary characteristics of walkability as follows:

- **Connectivity:** People can walk from one place to another without encountering major obstacles, obstructions, or loss of connectivity.
- **Convivial:** Pedestrian routes are friendly and attractive, and are perceived as such by pedestrians.
- **Conspicuous:** Suitable levels of lighting, visibility, and surveillance over its entire length, with high quality delineation and signage.
- **Comfortable:** High quality and well-maintained footpaths of suitable widths, attractive landscaping and architecture, shelter and rest spaces, and a suitable allocation of roadspace to pedestrians.
- **Convenient:** Walking is a realistic travel choice, partly because of the impact of the other criteria set forth above, but also because walking routes are of a suitable length as a result of land use planning with minimal delays.

Additionally, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan includes Urban Design guidelines that address the overall community design of the Project area. The design policies establish a minimum level of design required in private projects and recommendations for public space improvements. With regards to the pedestrian environment in multi-family residential areas, the Urban Design guidelines promote architectural design that enhances quality-of-life, living conditions and neighborhood pride of the residents. The proposed Project is anticipated to be consistent with the following policies that cater to fostering a pedestrian environment, as suggested in the Urban Design guidelines:

- Provide a pedestrian entrance at the front of each project.
- Require useable open space for outdoor activities, especially for children.
- Require the use of articulations, recesses, surface perforations and porticoes to break up long, flat building facades.
- Consider the siting of open space to maximize pedestrian accessibility and circulation.
- Location adjacent to pedestrian routes and other open spaces.
- Appropriate plant and hardscape materials.

The Project Site is adjacent to and accessible from nearby commercial uses (e.g., retail stores, restaurants, etc.) and other amenities along the Ventura Boulevard corridor, as well as adjacent public bus transit stops. The pedestrian walkways within the site and the adjacent sidewalks will be appropriately landscaped and designed to provide a friendly walking environment. Additionally, the walkways will be well lit and will include appropriate wayfinding signage.

The interior of the Project is planned to provide a combination of landscape and hardscape that facilitates internal accessibility as well as connectivity to a broad range of uses beyond its boundaries. The Project will include pedestrian gates on all sides, which will allow residents to access the golf course and driving range, the sidewalk along the Los Angeles River, and the sidewalk along Whitsett Avenue. Parking for golfers, both below and above-grade, will connect to the golf course and driving range by way of a walkway along the westerly side of the surface parking spaces. Once outside the Project, residents will be able walk to a myriad of nearby destinations, including grocery stores, restaurants, coffee houses, bars, retail shops, movie theaters, schools, parks, libraries, and fitness establishments.

Due to the Project's consistency with the principles of walkability and the design guidelines in the Community Plan, the Project can be considered a pedestrian-friendly development, and thus will not have any detrimental significant impacts on pedestrian access to the site and pedestrian orientation of the existing surrounding streets.

Although the Project will not have significant adverse impacts on the surrounding pedestrian environment, certain measures should be designed and implemented, in concurrence with and approval by, the City of Los Angeles Department of Public Works, which may further improve pedestrian connections and enhance walkability near the Project Site (with the focus being on the separation of pedestrians from vehicles and measures that increase the visibility of pedestrians). These measures are listed as Mitigation Measures below. Should the Department of Public Works disagree with any of the measures, those measures shall not be implemented.

It should be noted that, although not yet approved by the City of Los Angeles, the Project could be required to comply with the Los Angeles River Design Guidelines of the proposed River Improvement Overlay (RIO) District. The Los Angeles River Design Guidelines purport two objectives that relate to pedestrian access and orientation for individual projects, including Objective 1 to consider the river context, visibility and access in the building and site design of private projects, and Objective 3 to maximize access to, and awareness of, the Los Angeles River and its relationship to the community. Many of the recommendations in the objectives promote pedestrian access and connectivity to the Los Angeles River, development of adjacent river pathways and greenspace adjacent to the river, opportunities for views to and from the river, and creation of visually interesting spaces along the river through lighting, artwork, landscape and furniture.

The majority of the Project Site frontage on Lot 1 along the Los Angeles River will be retained as a golf course use with existing greenspace and foliage. As such, the Project and Project Site will continue to be consistent with many of the recommendations in the RIO guidelines that promote the creation of green open spaces along the river. The SCSLC on Lot 2 will occupy a smaller portion of the river frontage. The elements of the Project which do abut the river will be oriented to the river through landscaping and hardscaping, sidewalks that are created through the extension of Valleyheart Drive, building and courtyard access from Valleyheart Drive, and a public children's playground. Currently, a publicly restricted (including gate and sign) river pathway along the Project Site's river frontage exists with access from Valleyheart Drive. Per approval from the City of Los Angeles, this river pathway could be opened to the public, thus providing convenient and direct access from the Project to the Los Angeles River. Due to the retention of the golf course on the Project Site and the pedestrian orientation of the proposed Project design and site planning, the Project is anticipated to be compliant with the RIO District

guidelines, thus resulting in a less-than-significant impact to pedestrian access and connectivity with relation to the Los Angeles River.

Bicycle Access and Environment

Bicycle access to the Project Site is facilitated by the City of Los Angeles bicycle roadway network.⁹ Additionally, in compliance with the City of Los Angeles Bicycle Parking Ordinance, it is anticipated that the Project would provide facilities to provide one long-term bike parking space per dwelling unit (equaling 200 long-term spaces) and one short-term bike parking space per every 10 dwelling units (equaling 20 short-term spaces). Outside of the Project Site, a total of three existing bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets, etc.) in the City's bicycle network are located within the vicinity of the Project Site. The following bicycle facilities are located in the vicinity of the SCSLC Project Site:

- North-South Route(s)
 - Colfax Avenue: Class II Bicycle Lane
- East-West Route(s)
 - Riverside Drive: Class II Bicycle Lane
 - Chandler Boulevard: Class II Bicycle Lane

The federal and State transportation system recognizes three primary bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Bicycle Paths (Class I) are exclusive car free facilities that are typically not located within a roadway area. Bicycle Lanes (Class II) are part of the street design that is dedicated only for bicycles and identified by a striped lane separating vehicle lanes from bicycle lanes. Bicycle Routes (Class III) are preferably located on collector and lower volume arterial streets.

None of the identified bicycle paths/routes are adjacent to the Project Site. As such, neither construction nor operation of the proposed Project will have any significant impact on the three bicycle routes in the Project vicinity. With regards to bicycle access into the SCSLC Project, the entrances into the complex that are utilized by pedestrians, can also be utilized by bicyclists. Bicycle access to the existing pathway along the north side of the Los Angeles River, adjacent to the Project Site, can be utilized as a Class I Bicycle Path, if the pathway is opened for public use by the City. The Project will not hinder nor prevent the river pathway from being used for bicycle access if desired by the City.

(c) Parking

This section summarizes a review of the Project's parking requirements according to the City of Los Angeles Municipal Code requirements in comparison to the planned Project parking supply. In accordance with City of Los Angeles Planning Department Deputy Advisory Agency

⁹ Source: City of Los Angeles Bicycle Plan, Chapter 9 of the Transportation Element of the General Plan (Adopted March 1, 2011); http://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/TOC_BicyclePlan.htm.

residential parking requirements, a total of 500 parking spaces will be required for the Studio City Senior Living Center on proposed Lot 2 of the Project Site. The City of Los Angeles Planning Department requirements for condominium and condominium conversion dwelling units is set forth in the Residential Parking Policy for Division of Land No. AA 2000-1. The Residential Parking Policy sets forth the following parking requirements as applied to the proposed Project:

- For projects with six units or more:
 1. 2.0 spaces per dwelling unit
 2. 0.25 guest space per dwelling unit in non-parking congested areas¹⁰
0.50 guest space per dwelling unit in congested areas
 3. For side-by-side parking in private garages with direct entries into the units, 0.25 guest space per unit will be permitted in parking congested areas.

For the purposes of analyzing the worst-case scenario of the Project, the parking requirements for the condominium units do not utilize any senior housing rates or discounts. Based on these parking requirements, the required parking is 500 spaces for the proposed Project based on the following calculation:

- 200 Dwelling Units \times 2.50 = 500 required spaces

The future parking requirements for the existing golf course, driving range, and clubhouse uses will be determined as part of the approval for a Conditional Use Permit, which is being requested by the applicant to allow continued operation of those uses on the Project Site. Currently, the Project Site operates with 92 existing surface parking spaces that serve the existing golf course, driving range, golf clubhouse, and tennis courts and related facilities; however, the City of Los Angeles may modify the amount of required parking for the recreational uses to remain on the Project Site after development of the Project, dependent upon the findings made during the Conditional Use Permit process. Strictly speaking, per the LAMC, parking for the recreational uses on proposed Lot 1 of the Project Site would use the floor area (as defined in LAMC Section 12.03) on Lot 1 as the basis for the parking requirement. The only floor area on Lot 1 would be the 4,342 square foot golf clubhouse on the northeast portion of the Project Site. As such, at a ratio (for commercial buildings) of 1 space per 500 square feet of floor area, the required parking for the uses on Lot 1 would be nine parking spaces. However, as part of the Conditional Use process, it is anticipated that more parking spaces will be required at the discretion of the City Planning Department.

As planned, a total of 70 of the 92 existing surface parking spaces on the Project Site will be eliminated to accommodate development of the Project. The Project will retain 22 of the existing surface spaces to continue to be used for the golf course, driving range, and clubhouse. In sum, a

¹⁰ “Determinations on required parking by the Advisory Agency are not intended to supersede more restrictive requirements contained in other adopted City ordinances such as adopted specific plans and “Q” conditions. Further, additional guest parking will be considered in special areas of the City which are either subject to unusual public access demands (such as the beach areas) or areas where on-street parking is highly restricted (Major Highways, such as Barham Boulevard).”

total of 635 parking spaces will be provided at the Project Site, including 613 new spaces in the subterranean parking garage and the aforementioned 22 existing spaces in the surface parking lot to be located adjacent to the driving range (the existing spaces may be modified to accommodate the Project). As required, of the 635 parking spaces, a total of 500 spaces will be allocated for residents and guests of the proposed Project and a total of 135 spaces will be allocated for employee parking and parking for patrons of the golf course, driving range, and clubhouse.

Parking level P1 of the subterranean structure will contain 370 spaces for the exclusive use by residents of the SCSLC and their guests. Residents and their guests will also have access to 130 of the 243 spaces on parking level P2. The remaining 113 spaces on parking level P2 plus the existing 22 surface parking spaces will provide the 135 parking spaces to be designated and reserved for the golf course, driving range, and clubhouse patrons, as well as employees of all uses on the Project Site. It should be noted that in compliance with RIO guidelines, approximately two percent of the residential (i.e., excluding the overflow golf parking) parking spaces in the parking structure would be allocated for use by a third party shared car (or equivalent) program.

