
VI. ALTERNATIVES

The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project, while still satisfying the project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR.

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6(a) of the CEQA Guidelines 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 comparable 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 which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Purpose

Section 15126.6(b) of the CEQA Guidelines states:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, 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 project objectives, or would be more costly.

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states:

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.

Level of Detail

The CEQA Guidelines do not require the same level of detail in the alternatives analysis as in the analysis of the proposed project. Section 15126.6(d) of the CEQA Guidelines states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

PROJECT OBJECTIVES

The project applicant's objectives for the proposed condominium project are as follows:

- To provide a substantial amount of housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
- To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
- To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the proposed project.
- To permanently preserve approximately 35.15 acres of public and/or private open space.
- To locate the residential development in proximity to existing infrastructure and services where possible.
- To provide safe and efficient streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.
- To minimize impacts to important natural landforms and significant natural resources.

OVERVIEW OF SELECTED ALTERNATIVES

- Alternative 1 - No Project (No Construction)
- Alternative 2 – All Residential Townhomes

- Alternative 3 - Mixed Use Residential and Retail
- Alternative 4 – Mixed Use Residential/Retail/Office

(1) Alternatives Eliminated from Detailed Consideration

In addition to specifying that the EIR evaluate “a range of reasonable alternatives” to the proposed project, Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but were rejected as infeasible. An All Park alternative, proposed by members of the community (see Appendix B-2), has been reviewed and subsequently rejected as infeasible. Under this alternative, the project site would be acquired by one or more public agencies and a regional park would be developed in the place of the existing golf course. This alternative has been rejected because no public agency has actually made an offer to purchase the project site. The alternative to retain the existing golf course is essentially the No Project Alternative and is discussed as such in this EIR.

Another alternative suggested by Planning Department staff is establishing the property as an easement, in collaboration with a land trust, for tax credits (state, which is around 55% of market value, plus federal). This is an alternative to selling to a public agency, but serves the purpose of preserving the existing open space, as suggested as an alternative by community members. An easement could be used for a portion of the site, as well, reducing the density, but still yielding the higher use of a portion of the land while maintaining more of the open space. This alternative has been rejected because it does not meet the project’s housing objectives.

EVALUATION OF ALTERNATIVES

This section provides an analysis of the environmental impacts anticipated for each alternative in comparison to the proposed project. The analysis below focuses on the ability of the alternatives analyzed to reduce or eliminate the environmental impacts associated with the proposed project. In addition, each alternative is evaluated on its ability to meet the project objectives.

Alternative 1: No Project

As required by CEQA, a No Project Alternative was analyzed. Under the No Project Alternative, the proposed project would not be constructed and the project site would remain undeveloped. The analysis of the No Project Alternative assumes the continuation of existing conditions as well as development of the related projects described in Section IV (Related Projects). The potential environmental impacts associated with the No Project Alternative are described below and are compared to the potential environmental impacts associated with the proposed project.

Section 15126.6(e)(2) of the CEQA Guidelines states that the No Project Alternative “. . . analysis shall discuss the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Furthermore, Section 15126.6(e)(3)(B) of the CEQA Guidelines states: “If disapproval of the project under consideration would

result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.”

Under Alternative 1: No Project (No Construction), it is assumed that no development of the project site would occur and the existing golf course operations would continue for the foreseeable future.

Relationship to Project Objectives

As proposed, Alternative 1 would not satisfy any of the applicant’s project objectives listed above.

Environmental Impacts

Aesthetics

Under Alternative 1, current golf course operations would continue into the foreseeable future without any substantial changes to on-site structures and facilities, landscaping and/or night lighting. Therefore, there would be no change to the aesthetic character of the project site. The bright night lighting would not be eliminated or mitigated.

Air Quality

As there would be no grading and construction, Alternative 1 would not cause any construction-related air quality impacts. Operationally, there would be no increase in vehicle emissions. Therefore, Alternative 1 would have less of an air quality impact than the proposed project.

Biological Resources

As there would be no site development, Alternative 1 would have no new impact on biological resources. No trees would be removed and there would be no fuel modification within the natural habitat portions of the site. Therefore, Alternative 1 would have less of an impact on biological resources than the proposed project.

Cultural Resources

Because there would be no site development, Alternative 1 would have less potential to impact archaeological or paleontological resources than the proposed project. Because all historic resources have been removed from the project site, neither the proposed project nor Alternative 1 would impact any historic resources. However, under Alternative 1 it is unlikely that significant historic events associated with the site would be commemorated through its designation as a California Historical Landmark (thematic landmark group "Temporary Detention Camps for Japanese Americans").

Geology and Soils

Under Alternative 1 there would be no landform alteration and no increased exposure of persons or structures to potentially hazardous geologic and soils conditions, such as seismicity, slope instability and soil erosion. Therefore, Alternative 1 would have less of an impact with respect to geologic and soils conditions than the proposed project.

Hazards and Hazardous Materials

There are no hazardous materials or conditions on the project site that currently affect golf course operations or would adversely affect the proposed project. Therefore, Alternative 1 would have no impact with respect to adverse hazards and/or hazardous materials.

Hydrology and Water Quality

Under Alternative 1, there would be no change in the volume of site generated runoff, its rate of discharge, or its velocity. Therefore, Alternative 1 would have no impact with respect to Hydrology. Also, under Alternative 1, there would be no change in the quality of water discharged from the site. Therefore, Alternative 1 would have less of a water quality impact than the proposed project.

Land Use

Alternative 1 would have no affect with respect to land use. There would be no need for a zone change and no potential conflicts with the goals and policies of the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan or the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan.

Noise

Because there would be no development, Alternative 1 would have no noise impact on nearby sensitive land uses due to site preparation, grading and/or construction activities. Furthermore, there would be no increased operational noise. Therefore, Alternative 1 would have less of a noise impact than the proposed project.

Population/Housing

Alternative 1 would not increase the local population, demand for housing or need for employment in the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon area. Therefore, Alternative 1 would have less of a population/housing impact than the proposed project.

Traffic

Alternative 1 would not increase the number of vehicle trips in the area or contribute to further congestion at any of the area's intersections. Therefore, Alternative 1 would have less of a traffic impact than the

proposed project. A summary of the trip generation forecasts for the proposed project as compared to Project Alternative 1, as well as the remaining project alternatives, is provided in Table VI-16, below.

Fire Protection

Because there would be no development, Alternative 1 would not increase demand for fire protection services. Therefore, Alternative 1 would have less of an impact on fire protection services than the proposed project.

Police Protection

Because there would be no development, Alternative 1 would not increase demand for police protection services. Therefore, Alternative 1 would have less of an impact on fire protection services than the proposed project.

Schools

Because there would be no development, Alternative 1 would not increase demand for police protection services. Therefore, Alternative 1 would have less of an impact on fire protection services than the proposed project.

Parks

Because there would be no development, Alternative 1 would not eliminate an existing recreational facility and, consequently, would not increase demand for remaining recreational facilities in the general area. Therefore, Alternative 1 would have less of an impact on public parks than the proposed project.

Wastewater

Because there would be no development, Alternative 1 would not increase the site's wastewater generation. Therefore, Alternative 1 would have less of an impact on the sewerage system than the proposed project.

Alternative 2 - Alternative 2 – All Residential Townhomes

Alternative 2 is an all residential development consisting of 336 townhome units (apartments). The townhomes would be developed in 14 stand-alone buildings of 24 units each. Each building would have a gross area of 36,000 square feet. In total, there would be 504,000 gross square feet of residential space. The buildings would be clustered in the eastern portion of the project site, primarily on that area currently occupied by the driving range and on the northeastern strip of land located between Tujunga Canyon Road and the Verdugo Wash Channel. The maximum height of these residential buildings would be 32 feet above grade, or five feet more than the maximum height of the proposed project's single-family homes (i.e., 27 feet).

The existing golf course would be retained and would continue to be available to the community. A new club house would be constructed and a new parking lot for the golf course would be provided along La Tuna Canyon Road to the west of the new club house.

Three points of access to the new residential area would be provided. One would be located on La Tuna Canyon Road, just east of the new golf course club house. This access would serve the southern most six residential buildings. Another access, serving the six centrally located residential buildings, would be located on Tujunga Canyon Road, opposite the intersection with Pali Road. Each 24-unit residential building would be served by own subterranean parking. The third access point, located in the northern portion of the project site, would serve the two northern most residential buildings. A total of 672 spaces would be required and provided. A large green commons area and/or community center would be provided in the southern portion of the residential area.

Alternative 2 would involve less landform alteration: Alternative 2 would grade approximately 12.7 acres of the project site, while the proposed project would grade 28.6 acres (approximately 15.9 acres more than Alternative 2). Alternative 2 would also require less earthwork: it would involve approximately 190,100 cubic yards of cut and fill, balanced on site. In comparison, the proposed project would require approximately 367,300 cubic yards of cut (177,200 cubic yards more than Alternative 2), and 403,600 cubic yards of fill (213,500 cubic yards more than Alternative 2).

The All Residential Townhome Alternative is shown in Figure VI-1.

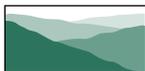
Relationship to Project Objectives

Alternative 2 would satisfy the following project objectives as listed in Section III. Project Description and reiterated above:

- To provide housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
- To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
- To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the proposed project.
- To permanently preserve approximately 35.15 acres of public and/or private open space.
- To locate the residential development in proximity to existing infrastructure and services where possible.
- To provide safe and efficient streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.



Source: LCRA Architecture & Planning, 2008.



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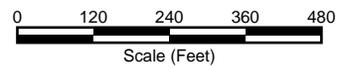


Figure VI-1
Alternative 2, All Residential Townhomes

- To minimize impacts to important natural landforms and significant natural resources.

Alternative 2 would not satisfy the following Project Objective:

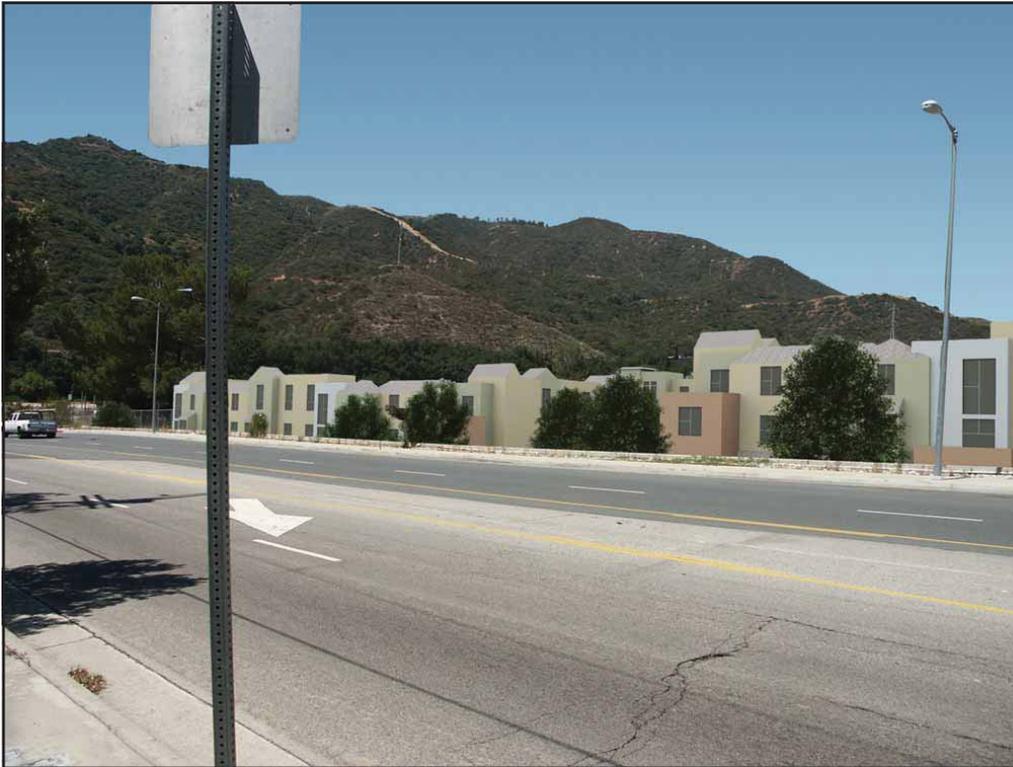
Environmental Impacts

Aesthetics

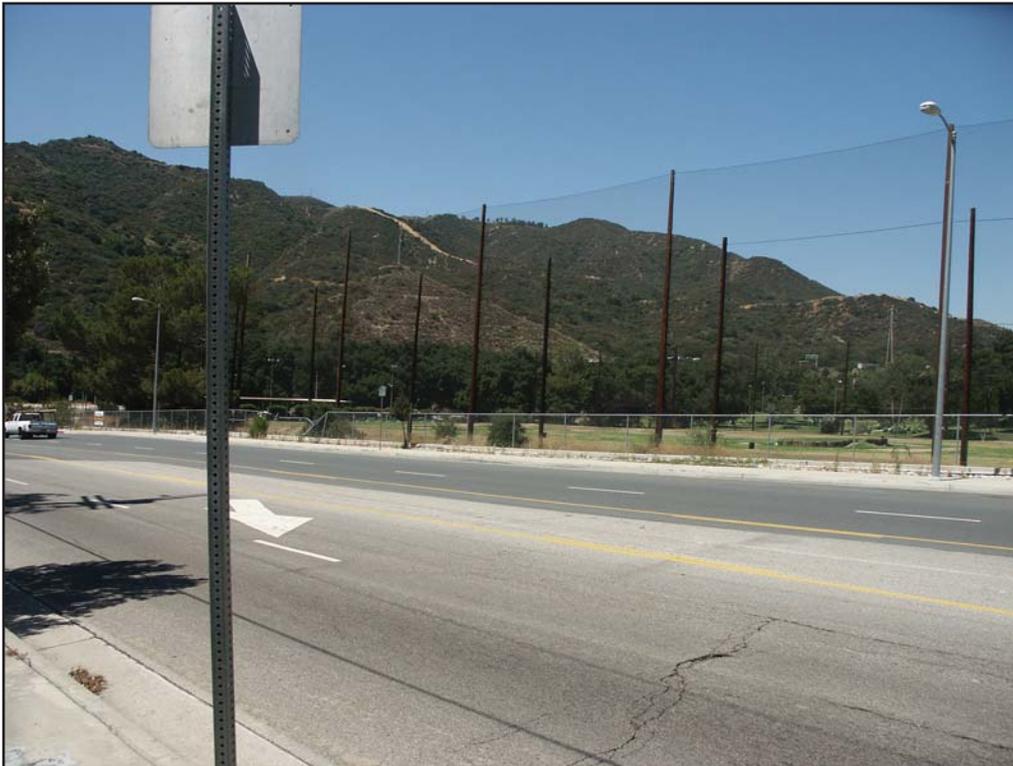
Alternative 2 would reduce Aesthetic impacts to scenic vistas from both Interstate 210 and La Tuna Canyon Road (designated scenic highways), compared to the proposed project. Because the project site is prominently visible in the foreground of scenic vistas available from La Tuna Canyon Road and Interstate 210, any change to the aesthetic character of the site will affect those scenic vistas. While the proposed project would eliminate the most prominent aspect of the foreground views, i.e., the green, landscaped open space of the golf course, Alternative 2 will preserve the golf course and a major portion of the foreground views. Also, while the proposed project would front along La Tuna Canyon, facing both scenic highways, Alternative 2 would be clustered in the eastern portion of the site and would stretch northerly in a linear fashion away from the scenic highways. Figure VI-2 is a computer simulation of Alternative 2 as seen from Tujunga Canyon Road.

- Alternative 2 would reduce Aesthetic impacts to scenic resources, compared to the proposed project.
- Alternative 2 would preserve the scenic golf course while the proposed project would eliminate it.
- Alternative 2 would preserve 46.72 acres of golf course open space and natural hillside and habitat. In comparison, the proposed project would preserve approximately 35.15 acres of public and/or private open space.
- Alternative 2 would reduce the total area disturbed by development. While Alternative 2 would construct townhouses in a campus of buildings located on 11.6 acres of the least scenic portion of the project site (the driving range), the proposed project would construct moderate density single-family housing over an area of approximately 28.6 acres, including approximately 0.95 off-site acres and the most scenic portion of the project site (i.e., the golf course).
- Alternative 2 would reduce impacts to trees on the project site. Of the total 321 protected trees on the project site (303 oaks and 18 sycamores), Alternative 2 would impact 48 oaks and 2 sycamores. In comparison the proposed project would impact 85 oak trees and 11 sycamores. Of the 120 mature “non-protected” landscape trees on the project site, Alternative 2 would impact 15 trees. In comparison the proposed project would impact 103 landscape trees.

Alternative 2 would reduce Aesthetic impacts to the existing visual character or quality of the site and its surroundings, compared to the proposed project. By preserving a greater portion of the project site in its current condition, Alternative 2 would alter less of the site’s existing visual character or quality than the proposed project. On the other hand, the introduction of a campus of 14 townhouse buildings, each as tall



View of Proposed Project.



View of Existing Project Site.

Source: Christopher A. Joseph & Associates, 2008.

as 32 feet, in the eastern portion of the project site would be less in character with the existing single-family homes in the surrounding area than the proposed project's single-family homes, and would be inconsistent with the scenic highway corridors viewshed protection provisions of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, which limits building heights to 30 feet. Also, as demonstrated in Figure VI-2, Alternative 2 would partially block views of the hillsides and mountains in the surrounding area as viewed from Tujunga Canyon Road. However, in balance, the preservation of the project site's landscaped open space and natural hillsides preserves more of the site's existing visual character than does the introduction of the campus of townhouses detract from it.

Alternative 2 would not reduce night lighting impacts to the extent achieved by the proposed project. By eliminating the golf course lighting, the proposed project would result in less night-time glare and night sky illumination than is currently present on the project site. In comparison, Alternative 2 would retain the night lighting for the golf course and would replace the driving range lighting with new lighting associated with the townhouses.

Air Quality

The analyses for Alternative 2 follows the same methodology as the analysis performed in the DEIR Air Quality Section IV.C, and is compared to the project as proposed as well as all applicable thresholds.

Consistency with the 2007 AQMP

Alternative 2 is consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the RCPG and are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

Implementation of the Alternative 2 would not directly or indirectly induce substantial population or employment growth beyond current growth projections. Because this alternative would be consistent with the regional populations forecasts for the City of Los Angeles, it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.

Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project site and the community in which it is located, thus minimizing air pollutant emissions, that aspect of the project is consistent with the AQMP. Based on this information, Alternative would not jeopardize attainment of air quality standards in the 2007 AQMP for the Basin and the Los Angeles County portion of the Basin; thus, this impact would be less than significant.

Construction Period Emissions – Mass Daily Emissions

During construction of the alternative 2 the same five basic types of activities identified for the proposed project would be expected to occur and generate emissions. The construction schedule is also assumed to

be the same for Alternative 2 as that for the proposed project. Also, it is assumed that the pieces of equipment for each construction activity would be the same as the proposed project.

The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table VI-1 identifies daily emissions that are estimated to occur on peak construction days along with the thresholds of significance recommended by the SCAQMD and used by the City of Los Angeles. These calculations assume that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403 – Fugitive Dust.¹ Because some phases may overlap, Table VI-1 also presents the maximum daily mass emissions in each year of construction. As shown, emissions generated during all the phases would not exceed the thresholds recommended by the SCAQMD with the exception of NO_x during 2009. Therefore, the impact is considered to be significant.

Construction Period Emissions – Localized Emissions of CO, NO_x, PM₁₀, and PM_{2.5}

The daily construction emissions generated by Alternative 2 are also analyzed to determine whether or not they would result in significant adverse localized air quality impacts on nearby sensitive receptors located off-site. The analysis for the proposed project takes into consideration emissions from haul trucks used to remove the soil that can not be used on site. In contrast, Alternative 2 balances the cut and fill soils on site; therefore, there are no emissions from off site hauling of excess soil. For air quality dispersion modeling purposes, the input data related to the construction emissions generated during the different phases of construction at the project site is required to be more precise than the mass daily emissions calculated by URBEMIS. To generate more precise construction emissions for a project, the SCAQMD recommends that their sample scenario LST spreadsheets be used for this purpose.² The individual LST spreadsheets showing the calculations of NO_x, CO, PM₁₀, and PM_{2.5} emissions during each phase of construction are available in Appendix E.