As part of the parking supply, the Project must also provide a minimum of 13 handicap (ADA compliant) accessible spaces. This complies with the Americans With Disabilities Act requirement of a minimum of two percent (2.0%) of the onsite parking supply as handicap spaces for parking facilities with 501 to 1,000 spaces, with one in every eight handicap spaces being van accessible. Provisions for these handicap spaces will be ensured by the Department of Building and Safety during the building permit process for the Project.

With the provision of Code- and regulation-required parking for the Project for all uses on the Project Site, all impacts related to parking will be less-than-significant.

(d) *Transit System*

As required by the *2010 Congestion Management Program for Los Angeles County*, the potential impacts of the Project on transit service have been reviewed and are discussed below. As discussed in Subsection 2.a(5) herein, existing transit service is provided in the vicinity of the proposed SCSLC Project.

The Project trip generation for the senior housing land use component, as shown in *Table IV.M-4: Project Traffic Generation*, was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed Project is forecast to generate demand for four transit trips during the A.M. peak hour and five transit trips during the P.M. peak hour. Over a 24-hour period, the Project is forecast to generate demand for 57 daily transit trips. The transit trip calculations are as follows:

- A.M. Peak Hour = $88 \times 1.4 \times 0.035 = 4$ Transit Trips
- P.M. Peak Hour = $104 \times 1.4 \times 0.035 = 5$ Transit Trips
- Daily Trips = $1,162 \times 1.4 \times 0.035 = 57$ Transit Trips

As shown in *Table IV.M-2: Existing Public Transit Routes*, seven bus transit lines and routes are provided adjacent, or in close proximity, to the Project Site. As outlined in *Table IV.M-2*, under the “No. of Buses/Trains During Peak Hour” column, these seven transit lines provide services for an average of (i.e., average of the directional number of buses during the peak hours) generally 46 buses during the A.M. peak hour and roughly 42 buses during the P.M. peak hour. Therefore, based on the above calculated A.M. and P.M. peak hour trips, this would correspond to less than one additional transit rider per bus. It is anticipated that the existing transit service in the project area will adequately accommodate the increase of Project-generated transit trips. Thus, given the low number of Project-generated transit trips per bus, no project impacts on existing or future transit services in the project area are expected to occur as a result of the proposed Project.

(3) *Consistency with Adopted Plans and Policies*

As previously discussed, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan is the primary guiding document for development in the Project area. The proposed residential Project will be consistent with a number of objectives and policies relating to transportation set forth in the Community Plan, including:

- Policy No. 13-2.2: Driveway access points onto major and secondary highways, arterial, and collector streets should be limited in number and be located to insure the smooth and safe flow of vehicles and bicycles.
- Objective 14-2: To promote pedestrian oriented areas and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.
- Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs.
- Policy 15-1.1: Consolidate parking where appropriate, to minimize the number of ingress and egress points on Major and Secondary Highways.
- Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.

A determination and discussion of consistency with the objectives and policies of the Community Plan is provided below.

Policy No. 13-2.2, Objective No. 13-2 of Goal No. 13. The Community Plan purports a goal to “[h]ave a system of highways, freeways, and streets that provides a circulation system which supports existing, approved and planned land uses....” One of the ways to achieve this goal, according to the Community Plan, is to limit the number of project access points onto major and secondary highways, arterial, and collector streets.

Most of the streets adjacent to the Project Site are local streets; however, Whitsett Avenue is a secondary highway. The Project will not add any additional driveway access points onto Whitsett Avenue. Currently, one inbound and one outbound driveway exist on Whitsett Avenue providing

access to the existing 92-space surface parking lot which serves the golf course, driving range, and tennis court uses on the Project Site. The surface parking lot will be reduced to 22 spaces to accommodate the Project, and although the Project will require relocation of the outbound driveway slightly to the north of the existing location, the number of access points on Whitsett Avenue will remain the same as current conditions. The main vehicular access point for the SCSLC will be the ingress/egress driveway and ramp into the subterranean parking garage off of Valleyheart Drive, which is a local dead-end street. As such, the Project Site's ingress and egress access points will not change along Whitsett Avenue and thus will not impede the current flow of vehicles and bicycles on Whitsett Avenue. Therefore, the Project is consistent with Policy No. 13-2.2 of the Community Plan.

Objective No. 14-2 of Goal No. 14. The Community Plan specifies objectives to promote pedestrian oriented areas and routes, while providing access to public transit. As discussed earlier, the Project accommodates the five key characteristics that define walkability. The Project is also consistent with several recommendations pertaining to pedestrian orientation in the Urban Design guidelines of the Community Plan. With regard to pedestrian friendliness and orientation, most notably, the Project provides a landscaped courtyard and open space for residents and guests to utilize, convenient access to the Los Angeles River and surrounding sidewalks, and location within walkable distance to the Ventura Boulevard commercial corridor. Several bus and bicycle routes also exist in the vicinity, thus providing convenient access to public transit and bicycle access to residents and visitors of the SCSLC, as well as patrons of the golf course, driving range, and clubhouse, which will be retained as part of the Project. The Project will not impede pedestrian or bicycle access to, from, or around the Project Site, and will not disrupt any public transit routes in the vicinity. Therefore, the Project will be consistent with Objective No. 14-2 of the Community Plan.

Objective No. 15-1 of Goal No. 15. The Community Plan specifies the need to have “[a] sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the Plan area”, including the provision of parking in appropriate locations in accord with Citywide standards and community needs. All of the parking for the SCSLC will be contained within a subterranean parking garage underneath the facility. A total of 613 parking spaces will be located in the parking garage, which will satisfy all City code-parking requirements for the 200 dwelling-unit Project. The parking garage will also provide 113 parking spaces for patrons and employees of the golf course, driving range, and clubhouse uses. This parking garage will be accessed from Valleyheart Drive and will provide sufficient off-street parking for the Project. As such, on-street parking is not anticipated to be impacted by the Project. The surface parking lot with access to and from Whitsett Avenue, will serve the golf course, driving range, and clubhouse uses, and will provide 22 additional parking spaces to accommodate the patrons and the community. In total, the golf course, driving range, and clubhouse, which currently have 92 parking spaces available for the community, patrons, and employees, will have 135 parking spaces available within the parking garage and surface lot after the completion of the Project. As such, it is anticipated that the golf course, driving range, and clubhouse will be provided with sufficient parking to accommodate patrons, employees, and the community, thus having no impact to on-street parking spaces in the area. Both the subterranean parking garage and surface parking lot will be reviewed by the Department of Building and Safety during the building permit process to ensure compliance with all City standards. Therefore, the Project is consistent with Objective No. 15-1 of the Community Plan.

Policy No. 15-1.1, Objective 15-1 of Goal No. 15. This policy of the Community Plan recommends a consolidation of parking to minimize the number of access points onto major and secondary highways. As discussed under Objective No. 15-1 and Policy No. 13-2.2, all parking for the SCSLC Project will be consolidated within a subterranean parking garage underneath the condominium complex, with ingress and egress access from one driveway ramp along Valleyheart Drive, a local street. There will be no access into or out of the parking garage from Whitsett Avenue, a secondary highway. The Project will maintain existing surface parking spaces within a parking lot along Whitsett Avenue, but there will not be an increase in the number of ingress/egress access points on Whitsett Avenue. The ingress driveway will remain as currently situated, while the egress driveway will be relocated slightly to the north to accommodate the Project. Therefore, the Project will be consistent with Policy No. 15-1.1

Policy No. 15-1.3, Objective No. 15-1 of Goal No. 15. This policy calls for new parking lots and parking garages to be developed in accordance with design standards specified in the Urban Design guidelines of the Community Plan. For multiple residential projects, the Urban Design guidelines recommend that parking structures be integrated with the design of the building they serve through: 1) Designing the exterior to match the style, materials and color of the main building, and 2) Utilizing decorative walls and landscaping to buffer residential uses from parking structures. As the parking structure for the Project will be completely subterranean, it will not be viewable from grade level and will not require exterior architectural design or decorative walls or landscaping for buffering purposes. As such, the design guidelines are not applicable to the Project parking garage. Furthermore, both the new subterranean parking garage and existing surface parking lot will be reviewed by the Department of Building and Safety during the building permit process to ensure compliance with all City standards. Therefore, the Project will be consistent with Policy No. 15-1.3 of the Community Plan.

d. Cumulative Impacts

The analysis of cumulative impacts was completed concurrent with the Project impact analyses (Existing Conditions plus ambient growth plus Related Projects development plus Project) and is included in the impact analysis discussion above. As discussed, application of the impact threshold criteria from the City of Los Angeles indicates none of the five study intersections and two study street segments would be significantly impacted on a cumulative level by the forecast Project traffic. Incremental, but not significant, cumulative impacts are noted at the study locations evaluated in the analysis.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific transportation and circulation impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- In accordance with Los Angeles Municipal Code Section 91.70067, hauling of construction materials shall be restricted to a haul route or haul route memo approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction.
- A parking and driveway plan shall be prepared for approved by the appropriate District Office of the Bureau of Engineering, the Department of Transportation, and/or the Department of City Planning.
- Access for the handicapped shall be located in accordance with the requirements of the Handicapped Access Division of the Department of Building and Safety.
- In compliance with future RIO District requirements, the Project design for the parking structure layout shall allocate 2% of the residential (i.e., excluding the overall golf) parking spaces for use by a third party shared car (or equivalent) program.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential transportation and circulation impacts. These PDFs are not required to be implemented to reduce any operational or construction traffic impacts, but are included as part of the Mitigation Program to ensure that they are implemented by the City as part of the Project Approval:

PDF TRF-1: The Project design incorporates subterranean parking that will be located below the buildings and street level. Therefore, the parking shall not be located between the buildings and the street and/or Los Angeles River.

PDF TRF-2: Vehicle access for the Project shall be from a single driveway leading to the subterranean parking area that will be provided from Valleyheart Drive (which will lead from Whitsett Avenue).

PDF TRF-3: The Project shall minimize the number of driveways needed to serve the site and the driveways shall be designed to accommodate the anticipated demand for each driveway.

c. Mitigation Measures

All transportation and circulation impacts related to construction and operation of the Project would be less-than-significant. However, to ensure that all and any unforeseen impacts are mitigated to a less-than-significant level through all possible measures during the construction and operational phases of the Project, the following Mitigation Measures shall be implemented relating to construction and pedestrian orientation:

- MM TRF-1: Existing access shall be maintained for the existing site uses and parking facilities.
- MM TRF-2: Any roadway lane closures shall be limited to off-peak travel periods.
- MM TRF-3: Receipt of construction materials shall be scheduled to non-peak travel periods, to the extent possible.
- MM TRF-4: Deliveries shall be coordinated to reduce the potential of trucks waiting to unload for protracted periods of times.
- MM TRF-5: Parking by construction workers shall be prohibited on adjacent streets and construction workers shall be directed to available parking areas within the Project Site.
- MM TRF-6: The existing sidewalk along the Whitsett Avenue Project Site frontage shall be improved as portions of the sidewalks are cracked and uneven and in poor conditions for pedestrians. The sidewalks shall be well-lit, even, and wide enough to accommodate seniors in walkers or wheelchairs. This improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.
- MM TRF-7: Existing traffic signal timing at the Whitsett Avenue/Ventura Boulevard intersection shall be reviewed by the Los Angeles Department of Transportation (LADOT) to ensure that pedestrians, in particular senior walkers, have adequate time to safely cross Whitsett Avenue and Ventura Boulevard during allocated pedestrian walk phases. The costs or fees associated with submittal and review by LADOT shall be paid by the Applicant, Property Owner, Developer, and/or other private party.
- MM TRF-8: A high visibility crosswalk with appropriate signage shall be installed at the west leg of the Whitsett Avenue/Valleyheart Drive intersection (i.e., across Valleyheart Drive) to provide access to nearby transit stops. This improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.
- MM TRF-9: A high visibility crosswalk with appropriate signage shall be installed across the west leg of the Whitsett Avenue/Valley Spring Lane intersection (i.e., across Valley Spring Lane) to provide access to nearby transit stops. This improvement shall be at the expense of the Applicant, Property Owner, Developer, and/or other private party, in coordination with the City of Los Angeles Department of Public Works.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Compliance Measures, all Project-specific and cumulative transportation and circulation impacts relating to traffic congestion on roadways and freeways and at intersections, cut-through traffic, Project access, pedestrian access, bicycle access, parking,

public transit, and consistency with adopted Plans and policies will be less-than-significant and not considerable. With implementation of the additional PDFs and required Mitigation Measures, impacts will be reduced further and any potentially unforeseen impacts will be reduced to a less-than-significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS

N.1. UTILITIES: ENERGY

1. INTRODUCTION

This section discusses the physical setting and provides analysis of energy resource services in the area where the proposed Project would be developed. The information contained in this section is derived primarily from the Los Angeles Department of Water and Power, Southern California Gas Company, and South Coast Air Quality Management District (SCAQMD).

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The Project Site is currently served by the City of Los Angeles Department of Water and Power (LADWP) for electrical services and the Southern California Gas Company (SoCalGas) for natural gas service. Energy service requirements are related to the size and type of projects, and the geographic area served. New projects (e.g., residential, commercial, industrial) may increase energy consumption and affect the energy distribution infrastructure.

(1) *Electricity*

The LADWP currently provides electrical services to the Project Site. Customers in the City of Los Angeles consume electricity at a rate of approximately 22,000 gigawatt hours (gWh) per year (gWh/yr). Residential uses represent the largest customer component of the LADWP's nearly 1.4 million customers; however, business and industry customers consume about 70 percent of the electricity provided. A portion of the electrical consumption is also dedicated to street lighting and water supply distribution.¹

The LADWP published and implemented the 2012 Integrated Resource Plan (IRP), which is a long-term strategic energy plan designed to ensure that the City's future energy needs are met, regulatory requirements are satisfied, and environmental policy goals are achieved. The 2012 IRP lays out alternative strategies for increasing renewable energy, while maintaining power reliability and meeting State and federal regulations. As described in the Integrated Resource Plan, LADWP is aggressively pursuing a policy of achieving 33 percent renewable energy by year 2020.

According to the 2012 IRP, the LADWP delivered and sold a total of approximately 23,232 gWh (or 23,232 million kWh) of electricity in 2011 and had an estimated net energy load² of 26,458

¹ City of Los Angeles, L.A. CEQA Threshold Guidelines, 2006, pg. M.4-1.

² "Net energy load", otherwise known as "net energy for load" is the net generation of main power generating units that are owned or operated by LADWP, plus energy receipts from non-LADWP sources, minus energy deliveries to non-LADWP service areas and agencies.

gWh (or 26,458 million kWh) of electricity.³ The consumption and sales of power in 2016, the Project's build-out year, is projected to be approximately 23,224 gWh (or 23,224 million kWh), while the annual net energy load is projected to be approximately 26,235 gWh (or 26,235 million kWh).⁴ The overall slight decline in electricity consumption in future years results from increasingly better energy efficiency and distributed generation technologies. A slight decrease in consumption is anticipated in 2014, attributed to the full ramp up of the lighting efficiency requirements of AB 1109 (approved in 2007 and known as the "Huffman Bill"), which significantly raises the efficiency standard of light bulbs. A slight increase in consumption is anticipated in 2015 due to the projected completion of port electrification projects. The annual net energy load in 2020 is projected to be approximately 27,452 gWh with a projected consumption and sales of 24,330 gWh in the LADWP service area.

The Project Site is currently served by an existing 4.8 kilowatt (kW) electrical line to the north along Valley Spring Lane and an existing 4.8 kW electrical line to the east along Whitsett Avenue.⁵ The Project Site is currently occupied by a 9-hole pitch-and-putt golf course, a clubhouse, a 24-stall driving range, and 16 tennis courts and related facilities. The driving range is lighted by eight stadium-style light standards for nighttime practice seven days of the week, closing at 11 P.M. The 16 tennis courts are also lighted by several floodlights for each court allowing for nighttime matches. Current uses at the Project Site are estimated to demand approximately 3,550,084 kilowatt hours of electricity per year (kWh/yr).⁶

(2) *Natural Gas*

SoCalGas serves about 19.5 million residential, commercial, and industrial customers in more than 530 communities and throughout 23,000 square miles in the southern half of California. SoCalGas owns and operates 95,000 miles of gas distribution mains and service lines, as well as nearly 3,000 miles of transmission and storage pipeline. The utility also owns gas transmission compressor stations and underground storage facilities.

The Gas Company has a total of 135.1 billion cubic feet (Bcf) of storage capacity, which is divided as follows: 82 Bcf is allocated for core residential, small industrial, and commercial customers, four Bcf is used for system balancing, and 49.1 Bcf is available to other customers.⁷

California's existing gas supply portfolio is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources (the Permian, Anadarko, and San Juan Basins), the Rocky Mountains, and Canada. In 2010, the Ruby pipeline came online bringing up to 1.5 Bcf per day of additional gas to California from the Rocky

³ Los Angeles Department of Water and Power. 2012 Final Power Integrated Resources Plan. December 3, 2012. Table A-1.

⁴ Los Angeles Department of Water and Power. 2012 Final Power Integrated Resources Plan. December 3, 2012. Table A-1.

⁵ Per phone conversation with Richard Gibson, LADWP, on September 6, 2012.

⁶ SCAQMD, CEQA Air Quality Handbook, Table A-9-11-A, 1993. Retail usage rate (13.55 kWh/sf/yr) was used to calculate the demand for the approximately 4,342 sf clubhouse, while the Miscellaneous usage rate (10.50 kWh/sf/yr) was used to calculate the demand for the approximately 136,500 sf driving range and approximately 196,000 sf area of the tennis courts. Assumes no electricity demand from the golf course.

⁷ California Gas and Electric Utilities. 2012 California Gas Report. July 2012. Page 89.

Mountains. The Energia Costa Azul LNG (Liquefied Natural Gas) receiving terminal in Baja California provides yet another source of supply for California.

Under average temperature conditions and normal hydro year, it was estimated that statewide natural gas demand for California averaged 6,248 million cubic feet per day (cf/day) in 2012 and would decrease to 5,975 million cf/day by 2030.⁸ Under the same conditions, it was estimated that statewide natural gas supply for California averaged 6,427 million cf/day in 2012 and would decrease to 6,129 million cf/day by 2030.⁹ As such, in 2012, there was a statewide gas surplus of 179 million cf/day, which will decrease to a surplus of 154 million cf/day by 2030.

From 2012 to 2030, SoCalGas projects demand in the southern California service area to exhibit an annual decline of 0.13% from the level in 2012 due to modest economic growth, energy efficiency and renewable electricity goals, and a decline in commercial and industrial demand among other reasons.

The Project Site is currently served by an existing 4-inch gas main to the east, underground in Whitsett Avenue. The existing uses on the Project Site are estimated to currently demand approximately 434 cf/day or 13,026 cf of natural gas per month (cf/month) or 156,312 cf of natural gas per year (cf/year).¹⁰

b. Regulatory and Policy Setting

(1) Title 24 of the California Code of Regulations

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, in Title 24 of the California Code of Regulations (Title 24). The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings provided these standards meet or exceed those provided in Title 24 guidelines.

Additionally, the California Subdivision Map Act requires that new subdivision designs provide for future passive or natural heating and cooling opportunities, to the maximum extent feasible. The Los Angeles Municipal Code (LAMC) incorporates these State requirements.¹¹

⁸ California Gas and Electric Utilities. 2012 California Gas Report. July 2012. Page 17.

⁹ California Gas and Electric Utilities. 2012 California Gas Report. July 2012. Page 17.

¹⁰ SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993. Retail/Shopping Center usage factor was used to calculate natural gas usage for the existing approximately 4,342 sf clubhouse. Assumes no natural gas usage by the existing golf course, driving range, and tennis courts.

¹¹ City of Los Angeles, L.A. CEQA Threshold Guidelines, 2006, pg. M.4-2.

(2) *City of Los Angeles General Plan*

*City of Los Angeles General Plan*¹²

The LADWP provides electrical service to over 1.3 million customers in the City of Los Angeles. LADWP obtains 17 percent of the required power from four municipally-owned power plants within the Los Angeles basin. The remaining LADWP requirements come from sources outside of the Los Angeles Basin. The current emphasis on purchasing power from non-LADWP power systems is to improve fuel diversity, to take advantage of low-priced surplus electricity and to minimize the air emissions in the South Coast Air Basin. Electricity is distributed through an extensive network of receiving stations, distributing stations, overhead lines, and underground lines. The following goals, objectives and policies are provided in the Framework Element of the Los Angeles City General Plan to ensure energy efficiency is obtained.

Goal 9M A supply of electricity that is adequate to meet the needs of Los Angeles Department of Water and Power electric customers located within Los Angeles.