The estimated daily emissions generated by construction of Alternative 2 are shown in Table VI-2, Localized Construction Emissions. For the purpose of analyzing the worst-case scenario from Alternative

¹ *The following mitigation measures were included in the URBEMIS analysis pursuant to SCAQMD Rule 403:*

- *Soil stabilizers shall be applied to inactive construction areas.*
- *Ground cover in disturbed areas shall be quickly replaced.*
- *Exposed surfaces shall be watered twice daily.*
- *All haul roads shall be watered twice daily.*
- *All stock piles of debris, dirt, or rusty materials shall be covered with a tarp.*
- *Vehicle speed on unpaved roads shall be reduced to less than 15 miles per hour (mph).*

² *South Coast Air Quality Management District, Sample LST spreadsheet: Appendix E – Five Acre Site Example, SCAQMD website: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>, July 2008.*

2 the total emission for the three concurrent phases (site preparation, grading, and building construction) for each criteria pollutant is used for input into the dispersion model to determine the potential localized air quality impacts associated with that pollutant. The concentrations of each criteria pollutant that are inputted into the dispersion model for analysis are as follows:

- NO_x: 58.65 lbs/day
- CO: 86.03 lbs/day
- PM₁₀: 5.72 lbs/day
- PM_{2.5}: 2.99 lbs/day

Data sheets from the dispersion modeling software are provided in Appendix E.

Table VI-1
Estimated Mass Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition Phase						
Fugitive Dust	0.00	0.00	0.00	0.00	0.16	0.03
Off-Road Diesel Equipment	4.35	33.48	17.15	0.00	1.92	1.76
On-Road Diesel Equipment	0.02	0.27	0.11	0.00	0.01	0.01
Worker Trips	0.09	0.16	2.61	0.00	0.02	0.01
Total Demolition Emissions	4.46	33.90	19.87	0.00	2.11	1.82
Site Preparation						
Off-Road Diesel Equipment	2.18	18.90	8.32	0.00	0.93	0.86
Worker Trips	0.04	0.07	1.16	0.00	0.01	0.00
Total Site Preparation Emissions	2.22	18.97	9.48	0.00	0.94	0.86
Grading Phase						
Fugitive Dust	0.00	0.00	0.00	0.00	14.78	3.09
Off-Road Diesel Equipment	11.50	104.97	48.78	0.00	4.56	4.19
On-Road Diesel Equipment	0.00	0.00	0.00	0.00	0.00	0.00
Worker Trips	0.07	0.12	2.03	0.00	0.02	0.01
Total Grading and Excavation Emissions	11.57	105.09	50.82	0.00	19.36	7.29
Building Construction Phase						
Building Construction Off-Road Diesel Equip.	4.20	16.54	12.46	0.00	1.25	1.15
Building Construction Worker Trips	0.92	1.70	28.10	0.03	0.22	0.12
Building Construction Vendor Trips	0.85	9.55	7.39	0.02	0.47	0.40
Total Building Construction Emissions	5.97	27.79	47.95	0.05	1.95	1.67
Site Finishing Phase						
Asphalt Paving Off-Gas	0.15	0.00	0.00	0.00	0.00	0.00
Asphalt Paving Off-Road Diesel Equip.	6.56	52.35	25.82	0.00	2.80	2.58
Asphalt Paving On-Road Diesel Equip.	0.05	0.64	0.26	0.00	0.03	0.03
Asphalt Paving Worker Trips	0.08	0.15	2.45	0.00	0.02	0.01
Architectural Coatings Off-Gas	7.95	0.00	0.00	0.00	0.00	0.00
Architectural Coatings Worker Trips	0.02	0.04	0.65	0.00	0.01	0.00
Total Site Finishing Emissions	14.81	53.18	29.18	0.00	2.86	2.62

Table VI-1 (Continued)
Estimated Mass Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
2009	19.75	151.84	108.25	0.05	22.24	9.82
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	Yes	No	No	No	No
2010	17.09	79.35	74.68	0.05	4.72	4.21
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
2011	19.63	74.33	71.03	0.05	4.41	3.93
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Note: Subtotals may not appear to add correctly due to rounding in the URBEMIS2007 model.
Source: Christopher A. Joseph & Associates, 2008. Calculation sheets are provided in Appendix E.

Table VI-2
Localized Construction Emissions

Construction Activity	Total On-Site Construction Emissions				
	NOx (ppm)	CO 1- HR (ppm)	CO 8-HR (ppm)	PM10 (µg/m ³)	PM2.5 (µg/m ³)
Demolition	0.12	3.11	2.41	0.83	0.77
Site Preparation	0.17	3.12	2.41	4.23	1.95
Grading	0.17	3.35	2.44	2.06	1.85
Building Construction	0.17	3.10	2.41	1.77	0.41
Asphalt	0.16	3.18	2.42	1.69	1.55
Concurrent	0.51	9.57	7.26	8.06	4.21
LST Significance Thresholds	0.18	20	9.0	10.4	10.4
Significant Impact?	Yes	No	No	No	No

Notes:
Source: Christopher A. Joseph & Associates, May 2008. Calculation sheets are provided in Appendix C

Nitrogen Dioxide

Based on the dispersion modeling results, the maximum localized emissions of 1-hour NO₂ would result in a concentration of 0.51 ppm. As shown in Table VI-2, localized air quality impacts would be significant if the 1-hour NO₂ level generated during construction would exceed 0.18 ppm at the sensitive receptors surrounding the project site. As such, impacts associated with NO₂ concentrations would be significant.

Carbon Monoxide

Based on the dispersion modeling results, the maximum localized emissions of CO would result in concentrations of 9.57 ppm for the 1-hour CO and 7.26 ppm for the 8-hour CO. Localized air quality impacts would be significant if the 1-hour and 8-hour CO levels generated during construction would exceed 20 ppm and 9.0 ppm, respectively, at any of the receptors surrounding the project site. As the 1-hour and the 8-hour maximum CO concentration would not exceed their respective thresholds outlined above, impacts associated with CO concentrations would be less than significant.

PM₁₀

Based on the dispersion modeling results, the maximum localized emissions of PM₁₀ would result in a maximum concentration of 8.06 µg/m³. As such, impacts associated with PM₁₀ concentrations would be less than significant.

PM_{2.5}

Based on the dispersion modeling results, the maximum localized emission of PM_{2.5} would result in a maximum concentration of 4.21 µg/m³. As the highest PM_{2.5} concentration would exceed the SCAQMD threshold of 10.4µg/m³, impacts associated with localized PM_{2.5} concentrations would be less than significant.

Operational Emissions – Mass Daily Emissions

The analysis of daily operational emissions for Alternative 2 has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD and utilizes the same methodology as the project as proposed analysis. The results of these calculations are presented in Table VI-3; the comparable results for the proposed project are presented in Table IV.C-9.

As shown, Alternative 2 would generate a net increase in average daily emissions that does not exceed the thresholds of significance recommended by the SCAQMD. This is a less-than-significant impact.

Operational Emissions – Localized CO Concentrations

The localized CO concentration impacts associated with Alternative 2 of the proposed project have been evaluated with the addition of traffic growth associated with cumulative development.

As shown previously in Table IV.C-11, future CO concentrations near these intersections would not exceed the national and State ambient air quality standards for CO. Therefore, implementation of the proposed project and cumulative development would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) located in close proximity to these intersections to substantial localized pollutant concentrations. This would be a less-than-significant impact regarding the exposure of sensitive receptors to substantial pollutant concentrations. A comparative analysis of the Alternative 2 traffic volume/capacity ratios shows two intersections that are potentially impacted for traffic, but neither

**Table VI-3
Alternative 2 - Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Proposed Land Uses						
Water and Space Heating	0.28	3.59	1.53	0.00	0.01	0.01
Landscape Maintenance Equipment	0.12	0.02	1.55	0.00	0.01	0.01
Consumer Products	18.78	-	-	-	-	-
Architectural Coatings	0.62	-	-	-	-	-
Motor Vehicles	18.37	17.06	220.43	0.25	43.77	8.31
Subtotal	38.17	20.67	223.51	0.25	43.79	8.33
Existing Land Uses (2009 emissions)	9.32	8.91	114.94	0.09	15.79	2.99
Total Net Increase (Proposed – Existing)	28.85	11.76	108.57	0.16	28.00	5.34
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Proposed Land Uses						
Water and Space Heating	0.28	3.59	1.53	0.00	0.01	0.01
Landscape Maintenance Equipment	0.12	0.02	1.55	0.00	0.01	0.01
Consumer Products	18.78	-	-	-	-	-
Architectural Coatings	0.62	-	-	-	-	-
Motor Vehicles	19.35	21.09	208.63	0.20	43.77	8.31
Subtotal	39.15	24.70	211.71	0.20	43.79	8.33
Existing Land Uses (2009 emissions)	10.48	13.65	111.64	0.07	15.79	2.99
Total Net Increase (Proposed – Existing)	28.67	8.00	100.07	0.13	28.00	5.34
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Subtotals may not appear to add correctly due to rounding in the URBEMIS 2007 model.</i>						
<i>Source: Christopher A. Joseph & Associates, 2007. Calculation sheets are provided in Appendix C.</i>						

of these intersection exceed the analysis criteria discussed under the proposed project air quality localized CO concentrations analysis. Therefore, under Alternative 2 impacts on local sensitive receptors would be considered less than significant.

Operational Emissions – Toxic Air Contaminants

Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of alternative 2. Only small quantities of common forms of hazardous or toxic substances, such as cleaning agents, which are typically used or stored in conjunction with residential uses, would be present. Most uses of such substances would occur indoors. Based on the common uses expected on the site, any emission would be minor. This would be a less-than-significant impact regarding the exposure sensitive receptors to substantial pollutant concentrations.

Operational Emissions – Airborne Odors

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Alternative 2 would include residential and commercial uses, and would not contain any of the above-listed odor producing uses. Instead potential operational airborne odors could result from cooking activities associated with the new residential units and restaurants. These odors would be minimal, if noticeable at all; would be similar to existing residential and commercial uses in the local vicinity; and would be confined to the immediate vicinity of the new buildings. Therefore, Alternative 2 is not expected to create objectionable odors affecting a substantial number of people. This is a less-than-significant impact.

Greenhouse Gas Emissions

The GHG emissions for Alternative 2 have been calculated in metric tons per year as shown in Table VI-4. The URBEMIS 2007 model was used to estimate GHG emissions from construction activities. The California Climate Action Registry (CCAR) protocol (CCAR Protocol) was used to calculating the operational GHG emissions resulting from on-road mobile vehicles, electricity, and natural gas.

For the qualitative GHG emissions analysis for Alternative 2, the 2006 CAT Report has recommended a list of strategies that the State could pursue to reduce climate changing greenhouse gas emissions. Alternative 2 would incorporate the same GHG reduction strategies as those associated with the proposed project; therefore, the impacts from GHGs would be considered less than significant. In addition, a number of local and state agencies will implement GHG emission reduction initiatives.

Consistency with General Plan Air Quality Element

Alternative 2 would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element, as it would be generally consistent with the applicable air quality policies discussed above. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the General Plan.

MITIGATION MEASURES

Construction-Related Project Impacts

The mitigation measures for alternative 2 would be the same as those discussed and analyzed in the project as proposed analysis.

Operational Impacts

As no significance thresholds for operational impacts were exceeded, mitigation measures are not required.

**Table VI-4
Predicted Proposed Project Greenhouse Gas Emissions**

Emissions Source	CO ₂ e Emissions in Metric Tons per Year
Alternative 2 Operation	
Natural Gas Consumption	878.10
Electricity Generation	754.58
Motor Vehicles	3,370.49
<i>Total from Proposed Operation</i>	5,003.17
Existing Operation	
Natural Gas Consumption	12.57
Electricity Generation	40.44
Motor Vehicles	1,216.16
<i>Total from Existing Operation</i>	1,269.17
Net Increase (Proposed – Existing)	3,734.00
<i>Source: Christopher A. Joseph & Associates, 2008. Calculation sheets are provided in Appendix E.</i>	

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts on air quality resulting from construction activities would be potentially significant for NO_x, PM₁₀, and PM_{2.5}, as previously discussed in Section IV.C. However, the analysis also shows that there are no air quality impacts following the implementation of the mitigation measures. Compared to the proposed project, Alternative 2 would generate lower construction-related emissions. Since Alternative 2 would employ the same mitigation measures as the proposed project, the emissions after mitigation would be even less. Therefore, the impacts from construction of Alternative 2 would be less than significant after mitigation.

The operational emissions associated with Alternative 2 would not exceed the established SCAQMD threshold levels for any criteria pollutants during both the summertime (smog season) and wintertime (non-smog season). Therefore, this impact would be less than significant.

Biological Resources

This alternative will result in fewer impacts to biological resources than the proposed Project due to the substantially reduced Project footprint. By eliminating development within the western portion of the site, Alternative 2 would result in fewer impacts to protected and mature trees, jurisdictional drainages, and native habitats (from a reduced fuel modification area). The impacts from Alternative 2 are discussed below and compared to the impacts of the proposed Project.

Alternative 2 will remove approximately 0.1-acre of native scrub habitat along the edge of the existing golf course which is already subject to disturbance from current fuel modification activities. It will also remove approximately 0.9-acre of oak woodland areas; these small, isolated patches are not considered high quality habitat as they are located on the active portion of the golf course as well as in the disturbed area along Tujunga Canyon Boulevard which is subject to regular vegetation removal for fire control. The remaining areas impacted by Alternative 2 construction consist of existing golf course, developed or disturbed areas. These impacts are less than the 0.6-acre of native scrub habitat and the 1.1 acres of oak woodland habitat that would be removed by the proposed Project. A summary of the impacts to plant communities (habitats) from the proposed Project and Alternative 2 are given in Table VI-5 below.

**Table VI-5
Impacts to Plant Communities from the Proposed Project and Alternative 2**

Plant Community	Grading Impacts (acres)			Fuel Modification Zone Impacts (acres)		
	Proposed Project	Alternative 2	Difference ()=less	Proposed Project	Alternative 2	Difference ()=less
Scrub						
California Sage Brush-Black Sage series	0.1	0.0	0.0	0.4	0.4	(0.1)
California Sagebrush-California Buckwheat series	0.0	0.0	0.0	0.0	0.0	0.0
Chamise-Black Sage (Fuel Modification Zone)	0.1	0.1	0.0	0.8	0.8	0.0
Chamise-Black Sage series	0.4	0.0	(0.4)	6.5	1.7	(4.8)
Scruboak-Birchleaf Mt. Mahogany series	0.0	0.0	0.0	2.1	1.0	(1.1)
Woodland						
Coast Live Oak series	1.1	0.9	(0.2)	1.8	1.3	(0.5)
Developed/Disturbed						
Developed	1.4	0.4	(1.1)	0.0	1.1	1.1
Disturbed	2.9	1.9	(1.0)	1.4	1.3	(0.1)
Golf Course	19.8	8.2	(11.5)	0.6	2.0	1.4
Ornamental	0.1	0.0	(0.1)	0.1	0.2	0.1
TOTAL	25.9	11.6	(14.3)	13.9	9.6	(4.2)

In addition, due to the reduced extent of structures under Alternative 2 as compared to the proposed Project, the required fuel modification zone (200 feet around structures) would be substantially reduced, thereby decreasing impacts to the native vegetation in the preserved area. The required fuel modification zone from Alternative 2 would impact approximately 3.9 acres of native scrub habitat and 1.3 acres of oak woodland due to annual vegetation thinning and “limbing up” of shrubs and trees. These impacts are

less than the 9.9 acres of native scrub and 1.8 acres of oak woodland that would be impacted by fuel modification activities under the proposed Project.

Special Status Species

Impact to special status species from Alternative 2 would be similar to, but less than, the proposed Project. Due to the reduction in impacts to native habitats from construction as well as fuel modification activities, as detailed above, the potential extent of impacts to special status species would be similarly reduced in extent and severity. Although reduced, the same potential impacts from the proposed Project to special status plants (Greata's aster, Catalina mariposa lily, golden-rayed pentachaeta, chaparral rein orchid, Fish's milkwort, ocellated Humboldt lily, Plummer's mariposa lily, slender mariposa lily, Coulter's Matilija poppy and white rabbit-tobacco) and reptiles (silvery legless lizard, orange-throated whiptail, coastal western whiptail, rosy boa, coast horned lizard, and coast patch-nosed snake) from fuel modification activities, and to special status birds (Cooper's hawk, southern California rufous-crowned sparrow, Bell's sage sparrow, oak titmouse, Costa's hummingbird, loggerhead shrike, black-chinned sparrow, chipping sparrow, and other nesting birds), bats (western mastiff bat and western red bat) and small mammals (San Diego woodrat) from construction and fuel modification activities have the potential to occur under Alternative 2. However, the implementation of Mitigation Measures D.1-1 through D.1-4, prescribed under the proposed Project, would reduce these potential impacts to special status species to less than significant.

Impact to the behavior and long-term survival of sensitive species from Alternative 2 would be similar to, but less than, the proposed Project. Due to the elimination of nearly half of the proposed Project development in the western portion under Alternative 2, the extent of impacts from the development on the adjacent preserved habitat would be similarly reduced. However, like the proposed Project, the quality of the preserved habitat may be compromised due to increased noise, light and human activity in the adjacent development, increased unattended domestic pets (particularly cats) which are known to predate upon reptiles and small birds, and possible "edge effects" such as an increase in trash. Although these impacts would be less under Alternative 2 than the proposed Project, these impacts may be considered potentially significant. However, these impacts can be reduced to a less-than-significant level through the implementation of Mitigation Measure D.1-5, as prescribed under the proposed Project.

Protected and Mature Trees

Of the 321 protected trees on-site (303 coast live oaks and 18 western sycamores), Alternative 2 would remove 48 coast live oaks and two western sycamores, compared to the proposed Project which would remove 85 coast live oaks and eleven (11) western sycamores. In addition, of the 120 mature "non-protected" trees on-site, only 15 would be removed by Alternative 2, as compared to the 103 that would be removed by the proposed Project. See Table VI-6 below for a summary of impacts.

Although impacts to these protected and mature trees from Alternative 2 would be less than the impacts from the proposed Project, they would still be considered significant. Similar to the proposed Project, these impacts would still be considered significant with mitigation in the short-term due to the temporal

loss of protected trees until they can grow to the size necessary to adequately replace the removed trees. However, these impacts to protected and mature trees would be reduced to less-than-significant in the long-term due to the implementation of Mitigation Measure D.2-16 to D.2-20, prescribed under the proposed Project. The amount of mitigation required for the protected trees would be less under Alternative 2 than for the proposed Project, as the area of protected tree canopy removed would be less; this would require a revision of the conceptual planting plan.

**Table VI-6
Protected and Mature Tree Removals from Alternative 2 Compared to the Proposed Project**

	Total Removed by Proposed Project	Total Removed by Alternative 2	Difference () = fewer removed
Protected Native Tree Species			
Coast live oak	85	48	(37)
California sycamore	11	2	(9)
<i>TOTAL Protected Native Trees</i>	96	50	(46)
Mature Other Trees			
Mature other (non-protected) trees	103	15	(88)
<i>TOTAL Mature Other Trees</i>	103	15	(88)
<i>TOTAL All Trees</i>	199	65	(134)
<i>Source: Christopher A. Joseph & Assoc. 2007 (Verdugo Hills Golf Course Tree Report, September 2008)</i>			

In addition to the trees that would be removed, other trees adjacent to the development (especially those associated with the widening of La Tuna Canyon Road) may be impacted by the project if construction activities encroach upon the dripline of the tree. However, with the implementation of Mitigation Measure D.2-1 to D.2-15, prescribed under the proposed Project, this impact would be reduced to less-than-significant.

Sensitive Wildlife Movement and Migration Corridors

As described under the proposed Project, the Project Site is not considered to constitute, or be a part of, a wildlife movement or migration corridor, due to the considerable suburban development that exists to the north and east making the site a “dead end” for any mobile wildlife species attempting to move or migrate from the Verdugo Mountains northward or eastward into the San Gabriel Mountains. Although the elimination of development within the western portion of the site under Alternative 2 would retain a portion of the golf course that would allow for additional wildlife movement throughout the site and between the golf course and the preserved habitats on-site, it would not increase the potential for the site to act as a regional wildlife movement or migration corridor. Therefore, as under the proposed Project, Alternative 2 would result in a less than significant impact to wildlife movement or migration corridors.

Wetlands

No wetlands are present on the Project site. However, there are eleven (11) potentially jurisdictional drainage features present on the Project Site. Alternative 2 would impact two (2) of these drainages, while the proposed Project would impact four (4) of these drainages due to Project construction. Impacts to drainages would result in the excavation and/or placement of fill material within all or a portion of these features. Under Alternative 2, approximately 154 linear feet (0.008 acre) of potential “waters of the U.S.” would be impacted, whereas impacts under the proposed Project would be nearly double, at approximately 352 linear feet (0.017 acre). Similarly, under Alternative 2, approximately 154 linear feet (0.027 acre) of potential CDFG-regulated streambed would be impacted, whereas impacts under the proposed Project would be more than triple, at approximately 529 linear feet (0.089 acre). See Table VI-7 below for a summary of impacts per drainage and drainage segment under Alternative 2 and the proposed Project with respect to potential Corps and CDFG jurisdictional areas.

**Table VI-7
Impacts to Potentially Jurisdictional Drainages Segments from the Proposed Project
and Alternative 2**

Drainage Segment	Impacts to Potential Section 404 Waters of the U.S.				Impacts to Potential CDFG Jurisdiction			
	Proposed Project		Alternative 2		Proposed Project		Alternative 2	
	Length (linear ft)	Area (acres)	Length (linear ft)	Area (acres)	Length (linear ft)	Area (acres)	Length (linear ft)	Area (acres)
1	0	0.000	0	0.000	0	0.000	0	0.000
2	0	0.000	0	0.000	0	0.000	0	0.000
3	0	0.000	0	0.000	0	0.000	0	0.000
4	0	0.000	0	0.000	0	0.000	0	0.000
5	0	0.000	0	0.000	0	0.000	0	0.000
6	0	0.000	0	0.000	0	0.000	0	0.000
7	147	0.006	0	0.000	291	0.049	0	0.000
8	137	0.006	98	0.004	137	0.031	98	0.022
9	0	0.000	0	0.000	33	0.003	0	0.000
10	0	0.000	0	0.000	0	0.000	0	0.000
11	68	0.004	56	0.004	68	0.006	56	0.005
TOTAL	352	0.017	154	0.008	529	0.089	154	0.027

Note: Shaded rows indicate drainages that are impacted by either the Proposed Project or Alternative 2

Although impacts to these drainages from Alternative 2 would be less than the impacts from the proposed Project, they would still be considered significant; however, implementation of Mitigation Measure D.1-6, prescribed under the proposed Project, would reduce these potential impacts to potentially

jurisdictional “waters of the U.S.” and streambeds to less than significant. One difference, however, between the mitigation for Alternative 2 and the proposed Project would be that impacts to the potential “waters of the U.S.” under Alternative 2 would be less than 300 linear feet of ephemeral waters, which would not require a written waiver from the District Engineer in order to receive a Nationwide Permit, as it would automatically fall within the parameters of NWP 29. Since the proposed Project would impact more than 300 linear feet of ephemeral waters, it would require a written waiver from the District Engineer in order to receive authorization under NWP 29, and if the waiver was not received, impacts to these drainages would require an Individual Permit.

Cultural Resources

Because Alternative 2 would disturb a smaller area of the project site than the proposed project, it has the potential to reduce impacts to archaeological and paleontological resources. Because all historic resources have been removed from the project site, neither the proposed project nor Alternative 2 would impact any historic resources. Both Alternative 2 and the proposed project could commemorate the significant historic events associated with the site through its designation as a California Historical Landmark (thematic landmark group "Temporary Detention Camps for Japanese Americans"). While cultural resources impacts under the proposed project would be less than significant, because of its smaller development area, they would be further reduced by Alternative 2.

Geology and Soils

Alternative 2 and the proposed project would be subjected to the same potential geotechnical conditions on the project site (e.g., seismicity, slope instability and soil erosion). However, Alternative 2 would involve less landform alteration: Alternative 2 would grade approximately 12.7 acres of the project site, while the proposed project would grade 28.6 acres (approximately 15.9 acres more than Alternative 2). Alternative 2 would also require less earthwork: it would involve approximately 190,100 cubic yards of cut and fill, balanced on site. In comparison, the proposed project would require approximately 367,300 cubic yards of cut (177,200 cubic yards more than Alternative 2), and 403,600 cubic yards of fill (213,500 cubic yards more than Alternative 2). While geologic impacts from landform alterations under the proposed project would be less than significant, they would be further reduced by Alternative 2. Therefore, Alternative 2 would have less of an impact with respect to geologic and soils conditions than the proposed project.

The project site does not lie within an Alquist-Priolo Special Studies Zone and no known active or potentially active faults cross the project site. Therefore, neither the proposed project nor Alternative 2 would expose people or structures to adverse effects involving rupture of a known earthquake fault.

The project site is susceptible to strong ground shaking during a seismic event. However, the homes under either the proposed project or Alternative 2 must be designed in accordance with the Unified Building Code, which would reduce seismic risks for either project to an acceptable level.

The project site is not within an area considered subject to liquefaction or seismic settlement. Therefore, neither the proposed project nor Alternative 2 would expose people or structures to potential substantial adverse effects involving liquefaction or other seismic-related ground failure.

The graded and natural areas of the project site will be subject to erosion, sedimentation during, and following grading of the Development Areas. Compliance with those the Grading Code and Federal Clean Water Act regulations will reduce soil erosion and loss of topsoil for both the proposed project and Alternative 2 to less than significant levels.

The project site does not show evidence of ancient or recent bedrock landslides, recent surficial slope failures or slumps. Also, gross stability analysis indicates that the bedrock slopes are stable. Therefore, construction of either the proposed project or Alternative would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts for both projects would be less than significant.

Since the primarily granular character of the surficial materials on the project site is not conducive to the development of mud and debris flows, neither the proposed project nor Alternative 2 would be subject to significant impacts from mud and debris flows.

No potential land subsidence-related circumstances and or activities are suspected to occur on the project site, nor have they in the past. Therefore, neither the proposed project nor Alternative 2 would be subject to subsidence hazards.

Expansive earth materials are not known to be present within the project site. Therefore, neither the proposed project nor Alternative 2 would be subject to significant impacts expansive earth materials.

Hazards and Hazardous Materials

The proposed project is not located on a site which is included on a list of hazardous materials sites. More specifically, there are no detectable amounts of petroleum hydrocarbons or organochloride pesticides on the project site. While there are detectable concentrations of petroleum hydrocarbons in one location, soil remediation in that area would reduce hazardous from detectable concentrations of petroleum hydrocarbons to a less than significant level. In addition, there are no known properties within a one-mile radius of the project site with known or documented releases of potentially hazardous materials. Therefore, neither the proposed project nor Alternative 2 would be adversely affected by hazardous materials left over from previous site uses or from offsite properties.

Both the proposed project and Alternative 2 are residential developments. Therefore, neither project would use, store, or transport significant amounts of hazardous materials; be likely to result in reasonably foreseeable conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Therefore, neither the proposed project nor Alternative 2 would have a significant impact with respect to adverse hazards and/or hazardous materials.

Hydrology and Water Quality

Both the proposed project and Alternative 2 would develop the site with residential uses; consequently, the two projects would be expected to discharge runoff of approximately the same quality. Both projects would be required to comply with the NPDES BMP requirements to ensure that the construction activities would not cause soils erosion and/or the discharge of polluted water from the project site. Similarly, both projects would also be required to comply with the SUSWP BMP requirements to ensure that the long-term operational activities would not result in the discharge of urban pollutants into the storm drainage system. This analysis assumes Alternative 2 would utilize the project's system of underground tanks to allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board. Therefore, Alternative 2 would have approximately the same less-than-significant water quality impacts as the proposed project.

The proposed project would increase the area of impervious surface area on the project site to 12.34 acres, or 19.7 percent of the total drainage area. As a consequence, runoff from the developed site is expected to increase. Assuming that Alternative 2 would have the same ratio of impervious surface area to development area as the proposed project (i.e., approximately 43 percent), Alternative 2 would be expected to increase impervious surface area to approximately 5.5 acres, or approximately 9.4 percent of the total drainage area. Therefore, Alternative 2 would be expected to generate less than half the runoff than the proposed project. Since it is the proposed project's goal that post-development runoff will not exceed that generated by the project site in its existing condition, the project will capture and store the excess runoff within each subarea in underground tanks. It is expected that Alternative 2 would use the same underground storage tank system too ensure that post-development runoff will not exceed that generated by the project site in its existing condition. Therefore, off-site hydrology impacts are expected to be comparable.

Land Use

Community Division

Impacts associated with physically dividing an established community would be the same as under the proposed project. Although the homes surrounding the proposed project site are generally single family homes rather than multi-family homes, the area is residential. The project site is currently occupied by a golf course and undeveloped open space. Although the proposed project will be more densely developed than the residential areas to the north, residential areas to the east of the site are more densely developed with condominiums. There are currently no community services or public services³ on the project site, and there are no existing roadways through the project site that are used by the adjacent residential communities to the north and east. Therefore, the proposed residential uses would not introduce a new use to the area and would not divide the residential communities to the north and east. Moreover, there

³ *Community and public services include schools, libraries, recreational facilities, neighborhood retail uses and other community-serving land uses.*

would be a greater open space buffer between the residential uses to the north and the project site than under the proposed project and the land uses to the east of the project site are currently separated from the project site by Tujunga Canyon Boulevard. Therefore, Alternative 2 would not physically divide any established communities.

Land Use Compatibility

From a functional perspective, the proposed condominium development proposed under Alternative 2 would be somewhat compatible with existing homes in the project vicinity. The Alternative's multi-family homes would be clustered in the eastern portion of the site adjacent to the more densely developed residential areas on the east side of Tujunga Canyon Boulevard. The golf course would remain as would the open space, serving as a buffer between the project site and the less densely developed residential areas to the north. Although the density of the Alternative's multi-family homes would be greater than the adjacent residential uses, Alternative 2 would be functionally compatible with the existing homes to the east and buffered from the homes to the north.

Although this alternative proposes multi-family uses which would be less compatible with the lower density single family homes to the north than the proposed project, the amount of open space would be greater, serving as a more substantial buffer. Additionally, there is a small condominium complex immediately to the east of the site and one slightly farther east fronting on Honolulu Avenue. The proposed maintenance of the golf course and the dedication of permanent open space are compatible with the existing open space in the project vicinity and are compatible with existing residential uses. Therefore, the multi-family homes under Alternative 2 together with the preservation of open space, would be functionally compatible with surrounding land uses.

Consistency with Land Use Plans, Policies and Regulations

In general, the discussion for impacts related to the consistency with regional plans would be the same for Alternative 2 as for the proposed project. Thus, this section focuses on the local applicable plans of the City of Los Angeles.

City of Los Angeles General Plan Framework Element

As identified in the setting section for the proposed project (section IV.I.), the Citywide General Plan Framework Element guides the City's long range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and community plans and it sets forth a conceptual relationship between land use and transportation issues on a citywide basis. Although the goals, objectives and policies of the General Plan Framework Element are intended for larger scale planning projects, such as policies and community plans, the two that were identified as applicable to the proposed project, and discussed in Table IV.I-1, are applicable to Alternative 2 and addressed below:

GOAL 3B: *Preservation of the City's stable single family neighborhoods.*

Objective 3.5: *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*

Discussion: *Somewhat Consistent.* Alternative does not involve the demolition of any existing residential units. It does include the development of 336 townhomes, encompassed within 14 buildings each containing 24 units. The buildings would be clustered on the eastern portion of the site. The alternative allows for the maintenance of the golf course and an open space buffer between very low density existing residential uses to the north and northwest of the project site. The residential neighborhood east of the project site on the east side of Tujunga Canyon Boulevard is of similar density to this alternative. Although it is adding multi-family residential uses to the site, represents a more dense development than the proposed project, and is not within the scale and character of the single family neighborhoods to the north of the site, it does provide more open space than the proposed project. Thus, this alternative is somewhat consistent with this goal and objective.

GOAL 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.3: *Conserve scale and character of residential neighborhoods.*

Discussion: *Consistent.* One of the objectives of the proposed project is to provide a substantial amount of housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.

There are a range of land use densities and developments surrounding the project site. Residential neighborhoods to the north are low density, however a multiple-acre open space buffer and the golf course will ensure there is no encroachment on that neighborhood. Residential land uses to the east of the project site are of similar density as the alternative. Thus the scale and character of the neighborhoods would be preserved and Alternative 2 is consistent with this goal and objective.

Alternative 2 would be similar in compatibility as the proposed project to the General Plan Framework.

Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (Community Plan)

The Community Plan encourages the preservation and protection of low-density, single family areas and existing open space from encroachment by incompatible uses. As discussed in Section IV.J, Land Use, Footnotes No. 4 and 20 to the Community Plan further limit the theoretical maximum density potential on the project site to approximately 274 dwelling units if designated under the RD5 zone, including

approximately 244 dwelling units on the golf course and a maximum of 30 dwelling units in the currently undeveloped areas. However, the total allowable density in the currently undeveloped areas would be permitted only where slope density is less than 15%. For the portions of this acreage where slope is greater than or equal to 50%, development is prohibited. Therefore, since the slope of the majority of the undeveloped areas is greater than 50%, the total number of potential allowable units would be closure to 244 dwelling units. Without the restrictions imposed by Footnotes No. 4 and 20, the Community Plan's existing land use designations for the project site (Low Medium I and Minimum) would permit up to 487 dwelling units on the project site in the R2 zone. However, because of Footnotes No. 4 and 20, the 336 units under Alternative 2 would exceed the theoretical maximum number of dwelling units permitted on the project site under the RD5 zone by 62 units; in addition, the apartments (i.e., attached housing) under Alternative 2 are not currently permitted on the project site. Thus, additional discretionary actions would be required which could include a general plan amendment, removing footnote No. 20 and a zone change that permits higher density. Alternative 2 would be permitted with footnote No. 4 since development is not on hillside.

As this alternative represents a higher density development on the site than under the proposed project, there is less consistency with the goals, objectives and policies of the Community Plan that seek to limit residential density. However, Alternative 2 would better satisfy the cluster opportunity where more open space is preserved, while greater housing choices are provided in comparison to the proposed project. Though Alternative 2 is denser than the currently permitted by the Community Plan footnote No. 20, it advances policies aimed to increase the provision of protected open space in the Community Plan area. Consistency of the proposed project with applicable policies is addressed below:

Objective 1-1 *To provide for the preservation of existing and the development of new housing to meet the diverse economic and physical needs of the existing and residents and projected population of the Plan area to the year 2010*

Discussion: *Consistent.* Alternative 2 includes the development of 336 multi-family townhome units and does not involve the demolition of any existing residential uses.

Policy 1-1.1 *Designate land for single and multi-family residential development.*

Discussion: *Consistent.* The proposed project is a multi-family residential development on land currently designated for residential development but used only as a golf course. Adding residential uses would be consistent with the land use designation.

Policy 1-1.2 *Protect existing single-family residential neighborhoods from encroachment by higher density residential and other incompatible uses.*

Discussion: *Not Consistent.* Because Alternative 2 would require a General Plan Amendment and a change of zoning to permit higher density, it does not protect nearby existing single-family neighborhoods from encroachment by higher density residential uses.

Policy 1-1.4 *The City should promote neighborhood preservation in existing residential neighborhoods.*

Discussion: *Partially Consistent.* The proposed project involves development of additional residential uses on a site that is designated for residential development and is adjacent to existing residential neighborhoods. However, because Alternative 2 increases density beyond that which is currently permitted, it does not promote neighborhood preservation.

Policy 1-3.1 *Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, impacts on traffic levels, and environmental impacts when changes in residential densities are proposed.*

Discussion: *Partially Consistent.* As the eastern most extension of La Tuna Canyon, the higher density multi-family housing of Alternative 2 is not consistent with the semi-rural, equestrian-oriented neighborhood character of La Tuna Canyon. The multi-family character of Alternative 2 is more in character with the areas of similar density located to the east of the site. Existing condominium developments exist and are proposed for the area to the east, on the east side of Tujunga Canyon Boulevard. As the alternative project includes similar land uses to those that already occur in the vicinity and on a site that has previously been developed infrastructure associated with these uses nearby homes (including, but not limited to, roadways, electricity, water, and solid waste services) currently exists. Additionally, the golf course and existing open space would remain. Project impacts to neighborhood character, services and public facilities, traffic, and other environmental issues are addressed in their respective sections of this Draft EIR.

Policy 1-3.2: *Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.*

Discussion: *Partially Consistent.* Buildings are proposed for 32 feet which is 2 feet higher than permitted by the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. The provision of relatively-large houses on small lots, with minimal yard and landscape areas does not demonstrate a high degree of architectural compatibility and landscaping with the existing single-family neighborhoods to the west (La Tuna Canyon) and to the north. Alternative 2 is more compatible (architecture and landscaping) with existing multi-family housing to the east.

Policy 1-3.3: *Preserve existing views of hillside and mountainous areas.*

Discussion: *Not Consistent.* Alternative 2 would partially block existing views of hillside and mountainous areas as seen from Tujunga Canyon Road and Honolulu Avenue. To a lesser extent Alternative 2 would also affect views of hillside and mountainous areas from the Interstate 210 Freeway and from La Tuna Canyon Road.

Policy 1-5.1: *Promote greater individual choice in type, quality, and location of housing.*

Discussion: *Consistent.* Alternative 2 includes 14 similar buildings containing 24 units each. It would be a high density development with limited individual style; however, the units would be developed to the east of the existing golf course. The alternative would include private open space (individual yards) and a substantial amount of open space available for passive recreational use.

Alternative 2 would provide housing to meet existing and future needs of those desiring to live in the northeast San Fernando Valley, and help alleviate the housing shortage in the City of Los Angeles.

Objective 1-6 *To limit residential density and minimize grading in hillside areas.*

Discussion: *Somewhat Consistent.* Alternative 2 would cluster residential uses clustered on the eastern portion of the site where the least amount of grading would be required. Also, Alternative 2 would involve less hillside grading than the proposed project. However, the density would be greater under this alternative than the proposed project.

Policy 1-6.1 *Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within the hillside areas.*

Discussion: *Consistent.* The project site is currently developed with a golf course and it is located adjacent to several residential neighborhoods. Thus, existing infrastructure is currently available at the project site. Any necessary upgrades to existing systems would be financed by the developer.

Policy 1-6.2 *Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area.*

Discussion: *Consistent.* No development would occur on slopes of 15% or greater. The site plan takes into account the steepness of topography and geotechnical constraints within the project site.

Policy 1-6.3 *Require that grading be minimized to reduce the effects on environmentally sensitive areas.*

Discussion: *Consistent.* Alternative 2 requires substantially less grading than the proposed project and development would will be clustered to minimizes grading and other effects on environmentally sensitive areas. No development would occur on slopes of 15% or greater.

Objective 5-1 *To preserve existing open space resources and where possible develop new open space.*

Discussion: *Consistent.* The alternative is designed to retain the golf course and a majority of the existing undeveloped portions of the site.

Policy 5-1.1 *Encourage the retention of passive and visual open space which provides a balance to the urban development of the Community.*

Discussion: *Consistent.* Alternative 2 includes the retention the golf course and a majority of the existing undeveloped portions of the site.

Policy 5-1.2 *Protect significant environmental resources from environmental hazards*

Discussion: *Consistent.* Development of Alternative 2 would retain substantial portions of existing undisturbed open space.

Policy 5-1.3 *Accommodate active park lands, and other open space uses in areas designated and zoned as Open Space.*

Discussion: *Consistent.* The project site does not include any land currently zoned or designated as Open Space, however the golf course and a substantial amount of existing open space would be retained.

Policy 5-1.4 *Preserve as much of remaining undeveloped hillside land, as feasible, for open space and recreational uses.*

Discussion: *Consistent.* Alternative 2 would preserve a substantial portion of the existing undeveloped portions of the project site.

Alternative 2 is generally consistent or partially consistent with the applicable policies in the Community Plan and it is more consistent than the project with regard to policies designed to protect open space, and that encourage greater housing choices. However, the density proposed by Alternative 2 is substantially greater than and not consistent with the density designated by the Community Plan. Thus, this alternative is not consistent with the Community Plan policy regarding single detached units and residential density, and would require additional discretionary actions, potentially including a general plan amendment to remove footnote No. 20.

San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan

The proposed project was designed to comply with the regulations of the Specific Plan. Consistency with the policies of the Specific Plan and s discussed in Table IV.J-3 in the Land Use section. Alternative 2 is analyzed with the same policies for compatibility.

Section 6. Prominent Ridgelines Protection Measures: *Section 6 contains a list of guidelines for development within the Prominent Ridgeline Protection Areas.*

Discussion: *Likely Consistent.* The project does not appear to fall near the ridgeline protection areas nearby. Therefore, the proposed project would not appear to directly impact a prominent ridgeline and impacts are expected to be less than significant. However, the final determination whether the project would impact a prominent ridgeline will be made by City staff during the Project Permit Compliance Review stage. The adjacent ridgeline near the project is currently developed with single family homes. No new development is proposed near the ridgeline. However, similar to the proposed project, Alternative 2 is also in compliance with prohibiting new development in areas with greater than 15% slope. This is to comply with the spirit and intent of the Specific Plan to limit the amount of development in hillside areas.

The Specific Plan also places an emphasis on the utilization of native planting materials in new construction projects. Although the landscape design of the proposed project will incorporate a significant amount of native plants that will improve the current conditions of the site, Alternative 2 retains the golf course and as an operating golf course, many non-native species have been introduced to the subject property and the natural landscape has been substantially altered. This would continue to remain a condition on the site.