Objective 9.26 Monitor and forecast the electricity power needs of Los Angeles' residents, industries, and businesses.

Policy 9.26.1 The LADWP shall continue to monitor and forecast its customers' peak load on its system and identify which parts of the system should be upgraded to accommodate expected growth.

Objective 9.27 Continue to ensure that all electric power customers will receive a dependable supply of electricity at competitive rates.

Policy 9.27.1 The LADWP shall continue to generate or purchase electric power to serve its customers.

Objective 9.28 Provide adequate power supply transmission and distribution facilities to accommodate existing uses and projected growth.

Policy 9.28.1 The LADWP shall continue to plan its power supply capability far enough in advance to ensure that it has available capacity to meet customer demand before it is needed.

Policy 9.28.2 The LADWP shall continue to ensure that the City's transmission and distribution system is able to accommodate future peak electric demand for its customers.

¹² Department of City Planning Los Angeles, California, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.

- Policy 9.28.3** The LADWP shall continue to advise the Planning and Building and Safety Departments of any construction project that would overload a part of the distribution system during a period of peak demand.
- Objective 9.29** Provide electricity in a manner that demonstrates a commitment to environmental principals, ensures maximum customer value, and is consistent with industry standards.
- Policy 9.29.1** Develop and deliver services to attract, assist, and retain industries and businesses in Los Angeles.
- Policy 9.29.2** Promote the responsible use of natural resources, consistent with City environmental policies.
- Policy 9.29.3** Promote conservation and energy efficiency to the maximum extent that is cost effective and practical, including potential retrofitting when considering significant expansion of existing structures.
- Policy 9.29.4** Provide incentives for the development of cleaner and more energy-efficient industrial development.
- Policy 9.29.5** Deliver to all sectors of the economy customer service programs, products and activities that promote satisfaction and value related to the provision of electric power.
- Policy 9.29.6** Encourage additional markets for electrical energy, such as environmentally friendly alternative fuel for transportation in electric buses and light-duty vehicles.
- Objective 9.30** Ensure continued electric service after an earthquake or other emergency.
- Policy 9.30.1** The LADWP shall periodically examine its emergency response programs to ensure continued electrical service.

(3) *Los Angeles Municipal Code*

The Los Angeles Municipal Code Article 9 Green Building Code provides standards for energy conservation for new developments that are to be built in the City of Los Angeles. Section 99.04.204 Energy Reduction provides the following standards that shall be applied to new developments to ensure energy reduction:

- Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of 0.90 or higher;

- Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher;
- Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5;
- Installed tank type water heaters shall have an Energy Factor (EF) higher than 0.60;
- Installed tankless water heaters shall have an Energy Factor (EF) higher than 0.80;
- Contractors shall perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow;
- Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaries); and,
- Installed swimming pool circulation pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

(4) *Western Electricity Coordinating Council*

The Western Electricity Coordinating Council (WECC) is a voluntary consortium of electrical power providers that is responsible for coordinating and promoting electricity reliability from northern Baja California in the south of its jurisdiction to Alberta and British Columbia in the north of its jurisdiction and the 14 western states in between. The LADWP is a member of the WECC. The WECC has implemented a regional reliability standard known as Standard BAL-STD-002-0, which requires reliable operations of the interconnected power system while ensuring adequate generating capacity be available at all times to account for varying demands and avoid loss of firm load following transmission or generation contingencies. As a means of ensuring power system reliability, LADWP maintains an extra reserve margin of power generation resources in the event of a disturbance in the electrical system. In order to determine how much extra generation reserves are needed, LADWP adheres to the WECC Reliability Standard which requires its providers to:

- Supply requirements for load variations;
- Replace generating capacity and energy lost due to force outages of generation or transmission equipment;
- Meet on-demand obligations; and,
- Replace energy lost due to curtailment of interruptible imports.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Energy demand factors were applied to determine the amount of electricity and natural gas the Project would demand during construction and operation.

b. Thresholds of Significance

In accordance with Appendix F to the State CEQA Guidelines, environmental impacts to energy resources with implementation of a Project may include¹³:

- a.) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- b.) The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- c.) The effects of the project on peak and base period demands for electricity and other forms of energy.
- d.) The degree to which the project complies with existing energy standards.
- e.) The effects of the project on energy resources
- f.) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

- a.) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- b.) Whether and when the needed infrastructure was anticipated by adopted plans; and,
- c.) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

¹³ California Environmental Quality Act, Statue and Guidelines 2012, Appendix F Energy Conservation, pg. 254 and 255.

c. Project Impacts

Construction Impacts on Electrical and Natural Gas Resources

Proposed development of the Project would be limited to the Development Site. During construction of the proposed Project, primarily stationary equipment will require minor quantities of electricity, including temporary use for lighting and power tools. The tools and lighting would be powered with charging stations supplied by a temporary power connection to the electrical system. The electrical demand generated by power tools and lighting is minor and substantially less than the operational demand of the Project. Heavy construction vehicles and equipment run on oil. Electrical consumption of small power construction tools range from 300 to 6,000 watts during run time (0.3 kW to 6 kW).¹⁴ If running for 8 hours per day/night, at worst case, the usage would be between 2.4 kilowatt hours (kWh) to 48 kWh. A typical temporary construction lighting tower would have 4 x 1,000 watt fixtures (4 kW).¹⁵ If running for 8 hours per day/night, at worst case, the usage would be 32 kWh. The minimal amount of electricity used for construction equipment compares to the daily operational electrical demand of the Project of approximately 3,083 kWh per day (or 4,977,490 kWh per year). Additionally, the amount of energy to be consumed during construction will be limited to the temporary construction period on the Development Site. Existing electrical infrastructure of the LADWP currently has enough capacity to provide service during the construction phase of the Project. Furthermore, electrical infrastructure or facilities would not have to be expanded or newly developed to provide service to the Project Site during construction or demolition. Therefore electrical resource impacts would be less-than-significant during construction of the proposed Project.

Construction activities are not anticipated to consume natural gas. Therefore, impacts to natural gas resources or infrastructure during construction would be less-than-significant.

Operational Impacts on Electrical Resources

Existing development on the Project Site has an estimated demand of approximately 3,550,084 kilowatt hours (kWh) of electricity per year. Development of the proposed Project would include the removal of the 16 lighted tennis courts that currently occupy Lot 2 and development of a six building 200-unit senior condominium complex with associated underground parking (two levels). The proposed Project, minus the tennis courts, but including the driving range and clubhouse to be retained on the Project Site, is estimated to demand approximately 4,977,490 kWh of electricity per year¹⁶, resulting in an approximately 40 percent increase above current use.

As discussed earlier, LADWP had an estimated net energy load of 26,458 million kWh in 2011. LADWP's projected annual net energy load for 2016, the Project's build-out year, is

¹⁴ Source: http://www.uspowerco.com/articles/power_consumption_chart_for_tools

¹⁵ Source: <http://www.sunbeltrentals.com/equipment/category.aspx?id=19>

¹⁶ SCAQMD, CEQA Air Quality Handbook, Table A-9-11-A, 1993. Residential usage rate (5,626.50 kWh/unit/yr) was used to calculate the demand for the 200-unit SCSLC. Retail usage rate (13.55 kWh/sf/yr) was used to calculate the demand for the approximately 4,342 sf clubhouse to be retained. Miscellaneous usage rate (10.50 kWh/sf/yr) was used to calculate the demand for the approximately 136,500 sf driving range to be retained and approximately 224,772 sf two-level subterranean parking garage. Assumes no electricity demand from the golf course.

approximately 26,235 million kWh.¹⁷ Although, the annual net energy load between 2011 and 2016 is forecasted to decrease by approximately 223 million kWh, the projected sales and consumption of power is also anticipated to decrease. Additionally, due to the incremental impacts of LADWP-sponsored energy efficiency programs, after year 2017, it is anticipated that the net energy load will steadily increase annually, averaging to a rise of 0.8% every year from 2011 to 2040. The proposed Project's net increase in electricity demand of almost 4.98 million kWh per year represents less than 0.02 percent of LADWP's forecast annual net energy load in 2016, and even less in subsequent years after 2017.

To forecast growth, LADWP uses the following sources: historical sales, historical weather data, historical employment data, historic population and forecasts data, economic forecast data, construction activity forecast data, plug-in vehicle forecast data, port electricity forecast data, and housing forecast data.¹⁸ Therefore, LADWP's forecasted electricity demand assumes construction of new projects within its service area, such as the proposed Project. As such, the net increase in electricity demand associated with the Project is anticipated to be within the service capabilities of LADWP and would not result in the need for new power supplies or adversely impact the LADWP's renewable energy resource supplies.

Since the Project would be adequately served for its operational demand on electricity, and considering no new electrical infrastructure or facilities would need to be developed to accommodate the Project (other than service connections), it can be concluded that the Project would have a less-than-significant impact on electrical resources.

Although the SCAQMD electrical usage rates from the 1993 CEQA Handbook are the standard for determining future electrical consumption for development projects, they do not include numerical reductions for implementation of Title 24 Standards, which are continuously updated. The proposed Project would comply with Title 24 Standards as required by the California Building Code and enforced by the City of Los Angeles.

Operational Impacts on Natural Gas Resources

Existing development on the Project Site has an estimated natural gas demand of approximately 434 cf/day or 13,026 cf/month. Development of the proposed Project would include the removal of the 16 lighted tennis courts that currently occupy Lot 2 and development of a six building 200-unit senior condominium complex. The proposed Project, including the golf clubhouse to be retained on the Project Site, is estimated to demand approximately 27,178 cf/day or 815,326 cf per month.¹⁹

¹⁷ Los Angeles Department of Water and Power. 2012 Final Power Integrated Resources Plan. December 3, 2012. Table A-1.

¹⁸ Los Angeles Department of Water and Power. 2012 Final Power Integrated Resources Plan. December 3, 2012. Table 2-1.

¹⁹ SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993. Multi-Family Units – Residential usage factor was used to calculate natural gas usage for the proposed 200-unit Project. Retail/Shopping Center usage factor was used to calculate natural gas usage for the existing approximately 4,342 sf clubhouse. Assumes no natural gas usage by the existing golf course and driving range.

Although the Project represents a large increase in natural gas demand on the Project Site, this is due to the recreational nature of the existing uses on the Project Site, which have a minimal usage of natural gas in comparison to residential uses in general. However, the Project's increase in natural gas demand at the Project Site is not out of line with the general demand for natural gas from similar-sized multi-family residential buildings, such as those along Whitsett Avenue.