Section 7. Equine District Protection: *This requirement in Section 7 only apply to projects that are within existing and future Equinekeeping Supplemental Use Districts (“K”).*

Discussion: *Consistent.* The proposed project site is not located within an Equinekeeping District and therefore the requirements do not apply to the proposed project.

Section 8. General Development Standards: *Several general development standards are required by the Specific Plan that involve slope density, oak trees, prohibited plan materials and domestic livestock. Domestic Livestock.*

Discussion: *Consistent.* As previously discussed, no development will occur in areas with greater than 15% slope. Any oak trees that would be removed for development will be replaced at a ratio of 9.5:1. New landscaping for the site would rely heavily on native plants in the landscape design (see Appendix F-3 for the Preliminary Landscape Plan’s Plant Palette. No prohibited plant materials would be used; and, as the project site is not within the RE40 zone and the homes are not designed for livestock keeping, this standard is not applicable.

Section 9: Scenic Highway Corridors Viewshed Protection: *This section of the Specific Plan establishes several regulations for new projects within a Scenic Highway Corridor. The majority of these are specific to commercial and industrial developments. However, building height is regulated within scenic highway corridors. The maximum height of any new building or structure visible from the right-of-way of a Scenic Highway shall be 30 feet.*

Discussion: *Not Consistent.* La Tuna Canyon and the 210 Freeway are designated as Scenic Highways under the Specific Plan. Alternative 2 would be visible from the rights-of-way of these two scenic highways.

The maximum height of the buildings will be 32 feet and thus will exceed the maximum permitted height.

Alternative 2 is less compatible with the Specific Plan than the proposed project. Although native vegetation will be used in the landscape design, no development will occur along any prominent ridgelines, fewer scenic views will be affected, building heights will be above the maximum permitted height and some native habitat could be impacted.

City of Los Angeles Planning and Zoning Code

The major portions of the site that includes the golf course is zoned RA-1 (Suburban Agricultural), and the northern 12.9 acres of the project site is currently zoned A1-1 (Agricultural). Although the Community Plan designates the subject property as Low Medium I residential (with corresponding zones of R2, RD3, RD4, RD5, and RD6), a footnote (Footnote No. 20) in the Community Plan restricts zoning for the site to no greater than the RD5 Zone. Thus, development on the site would be limited to the density permitted within the RD5 zone as designated by the Community Plan, though this is denser than what is currently allowed onsite in the A1-1 and RA-1 zones. As discussed under the Community Plan, the RD5 Zone would permit the development of a maximum of 244 dwelling units on the 28 acres of the golf course. Therefore, the proposed 336 homes would be denser than what is allowed in the RD5 zone,

and substantially greater than what would be currently allowed in the A1-1 and RA-1 zones. Additionally, although apartments are permitted within the RD5 zone, as previously discussed and stated in Footnote No. 20, housing would be restricted to detached units. Thus, the zone change request to RD5-1, although consistent with the land use designation on the map, would not permit the Alternative as proposed. Less restrictive zoning that permits higher density residential uses and a general plan amendment would likely be necessary.

This alternative has greater impacts associated with consistency with land use policies that apply to residential density and single detached housing than the proposed project. However, the proposed project is inconsistent with Community Plan policies 5-1.1 and 5-1.4 in Goal 5.

The alternative would implement policies designed to protect open space by clustering development, and providing greater housing choices in comparison to the proposed project, which is consistent with the goals and policies of the General Plan and Community Plan.

Noise

Construction

Construction activities Alternative 2 would be similar to the proposed project. Because this alternative would involve the use of the same types of construction equipment as the proposed project, construction of this alternative would cause a temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. The construction noise impacts would be reduced to less than significant with compliance with LAMC Noise Ordinance No. 41.40, which restricts demolition and noise activities to the hours of 7:00 AM to 9:00 PM. Nevertheless, as Alternative 2 would concentrate construction activities in the eastern portion of the project site, it would reduce impacts to the single-family homes to the north and east, compared to the proposed project.

Construction activities that would occur under Alternative 2 have the potential to generate low levels of groundborne vibration at the adjacent sensitive receptors. With implementation of the mitigation measures in Section IV.L (Noise Section), impacts would be similar to the proposed project's less than significant impacts.

Operation

When operational, Alternative 2 would increase the amount of human activity at the project site compared to the proposed project. The noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative 2 would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Alternative 2 would generate slightly more daily vehicular trips. Specifically, the proposed project is forecast to generate 1,166 new daily vehicular trips while Alternative 2 is forecast to generate 1,232 new vehicular tips, a difference of 66 daily vehicular trips. In general, in order to achieve a noticeable

increase in ambient noise levels due to traffic, a double of traffic on any given roadway would need to occur. Therefore, because Alternative 2 would only generate slightly more offsite vehicle trips, traffic noise would be similar to the proposed project and impacts would be less than significant.

Population/Housing

Development under this alternative would, similar to the proposed project, only involve the development of residential uses on the site. As, the project site is currently a golf course and does not contain any homes or people, this alternative would not result in the displacement of any existing homes or people.

Under Alternative 2, 336 townhomes would be developed on the project site, 107 more dwelling units than under the proposed project. As indicated in Section IV.M (Population and Housing) of this Draft EIR, the Community Plan indicates that approximately 2.52 persons are anticipated to occupy each unit within the Low Medium I density land use category in 2010.⁴ Based upon this factor, approximately 847 persons are anticipated to reside on the project site upon the completion of construction which is 270 more people than would occupy the site under the proposed project.

However, similar to the proposed project, increases in population and housing resulting from this alternative are not expected to directly induce substantial population growth because the projected population associated with this alternative would be consistent with area-wide population and housing forecasts. Specifically, the alternative represents approximately nine percent of the forecasted population growth and approximately eight and one-half percent of the forecasted housing growth in the Community Plan area (see Table IV.M-3 in Section IV.M of this Draft EIR). Therefore, similar to the proposed project, population and housing increases under Alternative 2 would be within the projected growth for the area.

The Community Plan's projected housing with respect to land with a Low Medium I Residential land use designation is based on 13.5 dwelling units per acre, within the range of 7 to 17 dwelling units per net acre for that land use designation. Thus, with 28 acres of Low Medium I Residential, the Community Plan projects approximately 378 housing units for the project site. Therefore, Alternative 2 would be consistent with the Community Plan's housing projections.

Traffic

Traffic generation for Alternative 2 was estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for Alternative 2 is presented in Table VI-8. A summary of the trip generation forecasts for the proposed project as compared to Project Alternative 2, as well as the remaining project alternatives, is provided in Table VI-16, below. As shown in Table VI-8, Alternative 2 is expected to generate 160 net new vehicle trips (27 inbound trips and 133 outbound trips) during the AM peak hour. During the PM peak hour, Project Alternative 2 is expected to generate 173

⁴ City of Los Angeles, *Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, 1997, page III-2.*

net new vehicle trips (119 inbound trips and 54 outbound trips). Over a 24-hour period, Project Alternative 2 is forecast to generate 1,876 net new daily trip ends during a typical weekday (938 inbound trips and 938 outbound trips). The Project Alternative 2 net traffic volumes during the weekday AM and PM peak hours are presented in Figures VI-3 and VI-4.

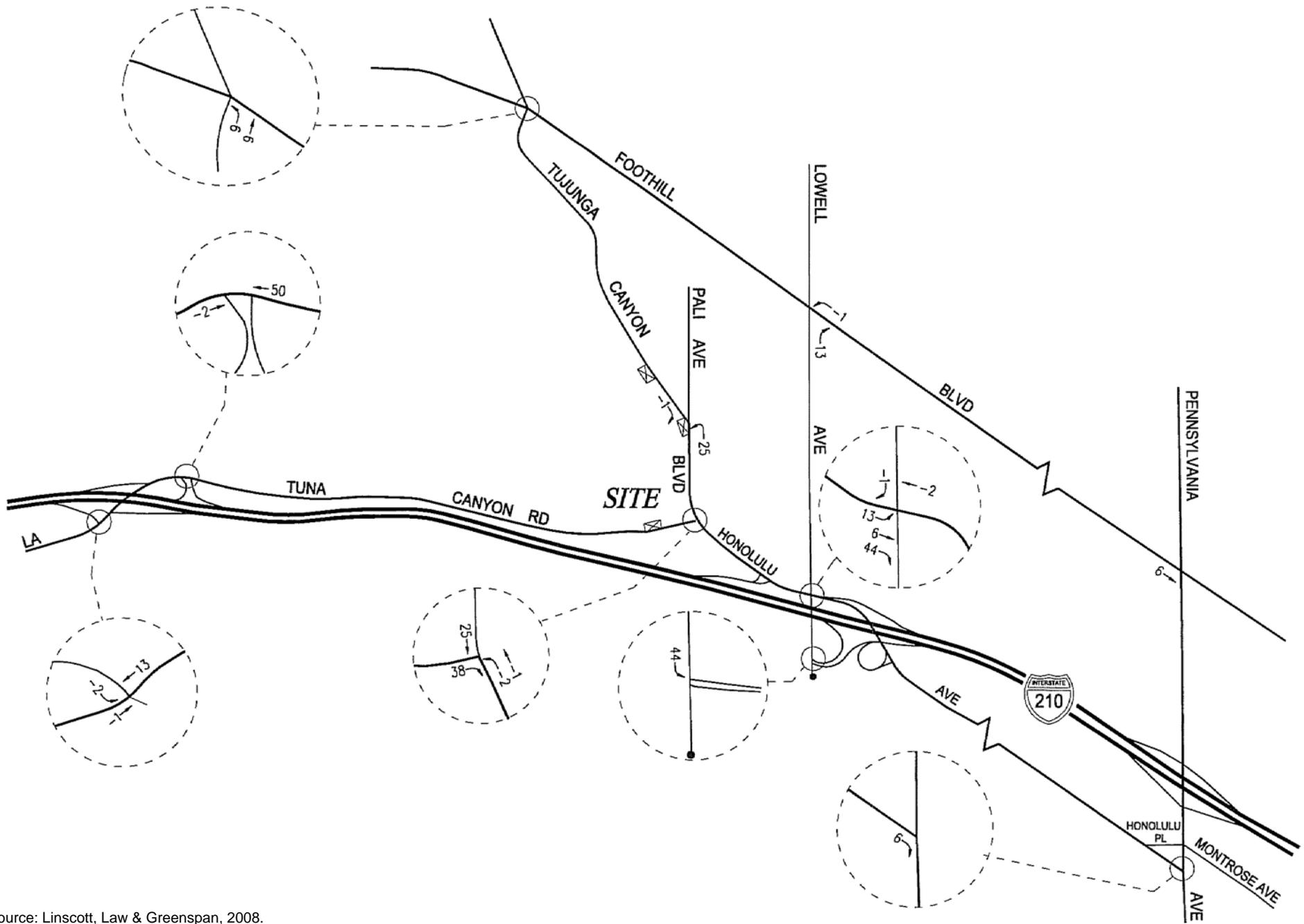
Summaries of the V/C ratios and LOS values during the AM and PM peak hours are provided in Tables VI-9, VI-10, and VI-11 for the City of Los Angeles, City of Glendale, and County of Los Angeles study intersections, respectively. As presented in Table VI-8 (refer to column 4), one more significant impact than that previously identified for the proposed project would result under this alternative. Alternative 2 is expected to create significant impacts at the following two locations according to the City of Los Angeles' impact criteria during the peak hour with the addition of ambient growth, related projects traffic, and project-related traffic:

- Int. No. 4: Tujunga Canyon Blvd./Pali Ave.
AM peak hour v/c ratio increase of 0.027 [to 1.484 (LOS F) from 1.457 (LOS F)]
- Int. No. 7: Lowell Ave./Honolulu Ave.
AM peak hour v/c ratio increase of 0.032 [to 0.985 (LOS E) from 0.953 (LOS E)]

Table VI-8
Alternative 2 Trip Generation^[1]

Land Use	Size	Daily Trip Ends ^[2] Volumes	Am Peak Hour Volumes ^[2]			Pm Peak Hour Volumes ^[2]		
			In	Out	Total	In	Out	Total
Alternative 2								
Apartment ^[3]	336 DU	2,258	34	137	171	135	73	208
Alternative 2 Subtotal		2,258	34	137	171	135	73	208
Existing Site Use								
Golf Driving Range ^[4]	(28) Tees	(382)	(7)	(4)	(11)	(16)	(19)	(35)
Subtotal Existing		(382)	(7)	(4)	(11)	(16)	(19)	(35)
NET CHANGE		1,876	27	133	160	119	54	173
^[1] Source: ITE "Trip Generation", 7th Edition, 2003.								
^[2] Trips are one-way traffic movements, entering or leaving.								
^[3] ITE Land Use Code 220 (Apartment) trip generation average rates. - Daily Trip Rate: 6.72 trips/DU; 50% inbound/50% outbound; - AM Peak Hour Trip Rate: 0.51 trips/DU; 20% inbound/80% outbound; - PM Peak Hour Trip Rate: 0.62 trips/DU; 65% inbound/35% outbound.								
^[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.								

As shown in Table VI-10 (refer to column 4), the Lowell Avenue/Honolulu Avenue study intersection is forecast to be impacted by Alternative 2 under the City of Glendale threshold criteria. This study

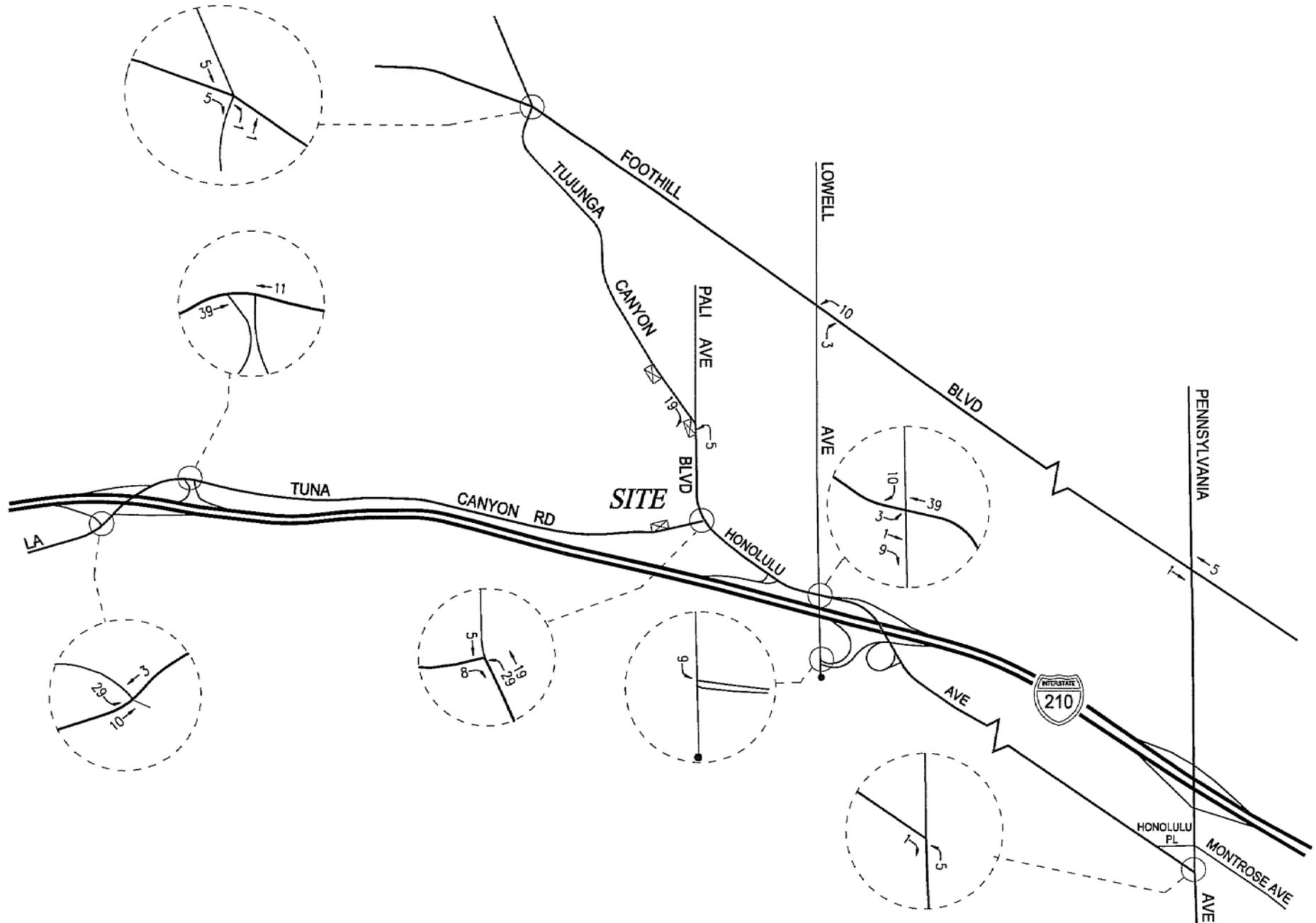


Source: Linscott, Law & Greenspan, 2008.

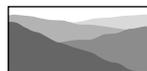


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Figure VI-3
Alternative 2 - Net Traffic Volumes
AM Peak Hour



Source: Linscott, Law & Greenspan, 2008.



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Environmental Planning and Research

Figure VI-4
Alternative 2 - Net Traffic Volumes
PM Peak Hour

Table VI-9
City of Los Angeles
Summary of Volume To Capacity Ratios and Levels of Service - AM and PM Peak Hours
Alternative 2: All Residential Townhomes

No.	Intersection	Peak Hour	[1]		[2]		[3]		[4]				[5]		Mitigated	
			Year 2008 Existing		Year 2012 W/ Ambient Growth		Year 2012 W/ Related Projects		Year 2012 W/ Proposed Project		Change V/C [(4)-(3)]	Signif. Impact ^a	Year 2012 W/ Project Mitigation			Change V/C [(5)-(3)]
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
1	I-210 Freeway EB Off-Ramp/ La Tuna Canyon Road	AM	0.298	A	0.322	A	0.346	A	0.353	A	0.007	NO	0.353	A	0.007	---
		PM	0.299	A	0.323	A	0.393	A	0.428	A	0.035	NO	0.428	A	0.035	---
2	I-210 Freeway WB On/Off Ramps/ La Tuna Canyon Road ^b	AM	0.737	C	0.796	C	0.592	A	0.599	A	0.007	NO	0.599	A	0.007	---
		PM	0.370	A	0.399	A	0.344	A	0.376	A	0.032	NO	0.376	A	0.032	---
3	Tujunga Canyon Boulevard/ Foothill Boulevard	AM	0.895	D	0.942	E	0.990	E	0.996	E	0.006	NO	0.996	E	0.006	---
		PM	0.806	D	0.846	D	0.896	D	0.901	E	0.005	NO	0.901	E	0.005	---
4	Tujunga Canyon Boulevard/ Pali Avenue	AM	1.320	F	1.426	F	1.457	F	1.484	F	0.027	YES	1.187	F	-0.270	YES
		PM	1.203	F	1.299	F	1.339	F	1.348	F	0.009	NO	1.078	F	-0.261	---
5	Tujunga Canyon Boulevard/ La Tuna Canyon Road-Honolulu Avenue	AM	0.640	B	0.591	A	0.605	B	0.644	B	0.039	NO	0.644	B	0.039	---
		PM	0.496	A	0.436	A	0.465	A	0.473	A	0.008	NO	0.473	A	0.008	---
6	Lowell Avenue/ Foothill Boulevard	AM	0.768	C	0.829	D	0.850	D	0.861	D	0.011	NO	0.861	D	0.011	---
		PM	0.779	C	0.841	D	0.874	D	0.882	D	0.008	NO	0.882	D	0.008	---
7	Lowell Avenue/ Honolulu Avenue	AM	0.869	D	0.938	E	0.953	E	0.985	E	0.032	YES	0.789	C	-0.164	YES
		PM	0.644	B	0.695	B	0.706	C	0.724	C	0.018	NO	0.724	C	0.018	---

Table VI-9 (Continued)
City of Los Angeles
Summary of Volume To Capacity Ratios and Levels of Service - AM and PM Peak Hours
Alternative 2: All Residential Townhomes

No.	Intersection	Peak Hour	[1]		[2]		[3]		[4]			[5]		Mitigated		
			Year 2008 Existing		Year 2012 W/ Ambient Growth		Year 2012 W/ Related Projects		Year 2012 W/ Proposed Project		Change V/C [(4)-(3)]	Signif. Impact ^a	Year 2012 W/ Project Mitigation		Change V/C [(5)-(3)]	
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C			LOS
8	Lowell Avenue/ I-210 Freeway EB Ramps	AM	0.162	A	0.174	A	0.175	A	0.175	A	0.000	NO	0.175	A	0.000	---
		PM	0.198	A	0.214	A	0.216	A	0.216	A	0.000	NO	0.216	A	0.000	---
9	Pennsylvania Avenue/ Foothill Boulevard	AM	0.882	D	0.953	E	0.971	E	0.973	E	0.002	NO	0.973	E	0.002	---
		PM	0.857	D	0.926	E	0.937	E	0.938	E	0.001	NO	0.938	E	0.001	---
10	Pennsylvania Avenue/ Honolulu Avenue	AM	0.584	A	0.631	B	0.639	B	0.644	B	0.005	NO	0.644	B	0.005	---
		PM	0.369	A	0.399	A	0.407	A	0.411	A	0.004	NO	0.411	A	0.004	---

^a According to LADOT's "Traffic Study Policies and Procedures," March 2002, Page 10, a transportation impact on an intersection shall be deemed significant in accordance with the following table:

<u>Level of Service</u>	<u>Final v/c</u>	<u>Project Related Increase in v/c</u>
C	> 0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E,F	> 0.900	equal to or greater than 0.010

^b The future Pre-Project and With Project conditions ([3] through [5]) include the signalization at this location as part of the Canyon Hills Related Project site access improvement.