It is estimated in 2015, that SoCalGas will be able to supply 2,615 million cf/day to the southern California region. The supply estimate for 2016, the year of Project build-out, will be substantially similar to that estimated for 2015. The approximately 27,178 cf/day natural gas demand of the Project represents a very minimal percentage of the supply to be provided by SoCalGas in 2016 and beyond. Furthermore, according to the *2012 California Gas Report*, due to the expected energy savings resulting from tightened building and appliance standards and energy efficiency programs, demand per residential customer will decline at an annual rate of minus 0.1% from 2012 to 2030. With increasing gas conservation and energy efficient technology available in the future, the residential gas demand from the Project will represent even less of a percentage of the supply provided by SoCalGas. Ultimately, the Southern California Gas Company does have capacity to adequately serve the proposed Project upon its completion and during its operation.

The Project would be responsible for paying connection costs to connect its onsite service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. As such, impacts on natural gas supply and infrastructure as a result of the Project would be less-than-significant.

d. Cumulative Impacts

Similar to the proposed Project, the ten Related Projects would require energy resources during construction and operation. The proposed Project would have a nominal cumulative demand on energy resources and therefore would not significantly cumulatively contribute to energy resource demand during its construction or operation.

Regarding electricity, based on information presented in the *2012 Integrated Resource Plan*, LADWP anticipates it can support future growth within the City, in accordance with growth rates projected. Regarding natural gas, according to the *2012 California Gas Report*, natural gas supplies from the southwestern United States (i.e., the San Juan Basin and the Permian Basin) are expected to meet southern California's gas demand. As such, it is anticipated that the proposed Project and Related Projects fall within the scope of the growth estimates for electrical and natural gas usage, and would result in less-than-significant impacts.

Similar to the proposed Project, each of the ten Related Projects would be required to contact LADWP and SoCalGas to ensure that existing infrastructure and facilities serving each Related Project site would be adequate. LADWP and SoCalGas may suggest new infrastructure

development or expansion of existing infrastructure for certain Related Projects as needed. Furthermore, Title 24 of the California Code of Regulations establishes energy conservation standards for new construction. These energy conservation standards would be incorporated into new buildings as part of the building permit process and thus reduce the amount of electricity and natural gas cumulatively consumed by the proposed Project in combination with the Related Projects by addressing insulation, glazing, lighting, shading, and water and space heating systems.

In consideration of the fact that the proposed Project would have a nominal increase in demand of energy resources compared to the Related Projects; the proposed Project would have a less-than-significant contribution to cumulative impacts of energy resources.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonable anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific energy resource impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses.

- The Project shall comply with the applicable provisions of the City of Los Angeles Green Building Code, including, but not limited to:
 - Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of 0.90 or higher;
 - Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher;
 - Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5;
 - Installed tank type water heaters shall have an Energy Factor (EF) higher than 0.60;
 - Installed tankless water heaters shall have an Energy Factor (EF) higher than 0.80;
 - Contractors shall perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow;
 - Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaries); and,

- Installed swimming pool circulation pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential energy resource impacts.

PDF UTE-1: The Project shall attempt to use as many regional construction materials as possible to reduce environmental impacts associated with the transportation of materials.

PDF UTE-2: The senior housing shall be located adjacent to the existing golf course to allow utilization of the existing greenery as a heat absorption source, thus creating a steady micro-climate, helping to increase occupant comfort, and lower air-conditioning and energy usage.

PDF UTE-3: The Project design shall incorporate roofing that serves to reduce unwanted heat absorption and minimize energy consumption.

PDF UTE-4: The Project shall use water efficient landscaping and native drought tolerant plants.

PDF UTE-5: The Project shall use stormwater infiltration and detention basins to manage stormwater runoff and limit disruption and pollution of natural water flows.

PDF UTE-6: The Project shall contain easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials for recycling.

PDF UTE-7: The Project shall utilize natural light as the primary source of light in all dwelling units. Lighting systems shall be controllable to achieve maximum efficiency.

PDF UTE-8: The Project energy performance shall be 20% more effective than required by California Title 24 Energy Design Standards, 2010 Edition, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

PDF UTE-9: The Project shall be designed to provide separate HVAC units for each dwelling unit and for common areas, thus providing a high level of thermal comfort controllability and satisfaction.

PDF UTE-10: The Project shall achieve the equivalent of LEED Platinum, Gold, or Silver status.

c. Mitigation Measures

The Project will result in less-than-significant construction and operational impacts related to energy resources. Therefore, Mitigation Measures are not required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of all required Compliance Measures, the Project will result in less-than-significant construction and operational impacts related to energy resources. With implementation of the Project Design Features, any impacts will be further reduced and any potentially unforeseen impacts will be less-than-significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

N.2. UTILITIES: WATER

1. INTRODUCTION

Consistent with the Urban Water Management Planning Act (see Regulatory and Policy Setting discussion below), the City of Los Angeles Department of Water and Power (LADWP) maintains an Urban Water Management Plan (LA-UWMP) which includes estimates of past, current, and projected potable and recycled water use; identifies conservation and reclamation measures currently in place; describes alternative conservation measures; and provides an urban water shortage contingency plan. The 2010 LA-UWMP provides water supply and demand projections in five-year increments to 2035, which are based on projected population estimates provided by the Southern California Association of Governments (SCAG).

In particular, the 2010 LA-UWMP emphasizes conservation and reuse. The adopted 2010 Plan focuses on recycling water for industrial use and for irrigation in public areas. LADWP's 2005 Plan included a proposal for a desalination plant, but the expensive project never came to fruition.

Water supply and Project water demand in this section are evaluated in the context of urban water management and planning requirements.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Water Supply

The LADWP owns, operates, and maintains all water facilities within the City of Los Angeles and is responsible for ensuring that the delivered water meets all applicable State quality standards. The Weddington Golf & Tennis Club is located within the City, and as such, LADWP is responsible for delivering water to the Project Site.

LADWP supplies water to its customers from four main sources: (1) the Mono Basin and Owens Valley, located on the east side of the Sierra Nevada Mountains delivered via the Los Angeles Aqueduct (LAA); (2) local groundwater basins, including the San Fernando, Sylmar, Eagle Rock, Central Coast, and West Coast basins; (3) purchases of State Water Project (SWP) and Colorado River water from the Metropolitan Water District (MWD); and (4) water recycling. LADWP operates the Los Angeles-Owens River Aqueduct (i.e., the LAA) and is a member of the MWD.

LADWP had an available water supply of 555,477 acre-feet per year (AFY) for the fiscal year 2009-2010. The 2010 LA-UWMP forecasts the available water supplies through the year 2035, which is projected to be 710,800 AFY at that point in time.

On average for the fiscal years 2006-10, City water supplies were derived from the following sources: (1) the Los Angeles Aqueduct, contributing approximately 36 percent; (2) groundwater, contributing approximately 11 percent; (3) purchases from the MWD, contributing approximately 52 percent; and (4) recycled water (for industrial and irrigation purposes), representing approximately 1 percent.¹ These sources are described in more detail later. Reliance on the MWD component is typically reduced during normal/average years. Furthermore, through the year 2035, the MWD component is projected to be reduced to fewer than 30 percent and replaced by water conservation, stormwater capture, and water transfer components, as well a greater City-wide reliance on recycled water.

The amount of water obtained from these sources varies from year to year based on demand and weather conditions. In addition, improved technology, as well as acceptance and application of reclaimed wastewater, continue to expand the role of recycled water as a water supply component. Additionally, application of water conservation practices, including low impact development (LID) measures and use of drought-tolerant landscaping, will shift water supply needs over time.

In 1993, MWD commenced its Integrated Resources Plan (IRP) process, which is designed to reduce MWD's dependency on imported water during droughts or other shortages. The IRP includes a variety of projects and programs, including: (1) providing financial incentives for local projects and conservation; (2) increased surface storage in Diamond Valley Lake and SWP reservoirs; (3) groundwater storage programs in the Central Valley, Imperial Valley, and Coachella Valley; (4) short- and long-term water transfers; and (5) local groundwater storage programs with participating member agencies. As part of its IRP update, MWD is planning for the development of a 500,000 acre-foot supply which will provide sufficient water to its member agencies even during critically dry events from now until at least 2025. MWD, along with LADWP and other member agencies, also established a Water Surplus and Drought Management Plan to ensure MWD's ability to meet its member agencies' future water needs.

In addition to purchases from MWD, the City of Los Angeles intends to enhance its water supplies through continued conservation measures and increased use of recycled water. LADWP is committed to expanding its recycled water program and has several projects that provide recycled water for landscape irrigation and commercial use. For example, the City uses recycled water in Griffith Park to irrigate two golf courses and a seven-mile stretch of open space along the Golden State Freeway. In addition, LADWP is evaluating the potential for using recycled water for recharging groundwater supplies.

As a result of LADWP's multiple supply sources and continued water management planning, the LA-UWMP concluded that LADWP will have adequate water supplies to serve City needs through the year 2035, during normal, single-dry, and multiple-dry years, taking into account projected population growth and various established and expected land uses based on current zoning. The LA-UWMP indicates that LADWP is planning for future population growth in its service area, similar to the manner in which the City's General Plan forecasts population growth

¹ Exhibit 11C. Los Angeles Department of Water and Power. *2010 Urban Water Management Plan*, Exhibit 11C 2011, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

in planning for future growth and development throughout the City. Both the General Plan and the LA-UWMP's growth projections are based on population forecasts provided by the SCAG.

Additional details on the City's water supply sources are provided in the following discussion:

Los Angeles Aqueduct (LAA) - Water supplies from the Los Angeles Aqueduct originate from both snowmelt runoff and groundwater, and therefore can fluctuate yearly due to varying hydrologic and climate conditions. Aqueduct supplies are primarily collected from snowmelt runoff from the Eastern Sierra Nevada Mountains, which is conveyed to the City of Los Angeles via the aqueduct. The City holds water rights in the Eastern Sierra Nevada Mountains. Aqueduct supplies come from groundwater pumping in the Owens Valley and Mono Basin. In recent years, aqueduct supplies have been less than normal due to environmental obligations to restore Mono Lake and mitigate dust from the Owens Lake. LADWP's ability to export Mono Basin water is now tied directly to the elevation of Mono Lake and flows of various streams that are tributary to Mono Lake. As such, when Mono Lake reaches its target elevation, exports from the Mono Basin can increase from the current suppressed levels of 16,000 AFY.