Source: Linscott, Law & Greenspan

Table VI-10
City of Glendale
Summary of Volume To Capacity Ratios and Levels of Service - AM and PM Peak Hours
Alternative 2: All Residential Townhomes

No.	Intersection	Peak Hour	[1]		[2]				[3]		[4]				[5]		Mitigated	
			Year 2008 Existing		Year 2008 Existing + Proposed Project		Change V/C [(2)-(1)]	Signif. Impact ^a	Year 2012 W/O Proposed Project		Year 2012 W/ Proposed Project		Change V/C [(4)-(3)]	Signif. Impact ^a	Year 2012 W/ Proposed Project Mitigation			Change V/C [(4)-(3)]
			V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS			V/C	LOS		
6	Lowell Avenue/ Foothill Boulevard	AM	0.784	C	0.794	C	0.010	NO	0.857	D	0.867	D	0.010	---	0.867	D	0.010	---
		PM	0.794	C	0.801	C	0.007	NO	0.878	D	0.886	D	0.008	---	0.886	D	0.008	---
7	Lowell Avenue/ Honolulu Avenue	AM	0.932	E	0.963	E	0.031	YES	1.014	F	1.044	F	0.030	YES	0.886	D	-0.128	YES
		PM	0.704	C	0.721	C	0.017	NO	0.762	C	0.778	C	0.016	---	0.778	C	0.016	---
8	Lowell Avenue/ I-210 Freeway EB Ramps	AM	0.321	A	0.323	A	0.002	NO	0.340	A	0.343	A	0.003	---	0.343	A	0.003	---
		PM	0.301	A	0.302	A	0.001	NO	0.320	A	0.321	A	0.001	---	0.321	A	0.001	---
9	Pennsylvania Avenue/ Foothill Boulevard	AM	0.858	D	0.860	D	0.002	NO	0.934	E	0.937	E	0.003	---	0.937	E	0.003	---
		PM	0.837	D	0.838	D	0.001	NO	0.906	E	0.906	E	0.000	---	0.906	E	0.000	---
10	Pennsylvania Avenue/ Honolulu Avenue	AM	0.720	C	0.725	C	0.005	NO	0.779	C	0.784	C	0.005	---	0.784	C	0.005	---
		PM	0.524	A	0.529	A	0.005	NO	0.569	A	0.575	A	0.006	---	0.575	A	0.006	---

^a The significance of the potential impacts was determined based on the traffic impact criteria provided by the City of Glendale transportation staff. The following definition of significant project-related traffic impacts has been applied in this analysis:

<u>Level of Service</u>	<u>Final v/c</u>	<u>Project Related Increase in v/c</u>
D, E, or F	> 0.800	equal to or greater than 0.020

Source: Linscott, Law & Greenspan

Table VI-11
County of Los Angeles
Summary of Volume To Capacity Ratios and Levels of Service - AM and PM Peak Hours
Alternative 2: All Residential Townhomes

No.	Intersection	Peak Hour	[1]		[2]		[3]				[4]		[5]			
			Year 2008 Existing		Year 2012 W/ Ambient Growth		Year 2012 W/ Proposed Project		Change V/C [(3)-(2)]	Signif. Impact	Year 2012 W/ Related Projects		Change V/C [(4)-(2)]	Signif. Impact ^a	Year 2012 W/ Regional Mitigation	
			V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS			V/C	LOS
9	Pennsylvania Avenue/ Foothill Boulevard	AM	0.858	D	0.919	E	0.921	E	0.002	NO	0.937	E	0.018	YES	0.817	D
		PM	0.837	D	0.896	D	0.897	D	0.001	NO	0.906	E	0.010	YES	0.802	D

^a According to the County of Los Angeles Department of Public Works' "Traffic Impact Analysis Report Guidelines," January 1, 1997, Page 6: "an impact is considered significant if the project related increase in the volume-to-capacity ratio (v/c) equals or exceeds the thresholds shown below:

<u>Level of Service</u>	<u>Final v/c</u>	<u>Project Related Increase in v/c</u>
C	> 0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E,F	> 0.900	equal to or greater than 0.010

Source: Linscott, Law & Greenspan

intersection was previously identified to be impacted by the proposed project under the City of Glendale threshold criteria. Alternative 2 is expected to create significant impacts at the following the location according to the City of Glendale's impact criteria during the peak hour with the addition of ambient growth, related projects traffic, and project-related traffic:

- Int. No. 7: Lowell Ave./Honolulu Ave.
- AM peak hour v/c ratio increase of 0.030 [to 1.044 (LOS F) from 1.014 (LOS F)]

The recommended mitigation measure for Intersection No. 4, Tujunga Canyon Boulevard/Pali Avenue, consists of installing a traffic signal at this location and retaining the existing lane configurations as one shared left/through/right-turn lane for each of the four approaches. The recommended mitigation measure is anticipated to reduce the forecast project-related traffic impact at the subject study intersection during the AM peak hour to less than significant levels, to 1.187 (LOS F) from 1.484 (LOS F).

The mitigation measure for Intersection No. 7, Lowell Avenue/Honolulu Avenue, as described previously for the project, is expected to reduce the project impacts to less than significant levels under this alternative. The improvement is expected to improve operations to 0.789 (LOS C) from 0.985 (LOS E) using the CMA methodology and to 0.886 (LOS D) from 1.044 (LOS F) using the ICU methodology.

As shown in Table VI-11 (refer to column 4), the Pennsylvania Avenue/Foothill Boulevard study intersection located partly in the County of Los Angeles and City of Glendale would result in a cumulative significant impact. This study intersection was previously identified to be cumulatively impacted under the County of Los Angeles threshold criteria. Project Alternative 2 is expected to contribute to the forecast cumulative impact at the following the location according to the County of Los Angeles' impact criteria during the peak hours with the addition of ambient growth, related projects traffic, and project-related traffic:

- Int. No. 9: Pennsylvania Ave./Foothill Blvd.
 - AM peak hour v/c ratio increase of 0.018 [to 0.937 (LOS E) from 0.919 (LOS E)]
 - PM peak hour v/c ratio increase of 0.010 [to 0.906 (LOS E) from 0.896 (LOS D)]

The cumulative mitigation measure for Intersection No. 9: Pennsylvania Avenue/Foothill Avenue, as described previously for the project, is expected to reduce the cumulative impact to less than significant levels under this alternative. The improvement is expected to improve operations to 0.817 (LOS D) from 0.937 (LOS E) during the AM peak hour and to 0.802 (LOS D) from 0.906 (LOS E) during the PM peak hour.

The proposed project would introduce approximately 577 new residents to the project site. Thus, an increase in the demand for fire protection services is anticipated. Under Alternative 2, the 336 town homes would introduce approximately 847 new residents to the project site. Thus, based upon the number of residents, Alternative 2 has the potential to increase further the demand for fire protection services.

The provision of adequate fire flows helps to ensure that the development of the project site will not overburden fire protection services. As previously discussed, the Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Both the proposed project and Alternative 2 would be required to provide hydrants, water lines, and water tanks per Fire Code requirements. Therefore, with respect to fire flows, fire protection for both projects would be adequate.

As previously mentioned, the response distance from the first response fire stations does not meet LAMC recommendations, and therefore, is considered inadequate. With respect to response distance and impacts would be potentially significant. However, the requirement to provide automatic fire sprinkler systems in order to compensate for the additional response distance is considered adequate mitigation for both the proposed project and Alternative 2.

With respect to emergency access, the proposed project would provide two full entrance points on La Tuna Canyon Road as well as two points of emergency vehicle access from Tujunga Canyon Road. In contrast, Alternative 2 would have a full entrance on Tujunga Canyon Road and a second full entrance on La Tuna Canyon Road. Therefore, both the proposed project and Alternative 2 would provide adequate emergency access.

Public Services - Police Protection

Both the proposed project and Alternative 2 would be sources of attractive nuisances, providing hazards, and inviting theft and vandalism during construction. Consequently, both could be expected to provide the same precautions to prevent trespassing through the construction site: temporary fencing installed around the construction site and the deployment of roving security guards. When such common sense precautions are taken, the demand for local law enforcement at the construction site would be less than significant for both projects.

While the proposed project would introduce approximately 577 new residents to the project site, Alternative 2 would introduce approximately 847 residents. Thus, Alternative 2 would generate more demand for police protection services than the proposed project: the number of requests for assistance calls for police response to retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to be greater under Alternative 2.

As previously discussed, the LAPD has stated that the Foothill Community Police Station is staffed and equipped to provide full service to the Foothill area, which includes the project site, and that the proposed project would not result in the need for construction or expansion of police stations or other police protection facilities. As such, no new or expanded police stations would be needed, the construction of which could cause significant environmental impacts, as a result of either the proposed project or Alternative 2. Therefore, impacts to police protection services would be less than significant for both the proposed project and Alternative 2, although impacts under Alternative would be somewhat greater.

Public Services - Schools

Both the proposed project and Alternative 2 would be served by the following LAUSD public schools: (1) Mountain View Elementary School (K-5) located at 6410 Olcott Street, Tujunga; (2) Mount Gleason Middle School (6-8) located at 10965 Mt. Gleason Avenue, Sunland; and (3) Verdugo Hills High School (9-12) located at 10625 Plainview Avenue, Tujunga. Each of these schools currently has excess enrollment capacity. The proposed project would generate a total of 94 public school students, including 46 elementary students, 22 middle school students, and 26 high school students. All of public school students generated by the proposed project could be served by the local schools without creating a capacity problem. In comparison, Alternative 2 would generate a total of 139 students, including 68 elementary students, 33 middle school students, and 38 high school students. While Alternative 2 would generate more public school students than the proposed project, there is sufficient capacity at each of the local schools to accommodate these additional students without creating a capacity problem. Neither the proposed project nor alternative 2 would generate enough students to exceed the capacities of the schools serving the project site resulting in the need to construct new or physically altered school facilities. Therefore, under both the proposed project and alternative 2 impacts on schools would be less than significant. Notwithstanding the less than significant impact, both the proposed project and Alternative 2 would be required to pay developer fees to the LAUSD, which would provide full and complete mitigation of any potential school impacts.

Public Services - Parks

Because the proposed project would redevelop the existing Verdugo Hills Golf Course and driving range for housing purposes, the community would lose a major private recreational facility. This would constitute a significant impact. In contrast, Alternative 2 would preserve the golf course although the driving range would still be eliminated. Therefore, Alternative 2 would reduce the project's significant impact to parks to a less than significant level.

Public Services - Libraries

According to the Los Angeles Public Library, the additional residents generated by the proposed project would adversely affect its ability to maintain its current levels of service. Based on the City's standard of 0.5 square feet of facility space per resident, the project's 577 new residents would generate a need for approximately 288.5 square feet of library space. These 288.5 square feet of library space are the approximate equivalent of a 17' x 17' room, the construction of which would not be expected to result in any significant environmental impacts. In contrast, the 847 new residents of Alternative 2 would generate a demand for approximately 423.5 square feet, which would be the equivalent of a room approximately 20.5' x 20.5' in area. The difference in size would be negligible with respect to potential construction-related impacts. Therefore, under the proposed project and Alternative 2, impacts would be less than significant.

Utilities - Wastewater

The existing Verdugo Hills Golf Course facility generates approximately 772 gallons of wastewater per day. The proposed project would eliminate the golf course and driving range, and would replace them with 229 single-family homes. Thus, it is estimated that the proposed project would generate a net increase of 74,798 gpd of wastewater. In contrast, Alternative 2 would add 336 apartment units and retain the existing golf course enhanced with a new club house, but it would remove the driving range. Assuming the golf course's sewage generation rate would remain comparable to the existing rate, Alternative 2 would generate a net increase of 53,760 gpd of wastewater. The 21,000 gpd decrease in sewage generation is accounted for by the lower sewage generation rate assigned to apartments, compared to single-family homes.⁵ While, the proposed project's impact on sewer systems and wastewater treatment requirements would be less than significant, Alternative 2 would further reduce impacts to the sewerage system.

**Table VI-12
Alternative 2 Wastewater Generation**

Land Use	Size	Generation Rate ^a	Net Daily Wastewater Generation (gpd)
Condo/Apartments	336 du	160 gallons/du	53,760
Alternative 2 Net Total			53,760
<i>Notes:</i> du=dwelling unit; sf = square feet ^a Source: Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, January 23, 2008.			

Utilities – Water Supply

The proposed project would generate a net increased water demand of 36,164 gallons per day. In contrast, because Alternative 2 would retain the golf course, it would increase daily water demand on the project site by approximately 64,512 gallons, or 28,348 gallons more than the proposed project. Alternative 2 would substantially increase water consumption, which would constitute a significant impact because Alternative 2 is not considered consistent with the Community Plan's project density for the project site. As previously discussed, the LADWP has stated that water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in water demand and that sufficient supplies are available to accommodate the proposed project. Also, LADWP has stated that there are no known water service problems in the area and that the treatment plant could adequately handle the proposed project. Therefore, impacts to water supply under Alternative 2 would be greater than the proposed project and would be significant.

⁵ Source: Table M.2-12, Sewage Generation Factors, of the 2006 LA CEQA Thresholds Guide.

Utilities – Solid Waste

As with the proposed project, Alternative 2 would generate a short-term, construction-related waste stream to one or both of the two identified landfills serving the project area. Because each of these landfills has sufficient remaining capacity to accommodate the construction waste stream, and because Alternative 2 would be required to divert 50% of its waste stream from landfills, the construction-related impact of Alternative 2 would be less than significant.

It is estimated that the proposed project would generate approximately 2,801 pounds of solid waste on a daily basis, one half of which would be diverted to recycling and only 1,400 pounds would be directed to a landfill. Because there is adequate short-term capacity at these landfills, the proposed project's impact on remaining landfill capacity is considered less than significant. In comparison, Alternative 2 would generate 4,109 pounds of solid waste, of which 2,055 pounds would be recycled and 2055 pounds would be directed to a landfill. While, Alternative 2 generate more solid waste than the proposed project, the magnitude of this impact would not be considered significant because there is adequate short-term capacity at these landfills.

Alternative 3: Mixed Use Residential and Retail

Alternative 3 is a mixed use residential and neighborhood serving commercial development. In total, there would be 106,525 square feet of commercial uses and 334 residential units (408,800 square feet of residential space). All residential units would be apartments. The development area would be located in the southeastern corner of the project site, largely on that portion currently occupied by the driving range. Commercial uses would occupy the ground floor level. Residential uses (305 units) would be on the second and third levels above the commercial spaces. In addition, 18 row townhomes would be provided on the northeastern strip of land located between Tujunga Canyon Road and the Verdugo Wash Channel; 11 residential units would also be provided at the ground floor level in the western portion of the development area. Total leasable space would be 515,325 square feet (gross). The maximum height of this alternative would be 40 feet above grade, or 13 feet more than the height of the proposed single-family homes.

Contemplated commercial uses would include 77,025 square feet of general neighborhood serving retail (including a grocery store); 7,000 square feet of restaurant space (2,000 square feet of fast food and 5,000 square feet of sit down space); a 3,000 square foot health club; and a 19,500 square foot theater mini-plex. A total of 1,623 parking spaces would be provided, consisting of 955 commercial spaces and 668 residential spaces.

The remaining portion of the existing golf course (11.9 acres) would be made over into a community serving park. The park would be dedicated to the City of Los Angeles, which would be responsible for its planning and maintenance. No active recreational facilities are envisioned by this alternative; although such facilities may ultimately be provided by the City.

Alternative 3 would be constructed on approximately 12.7 acres in the eastern portion of the project site, primarily on that area currently occupied by the driving range (approximately the same area as Alternative 2). This is the flattest portion of the site and requires the least amount of grading. As indicated in Table VI-13, grading for Alternative 3 would consist of approximately 212,100, which would be essentially balanced on site.

**Table VI-13
Alternative 3 –Earthwork Summary**

	Cut (Cu. Yds.)	Fill (Cu. Yds.)	Import (Cu. Yds.)*
Raw	80,700	53,200	--
Over Excavation & Replacement	131,400	131,400	--
Subtotal	212,100	184,600	--
Shrinkage (15%)		27,700	--
Total	212,100	212,300	200
* Negligible import – balance with site grading			

Environmental Impacts

Aesthetics

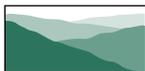
Alternative 3 would also reduce Aesthetic impacts to scenic vistas from both Interstate 210 and La Tuna Canyon Road (designated scenic highways), compared to the proposed project. While the proposed project would eliminate the foreground views of the golf course's green, landscaped open space, Alternative 3 would retain the landscaped open space although the current golf course would be converted to a public park. Also, while the proposed project would front along La Tuna Canyon, facing both scenic highways, Alternative 3 would be clustered in the eastern portion of the site and would stretch northerly in a linear fashion away from the scenic highways.

Alternative 3 would reduce Aesthetic impacts to scenic resources, compared to the proposed project.

- Alternative 3 would replace the scenic golf course with a public park, while the proposed project would eliminate it.
- Alternative 3 would preserve most of the currently undisturbed natural hillside and habitat to the north and west of the proposed park. In comparison, the proposed project would disturb through fuel modification approximately 13.9 acres of undisturbed hillsides.
- Alternative 3 would reduce the total area disturbed by development. Alternative 3 would construct a mixed use residential/retail complex on approximately 15.5 acres of the least scenic eastern portion of the project site. In contrast, the proposed project would construct moderate density single-family housing over an area of approximately 28.6 acres, including the most scenic portion of the site (the golf course).



Source: LCRA Architecture & Planning, 2008.



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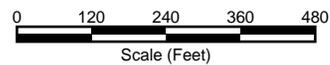
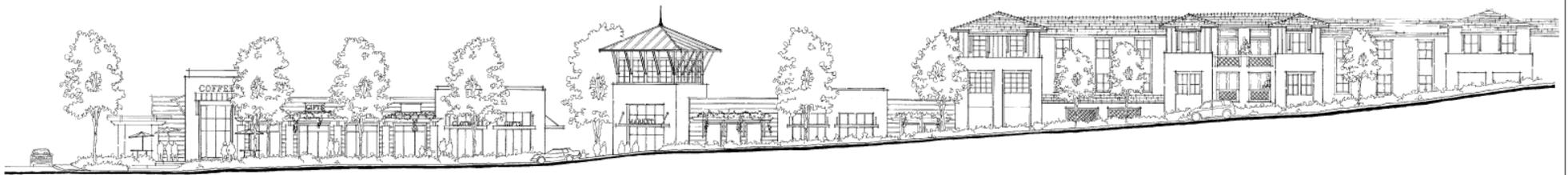


Figure VI-5
Alternative 3, Mixed Use
Retail and Residential



Source: LCRA, June 9, 2008.



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Environmental Planning and Research

Figure VI-6
Alternative 3 Elevation

- Alternative 3 would reduce impacts to trees on the project site. Of the total number of protected trees on the project site (303 oaks and 18 sycamores), Alternative 3 would impact approximately 52 oaks and five (5) sycamores. In comparison the proposed project would impact 85 oaks and 11 sycamore trees. Of the total number of mature landscape trees on the project site (120 trees), Alternative 3 would remove 28 trees. In comparison the proposed project would remove 103 mature landscape trees.

Alternative 3 would reduce Aesthetic impacts to the existing visual character or quality of the site and its surroundings, compared to the proposed project. By preserving a greater portion of the project site as a landscaped park and undisturbed hillsides, Alternative 3 would alter less of the site's existing visual character or quality than the proposed project. On the other hand, the introduction of a mixed-use residential/retail complex, with roof lines up to 40 feet above grade, in the eastern portion of the project site would be less in character with the existing single-family homes in the surrounding area than the proposed project's single-family homes, and would be inconsistent with the scenic highway corridors viewshed protection provisions of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, which limits building heights to 27 feet..

By eliminating the golf course lighting, the proposed project would result in less night-time glare and night sky illumination than is currently present on the project site. Alternative 3 would also eliminate the golf course lighting, but it would create more intensive lighting in the eastern portion of the project site. Therefore, Alternative 3 would have a greater night-lighting impact than the proposed project.

Air Quality

Essentially the same as Alternative 2, the development footprint of Alternative 3 is less than half that of the proposed Project, and it avoids the western portion of the existing golf course, which would be converted to a park. Therefore, construction related-impacts (and particular those from site preparation activities) associated with Alternative 3 would be substantially less than that of the proposed project, but be comparable to those of Alternative 2. Implementation of the project's recommended mitigation measures would also reduce potentially significant construction-related NOx emissions to less-than-significant levels.

Due to substantially more vehicle traffic, operational emissions under Alternative 3 would be substantially greater than those from the proposed project. Specifically, while the proposed project would generate a net increase of 1,166 daily vehicle trips, Alternative 3 would generate 4,438 vehicle trips. In other words, Alternative 3 has the potentially to generate approximately three to four times the vehicle emissions generated by the proposed project.

Biological Resources.

The development footprint of Alternative 3 is less than under the proposed Project, as it avoids the western portion of the existing golf course and would retain this area as a park. Therefore, Alternative 3 would result in fewer impacts to protected and mature trees, jurisdictional drainages, and impacts to

sensitive species associated with the natural scrub and woodland vegetation along the western and northwestern portions of the existing golf course that would otherwise be impacted by fuel modification under the proposed Project. Given that the development footprint for Alternative 3 most closely matches that of Alternative 2, except for a small increase along the western edge, the potential impacts to, and mitigation measures for, biological resources from Alternative 2 described above would be very similar to those for Alternative 3.

Cultural Resources

Because Alternative 3 would disturb a smaller area of the project site than the proposed project, it also has the potential to reduce impacts to archaeological and paleontological resources. However, because all historic resources have been removed from the project site, neither the proposed project nor Alternative 3 would impact any known historic resources. Both Alternative 3 and the proposed project could commemorate the significant historic events associated with the site through its designation as a California Historical Landmark (thematic landmark group "Temporary Detention Camps for Japanese Americans"). While cultural resources impacts under the proposed project would be less than significant, because of its smaller development area, they would be further reduced by Alternative 3.

Geology and Soils

Alternative 3 and the proposed project would be subjected to the same potential geotechnical conditions on the project site (e.g., seismicity, slope instability and soil erosion). However, Alternative 3 would involve less landform alteration: Alternative 3 would grade approximately 12.7 acres of the project site, approximately 15.9 acres less than the grading disturbance caused by the proposed project. While geologic impacts from landform alterations under the proposed project would be less than significant, they would be further reduced by Alternative 3. Therefore, Alternative 3 would have less of an impact with respect to geologic and soils conditions than the proposed project.

Neither the proposed project nor Alternative 3 would expose people or structures to adverse effects involving rupture of a known earthquake fault, liquefaction, subsidence, expansive soils or slope instability (landslides and/or mud and debris flows).

Both the proposed project and Alternative 3 would be susceptible to strong ground shaking during a seismic event. However, the homes under either the proposed project or Alternative 2 must be designed in accordance with the Unified Building Code, which would reduce seismic risks for either project to an acceptable level. Similarly, both the proposed project and Alternative 3 would be susceptible to erosion and sedimentation during and following grading. However, compliance with those the Grading Code and Federal Clean Water Act regulations will reduce soil erosion and loss of topsoil for both the proposed

Hazards and Hazardous Materials

There are no detectable amounts of organochloride pesticides on the project site. While there are detectable concentrations of petroleum hydrocarbons in one location, soil remediation in that area would

reduce hazardous from detectable concentrations of petroleum hydrocarbons to a less than significant level. In addition, there are no known properties within a one-mile radius of the project site with known or documented releases of potentially hazardous materials. Therefore, neither the proposed project nor Alternative 3 would be adversely affected by hazardous materials left over from previous site uses or from offsite properties.

Neither the proposed project nor Alternative 3 would use, store, or transport significant amounts of hazardous materials; be likely to result in reasonably foreseeable conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Therefore, neither the proposed project nor Alternative 3 would have a significant impact with respect to adverse hazards and/or hazardous materials.

Hydrology and Water Quality

Both the proposed project and Alternative 3 would be required to comply with the NPDES BMP requirements to ensure that the construction activities would not cause soils erosion and/or the discharge of polluted water from the project site. Similarly, both projects would also be required to comply with the SUSWP BMP requirements to ensure that the long-term operational activities would not result in the discharge of urban pollutants into the storm drainage system. This analysis assumes Alternative 3 would utilize the project's system of underground tanks to allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board. Therefore, Alternative 3 would have approximately the same less-than-significant water quality impacts as the proposed project.

Because Alternative 3 would have a smaller development footprint, it would create less impervious surface area than the proposed project. As a consequence, Alternative 3 would generate less runoff than the proposed project. However, since it is the proposed project's goal that post-development runoff will not exceed that generated by the project site in its existing condition, the project will capture and store the excess runoff within each subarea in underground tanks. It is expected that Alternative 3 would use the same underground storage tank system too ensure that post-development runoff will not exceed that generated by the project site in its existing condition. Therefore, off-site hydrology impacts are expected to be comparable.

Land Use

Under Alternative 3, there would be more open space provided, including existing undeveloped open space and a community park, than under the proposed project. However, the construction of 334 multiple family units represents a higher density use on the site and the 106,525 square feet of commercial uses represent a new use to the area. The impacts from Alternative 3 are discussed below.

Community Division

This alternative introduces commercial uses and high density multifamily uses into the community. There are currently no community services or public services⁶ on the project site, and there are no existing roadways through the project site that are used by the adjacent residential communities to the north and east. While Alternative 3 would introduce new uses to the area causing some disruption to the surrounding residential communities to the north and east, these new uses would not physically divide an established community

Land Use Compatibility

The high density multi-family dwelling units and range of commercial uses proposed under Alternative 3 would not be compatible with existing homes in the project vicinity. The proposed development would be located in the southeastern portion of the site with a row of townhomes located on the northeastern strip. The golf course would be redeveloped as a public park and the surrounding hillsides would remain generally undisturbed, with the exception of fuel modification in the northeastern portion of the site. The residential uses would be much higher density apartments than the detached homes proposed by the project, and they would be built primarily atop commercial uses. Therefore, this alternative introduces new uses to the community that are not compatible with the existing single family residential areas to the north, east and west.

Consistency with Land Use Plans, Policies and Regulations

In general, the discussion for impacts related to the consistency with regional plans would be the same for Alternative 3 as for the proposed project. Thus, this section focuses on the local applicable plans of the City of Los Angeles.

City of Los Angeles General Plan Framework Element

Although housing is provided under this alternative, it is a mixed use development involving a total of 334 apartments, primarily built atop approximately 106,525 square feet of commercial uses, as well as some townhome units. Therefore it would not be consistent with the following goals and objectives of the General Plan Framework Element:

- **Goal 3B:** *Preservation of the City's stable single family neighborhoods.*
- **Objective 3.5:** *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*
- **Objective 4.3** *Conserve scale and character of residential neighborhoods.*

⁶ Community and public services include schools, libraries, recreational facilities, neighborhood retail uses and other community-serving land uses.

Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan

The Community Plan encourages the preservation and protection of low-density, single family areas and existing open space from encroachment by incompatible uses. The maximum residential development potential under the project site's current land use designations is approximately 274 dwelling units. However, Alternative 3 is a mixed use project including 334 apartments (apartments and 18 townhomes) as well as approximately 106,525 square feet of commercial uses. The uses include high intensity commercial including retail, restaurant, health club and movie theater complex. Alternative 3 is inconsistent with the land use designation for the site because:

- Commercial uses are not permitted within the Low Medium I Residential Family land use designation;
- The number of proposed units exceeds the maximum number of units that could be developed on the site;
- Residential development is limited to detached single family homes per Footnote #20.

A general plan amendment would be required to construct this alternative on the site.

As this alternative represents a high density development on the site including introducing incompatible uses, there is less consistency with the goals, objectives and policies of the Community Plan that are generally applicable to the proposed project. Specifically it contradicts the goals, objectives and policies that encourage protecting existing single-family residential neighborhoods from encroachment by higher density residential and other incompatible uses, promoting neighborhood preservation, and limiting residential density.

San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan

The project site is not located near any prominent ridgelines as identified in the San Gabriel/Verdugo Hills Specific Plan; therefore, Alternative 3 will not impact any prominent ridgelines. Section 9.B. of the Specific Plan gives additional development standards for commercial and industrial developments which include exterior lighting, roofs, and roof-mounted structures, landscaping, landscaping setbacks, underground utilities, fencing, parking lot design, and pedestrian access. However, building height is regulated within scenic highway corridors and is restricted to 30 feet. The maximum height of the buildings under Alternative 3 is 40 feet and therefore would not comply with this regulation. Additionally, La Tuna Canyon and the 210 Freeway are designated as Scenic Highways under the Specific Plan and Alternative 3 would alter scenic vistas visible from the rights-of-way of these two scenic highways. Therefore, Alternative 3 is not in compliance with the Specific Plan.

City of Los Angeles Planning and Zoning Code

Although the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan designates the subject property as Low Medium I residential with corresponding zones of R2, RD3, RD4, RD5, and RD6, a footnote (Footnote No. 20) in the Community Plan states "Development should be

limited to no greater than that permitted by the RD5 Zone and shall be detached housing. Slope density regulations shall apply to areas of this site having a 15% or greater slope". Thus, development on the site is currently limited to the density permitted within the RD5 zone. The RD5 Zone would permit the development of a maximum of 244 dwelling units on the 28 acres of the golf course. In order to construct 334 dwelling units, under the RD5 zone, approximately 38.5 acres would be required and the units would be required to be detached. Additionally, commercial uses are not permitted within the RD5 zone. Therefore, the proposed 334 homes would represent too dense of a development for the site and the commercial uses are non-permitted uses. Thus, in addition to a general plan amendment, a zone change that would permit higher density development as well as commercial uses would be required.

This alternative has greater impacts associated with land use issues than the proposed project.

Noise

Construction

Construction activities Alternative 3 would be similar to the proposed project. Because this alternative would involve the use of the same types of construction equipment as the proposed project, construction of this alternative would cause a temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. The construction noise impacts would be reduced to less than significant with compliance with LAMC Noise Ordinance No. 41.40, which restricts demolition and noise activities to the hours of 7:00 AM to 9:00 PM.

Construction activities that would occur under Alternative 3 have the potential to generate low levels of groundborne vibration at the adjacent sensitive receptors. With implementation of the mitigation measures in Section IV.L (Noise Section), impacts would be similar to the proposed project's less than significant impacts.

Operational

When operational, Alternative 3 could result in an increase in the amount of human activity at the project site as compared to the proposed project. However, the noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative 3 would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Alternative 3 would generate more daily vehicular trips. Specifically, the proposed project is forecast to generate 1,166 new daily vehicular trips while Alternative 3 is forecast to generate 4,438 new vehicular tips, a difference of 3,272 daily vehicular trips. In addition, the construction of 334 multiple family units represents a higher density use on the site and the 106,525 square feet of commercial uses represent a new use to the area. The higher density and new use would create traffic which may increase local ambient noise levels by more than 3 dBA CNEL. Therefore Alternative 3 may have greater impacts associated with vehicular noise than the proposed project.

Population/Housing

Alternative 3 would involve the development of both residential and commercial uses to the project site. As, the project site is currently a golf course and does not contain any homes or people, this alternative would not result in the displacement of any existing homes or people.

Under Alternative 3, the residential component would add 334 apartments to the project site, 105 more dwelling units than under the proposed project. Based upon the Community Plan's population generation rate of 2.52 persons per household, Alternative 3 would be expected to generate a population of approximately 842 residents on the project site, is 265 more people than would occupy the site under the proposed project. The projected population associated with this alternative would be consistent with area-wide population and housing forecasts. Specifically, the alternative represents approximately nine percent of the forecasted population growth and approximately eight and one-half percent of the forecasted housing growth in the Community Plan area (see Table IV.M-3 in Section IV.M of this Draft EIR). Therefore, similar to the proposed project, population and housing increases under Alternative 3 would be within the projected growth for the area.

The Community Plan's projected housing with respect to land with a Low Medium I Residential land use designation is based on 13.5 dwelling units per acre, the midpoint range of 9 to 18 dwelling units per net acre for that land use designation. Thus, with 28 acres of Low Medium I Residential, the Community Plan projects approximately 378 housing units for the project site. Therefore, Alternative 3 would be consistent with the Community Plan's housing projections.

The commercial component of this alternative would involve the development of 77,000 square feet of retail space, 7,000 square feet of restaurant uses, a 19,500 square foot theater, and a 3,000 square foot health club. Table VI-14 identifies the number of employees that would be generated by Alternative 3:

**Table VI-14
Employees Generated by Alternative 3**

Land Use	Size	Employee Generation Rate (employees/sf)	Employees
Retail Uses	77,000 sf	0.0014	108
Restaurant	7,000 sf	0.004	28
Theater ^a	19,500 sf	0.004	78
Health Club ^b	3,000	0.0034	10
Total Employees			224
^a uses restaurant generation factor.			
^b uses office generation factor.			
Source: LAUSD School Facilities Fee Plan, March 2, 2000.			

If it is conservatively assumed that each full-time employee that would be generated by the commercial component of this alternative relocated to the Sunland-Tujunga area, the residential population would

increase by approximately 224 households and 665 people.⁷ This would result in a population increase of 1,507 people to the Community Plan area (842 residents from the residential component + 665 employee related residents). This represents approximately 930 more residents to the area than would be generated by the proposed project. However, while some of the projected employees may move into the Community Plan area, it is more likely that most of the new employment opportunities would be met by the local work force. Therefore, it is expected the actual number of new employees would substantially less than projected by the preceding analysis. Nevertheless, Alternative 3 would have greater impacts related to population and housing than the proposed project.

Traffic

Traffic generation forecasts for the residential and commercial components were estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for Alternative 3 is presented Table VI-15). A summary of the trip generation forecasts for the proposed project as compared to Project Alternative 3, as well as the remaining project alternatives, is provided in Table VI-16. As shown in Table VI-15, Alternative 3 is expected to generate 196 net new vehicle trips (42 inbound trips and 154 outbound trips) during the AM peak hour. During the PM peak hour, Project Alternative 3 is expected to generate 402 net new vehicle trips (231 inbound trips and 171 outbound trips). Over a 24-hour period, Project Alternative 3 is forecast to generate 4,438 net new daily trip ends during a typical weekday (2,219 inbound trips and 2,219 outbound trips). As the daily, AM and PM peak hour trip generation forecast for Project Alternative 3 is greater than the proposed project, it is anticipated that the traffic impacts associated with Project Alternative 3 will likely be greater than the proposed project.

Public Services - Fire Protection

Any construction at the project site, including Alternative 3, would increase the potential for accidental on-site fires during construction from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. However, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would reduce these hazards to less-than-significant levels. Both Alternative 3 and Alternative 2 are situated farther from the combustible native vegetation on the steeper slopes than the proposed project and, therefore, have less potential for starting a wildfire. Also, Alternative 3 would transform the golf course into a public park, which would not only act as an irrigated buffer between the development area and the adjacent hillsides, but would continue to act as an irrigated green buffer for the existing homes on top of the hills to the north and west. Consequently, Alternative 3 would appear to pose less of a construction-related fire hazard than the proposed project.

⁷ This assumes that each full-time employee would generate one household and that the population per household would be based on the more conservative estimate of 2.97 persons per dwelling unit.

Table VI-15
Alternative 3 Trip Generation^[1]

Land Use	Size	Daily Trip Ends ^[2] Volumes	Am Peak Hour Volumes ^[2]			Pm Peak Hour Volumes ^[2]		
			In	Out	Total	In	Out	Total
Alternative 3								
Apartment [3]	334 DU	2,244	34	136	170	135	72	207
Shopping Center [4]	106,525 GLSF	4,574	67	43	110	192	207	399
Less Pass-by (30%) [5]		(1,372)	(20)	(13)	(33)	(58)	(62)	(120)
Community Park [6]	11.9 Acres	18	nom.	nom.	nom.	nom.	nom.	Nom.
Alternative 3 Subtotal		5,464	81	166	247	269	217	486
Existing Site Uses								
Golf Course [7]	(18) Holes	(644)	(32)	(8)	(40)	(22)	(27)	(49)
Golf Driving Range [8]	(28) Tees	(382)	(7)	(4)	(11)	(16)	(19)	(35)
Subtotal Existing		(1,026)	(39)	(12)	(51)	(38)	(46)	(84)
NET CHANGE		4,438	42	154	196	231	171	402

^[1] Source: ITE "Trip Generation", 7th Edition, 2003.

^[2] Trips are one-way traffic movements, entering or leaving.

^[3] ITE Land Use Code 220 (Apartment) trip generation average rates.
 - Daily Trip Rate: 6.72 trips/DU; 50% inbound/50% outbound;
 - AM Peak Hour Trip Rate: 0.51 trips/DU; 20% inbound/80% outbound;
 - PM Peak Hour Trip Rate: 0.62 trips/DU; 65% inbound/35% outbound.

^[4] ITE Land Use Code 820 (Shopping Center) trip generation average rates.
 - Daily Trip Rate: 42.94 trips/1,000 GLSF; 50% inbound/50% outbound;
 - AM Peak Hour Trip Rate: 1.03 trips/1,000 GLSF; 61% inbound/39% outbound;
 - PM Peak Hour Trip Rate: 3.75 trips/1,000 GLSF; 48% inbound/52% outbound.

^[5] Pass-by trip adjustment based on LADOT "Policy on Pass-By Trips", Attachment G, March 2002.

^[6] ITE Land Use Code 411 (City Park) trip generation average rates.
 - Daily Trip Rate: 1.59 trips/Acre; 50% inbound/50% outbound;
 - AM Peak Hour Trip Rate: Not Available
 - PM Peak Hour Trip Rate: Not Available

^[7] 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: 2.22 trips/Hole; 79% inbound/21% outbound;
 - PM Peak Hour Trip Rate: 2.74 trips/Hole; 44% inbound/56% outbound.

^[8] 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.

**Table VI-16
Summary of Trip Generation Forecasts [1]
Project and Project Alternatives**

03-Mar-09

DEVELOPMENT SCENARIO	LAND USE(S)	SIZE		NET NEW TRIP GENERATION						
				Weekday						
				Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Proposed Project	Single Family Housing	229	DU	1,166	4	117	121	108	39	147
Project Alternative 1	No Build	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A
Project Alternative 2	Apartment	336	DU	1,876	27	133	160	119	54	173
Project Alternative 3	Apartment Shopping Center Community Park	334 106,525 11.9	DU GLSF Acres	4,438	42	154	196	231	171	402
Project Alternative 4	Apartment Shopping Center General Office Community Park	209 106,525 150,600 11.9	DU GLSF GSF Acres	5,256	234	132	366	219	330	549

^a [1] Refer to Table 6-1 in the traffic impact study for the project trip generation forecasts. Refer to the project alternatives' trip generation forecasts provided in the Appendix H of the traffic impact study.

The proposed project would introduce 334 residential units (approximately 842 residents) and 106,525 square feet of commercial uses to the project site. Thus, an increase in the demand for fire protection services, compared to the proposed project, is anticipated. Both the proposed project and Alternative 3 would be required to provide hydrants, water lines, and water tanks per Fire Code requirements. Therefore, with respect to fire flows, fire protection for both projects would be adequate. The requirement to provide automatic fire sprinkler systems in order to compensate for the additional response distance is considered adequate mitigation for both the proposed project and Alternative 3.

Public Services - Police Protection

Both the proposed project and Alternative 3 would be sources of attractive nuisances, providing hazards, and inviting theft and vandalism during construction. Consequently, both could be expected to provide the same precautions to prevent trespassing through the construction site: temporary fencing installed around the construction site and the deployment of roving security guards. When such common sense precautions are taken, the demand for local law enforcement at the construction site would be less than significant for both projects.

While the proposed project would introduce approximately 577 new residents to the project site, Alternative 2 would introduce approximately 842 residents, plus employees and visitors to the retail component. Thus, Alternative 3 would generate more demand for police protection services than the either the proposed project or Alternative 2. Because the Foothill Community Police Station is staffed and equipped to provide full service to the Foothill area, which includes the project site, the need for new or expanded police stations, the construction of which could cause significant environmental impacts, as a result of either the proposed project or Alternative 3 would not be anticipated. Therefore, impacts to police protection services would be less than significant for both the proposed project and Alternative 3, although impacts under Alternative 3 would be greater.