Groundwater - LADWP extracts groundwater from various locations throughout the Owens Valley and four local groundwater basins (i.e., the San Fernando, Sylmar, Central, and West Coast groundwater basins). Because LADWP owns extensive property in the Owens Valley, it appropriates groundwater for use in the Owens Valley area, as well as Los Angeles. The groundwater basins in Los Angeles County have been adjudicated, meaning that the groundwater supplies and quantities have been assigned by the courts to existing users. The San Fernando Basin, which consists of 112,000 acres of land and comprises 91.2 percent of the Upper Los Angeles River Area (ULARA) valley fill, is the largest of the four local basins. LADWP has accumulated nearly 404,400 acre-feet of stored water credit (i.e., banked) in the San Fernando Basin as of October 2009, which can be withdrawn from the basin during normal and dry years or in an emergency.² This banked groundwater is in addition to LADWP's annual entitlement of approximately 87,000 acre-feet from the basin. The majority of LADWP's local groundwater is extracted from the San Fernando Basin.

Sylmar Basin, located in the northern part of the ULARA, consists of 5,600 acres and comprises 4.6 percent of the ULARA valley fill. LADWP has an annual entitlement of 3,255 AFY from the Sylmar Basin. LADWP also has adjudicated rights to extract groundwater from the Central and West Coast Basins, with annual entitlements of 15,000 AFY and 1,503 AFY, respectively. Currently, LADWP does not exercise its pumping rights to the West Coast Basin due to localized water quality issues.³

Metropolitan Water District (MWD) – MWD is the largest water wholesaler for domestic and municipal water uses in southern California. MWD imports a portion of its water supplies from

² Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*, Page 124, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

³ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*, Pages 129-132, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

northern California through the SWP's California Aqueduct and the Colorado River through the MWD's own Colorado River Aqueduct. MWD's long-term plans to meet its member agencies' growing demands are through water transfer programs, outdoor conservation measures, and development of additional resources such as recycling, brackish water desalination, and seawater desalination. Additionally, MWD has approximately 1.1 million acre-feet of storage capacity available within nine regional reservoirs and more than 1.3 million acre-feet additional storage within the aqueduct and banking/transfer programs (as of 2010).⁴

As one of 26 member agencies of the MWD, LADWP purchases water to supplement its supplies from the City's LAA, local groundwater, and recycled water sources. LADWP will continue to rely on MWD to meet its current and future supplemental water needs, but will seek to reduce this reliance in future years. Per the 2010 LA-UWMP, LADWP intends to reduce its reliance on MWD water supplies from the current five-year average of 52 percent to a total demand of 24 percent by 2035 (under average weather conditions).⁵ In addition, LADWP is participating in MWD's Water Surplus and Drought Management Plan in order to acquire its drought supplies from MWD in the future.

The amount of water that MWD will be able to supply to southern California in the near future is unclear given recent and ongoing federal court decisions (e.g., Natural Resources Defense Council et al. v. Kempthorne et al.). In Spring 2007, various environmental groups sought to halt the operation of water pumps in the Sacramento-San Joaquin River Delta (the Delta) to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, a federal court invalidated the Biological Opinion issued by the U.S. Fish and Wildlife Service, which had concluded that the Delta smelt were in "no jeopardy" from operational changes of the SWP in the Delta. On May 31, 2007, the California Department of Water Resources (DWR), which oversees and manages the SWP, voluntarily shut down SWP pumps for 17 days in an effort to protect the Delta smelt. That was followed in August 2007 by an oral decision of the same federal court to institute interim protective measures that restrict water operations in the Delta, including reducing the amount of water being pumped out of the Delta between the end of December and June. In December 2007, the federal court issued an interim remedial order, requiring the U.S. Fish & Wildlife Service to revise its Biological Opinion by September 15, 2008 and conditioning Delta operations on various requirements.

Subsequently, five fish species residing in the Delta have been listed as endangered and as a result, SWP exports and pumping operations from the Delta have been significantly curtailed. The Department of Water Resources prepared a Water Allocation Analysis in 2010 indicating that MWD could receive 0.15 to 0.20 million AFY less water than forecast for 2010 under average hydrologic conditions. LADWP indicates that these reductions represent a 10 to 15 percent reduction of the approximately 1.2 million AFY of water that MWD previously obtained from the SWP. Litigation remains ongoing while progress toward a long-term solution is

⁴ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*, Exhibit 8C, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

⁵ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*, Page 163, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

reached. Therefore, the full extent of the Natural Resources Defense Council's impact on MWD's ability to supply water to southern California is still uncertain.

At present, both the California State government and MWD are evaluating Delta operations and options to address Delta smelt impacts and other environmental concerns. The Governor's Delta Vision Process and the Bay-Delta Conservation Plan are both focused on finding and implementing long-term solutions for the Delta. MWD is also actively engaged in improving Delta water operations. In May 2007, MWD's Board adopted a Delta Action Plan as a framework to address water supply risks in the Delta both for the near- and long-term. The near- and mid-term actions outlined in the Delta Action Plan are intended to implement measures to reduce fishery and earthquake related risks, such as aggressive monitoring, ecosystem restoration, local water supply projects, and emergency preparedness and response plans.

In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. Campaigns for voluntary conservation, curtailment of replenishment water, and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented.

Nonetheless, the LA-UWMP reports that MWD forecasts 2015 supply availability (for service to all its members) of 3.49 million acre-feet under its current programs. This supply could be expanded to a total of 4.26 million acre-feet with implementation of water storage and supply programs scheduled for development. Even under current programs and conditions, MWD anticipates a water surplus of more than 1.0 million acre-feet.⁶

Water Conservation and Recycling – In order to meet future water demands, water conservation and recycling will continue to play an important role. LADWP has implemented water conservation and recycling measures with efforts to further promote such programs and integrate their application more broadly. LADWP is committed to increasing the percentage of the City's water demand that is met through water conservation and recycling.

LADWP encourages water conservation through multiple measures, including a tiered pricing system, weather sensitive irrigation controllers, low flow toilets, and water saving showerheads, as well as a rebate program encouraging residential customers to purchase high efficiency clothes washers. Moreover, there are a number of City ordinances in place mandating water conservation (e.g., requiring the installation of low-flow showerheads and toilets for all

⁶ Los Angeles Department of Water and Power, *2010 Urban Water Management Plan*, Exhibit 8R, 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

properties; requiring water-efficient landscaping for all new construction; prohibiting hose washing of paved surfaces; and imposing watering restrictions on turf that exceeds three acres).⁷

(2) Existing Water Demand

The City's annual water demand is anticipated to be 710,800 AFY by 2035, an increase of 96,000 AFY from 2015 demand levels of 614,800 AFY. LADWP anticipates adequate water supplies will be available to service the City and its customers, contingent to normal, single-dry and multiple-dry year conditions forecast through 2035.

(3) Water Treatment, Storage and Conveyance

Strategic and well-managed water storage is essential to ensure that LADWP can maintain a consistent water supply during high demand conditions and for firefighting and emergencies. The City water system includes 110 tanks and reservoirs ranging in size from 10,000 to 60 billion gallons in size, with a total collective capacity of 109 billion gallons. Water is distributed through a network of 7,200 miles of water mains ranging from 4 inches to 120 inches in diameter. Because of the size and range in City-wide elevations, the water system is divided into 102 pressure zones, with approximately 90 booster pumping stations to ensure water service at higher elevations.⁸

The primary water treatment plant serving the general Los Angeles area, including the Project Site, is the Los Angeles Filtration Plant (LAFP). The LAFP experiences an average flow of 450 million gallons per day (mgd) in non-summer months and 550 mgd during summer months, with an overall design capacity of 600 mgd. With an annual average flow of 475 mgd, the LAFP has a remaining capacity of 125 mgd (approximately 21 percent). LADWP does not have any plans for expansion of water treatment facilities at this time.

⁷ City of Los Angeles, *The Water Conservation Plan of the City of Los Angeles*, Chapter XII, 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition (LAMC)*. Cincinnati, OH: American Legal Publishing Corp, 6 June 2008

<http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

⁸ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

(4) *Local Site Conditions*

Existing Site Water Consumption – Water demand and consumption at the Project Site, including operation of the golf course, driving range, tennis court facilities, and clubhouse, is estimated to be approximately 112,900 gallons per day or 126.61 AFY.^{9 10} As an isolated component, the water demand from the tennis court facilities, which will be removed for the Project, is based on a factor of 0.0192 gallons per day per square feet (or 7 gallons per year per square foot)¹¹, resulting in an estimated water demand of 3,781 gallons per day or 4.24 AFY.¹²

Local Lines – Water is conveyed by a local system of water mains and lines that serve the community and the Project Site. Specifically, the Project Site is currently served by a 6-inch LADWP water main beneath Whitsett Avenue.¹³ There are no other water mains in the area that would be expected to serve this Project and Project Site.

In addition to providing domestic water service, the LADWP also provides water for firefighting services in accordance with the Fire Code of the City of Los Angeles Municipal Code (LAMC). Fire flow requirements are closely related to land use, as the amount of water necessary for fire protection varies with the type of development found in the immediate community and the development itself. The existing fire flow capacity for the Project Site is 1,500 gallons per minute with a residual static water pressure of 150 pounds per square inch (psi) to remain in the pipes in the Project area while the appropriate fire flow is streaming.¹⁴

b. Regulatory and Policy Setting

(1) *California Water Planning and Regulations*

California Urban Water Management Planning Act – The California Urban Water Management Planning Act (Water Code § 10610 et. seq.) (UWMP Act), addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The UWMP Act also requires water suppliers, which serve

⁹ City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit M.2-12, 2006. Water generation rates are 120% of the wastewater generation rates in Exhibit M.2-12. The clubhouse was classified as a “Commercial Use” with a water consumption rate of 0.08 gpd/sf (120% of the final number for wastewater generation). Rates for tennis courts are not provided in the Exhibit, but provided through the U.S. Department of Energy (see footnote 11).

¹⁰ Golf Course Superintendents Association of America and National Golf Foundation, *Golf Course Environmental Profile Measures Water Use, Source, Cost, Quality, and Management and Conservation Strategies*, <<http://bucketurf.osu.edu/pdf/profile.pdf>>, 29 January 2009. Since golf courses and driving ranges do not produce wastewater, water generation rates could not be determined from the L.A. CEQA Thresholds Guide. As such, a total consumption of 99.7 AFY (or 11.1 AFY per hole) was used, which represents the average annual water usage of a 9-hole golf course in the southwest region of the United States under normal weather conditions. The driving range is approximately the length of two golf holes on the golf course. As such, a total consumption of 22.2 AFY was used for the driving range, although it is likely the driving range uses much less water for maintenance.

¹¹ U.S. Department of Energy, *Buildings Database*, <<http://eere.buildinggreen.com/site.cfm?ProjectID=282>>, accessed 1 October 2012. A factor of 7 gallons per year per square feet is based on comparative water use data for Challengers Tennis Club, and is a collective average for water use that includes irrigation, flush toilets, water fountains and court maintenance.

¹² Based on 196,950 square feet or area for Lot 2.

¹³ City of Los Angeles, Department of Public Works, Substructure Map SUB-7347

¹⁴ Captian Souter, Los Angeles Fire Department, Station No. 78, personal communication, 6 September 2012.

more than 3,000 customers or provide more than 3,000 AFY of water, to develop UWMPs that evaluate the purveyor's water supplies and demands for a 20-year period (Water Code Section 10620). Among other requirements, the UWMP Act requires purveyors to identify existing water supplies and demands; project future supplies and demands for the next 20 years; assess such supplies and demands during dry years; describe all water supply projects and programs that may be undertaken by the purveyor; and formulate a water shortage contingency plan (Water Code Section 10631). The UWMP Act requires that UWMPs be updated every five years. UWMPs provide valuable information that can be used in the land use planning process and enable cities to gauge the availability of water supplies to support development projects within their boundaries.

In 1995, the California legislature passed, and Governor Wilson signed into law, Senate Bill (SB) 901 (Costa) which is codified as Part 2.10 (§ 10910 et seq.) of the California Water Code. This statute provides that environmental impact reports for certain development projects must address the availability of water for a project.

SB 610 and SB 221 – Additional legislation was enacted as of January 2002 that placed further requirements upon water purveyors. Senate Bill (SB) 610 (Costa) amended Part 2.10 of the Water Code regarding water supply availability. SB 221 (Kuehl) amended the Subdivision Map Act, requiring that a public water system must provide written verification of sufficient water supply prior to approval of a new subdivision of property of more than 500 dwelling units prior to approval of a tentative or parcel map.¹⁵ These amendments require generally that retail water providers demonstrate that sufficient and reliable sources are available in order for local agencies to evaluate large scale developments and complete the environmental review process. Both SB 610 and SB 221 became effective January 1, 2002.

SB 610, codified as Section 10910 et seq. in the California Water Code, describes requirement for both water supply assessments and Urban Water Management Plans applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that for specified projects subject to CEQA, the urban water supplier must prepare a water supply assessment to determine whether the anticipated water demand associated with a proposed project has been included and contemplated as part of the most recently adopted UWMP. Specifically, a water supply assessment shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. Additionally, it must address water supplies over a 20-year period and consider average, dry, and multiple-dry years.

In particular, SB 610 requires cities and counties to request specific information regarding water supplies from the public water systems that would serve any project that is subject to CEQA and is defined as a "project" in Water Code Section 10912, and to include this information in

¹⁵ The proposed Project involves development on 200 dwelling units, which is less than the 500 dwelling unit threshold for SB 221. Accordingly, SB 221 does not apply to the Project.

environmental review documents prepared pursuant to CEQA.¹⁶ Projects meeting the following criteria must prepare a Water Supply Assessment:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects specified above; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

In accordance with SB 610 and Section 10912 of the California Water Code, a residential development project that is subject to CEQA and proposes more than 500 dwelling units (or water use equivalent to or greater than 500 dwelling units) would require preparation and submittal of a water supply assessment. Because the proposed SCSLC Project is limited to 200 dwelling units, a water supply assessment is not required under this provision. When required, the water supply assessment must be approved by the applicable public water Board and incorporated into the CEQA document.

Under SB 610, an urban water supplier must prepare and periodically update a UWMP, which in turn describes the water supply projects and programs that may be undertaken to meet the total project water use of the service area. Special informational provisions are required when groundwater is identified as a component of the water supply.

SB 221 addresses water supply in the land use planning process and focuses on new residential subdivisions in non-urban areas. SB 221 requires that written verification from the water service provider be submitted indicating sufficient water supply is available to serve a proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are (or will be) available prior to completion of a project. SB 221 specifically applies to residential subdivisions of 500 units or more. In addition, Government Code Section 66473.7(i) exempts

¹⁶ The Project does not fall within the purview of SB 610 because the Project involves development of 200 dwelling units that are consistent with community-wide growth and housing goals. The Project would need to provide 500 units or more in order to fall within the California Water Code's definition of "project." Cal. Water Code § 10912(a)(2).

residential projects that are proposed on a site within an urbanized area and that has been previously developed for urban uses or which qualify as infill development sites.

California Code of Regulations – Title 20, Section 1605.1(h) and (i) of the California Code of Regulations (CCR) establish efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. For example, the maximum flow rate for showerheads and lavatory faucets are 2.5 gallons per minute (gpm) at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. Section 1605.3(h) establishes State efficiency standards for non-federal regulated plumbing fittings, including commercial pre-rinse spray valves.

(2) *Los Angeles Region and City of Los Angeles Water Planning*

The UWMP Act (see discussion above) requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 AFY of water to prepare, and update every 5 years, an UWMP. Complying with that statute, LADWP's UWMP (LA-UWMP) includes estimates of past, current, and projected potable and recycled water use, identifies conservation and reclamation measures currently in place, describes alternative conservation measures, and provides an urban water shortage contingency plan. The LA-UWMP details LADWP's efforts to promote the efficient use and management of its water resources. The LA-UWMP utilized a service area-wide method in developing its projected water demand. This methodology does not rely on individual development demands to determine area-wide growth; rather, the demand is based on service area growth. LADWP updates the LA-UWMP every five years to account for changing conditions. The LA-UWMP projects water supply and distribution needs based on anticipated growth in population, housing, and employment per SCAG forecasts, and identifies water supply strategies to meet this demand. LADWP currently expects to have adequate water supplies for all anticipated development in the City. The LA-UWMP is available on the LADWP's website¹⁷, or by contacting the Department of City Planning or Department of Water and Power.

In the next LA-UWMP update (for 2015 and each successive five years), LADWP will develop a revised demand forecast that will factor in the water demand for which all water supply assessments have been prepared in addition to future demands based on growth. This will allow LADWP to work collaboratively with its supplemental water suppliers and the MWD, and to ensure that the City's anticipated water demands are incorporated into MWD's regional long-term water resources development plan.

City of Los Angeles Ordinances Nos. 172,075 and 163,532 – The City of Los Angeles adopted several ordinances in an effort to reduce water consumption. Specifically, the City of Los Angeles Ordinance No. 172,075, adopted in 1998 (Chapter XII, Article II, of the LAMC), requires all building owners to install low-flow showerheads (with a maximum flow of 2.5 gpm), water closets (with a maximum flow of 3.5 gpm), and urinals (with a maximum 1.5 gallons per flush) prior to obtaining building/occupancy permits. City Ordinance No. 163,532 (Chapter XII,

¹⁷ The LA-UWMP is available on LADWP's website at <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>

Article IV, of the LAMC) requires a 10 percent reduction in irrigation water use for large turf areas (i.e., turf areas of three acres or more).

(3) *Global Warming and Climate Change*

Global warming and climate change should be considered in assessing water supply in California. Potential impacts of climate change in California's water resources include changes in water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on Delta levees. The impact of climate change on California's water supply has already been the subject of study. California Department of Water Resources prepared a July 2006 report entitled "Progress on Incorporating Climate Change into Management of California's Water Resources," which found that climate change may have a significant effect on California's future water resources and demand. This report also examined the potential impacts of selected climate change scenarios on operation of the SWP and Central Valley Project, Delta water quality, flood management, and evapotranspiration. Potential issues include a reduction of Sierra snow pack and seasonal water storage; increased rain and less snow impacting supply reliability and hydropower generation; increased variable precipitation and extreme weather events; and rising sea levels.

While climate change is expected to continue for at least several decades, the magnitude and nature of future changes are uncertain. This uncertainty serves to complicate the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood.¹⁸ Based on this information, global climate changes and their potential effects on California's water supply are too speculative at this time for further evaluation.

LADWP also addresses climate change in the LA-UWMP. LADWP is currently conducting studies and monitoring research on the potential impacts of climate change on its water supply. However, LADWP has concluded that, at present, there is still general uncertainty within the scientific community regarding the potential impacts of global warming on the City's water supply. Because of this uncertainty, the City has determined that the potential impact of climate change on water supply is too speculative to conduct a quantitative evaluation of climate change impacts. Therefore, pursuant to CEQA Guideline Section 15145, this EIR does not, and is not required to, provide further discussion of impacts related to water supply in the context of climate change.

(4) *Water Conservation Planning and Requirements*

In addition to State regulations, LADWP has instituted its own water conservation measures. As described in LA-UWMP, water use in the City of Los Angeles is currently equal to water use from approximately 20 years ago, even though the population has increased by over 750,000

¹⁸ Roos, Maurice. 2005 (December). *Accounting for Climate Change*, California Water Plan Update 2005, Volume 4. California Department of Water Resources. 2005. 6 June 2008
<<http://www.waterplan.water.ca.gov/docs/cwpu2005/vol4/vol4-globalclimate-accountingforclimatechange.pdf>>.

persons during this period.¹⁹ The stabilization in water use is attributed to the City's public education campaigns and water conservation programs over the past 15 years. LADWP continues to develop cost-effective programs to achieve its multiple goals of demand reduction, customer service, and environmental responsibility. The conservation program falls under five categories: awareness/support, residential, commercial/industrial/institutional, landscape, and system maintenance measures.

As noted above, the City of Los Angeles Municipal Code also mandates certain water conservation practices. Further, the proposed River Improvement Overlay District (RIO District) Ordinance will require that all new developments within 2,500 feet of the Los Angeles River meet certain performance standards aimed to protect the watershed, promote groundwater recharge, enhance water quality, and conserve water use. The proposed Project's compliance with the RIO is discussed in *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this Draft EIR.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Project water demand is estimated based on accepted published water factors, which are then compared with available know water supplies as documented through the LA-UWMP.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant impact on water supply and water resources if it would cause any of the following conditions to occur:²⁰

- (a) A project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or
- (b) If there were insufficient water supplies available to serve the project from existing entitlements and resources, and new or expanded facilities were needed.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

- (a) The total estimated water demand for the project;

¹⁹ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*. 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

²⁰ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2012).