Public Services - Schools

Both the proposed project and Alternative 3 would be served by the following LAUSD public schools: (1) Mountain View Elementary School (K-5) located at 6410 Olcott Street, Tujunga; (2) Mount Gleason Middle School (6-8) located at 10965 Mt. Gleason Avenue, Sunland; and (3) Verdugo Hills High School (9-12) located at 10625 Plainview Avenue, Tujunga. Each of these schools currently has excess enrollment capacity. The proposed project would generate a total of 94 public school students, including 46 elementary students, 22 middle school students, and 26 high school students. All of public school students generated by the proposed project could be served by the local schools without creating a capacity problem. In comparison, the residential component of Alternative 3 would generate a total of approximately 139 students, including 68 elementary students, 33 middle school students, and 38 high school students. Given the employment requirements of a typical retail center, the employees of this alternative's retail component would most likely be supplied by the local labor market. Consequently, it is unlikely that the new employment opportunities would generate additional enrollments at the local schools. While Alternative 3 would generate more public school students than the proposed project, there is sufficient capacity at each of the local schools to accommodate these additional students without

creating a capacity problem. Neither the proposed project nor Alternative 3 would generate enough students to exceed the capacities of the schools serving the project site resulting in the need to construct new or physically altered school facilities. Therefore, under both the proposed project and Alternative 3 impacts on schools would be less than significant. Notwithstanding the less than significant impact, both the proposed project and Alternative 3 would be required to pay developer fees to the LAUSD, which would provide full and complete mitigation of any potential school impacts.

Public Services - Parks

Because the proposed project would redevelop the existing Verdugo Hills Golf Course and driving range for housing purposes, the community would lose a major private recreational facility. This would constitute a significant impact. In contrast, Alternative 3 would convert golf course portion of the project site to a public park. Therefore, Alternative 3 would reduce the project's significant impact to parks to a less than significant level.

Public Services - Libraries

According to the Los Angeles Public Library, the additional residents generated by the proposed project would adversely affect its ability to maintain its current levels of service. Based on the City's library standard, the proposed project's 577 new residents would generate a need for approximately 288.5 square feet of library space. These 288.5 square feet of library space are the approximate equivalent of a 17' x 17' room, the construction of which would not be expected to result in any significant environmental impacts. In contrast, the 842 new residents of Alternative 3 would generate a demand for approximately 421 square feet, which would be the equivalent of a room approximately 20.5' x 20.5' in area. The difference in size would be negligible with respect to potential construction-related impacts. Therefore, under the proposed project and Alternative 3, impacts would be less than significant.

Utilities - Wastewater

The existing Verdugo Hills Golf Course facility generates approximately 772 gallons of wastewater per day. The proposed project would eliminate the golf course and driving range, and would replace them with 229 single-family homes. Thus, it is estimated that the proposed project would generate a net increase of 74,798 gpd of wastewater. In contrast, Alternative 3 would add 334 apartment units, 106,525 square feet of commercial uses and convert the existing golf course to a public park while removing the driving range. Assuming the park's sewage generation rate would remain comparable to the existing golf course's rate, Alternative 3 would generate a net increase of approximately 61,962 gpd of wastewater. While, the proposed project's impact on sewer systems and wastewater treatment requirements would be less than significant, Alternative 3 would further reduce impacts to the sewerage system, although not to the same extent as Alternative 2.

**Table VI-17
Alternative 3 Wastewater Generation**

Land Use	Size	Generation Rate ^a	Net Daily Wastewater Generation (gpd)
<i>Apartments</i>	<i>334 du</i>	<i>160 gallons/du</i>	<i>53,440</i>
<i>Retail/Commercial</i>	<i>106,525 sq. ft.</i>	<i>80 gallons/1,000 sf</i>	<i>8,522</i>
Alternative 3 Net Total			61,962
<i>Notes:</i>			
<i>du=dwelling unit; sf = square feet</i>			
<i>^a Source: Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, January 23, 2008.</i>			

**Table VI-18
Alternative 3 Water Consumption**

Land Use	Size	Consumption Rate ^a	Total Water Consumption (gpd)
<i>Apartments</i>	<i>336 du</i>	<i>192 gallons/du</i>	<i>64,512</i>
<i>Retail/Commercial</i>	<i>106,525 sq. ft.</i>	<i>96 gallons/1,000 sf</i>	<i>10,226</i>
Proposed Project Net Total			74,738
<i>Notes:</i>			
<i>du=dwelling unit; sf =square feet</i>			
<i>^a Source: City of Los Angeles, Draft L.A. CEQA Thresholds Guide, Exhibit K.2-11, May 14, 1998. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			

Utilities – Water Supply

The proposed project would generate a net increased water demand of 36,164 gallons per day. In contrast, because Alternative 3 would convert the golf course to a public park, increase the number of housing units by 105 units and add 106,525 square feet of commercial uses, it would increase daily water demand on the project site by approximately 74,738 gallons, or more than twice the net increased water demand of the proposed project. Because Alternative 3 is not consistent with the General Plan, its increased water demand may not have been taken into consideration by the LADWP's long range water planning. Therefore, Alternative 3 would be greater than the proposed project and be significant.

Utilities – Solid Waste

As with the proposed project, Alternative 3 would generate a short-term, construction-related waste stream to one or both of the two identified landfills serving the project area. Because each of these landfills has sufficient remaining capacity to accommodate the construction waste stream, and because Alternative 3 would be required to divert 50% of its waste stream from landfills, the construction-related impact of Alternative 3 would be less than significant.

It is estimated that the proposed project would generate approximately 2,801 pounds of solid waste on a daily basis, one half of which would be diverted to recycling and only 1,400 pounds would be directed to a landfill. Because there is adequate short-term capacity at these landfills, the proposed project's impact on remaining landfill capacity is considered less than significant. In comparison, Alternative 3 would generate 4,642 pounds of solid waste, of which 2,321 pounds would be recycled and 2,321 pounds would be directed to a landfill. While, Alternative 3 would generate more solid waste than the proposed project, the City of Los Angeles does not consider the magnitude of this impact to be significant because there is currently adequate capacity at these landfills.

Table VI-19
Alternative 3 Solid Waste Generation

Land Use	Size	Generation Rate ^a	Total (lbs/day)
<i>Apartments</i>	<i>336 du</i>	<i>12.23 lbs/du</i>	<i>4,109</i>
<i>Retail/Commercial</i>	<i>106,525 sq. ft.</i>	<i>5 lbs/1,000 sf</i>	<i>533</i>
Proposed Project Total			4,642
<i>du=dwelling unit; lbs=pounds</i>			
<i>^a Source: City of Los Angeles, Draft L.A. CEQA Thresholds Guide, Page K.3-2, May 14, 1998, and City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i>			

Alternative 4 – Mixed Use Residential/Retail/Office

Alternative 4 is a variation on Alternative 3, and as such would occupy the same development footprint. However, whereas Alternative 3 would provide 336 apartment units on the second and third levels above the ground floor retail, Alternative 4 would provide 209 apartment units as well as 150,600 square feet of commercial office space. Similar to Alternative 3, Alternative 4 would provide second and third level residential uses above the large, partially subterranean parking structure located north of the commercial space, as well as the row of 18 townhomes in the northern portion of the project site and the 11 ground floor residential units in the western portion of the development area.

In total, Alternative 4 would provide a total of 257,125 square feet of commercial space, consisting of 106,525 square feet of neighborhood serving retail and 150,600 square feet of commercial office space. Contemplated retail uses would include 77,025 square feet of general neighborhood serving retail; 7,000 square feet of restaurant space (2,000 square feet of fast food and 5,000 square feet of sit down space); a 3,000 square foot health club; and a 19,500 square foot theater mini-plex. There would be a total 209 residential units (258,200 square feet). All residential units would be apartments. Total leasable space would be 515,325 square feet (gross). The maximum height of this alternative would be 44 feet above grade, or 17 feet more than the height of the proposed single-family homes.

Also, similar to Alternative 3, Alternative 4 would make over the remaining portion of the existing golf course (11.9 acres) into a community serving park. The park would be dedicated to the City of Los

Angeles, which would be responsible for its planning and maintenance. No active recreational facilities are envisioned by this alternative; although such facilities may ultimately be provided by the City.

Environmental Impacts

Aesthetics

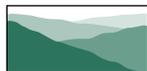
Alternative 4 would also reduce Aesthetic impacts to scenic vistas from both Interstate 210 and La Tuna Canyon Road (designated scenic highways), compared to the proposed project. While the proposed project would eliminate the foreground views of the golf course's green, landscaped open space, Alternative 4 would retain the landscaped open space although the current golf course would be converted to a public park. Also, while the proposed project would front along La Tuna Canyon, facing both scenic highways, Alternative 4 would be clustered in the eastern portion of the site and would stretch northerly in a linear fashion away from the scenic highways. In summary:

- Alternative 4 would replace the scenic golf course with a public park, while the proposed project would eliminate it.
- Alternative 4 would preserve most of the currently undisturbed natural hillside and habitat to the north and west of the proposed park. In comparison, the proposed project would disturb approximately 13.9 acres of undisturbed hillsides through fuel modification.
- Alternative 4 would reduce the total area disturbed by development. While Alternative 4 would construct a mixed use residential/retail/office complex on the same portion of the project site as Alternative 3 (approximately 15.5 acres), the proposed project would construct moderate density single-family housing over an area of approximately 28.6 acres of the most scenic portion of the site (the golf course).
- Alternative 4 would reduce impacts to trees on the project site. Of the total number of protected trees on the project site (303 oaks and 18 sycamores), Alternative 4 would impact 52 oaks and five (5) sycamores. In comparison the proposed project would impact 85 oaks and 11 sycamore trees. Of the total number of mature landscape trees on the project site (120 trees), Alternative 4 would remove 28 trees. In comparison the proposed project would remove 103 mature landscape trees.

Alternative 4 would exchange the visual impacts of a moderate density housing development for those of a mixed-use residential/shopping/office center. By preserving a greater portion of the project site as a landscaped park and undisturbed hillsides, Alternative 4 would alter less of the site's existing visual character or quality than the proposed project. On the other hand, the introduction of a mixed-use residential/retail/office complex, with commercial signage, bright night lighting, and roof lines up to 44 feet above grade, in the eastern portion of the project site would be less in character with the existing single-family homes in the surrounding area than either the proposed project's single-family homes or Alternative 3 and would be inconsistent with the scenic highway corridors viewshed protection provisions



Source: LCRA Architecture & Planning, 2008.



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Environmental Planning and Research

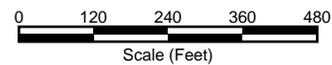


Figure VI-7
Alternative 4, Mixed Use
Retail, Office and Residential

of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, which limits building heights to 27 feet

By eliminating the golf course lighting, the proposed project would result in less night-time glare and night sky illumination than is currently present on the project site. Alternative 4 would also eliminate the golf course lighting, but it would create more intensive lighting in the eastern portion of the project site. Therefore, Alternative 4 would have a greater night-lighting impact than the proposed project.

Air Quality

Essentially the same as Alternative 2, the development footprint of Alternative 4 is less than half that of the proposed Project, and it avoids the western portion of the existing golf course, which would be converted to a park. Therefore, construction related-impacts (and particular those from site preparation activities) associated with Alternative 4 would be substantially less than that of the proposed project, but be comparable to those of Alternative 2 and 3. Implementation of the project's recommended mitigation measures would also reduce potentially significant construction-related NOx emissions to less-than-significant levels.

Due to substantially more vehicle traffic, operational emissions under Alternative 4 would be substantially greater than those from the proposed project. Specifically, while the proposed project would generate a net increase of 1,166 daily vehicle trips, Alternative 4 would generate 5,256 vehicle trips. In other words, Alternative 4 has the potential to generate approximately 4.5 times the vehicle emissions generated by the proposed project.

Biological Resources

Given that the development footprint of Alternative 4 is identical to that of Alternative 3, the potential impacts to biological resources from Alternative 4 would be very similar to those described above for Alternatives 2 and 3. The only difference between Alternatives 3 and 4 is that, under Alternative 4, portions of the second and third levels would be occupied by office space instead of residential uses; this may result in slightly reduced impacts to wildlife species from increased noise and light, as the offices would presumably be unoccupied in the evening and on weekends. However, these impacts would be similar to, or less than, those under the proposed Project, and would still be mitigated through implementation of the proposed Project's mitigation measures.

Cultural Resources

Because Alternative 4 would disturb a smaller area of the project site than the proposed project, it also has the potential to reduce impacts to archaeological and paleontological resources. However, because all historic resources have been removed from the project site, neither the proposed project nor Alternative 4 would impact any known historic resources. Both Alternative 4 and the proposed project could commemorate the significant historic events associated with the site through its designation as a California Historical Landmark (thematic landmark group "Temporary Detention Camps for Japanese

Americans"). While cultural resources impacts under the proposed project would be less than significant, because of its smaller development area, they could be further reduced by Alternative 4.

Geology and Soils

Alternative 4 and the proposed project would be subjected to the same potential geotechnical conditions on the project site (e.g., seismicity, slope instability and soil erosion). However, Alternative 4 would involve less landform alteration: Alternative 4 would grade approximately 12.7 acres of the project site, approximately 15.9 acres less than the grading disturbance caused by the proposed project. While geologic impacts from landform alterations under the proposed project would be less than significant, they would be further reduced by Alternative 4. Therefore, Alternative 4 would have less of an impact with respect to geologic and soils conditions than the proposed project.

Neither the proposed project nor Alternative 4 would expose people or structures to adverse effects involving rupture of a known earthquake fault, liquefaction, subsidence, expansive soils or slope instability (landslides and/or mud and debris flows).

Both the proposed project and Alternative 4 would be susceptible to strong ground shaking during a seismic event. However, the homes under either the proposed project or Alternative 4 must be designed in accordance with the Unified Building Code, which would reduce seismic risks for either project to an acceptable level. Similarly, both the proposed project and Alternative 4 would be susceptible to erosion and sedimentation during and following grading. However, compliance with those the Grading Code and Federal Clean Water Act regulations will reduce soil erosion and loss of topsoil for both the proposed

Hazards and Hazardous Materials

There are no detectable amounts of organochloride pesticides on the project site. While there are detectable concentrations of petroleum hydrocarbons in one location, soil remediation in that area would reduce hazardous from detectable concentrations of petroleum hydrocarbons to a less than significant level. In addition, there are no known properties within a one-mile radius of the project site with known or documented releases of potentially hazardous materials. Therefore, neither the proposed project nor Alternative 4 would be adversely affected by hazardous materials left over from previous site uses or from offsite properties.

Neither the proposed project nor Alternative 4 would use, store, or transport significant amounts of hazardous materials; be likely to result in reasonably foreseeable conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Therefore, neither the proposed project nor Alternative 3 would have a significant impact with respect to adverse hazards and/or hazardous materials.

Hydrology and Water Quality

Both the proposed project and Alternative 4 would be required to comply with the NPDES BMP requirements to ensure that the construction activities would not cause soils erosion and/or the discharge

of polluted water from the project site. Similarly, both projects would also be required to comply with the SUSWP BMP requirements to ensure that the long-term operational activities would not result in the discharge of urban pollutants into the storm drainage system. This analysis assumes Alternative 4 would utilize the project's system of underground tanks to allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board. Therefore, Alternative 4 would have approximately the same less-than-significant water quality impacts as the proposed project.

Because Alternative 4 would have a smaller development footprint, it would create less impervious surface area than the proposed project. As a consequence, Alternative 4 would generate less runoff than the proposed project. However, since it is the proposed project's goal that post-development runoff will not exceed that generated by the project site in its existing condition, the project will capture and store the excess runoff within each subarea in underground tanks. It is expected that Alternative 4 would use the same underground storage tank system too ensure that post-development runoff will not exceed that generated by the project site in its existing condition. Therefore, off-site hydrology impacts are expected to be comparable.

Land Use

Community Division

This alternative introduces retail, office and high density multifamily uses into the community. There are currently no community services or public services on the project site, and there are no existing roadways through the project site that are used by the adjacent residential communities to the north and east. Alternative 4 uses would introduce new uses to the area with some disruption to the surrounding residential communities to the north, east and west. However, Alternative 4 would not physically divide the established community.

Land Use Compatibility

The high density multi-family dwelling units, retail, entertainment and office uses proposed under Alternative 4 would not be compatible with existing homes in the project vicinity. The residential uses would be much higher density apartments than the detached homes proposed by the project and would be built primarily atop commercial uses. This alternative introduces new uses to the community that are not functionally compatible with the existing residential areas to the north, east and west.

Consistency with Land Use Plans, Policies and Regulations

In general, the discussion for impacts related to the consistency with regional plans would be the same for Alternative 4 as for the proposed project. Thus, this section focuses on the local applicable plans of the City of Los Angeles.

City of Los Angeles General Plan Framework Element

Although housing is provided under this alternative, it is a mixed use development involving a total of 209 apartments, primarily built atop approximately commercial/parking uses, as well as some townhome units. Therefore it would not be consistent with the following goals and objectives of the General Plan Framework Element:

- **Goal 3B:** *Preservation of the City's stable single family neighborhoods.*
- **Objective 3.5:** *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*
- **Objective 4.3** *Conserve scale and character of residential neighborhoods.*

Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan

The Community Plan encourages the preservation and protection of low-density, single family areas and existing open space from encroachment by incompatible uses. The maximum residential development potential under the project site's current land use designations is approximately 274 dwelling units. However, Alternative 4 is a mixed use project including 209 apartments (apartments and 18 townhomes) as well as approximately 257,000 square feet of commercial uses (office, retail and entertainment). Alternative 4 is inconsistent with the land use designation for the site because:

- Commercial uses are not permitted within the Low Medium I Residential Family land use designation;
- The number of proposed units exceeds the maximum number of units that could be developed on the site;
- Residential development is limited to detached single family homes per Footnote #20.

A general plan amendment would be required to construct this alternative on the site.

As this alternative represents a high density development on the site including introducing incompatible uses, there is less consistency with the goals, objectives and policies of the Community Plan that are generally applicable to the proposed project. Specifically it contradicts the goals, objectives and policies that encourage protect existing single-family residential neighborhoods from encroachment by higher density residential and other incompatible uses, promoting neighborhood preservation, and limiting residential density.

San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan

The project site is not located near any prominent ridgelines as identified in the San Gabriel/Verdugo Hills Specific Plan; therefore, Alternative 4 will not impact any prominent ridgelines. Section 9.B. of the Specific Plan gives additional development standards for commercial and industrial developments which

include exterior lighting, roofs, and roof-mounted structures, landscaping, landscaping setbacks, underground utilities, fencing, parking lot design, and pedestrian access. However, building height is regulated within scenic highway corridors and is restricted to 30 feet. The maximum height of the buildings under Alternative 4 is 40 feet and therefore would not comply with this regulation. Additionally, La Tuna Canyon and the 210 Freeway are designated as Scenic Highways under the Specific Plan and Alternative 4 would alter scenic vistas visible from the rights-of-way of these two scenic highways. Therefore, Alternative 4 is not in compliance with the Specific Plan.

City of Los Angeles Planning and Zoning Code

Although the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan designates the subject property as Low Medium I residential with corresponding zones of R2, RD3, RD4, and RD5, a footnote (Footnote No. 20) in the Community Plan states “Development should be limited to no greater than that permitted by the RD5 Zone and shall be detached housing. Slope density regulations shall apply to areas of this site having a 15% or greater slope”. Thus, development on the site is currently limited to the density permitted within the RD5 zone. The RD5 Zone would permit the development of a maximum of 244 dwelling units on the 28 acres of the golf course. However, In order to construct 209 attached dwelling units, the Community Plan’s requirement that such housing consist of detached units would have to be removed. Additionally, commercial uses are not permitted within the RD5 zone. Therefore, the proposed apartments and the commercial uses are non-permitted uses. Thus, in addition to a general plan amendment, a zone change that would permit commercial uses would be required.

This alternative has greater impacts associated with land use issues than the proposed project.

Noise

Construction

Construction activities Alternative 4 would be similar to the proposed project. Because this alternative would involve the use of the same types of construction equipment as the proposed project, construction of this alternative would cause a temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. The construction noise impacts would be reduced to less than significant with compliance with LAMC Noise Ordinance No. 41.40, which restricts demolition and noise activities to the hours of 7:00 AM to 9:00 PM.

Construction activities that would occur under Alternative 4 have the potential to generate low levels of groundborne vibration at the adjacent sensitive receptors. With implementation of the mitigation measures in Section IV.L (Noise Section), impacts would be similar to the proposed project’s less than significant impacts.