- (b) Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- (c) The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and
- (d) The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

In addition, a project would normally have a significant impact on groundwater level if it would:

- (a) Change potable water levels sufficiently to:
 - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought; or
 - Reduce yields of adjacent wells or well fields (public or private); or
 - Adversely change the rate or direction of flow of groundwater; or
- (b) Result in demonstrable and sustained reduction of groundwater recharge capacity.

c. Project Impacts

The proposed Project includes replacement of 16 existing tennis courts and related facilities with 200 multiple-family units intended for senior residents. The analysis generally assumes that the Project will incorporate a series of measures that will reduce water consumption and resulting wastewater. These include implementation of “smart irrigation” systems that are customized to control water and accommodate specific plant areas, based on information from weather forecasts. The Project will also include water conservation through installation of efficient plumbing fixtures including low flow and dual flush toilets, waterless urinals, and on touch faucets with short “on” cycles and efficiency aerators.

Further, the analysis assumes that the Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including Title 20 and Title 24 of the California Code of Regulations, which establish various conservation standards, including standards that relate to water conservation and the protection of water resources. The Project will be consistent with State requirements for water conservation standards.

(1) Water Supply

A project would have a significant environmental impact if sufficient water supplies were not available to serve the project from existing entitlements and resources, or if new or expanded entitlements were needed.

According to the LA-UWMP, water demand Citywide in 2010 was approximately 555,500 AFY.²¹ This represents a reduction of just over 100,000 AFY from the 2005 recorded demand of approximately 661,000 AFY. The reduction is attributed to progress of Citywide conservation programs coupled with three years of economic recession. For fiscal year 2009-10, the water demand equated to an approximate 117 gpd per capita. The proposed Citywide demand for 2015 is expected to be approximately 614,800 AFY.

The Project will build 200 multiple-family units of which 136 units will have two bedrooms and 64 units will have one bedroom. The Project Site is currently occupied by the Weddington Golf & Tennis Club and its related buildings. The tennis courts and related facilities will be removed to accommodate the new dwelling units on proposed Lot 2 of the Project Site. As noted above, water usage associated with the tennis courts is estimated at 3,781 gallons per day or 4.24 AFY. The golf course and associated driving range, clubhouse, and other support facilities will remain relatively unchanged, and as such, water usage for the golf course, driving range, and clubhouse portion of the Project Site is anticipated to remain unchanged from current conditions.

In order to present a conservative analysis, water consumption is assumed to be 120 percent of the wastewater generated for the proposed land use. The proposed senior housing Project would generate a water demand of 36,000 gallons per day (gpd) or approximately 40.35 AFY.²²

The tennis courts and their related facilities, which would be removed from the Project Site, currently generate a water demand that is estimated at 4.24 AFY. As such, there will be a net increase in water usage on the Project Site, due to the removal and replacement of the existing recreational uses with new residential uses. The anticipated net increase in water usage at the Project Site would be 36.11 AFY. The current water usage represents nearly 10 percent of the future projected water usage. In order to keep a conservative analysis for water resources, the factor of current water usage will not be considered. The proposed Project water supply impacts are evaluated as though no previous water usage occurs at the Project Site. In addition, although the Project will use water to control fugitive dust during construction and demolition, that amount is negligible, non-substantial, and short-term.

The increase in water demand during occupancy of the Project would be approximately (conservative worst-case) 40.35 AFY. Based on the LA-UWMP's projected Citywide water demand, the City's total water needs will be approximately 614,800 AFY in 2015, which will be substantially similar to 2016 (the year of Project buildout). The Citywide demand will increase to 710,800 AFY in 2035 (for average dry years). The LA-UWMP concludes that LADWP will be able to meet the increasing demand through 2035 to accommodate anticipated growth (as projected through SCAG growth forecast numbers).

²¹ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*. 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

²² Assumes approximately 120% of wastewater generation. Based on the City of Los Angeles Wastewater Program Management, Sewer Facilities Charge Guide and Generation Rates, August 1988. This Guide provides the following generation rates for the Project: 150 gpd per senior living dwelling unit.

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 proposed Project, which would be accommodated by the LADWP through the year 2035, as set forth in the LA-UWMP.²³

Although the Project Site is currently designated under the General Plan and Community Plan as "Open Space", implementation of the Project would not cause the Community Plan Area to exceed the projected growth in population or housing for the year of Project occupancy or buildout.²⁴ Refer to *Section IV.H: Environmental Impact Analysis – Land Use and Planning* and *Section IV.J: Environmental Impact Analysis – Population and Housing* of this Draft EIR. Since the projected water supply is based on the growth projections from SCAG in the City's General Plan, which are used in the LA-UWMP, and the Project is consistent with the General Plan and Community Plan designations, the Project will fit within the water demand projections.

Finally, the LA-UWMP analyzes water supply during both normal and dry years and concludes LADWP will have sufficient water supplies to serve the water needs of its service area, which would include the Project Site, during normal and drought conditions through access to surplus supplies and emergency conservation measures. The Project would not cause an increase in water usage beyond the projections in the LA-UWMP.

Because the LA-UWMP anticipates potential development in the Project area and demonstrates that sufficient water supplies are available, the proposed Project will result in a less-than-significant impact to water supply. Even so, due to statewide drought conditions, there is an ongoing need for water conservation. The LADWP recommends that water should be conserved at all times because efficient use of water allows increased water for use in dry years and makes water available for beneficial environmental uses. As such, the Project would comply with Title 24 requirements.

As discussed above, SB 610 requires specific information regarding water supplies for projects meeting the criteria defined in Water Code Section 10912. Projects meeting the criteria must prepare a Water Supply Assessment (WSA) and provide such information as part of the CEQA process. A WSA would be required if the Project would include more than 500 dwelling units. However, the proposed Project would result in the net addition of 200 senior living dwelling units, and as such, will not exceed the above criteria. Therefore, a WSA is not required for the Project.

LADWP has stated that water requirements for any project that is consistent with the City's General Plan have been taken into account as part of the planned cumulative growth used to forecast water demand. As such, sufficient water supplies are available to accommodate the proposed Project. Further, the LADWP has indicated in its LA-UWMP that it will provide an

²³ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*. 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afzLoop=110879001935000>.

²⁴ City of Los Angeles, L.A. *CEQA Thresholds Guide*. Section M.1.C, 2006, Los Angeles, CA: Author. 6 June 2008 <<http://www.lacity.org/ead/EADWeb-AQD/thresholdsguide.htm>>.

adequate water supply to meet current and future growth until at least 2035.²⁵ Finally, LADWP does not have any known water service problems in the area and the LAFP, which serves the Project Site, has adequate capacity to handle the Project. Therefore, impacts to water supply would be less-than-significant.

(2) *Consistency with Adopted Plans and Policies*

Consistency with applicable plans and policies, including land use and design policies which indirectly address water resources and supply, is discussed in detail in *Section IV.H: Environmental Impact Analysis – Land Use and Planning* of this Draft EIR.

d. Cumulative Impacts

The ten Related Projects evaluated in this cumulative impact analysis are comprised of the planned or projected development identified in the Related Projects list (see *Table III-1: List of Related Projects* earlier in this Draft EIR).

With respect to potential cumulative impacts to water provisions, based on the uses identified and not accounting for demolition of existing uses as part of the Related Projects (which would result in water demand reductions), the ten Related Projects could result in an increase in water demand of approximately 193,918 gpd,²⁶ which, based on a conservative estimate of a seven-day-a-week operation, could result in approximately 217.4 AFY of additional water demand. According to the LA-UWMP, water demand Citywide in 2010 was approximately 555,500 AFY.²⁷ The proposed Citywide demand for 2015 is expected to be approximately 614,800 AFY and 710,800 AFY in 2035, and the LA-UWMP concludes that LADWP will have sufficient supply to meet anticipated demand through the year 2035. Moreover, as the anticipated Related Projects are already planned for in the City's General Plan, SCAG's population projections, and the LA-UWMP, these Related Projects' additional demand of 217.4 AFY will not be cumulatively considerable, resulting in a less-than-significant impact. Additionally, the SCSLC Project's addition of 40.35 AFY of water demand to the Project Site represents approximately 18.6% of water demand from the Related Projects, which is not a considerable contribution to the cumulative water demand. Consequently, the proposed Project will result in a less-than-significant cumulative impact to water supply and infrastructure, and as such, no Mitigation Measures are required.

²⁵ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*. 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

²⁶ Similar to the Project's water demand estimation, the water demand for Related Projects was determined by taking 120% of their wastewater generation as determined by the wastewater generation factors in Exhibit M.2-12 of the L.A. CEQA Thresholds Guide. Categories of uses in the Exhibit (bank, residential, restaurant, school, etc.) were appropriately assigned to the Related Projects. All residential apartments and condominiums were assumed to contain an average of two bedrooms for purposes of calculation. For all Related Project uses that could fit into more than one use category, the highest demand factor was used for worst-case purposes.

²⁷ Los Angeles Department of Water and Power. 2011. *2010 Urban Water Management Plan*. 3 May 2011 <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18pb7t1oha_29&_afLoop=110879001935000>.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific water resource impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- The Applicant shall be required to submit a Landscape Plan for City review and approval. Such review will ensure that the Project conforms to the City's policies and guidelines for compatible plantscape and hardscape materials, including those related to non-invasive and LA River compatible species as required under the RIO.
- The Project shall comply with all Water Closet, Urinal, and Showerhead Regulations in the LAMC.
- The Project shall comply with Title 20 (Public Utilities and Energy) and Title 24 (Building Standards Code) of the California Code of Regulations.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential water resource impacts:

PDF UTW-1: The landscaping for the Project shall use water efficient landscaping and native drought tolerant plants.

PDF UTW-2: The Project shall utilize recaptured or reclaimed water for at least 50% of the irrigation needs on proposed Lot 2 of the Project Site.

c. Mitigation Measures

The Project will result in less-than-significant water resource impacts, both Project-specific and cumulatively. Therefore, Mitigation Measures are not required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of all required Compliance Measures, as well as PDFs, the Project will result in less-than-significant impacts to water supply or water delivery infrastructure. No Mitigation Measures are required since impacts related to water supply and delivery are already less-than-significant as a result of the proposed Project.

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) approximately 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 a 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 Avenue. 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 Alternative, 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-significant 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 Measures, 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-significant 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 Project. 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 within 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 alternative 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 PM₁₀ 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 6.5¹ 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																						

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.

VII. PERSONS AND ORGANIZATIONS CONSULTED

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E. AGENCIES AND ORGANIZATIONS

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—

City of Los Angeles, Department of Transportation
—

City of Los Angeles, Fire Department
Captain Souter
Captain Vosberg
Captain Stanley
—

City of Los Angeles, Los Angeles Public Library
Ms. Karen Pickard-Four
—

E. AGENCIES AND ORGANIZATIONS (continued)

City of Los Angeles, Police Department
Lieutenant Brian Wendling

VIII. REFERENCES

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