Operation

When operational, Alternative 4 would result in an increase in the amount of human activity at the project site as compared to the proposed project. However, the noise levels from the onsite activities would not

be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative 3 would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Alternative 4 would generate more daily vehicular trips. Specifically, the proposed project is forecast to generate 1,166 new daily vehicular trips while Alternative 4 is forecast to generate 5,256 new vehicular trips, a difference of 4,090 daily vehicular trips. Alternative 4 is a mixed use project with the same footprint as Alternative 3. However, in addition to the approximately 106,000 square feet of commercial retail uses, approximately 150,000 square feet of office uses would be provided as well. The office space would replace approximately 125 residential units, with only 209 apartments proposed under Alternative 4. The higher density and new use would create traffic which may increase local ambient noise levels by more than 3 dBA CNEL. Therefore Alternative 4 may have greater impacts associated with vehicular noise than the proposed project.

Population/Housing

Alternative 4 is similar to Alternative 3, however it involves more commercial and less residential development than Alternative 3. As, the project site is currently a golf course and does not contain any homes or people, this alternative would not result in the displacement of any existing homes or people.

Under Alternative 4, the residential component would add 209 apartments to the project site, 20 fewer dwelling units than under the proposed project. Based upon the Community Plan's population generation rate of approximately 2.52 persons per dwelling unit, approximately 527 persons are anticipated to reside on the project site upon the completion of construction which is 50 fewer people than would occupy the site under the proposed project.

The projected population associated with this alternative would be consistent with area-wide population and housing forecasts. Specifically, the alternative represents less than six percent of the forecasted population growth and approximately five percent of the forecasted housing growth in the Community Plan area (see Table IV.M-3 in Section IV.M of this Draft EIR). Therefore, similar to the proposed project, population and housing increases under Alternative 4 would be within the projected growth for the area.

The Community Plan's projected housing with respect to land with a Low Medium I Residential land use designation is based on 13.5 dwelling units per acre, the midpoint range of 9 to 18 dwelling units per net acre for that land use designation. Thus, with 28 acres of Low Medium I Residential, the Community Plan projects approximately 378 housing units for the project site. Therefore, Alternative 4 would be consistent with the Community Plan's housing projections.

The commercial component of this alternative would involve the development of 150,600 square feet of office space, 77,000 square feet of retail space, 7,000 square feet of restaurant uses, a 19,500 square foot theater, and a 3,000 square foot health club. Table VI-20 identifies the number of employees that would be generated by Alternative 4:

Table VI-20
Employees Generated by Alternative 4

Land Use	Size	Employee Generation Rate (employees/sf)	Employees
Office	150,600 sf	0.0034	512
Retail Uses	77,000 sf	0.0014	108
Restaurant	7,000 sf	0.004	28
Theater ^a	19,500 sf	0.004	78
Health Club ^b	3,000	0.0034	10
Total Employees			736
^a uses restaurant generation factor.			
^b uses office generation factor.			
Source: LAUSD School Facilities Fee Plan, March 2, 2000.			

If it is conservatively assumed that each full-time employee that would be generated by the commercial component of this alternative relocated to the Community Plan area, the residential population would increase by approximately 736 households and 2,186 people.⁸ This would result in a population increase of 1,507 people to the area (527 residents from the residential component + 2,186 employee related residents). This represents approximately 2,136 more residents to the area than would be generated by the proposed project. However, while some of the projected employees may move into the Community Plan area, it is more likely that most of the new employment opportunities would be met by the local work force. Therefore, it is expected the actual number of new employees would substantially less than projected by the preceding analysis. Nevertheless, Alternative 4 would have greater impacts related to population and housing than the proposed project.

Traffic

Traffic generation forecasts for the residential, commercial and office components of Alternative 4 were estimated based on trip rates provided in the ITE *Trip Generation* manual. A summary of the trip generation forecast for Project Alternative 4 is presented in Table VI-21. A summary of the trip generation forecasts for the proposed project as compared to Project Alternative 4, as well as the remaining project alternatives, is provided in Table VI-16. As shown in Table VI-21, Project Alternative 4 is expected to generate 366 net new vehicle trips (234 inbound trips and 132 outbound trips) during the AM peak hour. During the PM peak hour, Project Alternative 4 is expected to generate 549 net new vehicle trips (219 inbound trips and 330 outbound trips). Over a 24-hour period, Project Alternative 4 is forecast to generate 5,256 net new daily trip ends during a typical weekday (2,628 inbound trips and 2,628 outbound trips). As the daily, AM and PM peak hour trip generation forecast for Project Alternative 4 is greater than the proposed project, it is anticipated that the traffic impacts associated with Project Alternative 4 will likely be greater than the proposed project.

⁸ This assumes that each full-time employee would generate one household and that the population per household would be based on the more conservative estimate of 2.97 persons per dwelling unit.

Table VI-21
Alternative 4 Trip Generation^[1]

Land Use	Size	Daily Trip Ends ^[2] Volumes	Am Peak Hour Volumes ^[2]			Pm Peak Hour Volumes ^[2]		
			In	Out	Total	In	Out	Total
Alternative 4								
Apartment ^[3]	209 DU	1,404	21	86	107	85	45	130
Shopping Center ^[4]	106,525 GLSF	4,574	67	43	110	192	207	399
Less Pass-by (30%) ^[5]		(1,372)	(20)	(13)	(33)	(58)	(62)	(120)
General Office ^[6]	150,600 GSF	1,658	205	28	233	38	186	224
Community Park [7]	11.9 Acres	18	nom.	nom.	Nom.	nom.	nom.	nom.
Alternative 4 Subtotal		6,282	273	144	417	257	376	633
Existing Site Uses								
Golf Course ^[7]	(18) Holes	(644)	(32)	(8)	(40)	(22)	(27)	(49)
Golf Driving Range ^[8]	(28) Tees	(382)	(7)	(4)	(11)	(16)	(19)	(35)
Subtotal Existing		(1,026)	(39)	(12)	(51)	(38)	(46)	(84)
NET CHANGE		5,256	234	132	366	219	330	549

[1] Source: ITE "Trip Generation", 7th Edition, 2003.

[2] Trips are one-way traffic movements, entering or leaving.

[3] ITE Land Use Code 220 (Apartment) trip generation average rates.

- Daily Trip Rate: 6.72 trips/DU; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.51 trips/DU; 20% inbound/80% outbound
- PM Peak Hour Trip Rate: 0.62 trips/DU; 65% inbound/35% outbound

[4] ITE Land Use Code 820 (Shopping Center) trip generation average rates.

- Daily Trip Rate: 42.94 trips/1,000 GLSF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.03 trips/1,000 GLSF; 61% inbound/39% outbound
- PM Peak Hour Trip Rate: 3.75 trips/1,000 GLSF; 48% inbound/52% outbound

[5] Pass-by trip adjustment based on LADOT "Policy on Pass-By Trips", Attachment G, March 2002.

[6] ITE Land Use Code 710 (General Office Building) trip generation average rates.

- Daily Trip Rate: 11.01 trips/1,000 GSF; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.55 trips/1,000 GSF; 88% inbound/12% outbound
- PM Peak Hour Trip Rate: 1.49 trips/1,000 GSF; 17% inbound/83% outbound

[7] ITE Land Use Code 411 (City Park) trip generation average rates.

- Daily Trip Rate: 1.59 trips/Acre; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: Not Available
- PM Peak Hour Trip Rate: Not Available

[8] 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: 2.22 trips/Hole; 79% inbound/21% outbound
- PM Peak Hour Trip Rate: 2.74 trips/Hole; 44% inbound/56% outbound

[9] 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

Public Services - Fire Protection

Any construction at the project site, including Alternative 3, would increase the potential for accidental on-site fires during construction from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. However, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would reduce these hazards to less-than-significant levels. Both Alternative 3 and Alternative 2 are situated farther from the combustible native vegetation on the steeper slopes than the proposed project and, therefore, have less potential for starting a wildfire. Also, Alternative 3 would transform the golf course into a public park, which would not only act as an irrigated buffer between the development area and the adjacent hillsides, but would continue to act as an irrigated green buffer for the existing homes on top of the hills to the north and west. Consequently, Alternative 3 would appear to pose less of a construction-related fire hazard than the proposed project.

The proposed project would introduce 334 residential units (approximately 842 residents) and 106,525 square feet of commercial uses to the project site. Thus, an increase in the demand for fire protection services, compared to the proposed project, is anticipated. Both the proposed project and Alternative 3 would be required to provide hydrants, water lines, and water tanks per Fire Code requirements. Therefore, with respect to fire flows, fire protection for both projects would be adequate. The requirement to provide automatic fire sprinkler systems in order to compensate for the additional response distance is considered adequate mitigation for both the proposed project and Alternative 3.

Public Services - Police Protection

Both the proposed project and Alternative 3 would be sources of attractive nuisances, providing hazards, and inviting theft and vandalism during construction. Consequently, both could be expected to provide the same precautions to prevent trespassing through the construction site: temporary fencing installed around the construction site and the deployment of roving security guards. When such common sense precautions are taken, the demand for local law enforcement at the construction site would be less than significant for both projects.

While the proposed project would introduce approximately 577 new residents to the project site, Alternative 2 would introduce approximately 842 residents, plus employees and visitors to the retail component. Thus, Alternative 3 would generate more demand for police protection services than the either the proposed project or Alternative 2. Because the Foothill Community Police Station is staffed and equipped to provide full service to the Foothill area, which includes the project site, the need for new or expanded police stations, the construction of which could cause significant environmental impacts, as a result of either the proposed project or Alternative 3 would not be anticipated. Therefore, impacts to police protection services would be less than significant for both the proposed project and Alternative 3, although impacts under Alternative 3 would be greater.

Public Services - Schools

Both the proposed project and Alternative 3 would be served by the following LAUSD public schools: (1) Mountain View Elementary School (K-5) located at 6410 Olcott Street, Tujunga; (2) Mount Gleason Middle School (6-8) located at 10965 Mt. Gleason Avenue, Sunland; and (3) Verdugo Hills High School (9-12) located at 10625 Plainview Avenue, Tujunga. Each of these schools currently has excess enrollment capacity. The proposed project would generate a total of 94 public school students, including 46 elementary students, 22 middle school students, and 26 high school students. All of public school students generated by the proposed project could be served by the local schools without creating a capacity problem. In comparison, the residential component of Alternative 3 would generate a total of approximately 139 students, including 68 elementary students, 33 middle school students, and 38 high school students. Given the employment requirements of a typical retail center, the employees of this alternative's retail component would most likely be supplied by the local labor market. Consequently, it is unlikely that the new employment opportunities would generate additional enrollments at the local schools. While Alternative 3 would generate more public school students than the proposed project, there is sufficient capacity at each of the local schools to accommodate these additional students without creating a capacity problem. Neither the proposed project nor Alternative 3 would generate enough students to exceed the capacities of the schools serving the project site resulting in the need to construct new or physically altered school facilities. Therefore, under both the proposed project and Alternative 3 impacts on schools would be less than significant. Notwithstanding the less than significant impact, both the proposed project and Alternative 3 would be required to pay developer fees to the LAUSD, which would provide full and complete mitigation of any potential school impacts.

Public Services - Parks

Because the proposed project would redevelop the existing Verdugo Hills Golf Course and driving range for housing purposes, the community would lose a major private recreational facility. This would constitute a significant impact. In contrast, Alternative 3 would convert golf course portion of the project site to a public park. Therefore, Alternative 3 would reduce the project's significant impact to parks to a less than significant level.

Public Services - Libraries

According to the Los Angeles Public Library, the additional residents generated by the proposed project would adversely affect its ability to maintain its current levels of service. Based on the City's library standard, the proposed project's 577 new residents would generate a need for approximately 288.5 square feet of library space. These 288.5 square feet of library space are the approximate equivalent of a 17' x 17' room, the construction of which would not be expected to result in any significant environmental impacts. In contrast, the 842 new residents of Alternative 23 would generate a demand for approximately 421 square feet, which would be the equivalent of a room approximately 20.5' x 20.5' in area. The difference in size would be negligible with respect to potential construction-related impacts. Therefore, under the proposed project and Alternative 3, impacts would be less than significant.

Wastewater

The existing Verdugo Hills Golf Course facility generates approximately 772 gallons of wastewater per day. The proposed project would eliminate the golf course and driving range, and would replace them with 229 single-family homes. Thus, it is estimated that the proposed project would generate a net increase of 74,798 gpd of wastewater. In contrast, Alternative 4 would add 209 apartment units, 106,525 square feet of neighborhood serving retail space, and 150,600 square feet of commercial office space, and it would convert the existing golf course to a public park while removing the driving range. Assuming the park's sewage generation rate would remain comparable to the existing golf course's rate, Alternative 4 would generate a net increase of approximately 64,552 gpd of wastewater. While, the proposed project's impact on sewer systems and wastewater treatment requirements would be less than significant, Alternative 4 would further reduce impacts to the sewerage system, although not to the same extent as Alternatives 2 and 3.

Utilities – Water Supply

The proposed project would generate a net increased water demand of 36,164 gallons per day. In contrast, because Alternative 4 would convert the golf course to a public park, add 209 apartment units, 106,525 square feet of commercial space and 150,600 square feet of office space. As a result, Alternative 4 would increase daily water demand on the project site by approximately 77,462 gallons, or more than twice the net increased water demand of the proposed project. Because Alternative 4 is not consistent with the General Plan, its increased water demand may not have been taken into consideration by the LADWP's long range water planning. Therefore, Alternative 3 would have a greater impact as compared to the proposed project and may have a significant impact with respect to available water supplies.

**Table VI-22
Alternative 4 Wastewater Generation**

Land Use	Size	Generation Rate ^a	Net Daily Wastewater Generation (gpd)
<i>Apartments</i>	<i>209 du</i>	<i>160 gallons/du</i>	<i>33,440</i>
<i>Retail</i>	<i>106,525 sq. ft.</i>	<i>80 gallons/1,000 sf</i>	<i>8,522</i>
<i>Office</i>	<i>150,600 sq. ft.</i>	<i>150 gallons/1,000 sf</i>	<i>22,590</i>
Alternative 4 Net Total			64,552
<i>Notes:</i>			
<i>du=dwelling unit; sf = square feet</i>			
<i>^a Source: Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, January 23, 2008.</i>			

Utilities – Solid Waste

As with the proposed project, Alternative 4 would generate a short-term, construction-related waste stream to one or both of the two identified landfills serving the project area. Because each of these

landfills has sufficient remaining capacity to accommodate the construction waste stream, and because Alternative 4 would be required to divert 50% of its waste stream from landfills, the construction-related impact of Alternative 4 would be less than significant.

Table VI-23
Alternative 4 Water Consumption

Land Use	Size	Consumption Rate ^a	Total Water Consumption (gpd)
<i>Apartments</i>	<i>209 du</i>	<i>192 gallons/du</i>	<i>40,128</i>
<i>Retail/Commercial</i>	<i>106,525 sq. ft.</i>	<i>96 gallons/1,000 sf</i>	<i>10,226</i>
<i>Office</i>	<i>150,600 sq. ft.</i>	<i>180 gallons/1,000 sf</i>	<i>27,108</i>
Proposed Project Net Total			77,462
<i>Existing Golf Course</i>			<i>54,520</i>
Total Project Site Water Consumption			131,918
<i>Notes:</i>			
<i>du=dwelling unit; sf= square feet</i>			
<i>^a Source: City of Los Angeles, Draft L.A. CEQA Thresholds Guide, Exhibit K.2-11, May 14, 1998. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			

It is estimated that the proposed project would generate approximately 2,801 pounds of solid waste on a daily basis, one half of which would be diverted to recycling and only 1,400 pounds would be directed to a landfill. Because there is adequate short-term capacity at these landfills, the proposed project's impact on remaining landfill capacity is considered less than significant. In comparison, Alternative 2 would generate 4,109 pounds of solid waste, of which 2,055 pounds would be recycled and 2055 pounds would be directed to a landfill. While, Alternative 2 generate more solid waste than the proposed project, the magnitude of this impact would not be considered significant because there is adequate short-term capacity at these landfills.

Table VI-24
Alternative 4 Solid Waste Generation

Land Use	Size	Consumption Rate ^a	Total Water Consumption (gpd)
<i>Apartments</i>	<i>209 du</i>	<i>192 gallons/du</i>	<i>40,128</i>
<i>Retail/Commercial</i>	<i>106,525 sq. ft.</i>	<i>96 gallons/1,000 sf</i>	<i>10,226</i>
<i>Office</i>	<i>150,600 sq. ft.</i>	<i>180 gallons/1,000 sf</i>	<i>27,108</i>
Proposed Project Net Total			77,462
<i>Existing Golf Course</i>			<i>54,520</i>
Total Project Site Water Consumption			131,918
<i>Notes:</i>			
<i>du=dwelling unit; sf= square feet</i>			
<i>^a Source: City of Los Angeles, Draft L.A. CEQA Thresholds Guide, Exhibit K.2-11, May 14, 1998. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			

Environmentally Superior Alternative

In general, the environmentally superior alternative, as defined by CEQA, should minimize adverse impacts to the project site and its surrounding environment. Of the alternatives considered, the "No Project Alternative" does not create any new impacts; therefore, it is environmentally superior to a project which proposes to change existing conditions. However, CEQA requires the identification of another "environmentally superior" alternative when the No Project Alternative is chosen. A comparison of the alternatives reveals that Alternative 2 – All Residential Townhomes, involves less environmental disruption with regards to aesthetics, air quality, biological resources, cultural resources, geology, and recreation. In addition, significant impacts on mature trees (short term), aesthetic views, and recreation facilities, associated with the proposed project, would be reduced to less than significant under Alternative 2. Although impacts on land use, public services, traffic, and utilities would be greater under Alternative 2 as compared to the proposed project, these impacts would remain less than significant. Consequently, as shown in Table VI-25 of the alternatives discussed in this EIR, Alternative 2 is the environmentally superior alternative.

**Table VI-25
Comparison of Impacts of Project Alternatives**

Impact Area	Proposed Project Impact with Mitigation	Alternative 1 No Project (No Construction)	Alternative 2: All Residential Townhomes	Alternative 3: Mixed Use Residential and Retail	Alternative 4: Mixed Use Residential/Retail/Office
Aesthetics					
Aesthetics Views	Significant	LESS	LESS	LESS	LESS
Light and Glare	L-T-S	LESS	LESS	GREATER	GREATER
Air Quality					
Construction	L-T-S	LESS	LESS	LESS	LESS
Operational	L-T-S	LESS	LESS	GREATER	GREATER
Biological Resources					
Special Status Species	L-T-S	LESS	LESS	LESS	LESS
Riparian/Wetland Habitat	L-T-S	LESS	LESS	LESS	LESS
Trees	L-T-S	LESS	LESS	LESS	LESS
Cultural Resources					
Historic	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Archaeological	L-T-S	LESS	LESS	LESS	LESS
Paleontological	L-T-S	LESS	LESS	LESS	LESS
Geology and Soils					
Seismic Hazards	L-T-S	LESS	LESS	LESS	LESS
Soils	L-T-S	LESS	LESS	LESS	LESS
Hazards	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR

Table VI-25 (Continued)
Comparison of Impacts of Project Alternatives

Impact Area	Proposed Project Impact with Mitigation	Alternative 1 No Project (No Construction)	Alternative 2: All Residential Townhomes	Alternative 3: Mixed Use Residential and Retail	Alternative 4: Mixed Use Residential/Retail/Office
Hydrology					
Stormwater Runoff	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Stormwater Water Quality	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Land Use					
Plan Consistency	L-T-S	LESS	SIMILAR	GREATER	GREATER
Community Division	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Noise					
Construction	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Operational	L-T-S	LESS	SIMILAR	SIMILAR	GREATER
Population/Housing					
Population	L-T-S	LESS	SIMILAR	GREATER	SIMILAR
Housing	L-T-S	LESS	SIMILAR	GREATER	SIMILAR
Public Services					
Fire Protection	L-T-S	LESS	GREATER	LESS	LESS
Police Protection	L-T-S	LESS	GREATER	GREATER	GREATER
Schools	L-T-S	LESS	GREATER	GREATER	LESS
Libraries	L-T-S	LESS	GREATER	GREATER	LESS
Recreation					
Park Facilities	Significant	LESS	LESS	LESS	LESS
Transportation/Traffic					
Intersections	L-T-S	LESS	GREATER	GREATER	GREATER
Parking	L-T-S	LESS	SIMILAR	SIMILAR	SIMILAR
Utilities					
Wastewater	L-T-S	LESS	LESS	LESS	LESS
Water	L-T-S	LESS	GREATER	GREATER	GREATER
Solid Waste	L-T-S	LESS	GREATER	GREATER	GREATER
<i>L-T-S = Less than significant impact</i>					